# CODE OF CONDUCT DC SWISS SA, Grand-rue 19, 2735 Malleray

## 1. Relationships and working conditions

#### Discrimination

We treat all our employees equally and fairly. We do not discriminate in hiring, training, promotion, or dismissal on the basis of gender, religion, age, disability, sexual orientation, political opinion, nationality, social or ethnic origin.

## Salaries and hours

We pay regular wages and overtime at the legal rate or at a premium rate, depending on the local requirements of the country of manufacture, and we provide workers with the legal benefits in force. In the event that there is no legal minimum wage and overtime in the country of origin, we ensure that the wage is at least equal to the minimum average for the industry concerned. Finally, no salary deductions are made for disciplinary reasons.

In terms of working hours and overtime, we comply with the limits imposed by the laws of the country of manufacture. We do not impose excessive overtime. The total number of hours worked per week never exceeds 60 hours, including all overtime hours and at least one day of rest per seven-day period.

## Forced labor

The use of forced labor, whether obtained under threat of punishment, withholding of identity papers, requiring workers to pay a security deposit, or any other coercion, is strictly prohibited.

### Child labor

The employment of children under the age of 15 is strictly prohibited. In countries where local law provides for a higher working age or extends compulsory schooling beyond age 15, the higher age applies. We also comply with laws and regulations applicable to those under the age of 18 who do not meet the definition of "child.

# Harassment and abuse

We treat our employees with respect and dignity and we do not condone or practice any form of corporal punishment, threat of violence, moral, physical, sexual or verbal harassment or any other abuse.

## Freedom of association

We respect and recognize the right of every employee to legally and peacefully associate, organize and join a labor organization of their choice without penalty, discrimination or harassment.

## **Health and Safety**

We provide a safe and healthy work environment for our employees to avoid accidents or injuries that may be caused by, associated with, or occur during work or while handling equipment. We comply with applicable laws and regulations, ensuring, at a minimum, access to potable water and sanitation, fire safety, and adequate lighting and ventilation. We put in place systems to detect, prevent or neutralize any threat to the health and safety of personnel.

## Anti-corruption

We will not offer any of our clients' employees any money, gifts, loans, discounts, except for gifts or promotional items of reasonable value, and provided that they comply with all applicable laws, regulations and rules.

We are committed to strongly condemning and acting against corruption in all its forms, including extortion and bribery.

# 2. Environmental requirements and responsibilities

We share a commitment to a clean and safe environment. As such, we operate in an environmentally responsible manner by ensuring compliance with applicable legal requirements, environmental standards and industry-specific environmental regulations. We encourage initiatives that can reduce our impact, in particular through the use of environmentally friendly technologies. We comply with the REACH regulation, which was adopted to better protect human health and the environment from the risks associated with chemical substances.

# 3. Compliance with the Dodd-Franck Act, known as "Conflict Minerals" legislation

DC Swiss SA confirms that to the best of its knowledge and based on information received from its suppliers, it does not use any minerals from war zones as defined by the American Dodd-Franck Act (Section 1502 Dodd Franck Act (p. 838 et seq.)) and European regulations (EU Regulation No. 2017-821 of 17 May 2017).

# 4. Legal requirements

We act lawfully and comply with national, local and international laws and regulations regarding the conduct of our business.

# **Customs and security authorities**

We comply with applicable customs laws, including those concerning the importation and prohibition of transshipment of goods in the country of importation.

Where national and other applicable laws and this Code of Conduct cover the same subject matter, the more stringent provision shall apply. In addition, where the Code of Conduct conflicts with applicable law, the applicable law shall apply.

Romain Fleury

Co-director

DC SWISS SA

Claude Sudan

Co-director

Malleray, August 18, 2021