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Code of Conduct for Ethical Business Practices Feintool Group[1]

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[1] Feintool International Holding AG and all its subsidiaries and affiliated companies. Feintool International Holding AG is a public limited company listed on the SIX Swiss Exchange (ISIN CH0009320091).

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PREAMBLE

The Feintool Group (hereinafter “Feintool”) is a global technology company in the field of fineblanking with proven expertise in forming and electroplating. As a driver of innovation, the group's mission is to continually expand technological horizons. Feintool develops intelligent solutions for customers and their demanding industrial applications and wants to shape the future of mobility with high-performance sheet metal technology.

The Code of Conduct for ethical business practices (hereinafter “CoC”) – aligned with the group’s mission – defines the important standards for entrepreneurial activity at Feintool and forms the basis for long-term success. The Group's reputation and the trust of customers, suppliers, business partners, shareholders and the public depend significantly on the fact that all employees (both terms are used interchangeably in this CoC) behave responsibly. The CoC is handed out with the employment contract, must be signed by each employee and serves as a tool for appropriate behavior. It applies to all employees at all levels of the plants and companies that are under the corporate control of Feintool.

The Feintool management emphasizes that the company and every employee must strictly adhere to the laws, rules and regulations of the countries in which the group operates. Under no circumstances may compliance with the CoC violate local laws. To go beyond legal compliance and promote social and environmental responsibility and business ethics, Feintool relies on internationally recognized standards: In accordance with the UN Guiding Principles on Business and Human Rights, the provisions of this CoC are derived from and respect internationally recognized standards, including the ILO Declaration on Fundamental Principles and Rights at Work and the United Nations Universal Declaration of Human Rights.

This CoC is divided into five sections:

- Sections A, B and C: Labor, health and safety and environmental standards
- Section D: Standards for Business Ethics
- Section E: Details of implementation, monitoring and verification

The Feintool CoC is therefore designed to meet global requirements in the areas of corporate governance, business ethics, human rights and labor standards as well as environmental responsibility.

For suppliers see Feintools Supplier Code of Conduct.

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A. WORK

Feintool is committed to protecting the human rights of its employees and treating them with dignity and respect in accordance with the United Nations. This applies to all employees regardless of their gender or type of employment.

The working standards are:

A.1 Freely chosen employment

Forced labor, involuntary or exploitative prison labor, slavery or human trafficking are not permitted. This includes transporting, harboring, recruiting, transferring or receiving persons for work or services using threats, violence, coercion, kidnapping or fraud. There are no unreasonable restrictions on the freedom of movement of employees within the facility and no unreasonable restrictions on entering or leaving the facilities provided by the company, including, where applicable, the employees' sleeping or living quarters.

As part of the recruitment process, all employees must be given a written employment contract in the official language(s) of the country in which the employing Feintool location is located. Relevant agreements between Feintool and its employees in accordance with local laws are accepted. The agreement contains a description of the working conditions. Foreign migrant workers must obtain the employment contract before departure from their country of origin, and after arrival in the host country, the employment contract may not be replaced or modified, unless such changes serve to comply with local laws and provide equal or better conditions. By mutual agreement, changes are also possible before the employee has arrived in his or her host country.

All work specified in the employment contracts is voluntarily agreed upon by the employees. Employees have the right to terminate the employment relationship at any time, subject to the agreed notice periods. A previously agreed non-competition clause must be adhered to by the employee. Employers, authorized representatives and sub-authorized persons may present identity or immigration documents, such as: You may not retain or otherwise destroy, conceal or confiscate any government-issued identification card, passport or work permit. Employers may only retain documents if required by law. In this case, employees may not be denied access to their documents at any time.

Ethical recruitment is ensured. Employees are never required to pay recruitment fees or other related fees to the employer's agents or sub-agents for their employment.

A.2 Child labor and young employees

Feintool does not tolerate child labor of any kind. The dignity of the child must be respected and their health and safety protected.

Therefore, the term “child” refers to a person who has not yet reached the age of compulsory education or has not yet reached the minimum age for employment in the country, whichever is higher. Young employees under the age of 18 are not allowed to do any work that could endanger their health or safety. Feintool ensures the proper management of young employees by properly keeping records, maintaining a strict duty of care towards educational partners and protecting the rights of young employees in accordance with applicable laws and regulations. If child labor is identified, support is provided and remedial action is taken.

