



CODE OF CONDUCT

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I

INTRODUCTION

A Code of Conduct is a set of guidelines that outline the expectations and behaviors that are acceptable within Sulzer & Schmid Laboratories AG company (hereinafter referred to as SSL). It is intended to establish a standard of conduct and provide a framework for resolving conflicts and issues that may arise. The Code of Conduct is used to ensure that all stakeholders of SSL are treated with respect and dignity and that everyone is held to the same standards of behavior.

It is important to understand and uphold SSL Code of Conduct. This code serves as a guide to ensure that

we conduct our work with integrity, respect, and adherence to the highest ethical standards. By following these recommendations, we contribute to fostering a positive work environment and upholding the reputation of our organization.

The Code of Conduct is based on relevant legislation, regulations, policies, and procedures and it is based on how we as a business expect people to behave with one another. It complements but does not replace, the standards of behavior and performance required by policies, industrial agreements, and relevant legislations.

The Code of Conduct is to ensure that the values underpinning SSL are upheld, trust in SSL is assured and there is confidence in the integrity and professionalism of the service offered.

The Code of Conduct serves as a guide to all employees, contractors, consultants, and anyone associated with our company.

The values that underpin our company and our work include honesty, trustworthiness, fairness, respect, integrity, and responsibility.

II

PURPOSE

SSL operates with transparency, integrity, and honesty at all times.

The purpose of the Code of Conduct is to clarify the standards of behavior that are expected of all employees or third party providers* in the performance of their duties. It gives guidance in areas where employees or third party providers need to make business, personal and ethical decisions.

The Code of Conduct is made to create a positive and inclusive culture within SSL, by setting guidelines for behavior and promoting values such as respect, integrity, and professionalism, and to help to foster a positive and supportive environment.

The Code of Conduct is established to prevent conflicts and mis-

understandings by clearly outlining what is and what is not acceptable behavior. To reduce the likelihood of misunderstandings and conflicts arising, and to ensure that everyone is treated with respect and dignity and to hold the employees of SSL as well as third party providers accountable for their behavior, by outlining the consequences for failing to adhere to the Code of Conduct. It helps to ensure that everyone is held to the same standards of behavior.

The Code of Conduct helps to protect SSL as a company by establishing clear guidelines for behavior and holding stakeholders accountable for their

actions. This helps to prevent damage to the reputation for integrity of SSL and helps to ensure that everyone is treated fairly and with respect.

All employees and contractors/consultants are responsible for ensuring that their behavior reflects the standards set in the Code of Conduct and builds a positive workplace culture.

By following this Code of Conduct, SSL employees as well as third party provider*s can create a positive and professional work environment that supports the success of the company and its stakeholders.

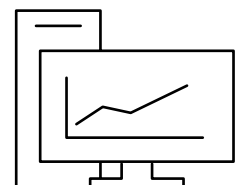
* Contractors, consultants and suppliers



RESPONSIBILITY OF EMPLOYEES AND THIRD PARTY PROVIDERS*

1. Treat others with respect and dignity, regardless of their race, gender, age, religion, sexual orientation, disability, or any other characteristic.
2. Familiarize yourself with the ethical principles outlined in our Code of Conduct. These principles, such as honesty, integrity, respect, fairness, and transparency, should guide your decisions and actions in the workplace.
3. Be vigilant in recognizing and addressing any conflicts of interest that may arise. If you find yourself in a situation where personal interests may interfere with your professional responsibilities, promptly disclose the conflict and seek guidance on the appropriate course of action.
4. Uphold the principles of fair competition. Avoid engaging in practices that hinder fair competition, such as collusion, price fixing, market manipulation, or abuse of market dominance. Maintain compliance with antitrust laws and regulations.
5. Treat others fairly and with impartiality.
6. Respect the privacy of others: do not access or use another person's computer or network resources without their permission.
7. Act with professionalism all the time, including communication, behavior, and appearance.
8. Protect company and customer data. Keep all passwords and confidential information, such as proprietary information, client information, and personal information secure, and do not share them with anyone. Emphasize the importance of protecting personal data and maintaining confidentiality throughout the Code of Conduct.
9. Act with integrity in all your actions and decisions.
10. Follow all laws and regulations. Do not use company resources for illegal activities or to access or distribute illegal or copyrighted material.
11. Maintain a professional and respectful work environment. Treat colleagues and customers with respect and kindness, and do not engage in discrimination, harassment, or other inappropriate behavior.
12. Use company resources responsibly. Do not use company resources for personal gain or for activities that do not align with the company's goals and values.
13. Keep your skills and knowledge up to date. Stay current on industry developments and best practices, and seek out opportunities for professional development.
14. Be accountable for your actions. Take responsibility for your work and behavior, and be willing to learn from your mistakes.
15. Collaborate and communicate effectively. Work closely with others to achieve common goals, and communicate clearly and openly with colleagues and customers.
16. Promote a safe and healthy work environment by following safety procedures and reporting any unsafe conditions or behaviors.
17. Follow proper procedures for reporting and addressing issues. If you encounter a problem or have a concern, report it to the appropriate person or channel. If you see someone else engaging in behavior that violates this Code of Conduct, report it immediately.
18. Do not accept and do not give gifts that can be perceived as inappropriate or that can create a conflict of interest, especially in the context of business negotiations or transactions. If you are unsure whether a gift is appropriate, consult with your supervisor or HR. As a rule, only gifts worth up to EUR 50 can be accepted.

