

**Angst+Pfister Group  
Anti-Corruption Guideline**



Dear Colleagues,  
Dear Partners,

As part of Angst+Pfister's commitment towards ethical and fair business behaviour, we actively engage against all forms of corruption, including extortion and bribery, in our relations with all our stakeholders. To this end, Angst+Pfister is participant of the United Nations Global Compact and supports its principle to work against corruption.

Corruption can have serious consequences for the functioning and development of our Group. Therefore, every member of the Angst+Pfister family has the duty to live our culture of integrity and to guarantee the Group's sustainable performance.

We work with business partners who share our commitment, ethics and compliance. We clearly communicate our expectations, agree on contractual obligations where appropriate and take necessary measures to ensure that these obligations are met.

We will continue to develop the integrity of our culture to contribute to the sound sustainable development of our company as well as strong partnerships.

A handwritten signature in black ink, appearing to read 'C. Domeisen'.

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Christof Domeisen  
CEO and Delegate of the Board  
Angst+Pfister Group

A handwritten signature in black ink, appearing to read 'M. Chariatte'.

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Marc-Antoine Chariatte  
CFO  
Angst+Pfister Group

## Purpose

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This policy sets forth our values and principles as outlined in the Angst+Pfister Group Code of Conduct and reflects our commitment to

- mitigate the risks of corruption
- ensure that business practices and decisions are compliant with all applicable laws and regulations
- ensure a safe and sound working environment

## 1. Scope

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This policy applies to all employees of the Angst+Pfister Group, including contingent workers, board members and anyone doing business on behalf of the Angst+Pfister Group (hereinafter called “employees”).

Where this policy conflicts with applicable local laws and regulations, the more restrictive requirements apply.

## 2. Guideline

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The Angst+Pfister Group Code of Conduct states:

*“At the Angst+Pfister Group we obey to all applicable laws and corresponding regulations and do not tolerate bribery or corruption.”*

The guideline below describes what you can do and what you cannot do.

### **2.1. Gifts, hospitality, and other benefits**

Employees of Angst+Pfister or any third parties are not allowed to give, promise to give, solicit, or accept any form of improper advantage, whether directly or indirectly, to or from any individual or organisation with the intention to obtain or retain business in return. Improper advantages include illegal rebates, bribes, kickbacks, and under-the-table payments. An improper advantage can be anything of value, including but not limited to payments, excessive or inappropriate gifts, meals and entertainment, travel expenses or fake agreements.

Gestures of hospitality and goodwill (whether given to, or received from third parties) are appropriate so long as the giving or receiving party of gifts meet the following requirements:

- a. It is in compliance with local law.
- b. It is given in the name of the company.
- c. It is not made with the suggestion that a return favour is expected.
- d. It does not include cash or a cash equivalent (e.g. a voucher or gift certificate).
- e. It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).
- f. It is of an appropriate type and value and given at an appropriate time, taking into account the reason for the gift.
- g. It is given or received openly, not secretly.
- h. It is not selectively given to a key, influential person, clearly with the intention of directly influencing them.

## **2.2. Facilitation payment and kickbacks**

*A facilitation payment is a payment to government employees to speed up an administrative process whose outcome is already determined. Although ethically questionable, it is not considered to be bribery according to the legislation of some states as well as in international anti-bribery conventions.*

*A kickback is a form of negotiated bribery in which a commission is paid to the bribe-taker in exchange for services rendered. Generally speaking, the remuneration (money, goods, or services handed over) is negotiated ahead of time. The kickback varies from other kinds of bribes in that there is implied collusion between agents of the two parties, rather than one party extorting the bribe from the other. The purpose of the kickback is usually to encourage the other party to cooperate in the scheme.*

Angst+Pfister does not accept and will not make any form of facilitation payments or kickbacks of any nature.

We recognize that facilitation payments are a form of bribery that involves expediting or facilitating the performance of a public official for a routine governmental action with the intention of securing or speeding up the performance of a certain duty or action.

## 3. Charitable Contributions

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Angst+Pfister accepts and encourages the act of donating to charities – whether through services, knowledge, time, or direct financial contributions (cash or otherwise) – and agrees to disclose all charitable contributions it makes to the Group Management.

## 4. Employees Responsibility

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- a. As an employee of Angst+Pfister, you must ensure that you read, understand, and comply with the information contained within this guideline, and with any training and information you are given.
- b. All employees and those working with and for the Angst+Pfister Group are equally responsible for the prevention, detection, and reporting of bribery and other forms of corruption. They are required to avoid any activities that could lead to, or imply, a breach of this policy.
- c. If you have reason to believe or suspect that an instance of bribery or corruption has occurred or will occur in the future that breaches this policy, you must follow the procedure as described under 5.
- d. If any employee breaches this policy, they will face disciplinary action and could face dismissal for gross misconduct. Angst+Pfister has the right to terminate a contractual relationship with an employee if they breach this policy.

## 5. How to raise a Concern or seek Guidance

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Every employee of the Angst+Pfister Group is responsible to respect the principles described in this policy.

If you have questions or are not sure how to deal with a particular situation, your leader is your first point of contact. Alternatively, you can also consider reaching out to your local HR department. In addition, the Angst+Pfister Group operates a Compliance Helpdesk where you can ask for guidance, but also report concerns about (potential) breaches and violations.

In exceptional critical situations where you are exposed to a threatening situation you must immediately report this incident to the Compliance Helpdesk.

The Compliance Helpdesk is managed by an independent third party, where you can report concerns or seek guidance. Your message will be dealt with confidentially. If local laws allow, anonymous reporting is also possible. The hotline can be reached via:

[Angst-pfister.compliancehelpdesk.report](mailto:Angst-pfister.compliancehelpdesk.report)

The Angst+Pfister Group does not accept retaliation against employees who report concerns in good faith. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct will not be tolerated and will be subject to disciplinary action.