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A.3 Working hours, wages and social benefits

Working hours may not exceed the maximum values set by law or collective agreements. In accordance with the labor markets in which Feintool operates, employees are compensated fairly and in accordance with all applicable laws, including those relating to minimum wages, overtime and statutory benefits. For each pay period, employees receive a timely and understandable payslip that contains sufficient information to verify the exact compensation for the work performed. The use of temporary workers and outsourced workers is carried out within the framework of local laws.

Further information on working hours, wages and benefits can be found in the human resources policy and the employee handbook. Collective bargaining agreement regulations remain unaffected.

A.4 Humane treatment, non-discrimination/non-harassment

As a globally active group of companies, Feintool pursues a zero-tolerance policy towards any kind of discrimination against employees or business partners. Violations that become known and proven will be sanctioned (see CoC Chapter D.15).

These include:

Harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, psychological or physical coercion, bullying, public shaming or verbal abuse of employees is not permitted; The threat of such treatment must not be made either. Disciplinary measures and procedures that support these requirements are clearly defined and communicated to employees.

Feintool is committed to a workplace free from harassment and unlawful discrimination and will not tolerate discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, protected veteran status, protected genetic information or marital status in hiring and in employment practices such as wages, promotions, rewards and access to training.

When using private or public security forces to protect corporate projects, it is ensured that they adhere to the prohibition of torture and cruel, inhumane or degrading treatment, do not harm life and limb and do not impair freedom of association through their use.

Upon request and after consultation with their supervisor, employees will be granted reasonable accommodation for religious practices. This does not affect the regulations on working hours and should not affect the work process.

A.5 Freedom of association

In accordance with local law, Feintool respects the right of all employees to form and join trade unions of their choice, to bargain collectively and to assemble peacefully, as well as the right of employees to refrain from such activities. Employees and/or their representatives can communicate openly with management and share their ideas and concerns regarding working conditions and management practices without fear of discrimination, reprisals, intimidation or harassment.

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B. HEALTH AND SAFETY

At Feintool, protecting and promoting the health and safety of employees has the highest priority. The Group adheres to all applicable health and safety laws to ensure a safe working environment. An effective health and safety management system is in place, which also includes specific and effective precautions in the event of a pandemic. This Feintool management system also regulates the annual internal and external audits to check compliance with occupational safety requirements, pandemic control measures and ergonomic workplace design to reduce the risk of accidents. It is the duty of all employees to avoid dangers that endanger people's health and safety.

Feintool is aware that a safe and healthy working environment not only minimizes the frequency of work-related injuries and illnesses, but also increases the quality of products, services and production processes. Feintool is also aware that the ongoing participation of employees and their further training is essential for identifying and solving health and safety problems in the workplace.

The health and safety standards are:

B.1 Occupational safety

Each production company has - in accordance with the respective legal regulations - specialized occupational health and safety representatives, with the ultimate responsibility lying with the company management. The potential exposure of workers to health and safety risks is identified and assessed through regular inspections and reduced using the control hierarchy, which includes elimination of the hazard, substitution of processes or materials, control through appropriate design, implementation of technical and administrative controls, preventative maintenance and safe work practices (including lock-out/tagout), as well as ongoing training on health and safety at work. Where hazards cannot be adequately controlled by these means, employees will be provided with appropriate, well-maintained personal protective equipment and training material on the risks associated with these hazards will be provided. Reasonable steps shall be taken to remove pregnant women and nursing mothers from high-hazard work conditions, eliminate or reduce any risks to the health and safety of pregnant women and nursing mothers in the workplace, including the risks associated with their work duties, and provide reasonable accommodations for nursing mothers.

The risk of fire is reduced through good operational management at Feintool, raising employee awareness of fire protection, fire protection training, and the implementation of fire risk assessments. Trained personnel will respond to fire alarms. Feintool assumes initial control over firefighting measures with regard to the safety of employees, visitors and premises. Feintool has appropriate firefighting and control measures in place, and fire alarm incidents are recorded, monitored and controlled to minimize the number of incidents over time.

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B.2 Emergency preparedness

Feintool has had a proven quality management system and solid risk management for a long time. Potential emergency risks relating to occupational safety, environmental protection, energy management and the handling of hazardous waste and substances are identified, assessed and documented during regular inspections. To minimize their impact, emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, training and exercises are carried out in accordance with the relevant legal requirements.

