

# Code of Conduct

<b>Scope</b>	Datwyler IT Infra
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***Important Confidentiality Notice***

*This document contains confidential and proprietary information of Datwyler IT Infra. This document or any information contained herein shall not be disclosed to any third party without the express written consent of Datwyler IT Infra.*

Dear Employees

More than 100 years of innovation for the benefit of our customers, employees, shareholders and other stakeholders – that is the hallmark of the Datwyler group of companies. Since 1 January 2013, Datwyler IT Infra has been operating as a private sister company of the publicly listed Datwyler Holding, while remaining under the common umbrella of Pema Holding, based in Altdorf, Switzerland. In recent years, Datwyler IT Infra has grown into an international enterprise with global production, engineering and sales facilities. Building on our strong roots, we have developed our own style with high standards and unique values:

- We are entrepreneurs.
- We bring value to our customers.
- We excel in what we do.
- We have respect for others.

While the social and economic environment is changing at an ever faster pace, we want to uphold the strengths of Datwyler IT Infra. This makes it vital to establish clear guidelines summarising our continuously evolving standards. The Code of Conduct below sets out those same standards of conduct that our employees have always applied using good common sense.

We are convinced that these traditional basic values are regaining importance in our continually globalising world and that they will be an additional competitive advantage. Based on this conviction, Datwyler has joined the UN Global Compact. As a member of this UN initiative, Datwyler has committed itself to the ten principles relating to human rights, labour standards, environmental protection and anti-corruption initiatives.

For us as an international company, it is extremely important to lay down binding standards of conduct expected by us, to regularly communicate them, to provide the necessary training, and to take appropriate disciplinary action in the event of any violations. As in the past, we are confident that everyone who works for Datwyler IT Infra will adhere to the highest standards of ethical behaviour. If any unclear situations arise in day-to-day business activities, this Code of Conduct will provide practical guidance. We are counting on you!

Altdorf, 11 March 2013, updated on 1 January 2014, on 1 July 2018, on 1 January 2021, on 12 August 2024, on 24 February 2025 and on 30 October 2025.

Dätwyler IT Infra AG

On behalf of the Board of Directors



Dirk Lambrecht, Chairman

On behalf of the Executive Management



Adrian Bolliger, CEO

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## **1 Background**

Datwyler IT Infra is a leading provider of high-quality IT solutions, infrastructure solutions, industrial harnessing solutions and elevator solutions. Focusing on Europe, the Near and Middle East and Asia, the company with its global workforce of about 900 employees is a professional partner offering innovative customised solutions and services in numerous countries.

We seek to sustain profitable growth for the benefit of our customers, employees and all other stakeholders. This is the foundation on which we add value in the long term and preserve the corporate independence of Datwyler IT Infra. As a competent development partner, we maintain close contact with our customers, deliver the highest quality and provide satisfaction with innovative services. Every Datwyler employee is committed to contributing to our customers' success in their markets.

## **2 Principles and objectives**

The Code of Conduct contains binding rules that apply to all Datwyler IT Infra employees worldwide. They are designed to help deal with ethical and legal challenges in our day-to-day work. All employees may contact their supervisor or the managing director of their respective company at any time if they have any questions or concerns regarding the Code of Conduct.

## **3 Basic principles of conduct for all employees**

### **3.1 Compliance with laws**

Compliance with laws is the top priority for our Company. Every employee must respect and obey the laws and regulations of the jurisdiction in which he operates. Violating the law must be avoided under all circumstances. Besides the penalties imposed by law, any employee guilty of a violation can expect disciplinary action, up to and including dismissal, for breach of his obligations under his employment contract.

### **3.2 Commitment to respect human rights**

Datwyler is committed to high standards of business ethics and integrity, including the support and respect of internationally recognised human rights and labour standards (such as the United Nations Guiding Principles on Business and Human Rights or OECD's Guidelines for Multinational Enterprises), as expressed in our dedicated Human Rights Policy, including the dignity, privacy and personal rights of every individual. We work with people of different origins, nationalities, cultural backgrounds, political and religious convictions, skin colour, age, sexual orientation, language, health or disability conditions and marital status, nurturing a culture of mutual respect and trust. We will not tolerate any form of discrimination, humiliation, oppression, harassment or offence and categorically reject any form of child and forced labour.

We are open and honest, act with integrity and take responsibility for our actions. We are reliable partners and do not make promises we cannot keep. These principles apply both to our internal communication with each other and to our behavior towards external partners and our expectations of our external partners (e.g. suppliers).

