

CODE OF CONDUCT

PRECISION. SPEED. POWER.



INTRODUCTION

Valued employees

The FISCHER Spindle Group is a reliable and trustworthy supplier of products in the field of fast, precise and powerful rotation. As a globally active industrial company, we pursue our interests according to the principles of fairness, personal responsibility, transparency and respect towards customers, employees, business partners and competitors.

We are committed to these principles every day by exercising due diligence in complying with applicable rules and regulations in our business activities and by always basing our actions on ethical values. We attach great importance to our employees implementing this premise responsibly in their actions on behalf of the FISCHER Spindle Group and helping to remedy any grievances.

This Code of Conduct serves to support employees in their daily challenges by documenting the most important legal principles and ethical rules of conduct and serving as a reference work. It combines general rules of conduct, concrete guidelines, internal control and information mechanisms, as well as possible sanction measures and consequences, and is intended to protect against civil claims as well as criminal prosecution.

The Code of Conduct is intended to ensure the future of the FISCHER Spindle Group as an honest, responsible and sustainable employer and business partner.

We thank you for your contribution.

With best regards
Herzogenbuchsee, December 15, 2021

The Board of Directors of FISCHER Spindle Group AG



SCOPE

The FISCHER Spindle Group comprises FISCHER Spindle Group AG with its affiliated subsidiaries. The Code of Conduct is binding for the Board of Directors, the Holding Management, the Management Boards and all employees of the FISCHER Spindle Group (hereinafter the "Employees"). The principles and behavioral instructions described below form the guiding principles for our dealings with each other and for our entrepreneurial actions towards third parties.

BUSINESS CONDUCT IN COMPLIANCE WITH THE RULES

The employees of the FISCHER Spindle Group comply with the laws and regulations, the internal work instructions and guidelines, as well as contractual agreements. We know the rules applicable to our field of activity and act accordingly on our own responsibility. We are aware that violations of the rules are never in the interest of the FISCHER Spindle Group. All persons working for the FISCHER Spindle Group support each other to the best of their ability on a daily basis and work together in a manner appropriate to the situation. Managers must live up to their role model function and demonstrate a high level of social and ethical competence.

SECRECY AND DATA PROTECTION

Trade secrets

We handle sensitive information and business secrets with discretion and care and maintain confidentiality at all times. This means that we maintain confidentiality with respect to all confidential internal matters, production, development and business secrets, as well as the customer base, for the duration of the employment relationship and after its termination.

Dealing with sensitive information in public spaces

For conversations with sensitive content, we choose a suitable environment. When using public transport or visiting restaurants, we are aware that other passengers or visitors may be listening in. When traveling on business, only absolutely essential data should be carried. The data carried locally must be encrypted.

Privacy

We are aware of the sensitivity of data protection and treat confidential personal data with due care and protect it from uncontrolled disclosure.

INFORMATION AND IT SECURITY

We strive for the highest possible information and data security. IT security is based on proven methods to adequately protect data, systems, devices, facilities and networks.

Data security

When transmitting, storing and archiving confidential data and information, we only use channels, facilities and systems that provide adequate security against unauthorized access and modification.



Internet use and electronic communication

We use electronic information and communication tools responsibly and only for legitimate operational and permitted or specifically authorized purposes. We are aware that use for illegal or unethical purposes will result in consequences. Consequently, the FISCHER Spindle Group does not tolerate in any way the creation, retrieval, downloading or forwarding of information with discriminatory, racist, pornographic or violence-glorifying content or content that otherwise violates personal rights.

RELATIONSHIPS WITH BUSINESS PARTNERS

We act with integrity towards partners and communicate openly and directly. We only promise what we can deliver. We fulfill the expectations of our business partners (customers, suppliers, representatives and consultants) to have a legally compliant business partner with the FISCHER Spindle Group. This also requires that we know and comply with our contractual obligations towards our business partners. Likewise, we ensure as far as possible that our business partners comply with the law in their business practices.

MARKETING OF PRODUCTS AND SERVICES

FISCHER Spindle Group always makes truthful statements in marketing and advertising about its products and services. False statements and misleading information about products and services can cause damage to both our customers and our reputation. This is contrary to our principles and will therefore not be tolerated. Employees in marketing, advertising and sales must pay particular attention to this.

RESPECT AND DISCRIMINATION

The FISCHER Spindle Group is committed to equal treatment and equal opportunities for employees. We treat each other with respect in every situation. The FISCHER Spindle Group does not tolerate discriminatory actions and statements based on gender, religion, age, nationality, ethnic origin, disability, sexual orientation, political activity. The FISCHER Spindle Group has a zero-tolerance policy towards any form of harassment (unwanted advances or devaluations, threats, etc.), bullying (deliberate exclusion, humiliation) or stalking. The FISCHER Spindle Group attaches great importance to the principle of "equal pay for equal work" between the sexes.

OCCUPATIONAL SAFETY AND HEALTH PROTECTION

FISCHER Spindle Group establishes a productive, healthy and safe working environment and ensures that employees have a suitable environment and appropriate work equipment to achieve their work objectives.

FRAUD, EMBEZZLEMENT, THEFT

The FISCHER Spindle Group takes appropriate measures to be able to recognize and avoid criminal acts at an early stage. It punishes criminal acts such as fraud, embezzlement, theft, falsification of documents or misuse of business information.

BRIBERY AND CORRUPTION

FISCHER Spindle Group is committed to the principles of a free but social market economy and unconditionally observes the applicable legal standards. In particular, we firmly reject any form of corruption as well as child and slave labor and punish any violation. Our actions are based on the 10 principles of the UN Global Compact.