* Contractors, consultants and suppliers





IV

RESPONSIBILITY OF MANAGEMENT AND SUPERVISORS

1 Set clear goals and expectations for team members: clearly communicate the expectations and objectives for your teams, including performance goals and deadlines.

2 Provide support and resources: provide the teams with the resources and support they need to achieve their goals, including training, equipment, and other necessary resources.

3 Promote a positive work culture: foster a positive and supportive work culture that promotes collaboration, creativity, and respect for diversity.

4 Manage performance: regularly review and assess the performance of team members, providing feedback and guidance as needed to help them meet their goals and improve their skills.

5 Lead by example: model the behaviors and values you expect from your teams, and demonstrate professionalism, integrity, and respect in all your actions.

6 Be responsive and accessible: be available to your teams and responsive to their needs, concerns, and questions.

7 Clearly state that all employees and third party providers* must handle personal data in a secure way and that this data should only be collected for legitimate business purposes.

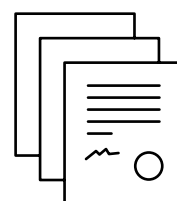
8 Specify that all employees and third party providers* must comply with relevant data protection laws or any other applicable regulations.

9 Clearly state that personal data should only be collected and processed for legitimate business purposes.

10 Explain the rights of data subjects, such as the right to access, rectify, and erase their personal data. Encourage employees and third party providers* to promptly address data subject requests and provide guidance on how to handle such requests in accordance with applicable laws.

* Contractors, consultants and suppliers

Overall, the expectations of management and supervisors are to effectively lead, support, and manage their teams, in order to achieve the goals and objectives of the organization.





V

SOCIAL RESPONSIBILITY OF EMPLOYEES AND THIRD PARTY PROVIDERS*

1 Protect the environment. Minimize the use of resources and reduce waste, and adopt environmentally-friendly practices in all business operations. Do not engage in discrimination or harassment.

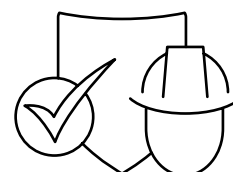
2 Support the local community. Engage with and support local organizations and initiatives that contribute to the well-being of the community.

3 Protect human rights. Respect the human rights of all employees and third party providers*, stakeholders, and individuals affected by the company's operations, and do not engage in or support any form of exploitation or abuse.

4 Be transparent and accountable. Communicate openly and transparently about the company's social responsibility practices and impact, and be willing to accept and address any concerns or issues that may arise.

By following this Code of Conduct, SSL demonstrates its commitment to being a responsible and ethical member of the community and contribute to the well-being of all stakeholders.

* Contractors, consultants and suppliers





VI

ADDRESSING VIOLATIONS

1 Report the violation: all employees and third party providers* are obliged to report any violations of the Code of Conduct as soon as possible. This can be done through a confidential reporting or through a manager or human resources representative.

2 Investigate the violation: a thorough investigation of the reported violation must be done. This may involve collecting witness statements, reviewing documentation, and speaking with the employee who is alleged to have violated the code.

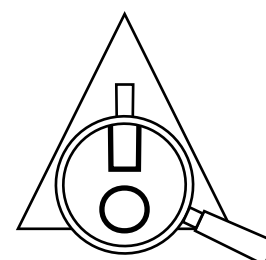
3 Determine the appropriate action: based on the findings of the investigation, the appropriate action must be taken. This may include disciplinary action, such as a warning or termination, as well as additional training or counselling.

4 Communicate the outcome: the outcome of the investigation and any resulting actions must be communicated to the employee who is alleged to have violated the code, as well as any relevant parties.

5 Follow up activities must be continued to ensure that the employee has understood the consequences of the violation and to prevent any future violations.

It's important to ensure that this process is fair, consistent, and transparent, and that it adheres to any relevant laws or policies. It's also important to provide support and resources for employees and third party providers* who may be struggling to adhere to the code of conduct.

* Contractors, consultants and suppliers





VII

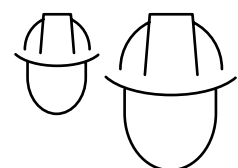
IMPLEMENTATION METHODS

1 By cooperating with SSL, subcontractors automatically accept the provisions of the Code of Conduct. The document will be delivered to them during signing the cooperative agreement.

2 The Code of Conduct is distributed to employees, third party providers*, anyone associated with our company via an online platform and in printed form. No objection in writing automatically means acceptance of the Code of Conduct.

3 Management is committed to continuously inform and reinforce the Code of Conduct through various channels such as newsletters, intranet updates, or training sessions as well as remind employees and third party providers* of their responsibility to read, understand and follow the Code.

* Contractors, consultants and suppliers





About Sulzer & Schmid Laboratories AG

Since its creation in 2016, Sulzer Schmid is at the forefront of innovation in the energy service sector. With its UAV technology and sophisticated data analytics platform the company helps customers digitalise blade inspections

by producing high-quality and consistent visual inspection data. The cloud-based 3DX™ Blade Platform offers transparent asset management for wind turbine rotor blades based on data analytics and digital applications, providing

actionable insights to optimise performance of renewable energy assets. Sulzer Schmid has been performing wind turbine inspections world-wide, affirming its position as a highly experienced expert technology partner.