### **3.3 Upholding the reputation of the Datwyler IT Infra**

The reputation of Datwyler IT Infra largely depends on the behaviour and conduct of each one of us. Inappropriate behaviour or conduct of even a single employee can cause serious harm to the company. Every employee is required to uphold the public image of Datwyler IT Infra. Everything he does in the performance of his duties must be guided by this principle. Rules for the use of social media platforms by Datwyler IT Infra employees are set out in separate Social Media Guidelines.

### **3.4 Coordinated external communications**

In respect of external communications issued by Datwyler IT Infra, the following must be observed:

Inquiries from trade media concerning technical matters must be referred to the VP Global Marketing and Communications of Datwyler IT Infra, who will then coordinate communications with trade media. The current VP Global MarCom is Marco Müller, [marco.mueller@datwyler-itinfra.com](mailto:marco.mueller@datwyler-itinfra.com).

Datwyler IT Infra's external communications must additionally take into account the needs of publicly listed Datwyler Holding. To ensure that all stakeholders are treated equally as required, communications with members of the daily, business and financial media must be coordinated with the CEO of Datwyler IT Infra. The current CEO is Adrian Bolliger, [adrian.bolliger@datwyler-itinfra.com](mailto:adrian.bolliger@datwyler-itinfra.com). He will ensure coordination with the Head of Corporate Communications of Datwyler Holding.

The above-named persons/units will decide whether and in which form it is best to communicate. The Corporate Design Guidelines must be followed at all times when using any communication tools.

### **3.5 Prohibition of fraud and money laundering activities**

All employees cannot accept nor engage, directly or indirectly, in any form of fraud, including but not limited to deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts, collusion or any other form of benefit for the purpose of influencing decision making in violation of law. All employees cannot accept or engage, directly or indirectly, in any form of money laundering or terrorism financing activity.

## **4 Attractive employer**

### **4.1 Modern corporate governance**

As a company committed to creating long-term value, Datwyler IT Infra has a clear framework of sound organisational, management and control policies. These policies are set out in the Articles of Association, Rules of Organisation, and the Delegation of Responsibilities of Datwyler IT Infra. They satisfy the demands of corporate governance thinking.

### **4.2 Decentralised management**

Datwyler IT Infra operates a systematically decentralised management system within a clear framework. By taking decisions at the lowest possible level, close to the market and customers, the company fosters a culture with a high degree of identification and fast response times. Full transparency in the organisation ensures the necessary sense of responsibility in decision-making. In the performance of duties, every employee must abide by the Rules of Organisation, Delegation of Responsibilities and special instructions issued by the employer.

### **4.3 Responsibility and supervision**

Each line manager is responsible for the employees reporting to him. He/her must earn their respect through exemplary personal conduct, performance, reliability and social skills. He/her sets clear, ambitious and realistic goals, leads by trust and allows employees as much personal responsibility and freedom as possible. He/her or the Human Resources Department can also be consulted by employees if they have any job-related or personal concerns.

Each line manager has organisational and supervisory duties to perform. He/her is responsible for ensuring that no violations of law are committed within his/her area of responsibility that could have been prevented or impeded by proper supervision. He/her still remains accountable even if some tasks have been delegated.

The following applies in particular to management, responsibility and supervision:

- The line manager must exercise care in selecting employees based on their personal and professional qualifications. The duty of care increases with the importance of the task to be performed by the employee (duty of selection).
- The line manager must define the tasks in a precise, complete and binding manner, in particular with respect to compliance with legal requirements (duty of instruction).
- The line manager must ensure that compliance with legal requirements is monitored continuously (duty of monitoring).
- The line manager must clearly communicate to employees that violations of law are not acceptable and will have consequences under labour law.
- In addition, each superior is required to familiarise his employees with the Code of Conduct on a regular and documented basis.

#### **4.4 Fair employment conditions**

Datwyler IT Infra companies ensure equal opportunities, equal treatment and fair employment conditions, pay fair wages and salaries, and offer employee benefits in line with national and industry standards. In business reorganization programs, we consider the needs of the employees. Regular employee surveys provide the foundation for continuous improvements. Our employees are free to join trade unions. We maintain a constructive dialogue with internal employee representatives.

#### **4.5 Systematic training and development**

The markets in which Datwyler IT Infra operates call for highly trained employees undergoing continuous development and improvement. Some of our initiatives to train young people are reflected in the numerous apprenticeships offered by Datwyler IT Infra's companies worldwide. We support training and retraining programs to develop the technical and social skills of employees at all levels in the hierarchy. To promote management talent, Datwyler IT Infra provides individual programs tailored to future job skill requirements.