All employees receive occupational safety training on a regular basis or in accordance with local legislation, whichever is stricter (see CoC B.8). In regular work meetings, employees are involved in the continuous development of Feintool's occupational safety procedures and management system. Emergency plans include appropriate fire alarm and suppression systems, clear and unobstructed escape routes, adequate means of egress, emergency responder contact information, and recovery plans. These plans and procedures focus on minimizing damage to life, the environment and property.

B.3 Accidents at work and occupational diseases

There are procedures and systems for the prevention, management, tracking and reporting of occupational accidents and diseases. This includes provisions to promote the reporting of occupational accidents and diseases, the classification and recording of occupational accidents and occupational diseases, to ensure access to necessary medical treatment, to investigate cases and to implement remedial measures to eliminate the causes and facilitate the return of employees to work. The key figures for occupational safety are published transparently in the Feintool sustainability report.

B.4 Industrial hygiene (potential exposure to various substances)

The potential exposure of workers to chemical, biological and physical substances is identified, assessed and controlled according to Feintool's hierarchy of controls: elimination, substitution, technical controls, administrative controls and personal protective equipment. Protection programs are ongoing, including educational materials about the risks associated with these hazards.

B.5 Physically demanding work

The risk to employees from physically demanding work, including manual material handling and heavy or repeated lifting, long periods of standing and highly repetitive or force-intensive assembly work, is determined, assessed and controlled in accordance with the relevant legal requirements.

B.6 Securing the machines

Feintool adheres to the strict safety requirements set out in the respective national laws. Production and other machines are proactively assessed for safety risks. Physical guards, locks and barriers are in place and properly maintained if the machines pose a risk of injury to employees.

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B.7 Hygiene and ergonomics in the workplace

Feintool ensures that all workplaces are hygienic and offer employees appropriate comfort (e.g. access to toilets, drinking water, hygienic options for preparing food). Feintool ensures the proper maintenance of the above-mentioned facilities. Employees are obliged to keep the workplace and all facilities that serve the employees or the company in order.

The group ensures appropriate lighting in accordance with national regulations and is committed to establishing and maintaining appropriate workplace ergonomics, e.g. by correctly adjusted workstations and chairs, and avoiding unfavorable movements in order to create optimal working conditions. The workplace conditions and ergonomics are regularly checked in accordance with the respective legal requirements.

B.8 Health and safety communication

Feintool provides employees with appropriate workplace health and safety information and training in a language that the employee can understand for all identified workplace hazards to which employees are exposed, including, but not limited to, mechanical, electrical, chemical, fire and physical hazards. Health and safety-related information is made recognizable and accessible to all employees.

All employees receive training before starting work and regularly thereafter. Employees are encouraged to raise health and safety concerns with their supervisor without retaliation.

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C. ENVIRONMENT

Feintool is guided by the principles of sustainability and takes all necessary measures to protect the environment and conserve natural resources within its area of influence within the framework of local legislation. The group management follows a clearly defined corporate policy that applies to all companies. Quality and environmental management systems are in place: All production sites are certified at least according to ISO 14001 and ISO 9001 as well as IATF 16949 for suppliers to the automotive industry.

Feintool is aware that environmental responsibility is the key to delivering first-class products that are always state-of-the-art. The group is committed to continuously optimizing the environmental footprint of its products and its overall business operations. Feintool's risk management, in particular its comprehensive quality and safety management, is closely linked to this goal. The Group reports annually on the environmental impacts and degradation of the community, the environment and natural resources in the course of its production, while maintaining the health and safety of the public.

The environmental standards in detail are:

C.1 Environmental permits and reporting

Where applicable, all required environmental permits, approvals and registrations are obtained, maintained and updated and relevant operational and reporting requirements are met.

C.2 Prevention of environmental pollution

Emissions and discharges of pollutants, as well as the generation of waste, are avoided or minimized through practices such as the installation of pollution reduction equipment, the modification of production, maintenance and plant processes or through other measures to prevent air, water and soil pollution, the loss of biodiversity and land degradation or the stress on marine and freshwater ecosystems.

C.3 Sustainable resources and water management

Feintool is committed to protecting the environment and uses resources sparingly, while complying with all applicable legal and official regulations and environmental standards.

In order to use water and other natural resources, raw materials and operating materials sustainably and to minimize environmental impact, all production steps are designed to be as environmentally friendly and energy-optimized as possible. This may include, but is not limited to, material substitution, reuse, conservation and recycling. Some of our products are subject to the requirements of the International Material Data System (IMDS). We strive to further develop our relevant reporting in line with our management system.

