

# **Directive**

## **Swisslog Supplier Code of Conduct**

### **Swisslog Group**

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## 1. Introduction

At Swisslog Logistics Automation, including its subsidiaries (“Swisslog”), we are committed to operational excellence, ethical and responsible conduct, fair and respectful treatment of all individuals, and practices that promote safety, health and environmental protection.

Swisslog’s business is based on close, long-term relationships with customers, suppliers and other business partners. With this Supplier Code of Conduct, we therefore communicate to our suppliers to expect them to operate as Swisslog, in accordance with internationally recognized standards on Human Rights, Labor Rights, Environment and Anti-corruption.

We expect our suppliers to communicate the principles laid out herein to their subcontractors and sub suppliers.

## 2. Human and labor rights

### 2.1 Child Labor

At Swisslog, we expect our suppliers to prohibit and refrain from any kind of child labor within their organization.

### 2.2 Forced Labor

At Swisslog, we expect our suppliers to prohibit any kind of forced labor or human trafficking in their organization and any contribution to it.

### 2.3 Human Rights

Swisslog supports internationally recognized human rights and we will comply with all applicable laws regarding the treatment of our employees and other stakeholders. We insist that our suppliers also uphold these principles and we are committed to working with all suppliers and other partners as they undertake similar assessments of their own business and develop their own approach to respecting human rights.

### 2.4 Diversity & Inclusion

Swisslog believes in recognizing and valuing our differences to deliver superior results. Bringing together people of different races, gender, education, language, viewpoints, skill sets and experience enables ideas and innovation to flourish. Swisslog expects its suppliers to be inclusive and to ensure that their employees and other stakeholders are always treated with dignity and respect. Swisslog expects its suppliers to prohibit discrimination or harassment against anyone based on an individual’s: ethnic descent or national origin, race or color, religion or ideology, gender, sexual orientation, gender identity and/or expression, age, disability, political or union affiliation, veteran status, citizenship, maternity, or marital status.

### 2.5 Wages & Hours

Suppliers must follow all applicable laws regarding working hours, wages and overtime pay. Workers must be paid at least the minimum legal wage or a wage that meets local industry standards. Suppliers should conduct operations in ways that limit overtime to a level that ensures humane and productive working conditions. Suppliers must pay overtime and any incentive rates required to meet standards. Hourly wage rates for overtime

should be higher than the rates for the regular work shift. Workers should receive necessary time off, paid annual leave and holidays, as required by local laws.

## **2.6 Freedom of Association**

The right to freedom of association, to bargain collectively and all other workplace rights of employees must be respected by suppliers. Employees should be able to choose whether or not to join a union and should not be subject to discrimination based on that choice.

## **3. Environmental protection**

At Swisslog, we expect our suppliers to comply with all applicable national laws, regulations and standards to protect the environment. Our suppliers are expected to establish and maintain a suitable environmental management system (e.g., in accordance with ISO 14001, or national equivalent) to minimize environmental impact and hazards, and to improve environmental protection in their everyday operations.

## **4. Occupational health and safety**

It is Swisslog's responsibility to ensure the safety of our products and installations, and the safety of the job sites under Swisslog supervision. We adhere to plant and industrial safety laws, regulations and standards, and we maintain and observe appropriate safety and quality policies, processes and organization. We immediately report and correct a threat to product, plant, employee, or site safety. Suppliers must comply with all applicable laws regarding working conditions. This includes worker health and safety, hygiene and sanitation, fire safety, risk protection and electrical, mechanical and structural safety.

## **5. Conduct in business environment**

### **5.1 Active bribery**

Swisslog forbids any engagement in corrupt practices to advance Swisslog's business interests. We do not offer or grant any improper monetary or other personal advantage to public officials, or to employees or agents of customers or business partners, in order to obtain or retain business or another advantage for Swisslog. We do not kick back any portion of contract payments to public officials, or to employees of the other contracting party.

### **5.2 Indirect payments**

Payments made to agents, consultants, sales or other intermediaries shall represent an appropriate, contractually defined remuneration for legitimate services rendered by such business partners. We do not utilize intermediaries to channel payments to public officials, or to employees or agents of customers or business partners. We maintain records of all our transactions with business partners, including their names, terms of contract and payments made, which allow the later verification that their services have been performed as requested.

### **5.3 Gifts and entertainment (including travel)**

Occasional gifts, entertainment and expenses offered or granted must be limited to reasonable, socially customary expenditures that cannot, in effect or in perception, influence the judgment and decision of a public official, or of an employee or agent of a customer or business partner. Cash may never be offered or granted.

## 5.4 Anti-Counterfeit

Swisslog strives to ensure that all of its products are of the highest quality and reliability. Suppliers have a responsibility to know the origins of all parts and materials and to ensure their authenticity. Suppliers must respond to requests for information regarding the source of any parts or materials.

## 5.5 Personal Data & Privacy

Swisslog is committed to protecting the privacy and personal data of our employees and customers. We adhere to the General Data Protection Regulation (“GDPR”) within European Union and the European Economic Area. Additionally, Swisslog ensures that when collecting or transferring personal data, the local laws, Swisslog Data Privacy Policy and Swisslog security requirements are followed. Suppliers that handle employees’ and customers’ personal data must comply with all regulatory requirements and must meet Swisslog security standards prior to handling the personal data.

## 5.6 Anti-competitive arrangements

Prohibited are agreements or concerted practices with business partners or competitors which have as their object or effect the prevention, restriction or distortion of competition. Prohibited in particular are discussions and arrangements with competitors on:

- negotiated and rigged bids (e.g. arrangements with other bidders on pricing, conditions, scope of supply)
- the allocation of tenders (public or private)
- the allocation of projects and of contracts
- the sharing of customers, markets, or territories
- agreements on prices, price mechanisms, price strategies and other conditions offered to customers
- arrangements not to compete for competitors’ customers or installed base
- arrangements for the exchange of information sensitive in relation to competition (prices, orders and sales data, customers, projects, etc.).

We do not talk with competitors about projects, tenders, bids, customers, prices, orders, profits and profit margins, or other sensitive and not purely historical information. We reject such discussions started by a competitor or within a trade association.

## 5.7 Preventing conflicts of interest

In our suppliers’ business dealings with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence our suppliers’ decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties. Suppliers must do business in a way that is open, transparent and with the highest integrity. There is the potential for a conflict of interest if a supplier’s employee or his or her family member has a close relationship with a Swisslog employee who can make decisions that will affect the supplier’s business. For that reason, the supplier must disclose these types of relationships to Swisslog before entering negotiations and whenever they arise.

The supplier should notify Swisslog if any of its employees or its employees’ family members work for Swisslog, have a financial interest in Swisslog, or have any kind of past or present business relationship with Swisslog. To better ensure that such notifications occur, suppliers should have policies regarding conflicts arising from personal relationships and the giving and receiving of gifts and other business courtesies.