#### **4.6 Occupational health and safety**

Datwyler IT Infra is committed to ensuring a safe and healthy working environment and provide employees with regular training. It is the responsibility of each individual towards his fellow employees and colleagues that provides the best safeguard against hazards and accidents. This applies both to technical planning of workplaces, equipment and processes and to safety management and personal behavior in everyday working life. Every employee must pay constant attention to safety.

Datwyler IT Infra maintains an occupational health and safety management system in accordance with ISO 45001 for the purpose of continuously improving its safety performance.

### **5 Dealings with business partners and third parties**

#### **5.1 Compliance with competition and antitrust laws**

Fair competition is fundamental to free enterprise. The principle of integrity also applies to competition for market share. Every employee is required to observe all rules of fair competition. In particular, employees must not enter into any discussions with competitors where arrangements are made about prices, capacities, industries, market territories or customers. Arrangements with competitors not to compete or to submit sham bids in a competitive bidding process are also prohibited.

Given Datwyler IT Infra's global presence, it is essential to closely monitor developments and updates in the fight against corruption in the various regions. The company can be punished regardless of the culpability of any individual.

## **5.2 No fraud and money laundering activities**

All employees, when dealing with business partners and third parties, cannot accept nor engage, directly or indirectly, in any form of fraud or money laundering activities, as defined under 3.5 above.

## **5.3 No offering and granting of benefits**

We compete for contracts on the merits of the quality and price of our innovative products, solutions and services. No employee may directly or indirectly offer or grant unwarranted benefits (“bribes”, “kickbacks”) to others in connection with his business activities, whether in cash or in the form of other services or benefits.

Business gifts to employees of business partners must be chosen so as to avoid any appearance of dishonesty and impropriety with the recipient, have a non-lavish value and be given on an irregular basis (e.g. promotional material or a box of chocolates). When it comes to officials<sup>1</sup>, no gifts are allowed and any meals should have a non-lavish value, have a valid business purpose and be on an irregular basis.

We have zero tolerance for facilitating payments<sup>2</sup> at Datwyler IT Infra, the same applies to third parties that interact with officials on behalf of Datwyler IT Infra.

Employees who enter into contracts with consultants, intermediaries, agents or similar third parties must make sure that those parties do not offer or grant any unwarranted benefits either.

## **5.4 No solicitation and acceptance of benefits**

No employee may use his position with the company to solicit, accept, procure or be promised benefits (“bribes”, “kickbacks”). This does not apply to the acceptance of occasional gifts of nominal value. Other gifts must be refused or returned.

## **5.5 Special contracting rules**

Anyone bidding for a contract expects his tender to be given fair and impartial consideration. Employees involved in awarding contracts must in particular observe the following rules:

- The employee must inform his line manager of any personal interest he might have in connection with the performance of his duties for the company. In particular, this also includes any family or personal relationships with a potential supplier. In such cases, competitive tenders must be obtained.
- Suppliers competing for contracts must not be unfairly preferred or discriminated against.
- Invitations from business partners may only be accepted if the occasion and the scope of the invitation are appropriate and if refusing the invitation would be discourteous. We exercise restraint in travel and functions involving overnight stays and, if an invitation is accepted, pay the costs of overnight accommodation and return travel ourselves. A process is in place for reporting invitations accepted that have a value equivalent to more than CHF 500.- / EUR 500.- / USD 500.- Each company must implement this process in an appropriate manner.

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<sup>1</sup> Examples of officials include, but are not limited to: a judge or legislator, employees working for a public international organisation, officials at the national, state or local level, employees of a foreign government, employees of companies under government/state ownership or de facto control (even if the company is operated as a privately-owned corporation), employees of a government-owned or operated public university or institute, political parties, party officials or candidates running for political office, or members of a royal family.

<sup>2</sup> Facilitating payments are a particular form of bribery that may also be referred to as “kickbacks”, “backhanders” or “grease payments”. It is a payment for a routine governmental action (e.g. to obtain a permit, police protection or to have papers processed), typically a small amount, that happens infrequently and is paid for something you are entitled to, and to accelerate the process.

- Gifts from business partners must be refused or returned unless they are occasional token gifts of nominal value.
- No employee may have private work carried out by firms with which he has business dealings if he could gain any advantage from the deal.