With regard to sustainable water management, routine monitoring is used to control possible pollution channels and analyze water consumption to find opportunities for water conservation.
We also ensure that there is no deforestation or improper land use in our area of responsibility and that there is no disregard for animal welfare.

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C.4 Dangerous substances and responsible use of chemicals

Chemicals, waste and other materials that pose a risk to humans or the environment are identified, labeled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

C.5 Waste management and reduction

Feintool has introduced systematic waste management. In this way, the group ensures that a large proportion of production waste is recycled and can therefore be reused as raw material. The remainder is disposed of responsibly, ensuring proper handling of hazardous and other waste.

C.6 Air emissions

Operational air and noise emissions are systematically recorded, monitored and, if necessary, treated before discharge. Ozone-depleting substances are managed in accordance with the Montreal Protocol. The effectiveness of the emission control systems and compliance with noise protection requirements are checked regularly.

C.7 Material Restrictions

Feintool is committed to complying with all applicable laws, regulations and customer requirements regarding the ban or restriction of certain substances in products and production, including labeling for recycling and disposal.

C.8 Greenhouse gas emissions, energy efficiency and renewable energy

The consumption of energy is of central importance for Feintool's production processes and core business. That is why the group has long been committed to reducing its greenhouse gas emissions and reducing its carbon footprint through the efficient use of energy and natural resources. In addition to complying with regulations and laws, Feintool regularly tracks its energy consumption and greenhouse gas emissions to minimize its impact on climate change.

Feintool is committed to constantly looking for methods to improve the energy efficiency of production processes, including the supply chain, and to minimize the corresponding energy consumption and greenhouse gas emissions. The procurement of steel in particular is essential for Feintool's core business. The Group is aware that the production process at the supplier level is energy intensive. Feintool therefore welcomes innovative solutions to reduce CO2 emissions and is even more determined to continually implement measures to increase energy efficiency and reduce greenhouse gas emissions within its own group of companies. The group promotes environmentally conscious behavior among all employees in order to conserve resources and reduce the burden on the environment and is working to continually increase the quota of renewable energies.

D. ETHICS

In order to live up to its social responsibility and to be successful in the market, Feintool adheres to the highest ethical standards:

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D.1 Business Integrity

The highest standards of integrity are maintained in all business interactions. All Feintool managers and employees must refrain from actions that could damage the trust of our business partners and the public in Feintool.

Although this CoC is intended to provide guidance for specific situations, Feintool has a zero-tolerance policy regarding the following topics:

- unsafe and illegal work practices
- Violence and aggression
- Discrimination, bullying and harassment
- Bribery and corruption
- Retaliation against people who speak out about injustices or do the right thing

Any proven violation of this CoC will be sanctioned (see CoC D.14). Feintool expects its suppliers to conduct their business ethically and responsibly and to act with integrity. Further details on the relationship between Feintool and its suppliers are contained in separate documents (Feintool Purchasing Conditions, Feintool Code of Conduct for Suppliers).

D.2 Anti-corruption

Feintool pursues a zero-tolerance policy towards corruption. Corruption distorts competition, harms the free market and, as a result, the group. Feintool does not tolerate corrupt behavior by employees, business partners or customers. We always act transparently and in accordance with all applicable international anti-corruption and bribery regulations.

Bribes or other means of obtaining an undue or improper advantage may not be promised, offered, approved, given or accepted. This prohibition includes promising, offering, authorizing, giving, or accepting anything of value, either directly or indirectly through a third party, to obtain or retain business, to direct business to any person, or to otherwise obtain an improper advantage.

Feintool managers and employees are not allowed to accept gifts or favors from suppliers, customers or other business partners. This prohibition does not extend to items of low value or invitations to ordinary business events, provided they are appropriate to the occasion and of a reasonable size. Visits at the customer's invitation to events that last longer than one day or require a longer journey must be approved by the responsible supervisor. In cases of doubt, you should consult your supervisor.

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D.3 Disclosure of Information

Records and reports (both internal and external) must be kept accurate, factual and transparent. The principles of proper bookkeeping and accounting must be adhered to. In particular, each accounting entry must be based on a factual documentary record, and all transactions must be recorded

Information regarding labor, health and safety conditions, environmental practices, business operations, structure, financial condition and performance is disclosed in accordance with applicable regulations and prevailing industry practices. Falsifying records or misrepresenting supply chain conditions or practices is unacceptable.

