

Agathon Code of Conduct

Code of Conduct Version 00 E – February 23, 2023

PREAMBLE

Agathon AG, headquartered in Bellach (CH), with subsidiaries in Germany, North America, China, and with representatives worldwide ([agathon.ch](https://www.agathon.ch)), is globally recognized as a leading manufacturer and service provider of high-tech laser and grinding machines for precision grinding as well as guide elements (Precision-Parts) for machine, tool, and mold making.

We are aware of our responsibility towards people, our businesses and our business partners as well as towards the environment. Our actions not only need to comply with laws and regulations, but must also be forward-looking and meet ethical requirements.

The Agathon Code of Conduct therefore defines the following globally applicable principles for all Agathon employees worldwide. It covers the areas of legal and social responsibility, human rights/labor and business practices, safety, and environmental protection. A separate Code of Conduct for suppliers and business partners with an intermediary function regulates their obligations to exercise due diligence.

Violations of legal requirements and the principles of the Agathon Code of Conduct will not be tolerated and must be reported to the Agathon company management.

Agathon company management contact person:

Peter Schneider, peter.schneider@agathon.ch; +41 32 617 45 67

If you have any questions or comments regarding the Agathon Code of Conduct or its implementation, please contact:

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I. Legal and social responsibility

We conduct our business responsibly and in compliance with the laws and official regulations of the applicable legal system. This applies in particular in the areas of civil, competition and copyright law, labor and employment law, tax law, import and export controls, customs law, criminal and sanctions law as well as the recognized rules of accounting.

We are familiar with the requirements of contracts, standards, regulations, and certification conditions that apply to us and are committed to complying with these. If we have any questions, we contact the respective responsible departments within the company.

We protect Agathon's intellectual property and assets in our daily work (patents, trademarks, copyrights, trade secrets, domain names as well as other related rights) and respect the rights and legitimate concerns of third parties.

Confidential information such as information on research and development projects, production processes, business processes, plans, strategies, financial and personnel data, new products, business mergers, acquisitions, sales, and similarly sensitive information is kept secret.

We observe the recognized principles of the mechanical and plant engineering industry on responsible procurement.

We understand social responsibility to mean performing our respective activities properly and correctly, recognizing each other's expectations, and conducting our business in a sustainable and socially responsible manner. No one shall come to harm as a result of our activities.

II. Human rights/conflict minerals/labor and business practices

We observe internationally recognized human rights and labor rights. We observe and comply with the United Nations Universal Declaration of Human Rights ([UDHR](#)), the core labor conventions developed by the International Labor Organization ([ILO](#)), and the UN Guiding Principles on Business and Human Rights ([OHCHR](#)). We reject forced labor, child labor, and slave labor.

It is important to us to source minerals from conflict-free areas. We consider requirements such as the OECD Guidelines on Due Diligence for Responsible Supply Chains of Minerals from Conflict

and High-Risk Areas ([OECD](#)) and the Guidelines for Compliance with Section 1502 of the Dodd-Frank Act to be mandatory ([Dodd-Frank Acts](#)).

We recruit, employ, and promote employees on the basis of qualifications, talents, and skills. We do this with due regard to reputation and reliability.

We ensure equal opportunities, equal treatment, compliance with the applicable working time regulations, and appropriate remuneration.

Employees are permitted to be active in political parties, trade unions, or associations to the extent permitted by law and their employment contracts.

Interpersonal relationships in the workplace are of a business nature. They are conducted in an unbiased manner, free of prejudice and harassment. This means in particular without any regard being given to gender, age, skin color, race, nationality, ethnicity, political affiliation, social origin, disability, sexual orientation, membership in an employee organization, or ideological or religious conviction.

The possession and consumption of drugs or controlled substances as well as the carrying of weapons of any kind in the company and at work is prohibited and will be sanctioned.

We ensure that gifts and hospitality – especially gifts to public officials or private functionaries – are handled correctly.

We do not tolerate bribery or corruption and we comply with the legal and official regulations.

Any agreements with competitors or business partners that constitute an unlawful restriction of competition are prohibited and will be sanctioned.

We do not finance political parties or any kind of political activity.

We foster a culture of mutual trust, mutual support, free exchange of opinions, and mutual respect. Employees are able to make a valuable contribution through constructive dialog and active participation.

When selecting and dealing with suppliers and business partners of any kind, we pay attention to the principles of non-discrimination and act in accordance with the principles of the Agathon Code of Conduct.

We focus on quality and take responsibility for our actions. The Agathon quality management system, the specifications of which we are familiar with and adhere to, is intended to support us in this respect.

Any conflicts of interest vis-à-vis Agathon that could influence or give the appearance of influencing business relationships or processes are to be avoided. They must therefore be disclosed to the relevant supervisor prior to commencing work.

III. Safety and environmental protection

Safe and healthy working conditions are important to us. We adhere to the established standards and trainings of the Agathon management system for safety and health at work. We have a responsibility to comply with these in our workplace as well as to continually strive for a properly maintained work environment.

Data security is very important to us. Data pertaining to employees, the business, and business partners must be treated with the utmost care. Personal data are kept confidential and used only for legitimate purposes.

Company-owned devices such as smartphones, PCs, laptops, and other electronic communication devices are generally intended to be used for business activities conducted by and on behalf of Agathon. This is subject to the respective local requirements, necessary diligence, and local practices. The devices must be protected from access by third parties.

The use of social media networks is only permitted for purposes agreed upon in advance with Agathon. Employees are not authorized to disclose information about business-related activities without the prior consent of the supervisor authorized to make such decisions. This must not cause any damage to persons, business partners, or Agathon itself.

We are committed to operating in an environmentally friendly and sustainable manner and to avoiding substances and materials in the manufacturing and supply chain that are harmful to people and nature. We observe the applicable legal norms and international standards relating to the environment. We endeavor to minimize environmental pollution and continuously improve environmental protection. The Agathon environmental management system, the specifications of which we are familiar with and adhere to, supports us in doing this.

IV. Reporting obligation

Violations or concerns regarding a possible violation of the principles set forth in this Code of Conduct must be reported immediately to the supervisor or the person designated for this purpose in the Preamble.

All information will be treated confidentially, promptly, and with due care and respect.

Adopted and entered into force in Bellach on February 23, 2023

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