### **5.6 Sponsorship payments and donations**

Datwyler IT Infra companies may make donations in cash or in kind to education and science, the arts, culture, sports and social causes. Datwyler IT Infra does not provide financial support to political parties, organisations or office holders. The following rules apply for granting donations:

- No payments to persons or organisations associated with a competitive bidding process for a business contract or order.
- Requests from individuals for donations should generally be refused.
- No payments to private accounts.
- A donation may never be granted to individuals or organisations that do not have an impeccable reputation or whose objectives are not consistent with those of Datwyler IT Infra.
- The donation must be transparent. The recipient of the donation and its actual use by the recipient must be known. The donor must be able to account for the reason for the donation and its intended purpose at any time.
- A process is in place for approval and reporting of sponsorship payments and donations totaling an amount in excess of CHF 500.- / EUR 500.- / USD 500.- per recipient and financial year. Each company must implement this process in an appropriate manner.

### **5.7 Separate Supplier Code of Conduct**

We believe in the values and the standards this Code of Conduct sets out and look to ensure compliance with the above-mentioned standards and rules in our relationship with our suppliers. We are committed to our values and standards and we expect our suppliers to feel obliged to adhere to similar standards and rules. The specific requirements in this regard are regulated within Datwyler IT Infra's Supplier Code of Conduct, which is applicable across the whole Datwyler IT Infra company. This document can be found on Datwyler IT Infra's website.

## **6 Avoiding conflicts of interest**

### **6.1 Policy of avoidance**

It is important to the company that its employees do not face any conflicts of interest or loyalty in their work. Such conflicts can arise when employees work for or have a financial interest in another company. Conflicts of interest may also arise as a result of family or personal relationships. Therefore, the policy is to avoid conflicts of interest.

### **6.2 Non-competition**

Employees are not permitted to run a business that fully or partly competes with Datwyler IT Infra. In addition, they are not permitted to hold direct or indirect interests in a company that fully or partly competes with Datwyler IT Infra.

Prior written approval must be obtained before a financial interest is acquired in a company that is a business partner of Datwyler IT Infra. Approval will be granted by the Corporate Management and documented in the employee's personnel file. Approval will not be granted or may be withdrawn later if the employee has business dealings with the company concerned.

Financial interests held by close relatives in a competing company or any other company described above must be disclosed to the superior immediately and the Human Resources Department in writing by the employee, if he is aware thereof. This will be documented in the employee's personnel file.

### **6.3 Outside activities**

The line manager must be notified in writing before an employee takes up any paid outside employment or activities. The outside activities may be prohibited if they interfere with work performance, are inconsistent with the employee's duties in the company or could give rise to a conflict of interest.

## **7 Use and protection of Company assets and information**

### **7.1 Use of assets**

The facilities and equipment in offices and workshops (e.g. telephones, photocopiers, PCs including software and the Internet/Intranet, machines, tools) may be used only for business purposes. Exceptions and, if necessary, any payment will be determined locally. It is never permissible to access or transmit material that incites racial hatred, violence or other criminal offences or that contains material perceived as sexually offensive in the particular cultural context.

No employee is permitted without the consent of his line manager to create recordings, files, photo, video and audio documents or copies unless directly required to perform his job.

### **7.2 Records and reports**

Open and effective cooperation requires accurate and honest reporting. This applies to the relationship with investors, employees, customers, business partners, the public and government offices alike. All records and reports produced internally or distributed externally must be accurate and truthful. In accordance with proper accounting practices, data recorded and other records must always be complete, accurate, timely and understandable. In particular, the principle of truthful presentation also applies to expense accounts.

### **7.3 Confidentiality: Intellectual property and inside information**

Internal company affairs that have not been publicly disclosed must be kept confidential. Examples include trade secrets, intellectual property, internal reporting data and details relating to the company's organisation and assets. The obligation to maintain confidentiality continues even after employment ends.

As Dätwyler IT Infra AG is the sister company of the publicly listed Datwyler Holding Inc., all employees are required to comply with insider trading legislation. Trading in securities of Datwyler Holding Inc. on the basis of privileged and confidential information is not permitted. Disclosing such information without authorisation or making a recommendation for the purchase or sale of securities of Datwyler Holding Inc. is also prohibited. Employees involved in the preparation of the Annual and Interim Reports are prohibited from trading in securities of Datwyler Holding Inc. during the binding closed periods specified.