All Feintool funds and assets must be recorded in the books; Black money is strictly prohibited. The submission of records, files, etc. using confidential company information is only permitted if it is in the direct interest of Feintool.

D.4 Intellectual property, counterfeit products

Intellectual property rights are respected; the transfer of technology and know-how is carried out in a way that protects intellectual property rights and prevents plagiarism. Customer and supplier information is protected.

The risks associated with counterfeit products and components are low due to Feintool's business activities. Raw materials (production of system parts) are purchased directly from verified manufacturers and suppliers or ordered by customers through agreed and official sales channels. All other goods and services are purchased from authorized business partners. All Feintool employees who are involved in purchasing goods and services are informed about the potential for counterfeit products and are advised that all goods must be purchased directly from the manufacturers or through agreed and official sales channels. Purchasing is subject to Feintool’s compliance processes.

D.5 Data protection and information security

We only collect and process personal data if and to the extent that a specific, legitimate purpose requires this. Anyone who works with such data - whether from employees, customers or business partners - treats it confidentially and does not pass it on without authorization.

Data subjects have the right to know what data we have about them and can request information, correction or deletion. We take these rights seriously and implement them.

All employees are obliged to protect the systems, access data and information entrusted to them. Passwords are not shared, sensitive data is not left unsecured and devices are locked when not in use. Anyone who notices or suspects a security incident - whether a lost device, unauthorized access or accidental disclosure - reports it to IT immediately.

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D.6 Property, assets and objects of Feintool

When acquiring, developing or otherwise using land, forests and waters whose use secures a person's livelihood, it is mandatory to ensure that there is no unlawful eviction or unlawful deprivation of land, forests and waters.

Employees are responsible for the protection and proper use of Feintool property and other material assets. Equipment and other items owned by the company (e.g. vehicles, computers, tools, data carriers, documents, office supplies, etc.) may only be used for company purposes. All Feintool Items must be protected against loss and theft, damage and misuse. Employees are not permitted to remove such items from the company premises without permission. Details are regulated in the local company car regulations.

D.7 Fair business conduct, competition and antitrust law

The standards of fair dealing, advertising and competition are adhered to. The Company complies with applicable laws to protect and promote competition, in particular applicable antitrust laws and other laws regulating competition. In the competition for market share, Feintool is guided by the need to act with integrity. Every employee is obliged to comply with the rules of fair competition within the framework of the legal requirements. In particular, competitors are not permitted to divide up territories or customers, make agreements or exchange information about prices/price components, delivery relationships and their conditions as well as capacities or procedures for tenders. The same applies to the exchange of information about market and investment strategies. Agreements or the exchange of information about research and development projects are only permitted in very limited exceptional cases, which must be approved by company management. The company's market position may not be illegally exploited to enforce price discrimination, unsolicited product deliveries or refusal to deliver.

D.8 Confidentiality and inside information

Confidential company information may not be disclosed to third parties or otherwise made available to them unless express authorization is given or the information in question is publicly available. This obligation of confidentiality also applies after the termination of the employment relationship.

All non-published information about Feintool or Feintool's business is considered inside information. The applicable legal regulations on insider trading apply.

Insider information must be treated as strictly confidential and must not be passed on to third parties, not even in an abbreviated or summarized form. This also applies to the passing on of passwords that enable access to electronically stored insider information. Passing on insider information to employees or external consultants is only permitted if the recipients need the information to carry out their tasks and have agreed to treat the information as strictly confidential.

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D.9 Social media

Social networks such as Facebook, LinkedIn, Xing or Instagram are playing an increasingly larger and more important role in public discourse. Feintool also uses social networks and its social media channels specifically for communication with employees, applicants and the public.

Feintool is a cosmopolitan and globally active company and sees its employees as important ambassadors. Tolerance and respect are elementary and inflammatory, offensive or discriminatory posts on social media will not be tolerated.

D.10 Conflicts of interest

Corruption often occurs as a result of conflicts of interest, i.e. if the professional activity is influenced by the private interests of one of the people involved. Feintool managers and employees must avoid situations that could lead to a conflict between their personal interests and those of Feintool.

Secondary activities always require the consent of Feintool. In particular, consent will not be granted if the secondary activities violate the law or the interests of Feintool.

