

## **Code of Conduct for Business Partners of RUAG**

### **1 Introduction**

Collaboration, high performance and visionary thinking – these are the values that represent RUAG.

For RUAG, business relations with customers and business partners are based on integrity and partnership, trust and mutual respect. Neglecting or disregarding these basic rules in the interest of securing business success is against our corporate culture.

RUAG also expects its business partners, i.e. its customers, suppliers, service providers and their supply chains, to act with integrity in every way. In order to substantiate this, RUAG sets out certain minimum standards and makes these known to its business partners.

This Code of Conduct forms a constituent part of all contracts with third parties and is binding on all business partners. RUAG publishes the Code of Conduct for its business partners on the internet, and draws its business partners' attention to it.

### **2 Human Rights**

Business partners of RUAG must observe the Universal Declaration of Human Rights of the United Nations.

### **3 Employees**

Business partners of RUAG must observe the labour laws of the countries in which they operate. RUAG expects them to create and maintain an atmosphere in which employees are treated with dignity and respect.

Business partners of RUAG shall not tolerate the illegal employment of children, forced labour, bonded labour or any other form of compulsory labour. Their recruitment and employment practices shall be free of all discrimination.

### **4 Health and Safety**

RUAG expects its business partners to ensure safe working conditions and a healthy working environment for their whole workforce. Employees must be protected from excessive exposure to chemical, biological and physical dangers.

Business partners of RUAG must have in place appropriate checks, safe working procedures, timely warnings and other protective measures to ensure that the health and safety risks in the workplace are minimised.

In all cases the business partners of RUAG must comply with the locally applicable health and safety measures for their employees.

### **5 Environment, Resources**

Business partners of RUAG must observe the locally applicable environmental regulations.

They must take all reasonable measures to protect the environment, i.e. through the reduction of harmful emissions and by the economical use of energy and natural resources.

The business partners of RUAG shall not make any use of conflict minerals.

### **6 Intellectual Property**

Our business partners must safeguard and make only appropriate use of confidential information and ensure that all RUAG employee and business partner privacy and intellectual property rights are adequately protected.

## **7 Competition**

RUAG is convinced that functioning markets drive innovation, technological progress and the continuous improvement in quality. For this reason, RUAG acts as a fair and responsible competitor.

RUAG expects its business partners to be part of this competition, while upholding standards for fair business practices, advertising and competition.

Fair competition also includes respecting the intellectual property of third parties and protecting information that is given in confidence, and only using such information within the framework of relevant agreements.

## **8 Ban on Corruption and Fraud**

RUAG applies a zero tolerance policy to corruption and rejects any form of bribery or any other corrupt behaviour. RUAG expects its business partners neither to tolerate nor actively participate in corrupt activities, regardless of whether this is with regard to public officials or private individuals or organisations.

It is prohibited to offer, provide or accept a benefit with the intention or effect of influencing the decision-making process of a business partner or public official. In the same way, no benefits may be accepted that could influence RUAG's or the business partner's own decision-making process.

Should corrupt activities be proven within the sphere of responsibility of its business partners, RUAG reserves the right to terminate business relations with that partner immediately and, where appropriate, to claim compensation.

## **9 Acceptance or Giving of Gifts, Entertainment, and Other Benefits**

No gifts of an exaggerated value or other inappropriate gifts may be offered, given or accepted.

Gifts and entertainment or other benefits should only be offered, given or received in good faith and only if they are appropriate and in-keeping with customary business hospitality and are in compliance with the local laws.

RUAG makes no donations to political parties and expects its business partners not to make such donations in connection with their business with RUAG.

## **10 Facilitation Payments**

RUAG does not offer or provide benefits to public officials for routine governmental action in order to initiate or expedite performance of duties of non-discretionary nature (facilitation payments) and expects its business partners to refrain from this as well.

## **11 Data Protection**

RUAG takes the protection of data that relates to a person directly or indirectly (personal data) serious. RUAG expects its business partners to comply with all applicable data protection laws, including, where applicable, the EU General Data Protection Regulation ("GDPR") and local laws implementing the GDPR. In particular, personal data must be:

- processed lawfully, fairly and in a transparent manner;
- collected and processed for specified, legitimate purposes;
- adequate, relevant and limited to what is necessary for the processing purpose;
- accurate and, where necessary, kept up to date;
- retained only for as long as necessary; and
- processed in a manner that ensures appropriate security of the personal data.

Should a business partner act as a data processor, the business partner is expected to enter into a data processing agreement in accordance with applicable data protection law.

Moreover, personal data must not be transferred to a country or territory outside of Switzerland or the European Economic Area (EEA) unless that country or territory ensures an adequate level of data protection or unless appropriate safeguards with respect to the protection of personal data in a legally binding instrument have been undertaken.

## **12 Laws, Regulations**

Just as RUAG undertakes to comply with all applicable national legislation and international agreements, its business partners must do the same. RUAG rejects all illegal conduct within its own companies and those of its business partners.

## **13 Conflicts of Interest**

RUAG expects its business partners to be open and transparent about any business or personal relations that may bring them into a conflict with the interests of RUAG, to ensure that the right measures can be taken to avoid a conflict of interest.

## **14 Monitoring**

RUAG expects its business partners to have appropriate compliance management systems in place to ensure adherence to the principles set forth in this code of conduct.

RUAG reserves the right to monitor existing and new business partners for compliance with this Code of Conduct. The monitoring may be carried out by a specialized, independent organization. RUAG and the business partner shall mutually agree on a suitable organization within a reasonable time frame. The results of such monitoring will be communicated to both parties.

## **15 Violations**

If there is a violation of this Code of Conduct, RUAG reserves the right to discontinue the relationship with the business partner.

## **16 Subcontracting**

It is required that all business partners communicate the principles laid out in this Code of Conduct throughout their supply chain, including to their subcontractors, to take these principles into account when selecting subcontractors, and further to ensure compliance with these principles by their subcontractors.

## **17 Amendments**

We reserve the right to change the requirements of this Code of Conduct from time to time. In such an event, we expect our business partners to review and accept such changes and to update their practices accordingly. A current version can be found on the following URL: <https://www.ruag.com/en/commitment/compliance>

## **18 Questions, Comments**

In the case of uncertainty in connection with the understanding and application of this Code of Conduct for business partners of RUAG, or should any infringements be discovered, the following reporting channels are available:

- [compliance@ruag.com](mailto:compliance@ruag.com)
- <https://ruag.integrityplatform.org>