## **7.4 Data privacy and security**

Together with the advantages of modern electronic communications, there are also risks for privacy and the security of confidential data. Taking effective measures to safeguard against these risks is an important part of ICT management, management responsibility and also the conduct of each individual. The standards of conduct expected in the use of ICT resources are set out in a separate ICT Security Policy.

Personal data may only be collected, processed or used if needed for specified, explicit and legitimate purposes. A high standard of data quality and technical protection to prevent not authorized access must be ensured. The use of data must be transparent for those concerned; their rights to information and correction and, if need be, to object and have data blocked and deleted must be preserved.

## **7.5 General Data Protection Regulation (GDPR)**

The General Data Protection Regulation (GDPR) came into force in the EU. Many other countries in Europe and abroad have adopted data protection laws to protect fundamental rights and meet the challenges of the digital economy. Datwyler IT Infra believes in and supports the right to privacy and, therefore, has implemented the GDPR in Europe. All Datwyler IT Infra companies and subsidiaries are responsible for adhering to and maintaining compliance with local data protection laws and ensuring the general data protection and security principles defined by Datwyler IT Infra and Datwyler Holding.

Failure to comply with data protection principles may result in the imposition of severe penalties (e.g., breach of GDPR rules may result in penalties of up to 4% of a company's annual turnover).

# **8 Environment and community**

## **8.1 Environmental protection**

Datwyler IT Infra companies understand and live up to their responsibility to protect the environment, complying with all applicable legislation. Furthermore, we make every reasonable effort to minimise identifiable risks. Specifically, this means that when choosing resources and production processes, we are committed to finding the most environmentally friendly materials and techniques that will have the least possible impact on the environment when the products are manufactured, used and ultimately disposed of. All employees are required to conserve natural resources in their environment.

Based on the core ecological values, all Datwyler IT Infra production companies are certified according ISO 14001. Datwyler IT Infra has also been a member of the Swiss Energy Agency for Industry (EnAW) since 2003 through its Swiss company Dätwyler IT Infra AG.

Furthermore, Datwyler IT Infra has committed itself to aiming carbon neutrality (Scope 1+2) in the medium term.

## **8.2 Community involvement**

Datwyler IT Infra recognises its share of responsibility for general civic causes and maintains regular contact with local authorities. We support social initiatives, endeavour to help the disadvantaged within and on the fringes of society and allow our employees to participate appropriately in community service.

## 9 Reporting procedure, violations and disciplinary action

Every employee is required to report circumstances that may constitute a violation of the Code of Conduct. Reports can be made verbally or in writing to the direct line manager, the Human Resources Department or the Managing Director of the company concerned.

Datwyler IT Infra also provides two global toll-free options to report violations of the Code of Conduct:

- by digital reporting channel: <https://whistleblowersoftware.com/secure/infra>
- by email: [whistleblowing@datwyler.com](mailto:whistleblowing@datwyler.com)

The first person contacted will investigate the matter thoroughly. If appropriate, suitable action will be taken. Employees and line managers should use all internal means to resolve the matter at the lowest possible level. All documentation will be kept confidential. We will not tolerate retaliation of any kind. The reporting employee must not suffer any disadvantage as a result of submitting a complaint or report in good faith. However, deliberate abuse of the complaints system is a violation of the Code of Conduct by the employee and may result in disciplinary action.

Any employee who violates rules contained in the Code of Conduct can expect disciplinary action, up to and including dismissal, besides the penalties imposed by law.

## 10 Implementation and monitoring

The Datwyler IT Infra Corporate Management actively facilitates widescale communication of the Code of Conduct and ensures its sustained implementation. Every employee will receive a copy of the Code of Conduct. Superiors and the Human Resources Departments will give the Code of Conduct to each new employee as an integral part of their employment contract. Supervisors or line managers and the Human Resources Departments will give the Code of Conduct to all new employees together with their employment contract and are responsible for communicating its contents.

The internal auditors regularly monitor compliance with laws and observation of the Code of Conduct in all organisational units of Datwyler IT Infra.

The Board of Directors receives an annual report from the Executive Management concerning compliance with the Code of Conduct.

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This Code of Conduct was adopted by the Board of Directors of Dätwyler IT Infra AG (former Dätwyler Cabling Solutions AG) on 11 March 2013 and became retroactively effective on 1 January 2013. It was updated with effect from 1 January 2014, 1 July 2018, 1 January 2021, 12 August 2024, 24 February 2025 and 30 October 2025.

### Disclaimer

This Code of Conduct does not create any rights enforceable by employees or third parties against Datwyler IT Infra or any of its companies. The Code is subject to change.