Members of the Feintool group's executive bodies and group management who hold shares in companies with which companies in the Feintool Group have a business relationship must disclose these financial (except for investments of less than ten percent of the respective share capital) or other interests to Human Resources Management. Other interests to be disclosed include all mandates such as board of directors or advisory board mandates as well as all consulting activities.

In order to avoid conflicts of interest between the company and the private matters of employees, employees are strictly prohibited from employing business partners who are closely related to their area of responsibility for private purposes. Exceptions require prior approval from the supervisor and the human resources manager. Feintool adheres to the corporate governance guidelines of the SIX Swiss Exchange.

D.11 Donations

In the spirit of good corporate citizenship, Feintool can make donations in cash or in kind for purposes in the areas of education and training, science, culture and social affairs. Donations must always be transparent. Both the recipient and the specific intended use must be verifiable at any time and must be consistent with the competence matrix. Feintool does not make donations to political parties.

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D.12 Responsible procurement of raw materials

When sourcing raw materials, Feintool is committed to pursuing and ensuring the best practices in terms of safety, health, environment and ethics at all stages of the supply and production chain. In terms of quantity, the procurement of steel is the top priority at Feintool. Part of the group's product portfolio is subject to the requirements of the International Material Data System (IMDS).

Feintool does not source any minerals from mines, but operates as a downstream company in the Supply chain ensures that human rights are respected throughout the entire sourcing and supply chain of all materials. This is particularly true for minerals such as tantalum, tin, tungsten and gold, which come from conflict and high-risk areas.

The Group's procurement decisions are embedded in the Group's risk management, including due diligence (Supplier Code of Conduct, Feintool Purchasing Conditions) in line with the OECD Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

D.13 Relationships with suppliers and customers

The selection of suppliers must be based solely on objective criteria after comparing price, quality, performance and suitability. Agreements with customers and suppliers must be made in a clear form and must be documented together with subsequent changes and additions. All employees must strictly adhere to the internal rules regarding the application of the dual control principle and the separation of executive and control functions.

D.14 Compliance with customs and trade regulations

Feintool ensures that no business is conducted with people or companies that have been placed on sanctions lists by governments. We will comply with the regulations and laws governing the distribution and use of our products in the markets in which we operate.

D.15 Whistleblowing, protection against retaliation and sanctions

In addition to complying with laws and regulations, Feintool employees must comply with the CoC, regardless of their location and the specialization of their work. Any kind of misconduct will not be tolerated. Any behavior that violates the Feintool CoC and relevant guidelines and/or external laws or regulations is considered misconduct.

All employees, without exception, are required to report possible misconduct to Feintool without further disseminating the information. Employees should speak up if they have a reasonable suspicion of a violation and honestly believe that someone has done, is currently doing or is planning to do something that violates the Feintool CoC. Reported concerns will be treated confidentially and Feintool will not discipline, penalize or take any action against any employee for making a bona fide report or for participating in the investigation of a bona fide complaint about a violation of this Code. At the same time, Feintool does not tolerate dishonest or misleading accusations.

Board members and all other managers may also be subject to disciplinary action if they do not notice such violations, provided that the failure is due to inadequate supervision of employees in their area of responsibility. If managers at all levels do not respond appropriately to violations, they can also be subject to disciplinary measures or sanctions.

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All employees, customers and business partners along Feintool's value chain can contact an ombudsman if they have any questions or observations about the CoC. As listed below, Feintool provides an ombudsman as a contact person in Europe, Asia and America.

The ombudsmen are all external professional lawyers and are therefore subject to professional confidentiality.

The ombudsmen

- record the alleged violations
- Maintain the confidentiality and anonymity of those who report a breach
- forward the information to Feintool's Compliance Officer in Switzerland
- ensure that they are carefully investigated and support these investigations
- prepare annual documentation for their area of responsibility

The Feintool Compliance Officer for his part

- takes all reports of violations and misconduct seriously
- is committed to investigating these efficiently and promptly
- is committed to ensuring that the facts are assessed
- takes the appropriate disciplinary measures and sanctions necessary, which may extend to termination of the employment relationship or service relationship and to claims for damages
- ensures that all types of violations and misconduct that come to our attention are tracked and documented annually

The Feintool complaint mechanisms, which ensure confidentiality, anonymity and protection of whistleblowers among suppliers and employees, will be maintained unless this is prohibited by law. The Group is committed to assessing and gathering feedback on employee understanding of our implemented grievance mechanisms to promote continuous improvement.

