

BRUSA HyPower AG – Langäulistrasse 60 – CH-9470 Buchs

# Code of Conduct

(Version November 2024)

## Foreword

BRUSA HyPower AG (hereinafter referred to as “BRUSA”) is committed to high standards of quality, honesty, integrity and conduct in accordance with all applicable laws. At BRUSA, compliance is an essential element in ensuring these quality standards and the long-term success of our company. This Code of Conduct applies at all BRUSA sites. Illegal activities and those not in accordance with the Code of Conduct are unacceptable and will not be tolerated. We place top priority on appropriate, responsible, and sustainable business conduct, which is the basis for the trust we have established with our employees and business partners.

Our Code of Conduct represents the values and core principles we stand for every day in our business. In order to ensure compliance across the entire supply chain, we expect our business partners to commit to this as well.

Dr. Holger Fink, CEO

## 1 Business relationship

### 1.1 Fair competition

The business partners undertake to conduct themselves fairly and openly in competition and to comply with and ensure the respective applicable competition regulations, in particular antitrust laws. In particular, the abuse of a dominant market position is not tolerated.

### 1.2 Corruption

Corruption is prohibited by international conventions and laws. The business partners do not tolerate any kind of bribery, extortion, or other business conduct aimed at undue influence, irrespective of local customs, among employees and the respective business partners alike.

### 1.3 Conflicts of interest

Corporate decisions are made exclusively on the basis of objective criteria without being influenced by the personal interests and relationships of employees. Any conflict of interest must be avoided or resolved by appropriate measures.

#### **1.4 Ban on money laundering**

The applicable laws and regulations for the prevention of money laundering must be observed. Whenever possible, the use of cash in business transactions must be avoided.

#### **1.5 Trade secrets**

Business information, e.g., technical, financial, or competition-related information, must always be treated confidentially and in accordance with any non-disclosure agreements. BRUSA recommends the international TISAX and ISO 27001 standards.

#### **1.6 Corporate and intellectual property**

The Corporate and intellectual property of business partners must be handled with care and must be protected from loss or misuse.

#### **1.7 Data protection**

Collection, storage, processing, transmission and transfer of personal data must comply with data protection laws (including EU-GDPR).

#### **1.8 Supply chain**

Business partners of BRUSA's service providers and suppliers must also be obliged to comply with and implement the requirements of this Code of Conduct.

#### **1.9 Taxes and accounting**

The applicable tax laws and legal requirements for proper accounting must be applied. Records must be correct, complete, and comprehensive.

#### **1.10 Export control and customs**

The respective legal obligations regarding the import and export of goods, services and information, as well as tax and customs regulations, apply. These legal obligations also include economic sanctions and anti-terrorism regulations.

#### **1.11 Compliance with local laws**

Compliance with local laws is expected and mandatory.

#### **1.12 Original parts**

Only original parts from OEMs may be used in order to meet the high BRUSA quality standards. Business partners are required to supply only original parts from OEMs. Traceability and inspection are the responsibility of the respective supplier. If counterfeit components are detected, BRUSA and the relevant authorities must be informed immediately.

## 2 Social responsibility

### 2.1 Human rights

Human dignity is inviolable. Therefore, the business partners respect, protect and promote the applicable regulations to protect children's and human rights. In addition, they are committed to the United Nations Global Compact.

### 2.2 Forced labour and child labour

No form of forced or child labour is tolerated. BRUSA is guided by the definition of child labour based on the standards of the International Labour Organization (ILO). If a local law stipulates a higher legal minimum age for employees or longer compulsory education, the higher age applies.

### 2.3 Exercising employee rights

The applicable laws and regulations for the protection of employees must be respected. Employees may actively exercise their rights.

### 2.4 Freedom of association

Employees must be allowed to freely form associations and interest groups in order to pursue collective interests, such as collective bargaining.

### 2.5 Discrimination

Any form of discrimination against employees is prohibited. This applies in particular with regard to gender, race, age, skin colour, disabilities, political convictions, religion, sexual orientation, etc. The business partner prohibits any form of discrimination. The business partner prohibits any form of mobbing, sexual harassment, discrimination and violence. All employees have a right to the protection of their personal integrity in the workplace. Business partners take appropriate measures to prevent threats to personal integrity in the workplace, in particular by sexual harassment, mobbing, and discrimination of any kind.

### 2.6 Working hours and remuneration

All applicable laws and regulations regarding the limitation of working hours and the granting of rest periods, breaks and vacations must be observed. Furthermore, the business partners undertake to pay their employees in accordance with the applicable laws and regulations and to guarantee them equal pay for work of value.

### 2.7 Occupational health and safety

Safety at work as well as the maintenance and promotion of health are key corporate requirements. Legal and internal measures are implemented to prevent accidents, injuries, and work-related illnesses. BRUSA recommends the international ISO 45001 standard.

The contractor undertakes to only employ technically suitable and qualified personnel for electrical work within the scope of the contract. The legal requirements and electrical engineering regulations (DGUV, VDE) must be observed and complied with. BRUSA reserves the right to request proof of competence on a random basis.

## 2.8 Conflict minerals

Business partners undertake to comply with the applicable laws and regulations regarding conflict minerals. Procurement sources without appropriate, audited due diligence processes must be avoided. BRUSA recommends to act in compliance with internationally accepted conduct principles such as those of UN Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org)) or EICC Electronic Industry Citizenship Coalition ([www.eicc.info](http://www.eicc.info)).

## 2.9 Diversity, equal opportunities, and tolerance

Diversity, equal opportunities, and tolerance are key to our success at BRUSA. That is why we promote an open and partnership-based culture where all employees have the same opportunities. Faith, cultural background, origin, sexual orientation, abilities or disabilities, age, or gender; the inclusion of all strengths and individual characteristics is welcome and fully accepted at our company. We believe that this increases the motivation and performance of the workforce and consequently also customer satisfaction. Therefore, we would like to continue this path of success together with our business partners.

# 3 Environmental protection

## 3.1 Hazardous materials management

All applicable environmental laws and environmental standards must be complied with.

## 3.2 Hazardous materials management

An adequate hazardous materials management system must be set up across the supply chain with the aim of avoiding hazardous materials in the products and reducing negative environmental impacts.

## 3.3 Reducing resource consumption

The use and consumption of resources, especially energy and water, during production and the generation of waste of any kind must be reduced or avoided. The negative impact on air and water quality must be continuously reduced or avoided. BRUSA recommends the international ISO 14001 and ISO 50001 standards as well as EMAS.

# 4 Miscellaneous

## 4.1 Audits

In the event of suspected violations of the standards and regulations set forth in the Code of Conduct and to secure the supply chain, business partners agree that BRUSA or authorized third parties may conduct audits to verify compliance with the Code of Conduct during normal business hours after reasonable advance notice.

## 4.2 Whistleblowing, anti-retaliation

BRUSA supports whistleblowers who report violations of legal requirements. In addition, we effectively protect them from dismissal or other forms of retaliation. We expect the same from our business partners.

### 4.3 Civil manufacturing

BRUSA's projects and business relationships are limited exclusively to the civil sector. Our business partners respect this.

### 4.4 Contact

In case of indications and complaints regarding non-compliance with this Code of Conduct, please use the following contact options: Whistleblower system (via homepage) or e-mail: [compliance@brusahypower.com](mailto:compliance@brusahypower.com)

## 5 Confirmation

We hereby confirm the receipt of the Code of Conduct and undertake to comply with the principles and requirements of that Code of Conduct.

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Business partner

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Place, date

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Signature (Executive or Director Level Authority)