

**The maxon Group Code of Conduct**

# **Code of conduct maxon Group**

## The maxon Group Code of Conduct

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## 1 Integrity

### 1.1 Business conduct

The business conduct of the maxon Group is based on fairness, professionalism and respect.

### 1.2 Avoiding conflicts of interest

It is absolutely prohibited to use one's position in the company to personal advantage or to the advantage of family members or close associates.

It is very important to the maxon Group that the employees avoid conflicts of interest or conflicts of loyalty in the course of their official work. If the possibility of such conflicts becomes apparent, the employees have to inform their superiors at an early stage and in a transparent way. The superior decides about the required measures for preventing repercussions for the maxon Group.

For example, conflicts of interest or loyalty can occur if an employee also works for another company or becomes shareholder in another company, and the company concerned has significant business relations with the maxon Group or is a competitor of the maxon Group. Such activities are strictly prohibited.

To avoid conflicts of interest, it is absolutely vital that all employees of the maxon Group, in their communication with customers, suppliers, consultants and other business partners, as well as competitors, avoid creating the impression of preferential treatment arising from personal closeness.

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### 1.3 Avoiding corruption and bribery

The maxon Group does not tolerate any form of corruption and bribery.

No employee may use his position or function to demand or accept personal benefits or promises of such benefits. It is also prohibited to offer, promise or grant benefits to public officials, or to employees and governing bodies of other companies, if even the slightest impression of corrupt behavior could arise as a result.

Therefore the employees of the maxon Group do not accept any gifts (except customary advertising give-aways) or invitations that are not appropriate and within the customary scope, nor any direct or indirect benefits, and refrain from providing such benefits to public officials or employees of other companies.

Lawful commissions, bonuses, discounts, reimbursements, etc., that arise from business transactions have to be fully documented and handled openly, to exclude involvement in money laundering and other dishonest activities.

Donations and sponsoring are approved and made available centrally in the individual companies of the maxon Group, by the authorized managers. The allocation of donations and sponsoring money always has to be transparent. The recipient and the use to which the money is put by the recipient have to be documented and traceable. It must be possible to publicly justify these expenditures at any time.

### 1.4 Avoiding anticompetitive conduct and cartel arrangements

Fair competition is prerequisite for market participants to develop fully. National and international regulations govern how market participants are allowed to sell products and technology and which information exchange with competitors is permitted. These regulations are binding for the maxon Group.

For the maxon Group, integrity and lawful information acquisition and utilization is paramount in the competition for market shares and customers. All employees are obliged to honor and observe the rules of fair competition. In particular, employees are not allowed to conduct conversations with competitors concerning agreement on prices, conditions or capacities. Arrangements with competitors regarding non-competition, submission of bogus quotations for tenders, division of customers, market territories or production programs are prohibited. This includes informal conversations, informal "gentleman's agreements" or "concerted actions" that result in or are aimed at effecting one of the above-mentioned restraints of competition.

### 1.5 Embargo and trade control regulations

The maxon Group is a globally operating company and its international activities are subject to regulations which restrict the free movement of goods.

Various national and international laws and embargoes restrict or prohibit the import, export or domestic trade of goods, technologies or services, as well as capital and payment transactions. The restrictions and prohibitions may depend on the nature of the goods, the country of origin or end-use, or on the identity of the business partner. The national and international export control regulations and the laws on exporting war material are of particular importance. The employees have to comply with these control regulations when goods or services are purchased, brokered, manufactured or placed on the market, or if technologies are transferred or received. Before taking any such actions, the employees have to check whether any permits or approvals from official authorities are required for the respective action.

### 1.6 Compliance with laws

The employees have to always comply with all relevant laws and regulations, as well as the internal directives and rules.

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### **2 Protection of assets**

#### **2.1 Non-disclosure – Keeping own trade secrets and those of others confidential**

All employees are obliged to prevent that trade secrets, especially know-how, technical information, distribution channels, information about organizational forms (such as spatial arrangements and personnel structures), customer data, information about contract relations, cooperation partners, price calculations, etc., become known to unauthorized third parties. Furthermore, even within the maxon Group, these data are only to be made accessible to the individuals that need them for their business purposes. The trade secrets of business partners of maxon are to be protected with equal diligence. These obligations to maintain confidentiality continue to apply after the end of the work relationship.

#### **2.2 Protection of material and intellectual property; data protection**

All employees are obliged to handle the property of the maxon Group with care and to protect it against damage, loss, theft, misuse and unauthorized use, as well as unauthorized access or sale. The property of third parties has to be treated with the same respect. The use of the property of the maxon Group is to be reduced to the business purposes of the maxon Group.

Intellectual property, such as trademarks, patents, inventions and other know-how, are valuable assets and are of great importance to the success and the future of the maxon Group. Therefore all employees are required to protect the intellectual property of the maxon Group. No employee may provide information on new findings/innovations or trade secrets to unauthorized individuals in any form whatsoever or, without prejudice to the employee's statutory rights, claim these as the employee's own. The maxon Group respects the intellectual property rights of third parties.

A well-functioning IT infrastructure is of fundamental importance to the maxon Group. Therefore all employees have to exercise their responsibility to protect these resources and have to handle all devices, applications and networks of the maxon Group with care. Applicable information security policies must be followed.

Only software authorized by the maxon Group may be installed and used.

Any form of data procurement, collection, processing, storage, and disclosure (especially personal data) must comply with the applicable laws and internal regulations (in particular the data protection policy of the maxon Group).