The list of ombudsmen can be viewed at https://www.feintool.com/de/impressum/ombudsstellen/.

E. IMPLEMENTATION, MONITORING AND VERIFICATION

To ensure proper implementation, monitoring and review of this CoC, Feintool has introduced the following procedures:

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E.1 Corporate Commitment and Management Responsibility

Feintool adheres to the principle of “Good Corporate Citizenship”. All managers and employees must comply with national legislation in the various countries in which Feintool operates and the regulations set out in this CoC.

Each business unit is responsible for compliance with the rules contained in this Code of Conduct in its area and in the other areas of the company. Management must ensure that violations of the Code of Conduct and the regulations subsequently issued are identified, prosecuted and remedied. You report to the Compliance Officer (CFO) on the status of things at regular intervals.

E.2 Monitoring and review

Feintool strives to regularly obtain input from stakeholders, especially employees, in the further development and implementation of the CoC. Every three years, Feintool carries out a self-evaluation of the content of this CoC to ensure compliance with legal and regulatory requirements as well as group-specific needs.

E.3 Information and training

Every employee must receive a copy of this CoC and be trained in the rules it contains at the start of their employment. The employees then receive regular training on CoC topics (see CoC B.2 and B.8). Participation is documented.

Board members and all other Feintool managers act as role models in the Feintool Group and must help ensure that the CoC regulations are also implemented in the company. All Feintool managers are trained to communicate and implement the contents of the CoC in their respective areas of responsibility and in day-to-day business.

Information about policies, practices, expectations and performance to employees, suppliers and customers is communicated regularly, clearly and precisely. The appropriate channel for communication is taken into account to ensure that the recipients receive and understand the communication. The Feintool CoC can be viewed at www.feintool.com/en/company/corporate-governance/principles/.

E.4 Reporting irregularities and complaints

All workers must be provided with a safe environment in which they can raise complaints and feedback without fear of reprisals or reprisals (see CoC D.14 for further details).

E.5 Responsibility of suppliers

Feintool expects its suppliers to conduct their business ethically and act with integrity. Further details on the relationship between Feintool and its suppliers are regulated in separate documents, in particular the “Purchasing Conditions” and the “Supplier Code of Conduct”. The documents must be signed by Feintool as well as existing and new suppliers before business activities begin.

REFERENCES

The following standards were used in the creation of this Code:

Initiative für ethischen Handel Ethical Trade Initiative

ILO Verhaltenskodex für Sicherheit und Gesundheit ILO Code of Conduct for Safety and Health

Internationale Arbeitsnormen der ILO ILO International Labor Standards

OECD-Leitlinien zur Sorgfaltspflicht für verantwortungsvolle Lieferketten von Mineralien aus konfliktbetroffenen und hochriskanten Gebieten OECD due diligence guidelines for responsible supply chains of minerals from conflict-affected and high-risk areas

OECD-Leitsätze für multinationale Unternehmen OECD Guidelines for Multinational Enterprises

Allgemeine Erklärung der Menschenrechte Universal Declaration of Human Rights

Übereinkommen der Vereinten Nationen gegen Korruption United Nations Convention against Corruption

Übereinkommen der Vereinten Nationen über die Rechte des Kindes United Nations Convention on the Rights of the Child

Übereinkommen der Vereinten Nationen zur Beseitigung jeder Form von Diskriminierung der Frau United Nations Convention on the Elimination of All Forms of Discrimination against Women

Global Compact der Vereinten Nationen United Nations Global Compact

Leitprinzipien der Vereinten Nationen zu Wirtschaft und Menschenrechten United Nations Guiding Principles on Business and Human Rights

Bundesbeschaffungsordnung der Vereinigten Staaten United States Federal Acquisition Regulations

Corporate-Governance-Richtlinien der SIX Swiss Exchange Corporate governance guidelines of SIX Swiss Exchange

Internationale Gesellschaft für soziale Verantwortung (SAI) International Society for Social Responsibility (SAI)

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APPLICABILITY AND DOCUMENT HISTORY

The regulations of this CoC were approved at the meeting of the Feintool Board of Directors on August 26, 2026. The CoC comes into force on September 1, 2026 in all companies under the corporate control of the Feintool Group. It can be changed or expanded at any time by the Board of Directors.



Norbert Indlekofer
Chairman of the Board of Directors

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