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### 1 Purpose

WYLER AG is committed to fully complying with ethical principles and to employing anti-corruption measures in all its business activities. We strive to promote a corporate culture of integrity and transparency in order to retain the trust of our customers, employees, and business partners, and to protect our good reputation.

### 2 Legal Compliance

We are committed to observing all applicable laws and regulations with regard to combatting corruption, including national and international anti-corruption laws. These include:

- the Swiss Unfair Competition Act (UWG)
- the relevant articles in the Swiss Criminal Code (STGB) regarding bribery, corruption, misconduct by a public official, accepting bribes, and bribery of foreign officeholders
- the Swiss Federal Law on International Mutual Legal Assistance in Criminal Matters (IRSG)
- among others.

### 3 Zero Tolerance Regarding Corruption

We do not tolerate corruption of any kind, be it bribery, accepting a bribe, embezzlement, or other corrupt practices. All employees are obligated to report incidents involving corruption, and whistleblowers can be assured of protection from retaliation.

#### 4 Code of Conduct

We have created a clearly defined **Code of Conduct** that is communicated to all employees. This code defines the actions and conduct that are unacceptable, and explicitly prohibits any type of corruption. Employees are expected to respect ethical standards, and to make proper business decisions.

#### 5 Training and Sensitization

We ensure that all employees are regularly trained with regard to corruption risks, laws, and procedures. Training is offered on ethical behavior and on identifying corruption indicators in order to increase awareness of this topic and to create a common understanding of proper business practices.

#### 6 Screening of Business Partners

When selecting business partners, we conduct careful vetting to ensure that they share our high ethical standards. Suspicions of corruption or unfair business practices are taken seriously and handled accordingly.

#### 7 Internal Review and Monitoring

Internal controls are in place to minimize risks associated with corruption. To this end, and in line with our ISO 9001 certification and annual financial review, this includes:

- Clear responsibilities
- Dual Control principle, which is defined in the signature regulations
- Separation of duties
- Regular review of transactions and financial reporting
- Monitoring mechanisms, to ensure adherence to the directives.

#### 8 Reporting Procedure and Investigations

We ensure that appropriate channels are in place for reporting instances of corruption. All reports are handled confidentially. We guarantee that employees who report suspicious activities will not suffer any retaliation. All accusations will be investigated thoroughly, and if any cases of corruption are confirmed, the appropriate measures will be taken.

#### 9 Review and Continuous Improvement

We regularly review our responsibility policy and associated measures as part of ISO 9001 in order to ensure their effectiveness. We conduct audits and assessments to identify any weaknesses and take measures aimed at continually improving our anti-corruption strategy.

## 10 Publication and Communication

Our responsibility policy is made accessible to all employees, and is communicated in an appropriate manner. External stakeholders such as customers, suppliers, and business partners are informed about our commitment to preventing corruption.

We are firmly committed to actively implementing this responsibility policy, and to continuously working to prevent and combat corruption within our organization. Each employee is responsible for contributing toward an ethical corporate culture and for maintaining our integrity