#### **2.3 Handling business documents**

For legal and business reasons, the maxon Group is obliged to document all business processes and transactions diligently, correctly, and completely, and to store the documents in a secure and orderly way for the required period. These documents, independent of the medium on which they are recorded, are very valuable to the maxon Group and can be used to underpin our integrity in our business transactions.

### **3 Social responsibility and the environment**

#### **3.1 Personnel policy**

##### **Fair and respectful conduct of the employees towards each other**

Respectful and fair human relations and corresponding treatment of the employees are an important part of the maxon culture.

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### **Prevention of discrimination and harassment**

All employees of the maxon Group are valued equally. Discrimination on the grounds of ethnic origin, gender, religion or life philosophy, political opinion, disability, age or sexual identity is prohibited. The maxon Group does not tolerate any discrimination against its employees on the reasons mentioned above.

The maxon Group does not tolerate any sexual or other harassment, mobbing, etc. This applies both to internal work relations and the conduct towards external partners.

### **Protection of human rights, in particular the prevention of child labor**

The maxon Group does not tolerate child labor and is committed to making sure all its products or services are free from child labor. The maxon Group endorses international standards regarding child labor, including the United Nations Guiding Principles on Business and Human Rights. In addition, the maxon Group is equally committed to compliance with the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and ILO Conventions No. 138 and No. 182. Furthermore, we are guided by the instruments recommended in the ILO-IOE Child Labour Guidance Tool for Business.

The maxon Group does not tolerate forced labor.

### **Management culture**

The maxon Group sees responsible leadership as the foundation of mutual success.

Therefore each and every manager plays a significant role in achieving the objectives of the maxon Group. The managers carry the responsibility for their employees and have to earn their respect and appreciation through exemplary personal conduct, performance, openness, managerial qualities and social competence. The managers trust their employees, set transparent and ambitious yet realistic targets with them, and thus allow them as much own responsibility and freedom as possible for developing their skills and implementing their individual performance targets. The employees have to be promoted by their superiors based on their personal abilities and suitability, as well as their dedication.

### **Employee protection (occupational health and safety)**

The maxon Group is responsible for the well-being of its employees.

The managers ensure a safe and healthy work environment. The employees have to comply with the pertinent regulations; the managers are obliged to regularly monitor this compliance. Inadequacies have to be remedied immediately.

The maxon Group respects the local occupational health and safety standards in the workplace and operates its facilities accordingly.

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### **3.2 Quality, safety and environment**

It is the policy of the maxon Group to distribute safe products worldwide. In the development, production and delivery of these products, the maxon Group puts a great importance on safety and environmental protection, as well as the use of sustainable material and environmentally friendly production processes.

maxon develops its products in compliance with the legal, regulatory and industrial standards concerning safety and health requirements.

The maxon Group is permanently committed to environmental protection, in the interest of current and future generations. The maxon Group supports environmentally responsible behavior of its employees and ensures adherence to the regulations that have been passed to protect the environment.

### **3.3 Use of artificial intelligence**

The Management Board of the maxon Group ensures that the use of AI systems within the maxon Group is carried out responsibly, transparently, in an ethically justifiable manner, and in compliance with all applicable laws.

### **3.4 Communication**

The maxon Group's dialog with its business partners (e.g. customers and suppliers), with its employees, with government bodies and supervisory authorities, as well as the media, is based on fairness, professionalism and respect.

All documents, recordings, reports, messages (including those in electronic modes of communication), etc., that are produced for internal purposes or are given or sent to third parties, have to be written with care and have to be correct and true. Misleading, ambiguous, emotional or deprecating comments are to be avoided.

Only the Management Board and the employees explicitly appointed by the Management Board are authorized to communicate with the media.

### **3.5 Responsible business partners**

It is very important to the maxon Group that its business partners (customers and suppliers) also act in an upright and socially responsible way in accordance with this code of conduct.

All business partners are requested to report any violations of this code of conduct promptly. The business partners can do so via the electronic reporting system (Legal Tegrity), which is linked on the website of the maxon Group.

## **4 Adherence to the code of conduct and reporting procedures**

This code of conduct is an inherent component of the company culture of the entire maxon Group.

Even small violations of this code of conduct by individual employees can severely affect the reputation of the maxon Group and cause major – also financial – damage. Neither the demands of customers and other business partners, nor time pressure justify the non-compliance with the code of conduct.

The individual rules are binding for all employees: Each employee shares the responsibility for ensuring compliance. All managers of the maxon Group have to ensure that the employees assigned to them follow this code of conduct. They have to set a good example themselves.

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The code of conduct cannot cover all imaginable situations. Therefore all employees have to act responsibly and use their good judgment to determine their actions. In the event of doubt, they are to request guidance. The superiors, the personnel managers, and the compliance officers are available to the employees for clarification of questions in the case of doubt.

To enforce the code of conduct and ensure compliance with laws, the maxon Group relies on being informed of any potential violations. For this reason, the maxon Group has set up the internal reporting procedure called “**inform maxon.**” All employees are encouraged to use the “inform maxon” procedure to report violations. Employees that provide information in good faith are protected against disadvantages, even if the report should prove to have been unfounded.

**Violations of this code of conduct will be consistently penalized. They have consequences for the work relationship (up to termination of the employment, in severe cases) and can lead to criminal proceedings and damage claims against the wrongdoer. When assessing employees, the managers take adherence with this code of conduct into account.**

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This code of conduct was approved by the Board of Directors on September 15, 2024, at the request of the Management Board.