In critical situations, employees must take personal responsibility for weighing up between gifts customary in business transactions and bribery or corruption that could influence a business decision or have the purpose of obtaining an unlawful private or business advantage. Invitations by suppliers and customers to a meal at which a project is discussed or at which the supplier thanks them for a contract awarded have become customary in our business world and are permissible. However, attention should be paid to the extent and frequency of such invitations. Generous invitations (e.g. weekend invitations) exceed the limits of what is tolerable and must be rejected. The acceptance/delivery of small gifts (up to CHF 200) in the form of "giveaways" is permissible. More valuable gifts are not accepted and must be returned or handled in accordance with the decision of the management.

The acceptance of money is strictly prohibited. The FISCHER Spindle Group and its employees do not arrange for payments of money, fees or other benefits to business partners, functionaries from politics and administration in order to gain an advantage. In case of doubt, employees are urged to contact the management.

CONFLICTS OF INTEREST

FISCHER Spindle Group employees must avoid situations in which their personal or financial interests conflict with those of FISCHER Spindle Group. FISCHER Spindle Group expects loyalty from its employees and that business is conducted fairly, honestly and transparently. Conflicts of interest exist when employees' personal or family interests compete in any way with the interests of FISCHER Spindle Group. In particular, they may arise in connection with business activities or the exercise of mandates outside the FISCHER Spindle Group, in connection with the awarding of contracts or positions, and in connection with gifts, gratuities and invitations offered. Employees who have the impression that they are in a conflict of interest must inform the management so that it can be determined whether a conflict of interest actually exists. The employee will then be informed of what appropriate action should be taken in accordance with the rules issued by the FISCHER Spindle Group. Secondary offices of a certain significance require the prior approval of the Executive Board. Board of Directors mandates require the approval of the Board of Directors.

INTELLECTUAL PROPERTY AND INTANGIBLE PROPERTY RIGHTS

The FISCHER Spindle Group respects the intellectual property of third parties as well as any intangible property rights and, conversely, demands that employees and third parties respect the same.

ENVIRONMENTAL AWARENESS

The FISCHER Spindle Group strives to avoid excessive impact on the environment. We pay attention to a conscious use of natural resources and act accordingly in a sustainable manner.

TAXES

The FISCHER Spindle Group complies with the applicable tax regulations and disapproves of any form of tax offence. We refrain from taking measures within our sphere of influence that lead to unlawful tax advantages for the FISCHER Spindle Group, employees or related parties. In particular, we refuse to accept illicit funds.

COMPLAINTS

FISCHER Spindle Group takes all complaints from customers and business partners seriously. We process all complaints fairly, truthfully and quickly.

COMMUNICATION WITH MEDIA AND AUTHORITIES

The FISCHER Spindle Group maintains an open, honest and credible communication and information policy. We promptly forward inquiries from the media and authorities to the management. If internal information is inadvertently disclosed to third parties, we ensure that it is destroyed in such a way that it cannot be reproduced and immediately inform the management.

COMPANY PROPERTY

FISCHER Spindle Group requires responsible handling of company property or other company assets. Company assets are to be used exclusively for their intended business purposes. Misuse for other, especially inappropriate personal, illegal or other unauthorized purposes is prohibited. Individual work results shall always be stored on the drives of the relevant department. It is prohibited to store business documents and correspondence on storage media that are not authorized by FISCHER Spindle Group.

APPEARANCE

The appearance of our employees is clean and well-groomed. The clothing is adapted to the area of responsibility and the respective activity and takes into account the fact that we are ambassadors of the FISCHER Spindle Group at all times and may have unexpected contact with third parties during working hours. Employees of the FISCHER Spindle Group who are on duty at external events such as trade fairs must appear in a uniform appearance. The usual formal requirements must be observed for correspondence, in particular e-mails to third parties.

IMPLEMENTATION

We are aware that the Code of Conduct does not cover every situation that may arise in the normal course of business. The supervisor, the responsible person in the HR department and the management are always happy to answer questions and help with decision-making in uncertain situations. The FISCHER Spindle Group concretizes the Code of Conduct for daily work as far as necessary in the sense of the principles and guiding principles mentioned in regulations or internal directives (mission statement, conditions of employment, directives, etc.). The FISCHER Spindle Group informs employees about the relevant rules and ensures that new employees are instructed accordingly when they take up their positions. All employees are responsible for their own conduct in accordance with the rules. The managers ensure that the rules are observed and enforced.

VIOLATIONS AND SANCTIONS

The FISCHER Spindle Group wants to avoid illegal and unethical behavior. Critical situations should be identified as early as possible so that measures can be taken and damage to the company, employees and customers can be averted.

Violations

The FISCHER Spindle Group counts on the support of employees when they observe violations of the rules. It expressly encourages employees to approach supervisors, the HR department and the management when misconduct is identified. Reports of this nature are in the best interest of the FISCHER Spindle Group. The reporting employee need not fear any disadvantages, provided that the report is made to the best of his or her knowledge and with good faith.

Note: Depending on the severity of the violation, the Holding Management and/or the Board of Directors will be informed.

Sanctions

The FISCHER Spindle Group sanctions violations of rules. In addition to consequences under labor law, these can also have civil and criminal consequences. Specifically, these can be reprimands or warnings, disciplinary measures up to and including termination, claims for damages and criminal charges.





Perfect Rotation.



Precision.



Speed.



Power.

www.fischerspindle.com