

Code of Conduct

Commitment of SUTER INDUSTRIES

1 Our Mission

- *cl.* 1 SUTER is a company which is engaged in development, design and manufacture mainly of engines, powertrains, motorcycles and components for high-end applications.
- cl. 2 In addition, SUTER provides customized design and engineering for its customer.
- *cl. 3* Through our vision & capability we aim to enrich our customers with extraordinary solutions.
- *cl.* 4 Our passion is always finding the best ratio in power density.
- *cl.* 5 The following principles guide our company and employees:

2 Business Ethics

- *cl.* 6 SUTER respects and complies with the laws, rules and regulations of the countries in which we are doing business in accordance with strict business ethics. We do not engage in any conduct that impedes fair and open market competition.
- *cl.* 7 As a worldwide active supplier of high-end developments and products, we adhere to applicable export control regulations.

3 Respect for Individuals

cl. 8 SUTER respects the character and individuality of each person. Trust, mutual respect and cooperation are essential parts of our corporate culture. We respect the personal dignity, privacy and personal rights of our fellow employees and do not tolerate either discrimination, harassment, or offense.

4 Environment

cl. 9 We are committed to continuously reduce environmental impact and conserve natural resources by minimizing waste and emissions, improving energy efficiency, reusing and recycling materials, and the use of water, land and other resources in a responsible manner.

5 Quality Management, Health and Safety

cl. 10 SUTER holds the ISO9001 certification and complies with other applicable regulations. Thus, we maintains a process-oriented quality management system and systematically reviews in order to measure progress and achieve continuous improvements. We conduct our operations in accordance with all applicable environment, health and safety laws and regulations. We design and equip our products for safe operation and operator intervention to prevent events that could have an adverse impact on people, property, and the environment.

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6 Anti-Corruption and Bribery

cl. 11 SUTER does not tolerate bribery or corruption or other corrupt behavior and is committed to complying with all relevant national and international anti-corruption laws (e.g. Foreign Corrupt Practices Act) when providing services. In connection with the provision of services, SUTER shall not offer, promise or grant, directly or indirectly, any unlawful payments, benefits, gifts or other pecuniary advantages to public officials or other private or public decision-makers or other business partners, or otherwise unlawfully influence their decision-making.

7 Conflicts of Interest

cl. 12 We only make business decisions in the best interest of SUTER. We anticipate and avoid situations where our business decisions might be affected by personal relationships, benefits to family members, our own financial interests, voluntary work, secondary employment, political interests, or other private interests. We assess ourselves whether we can avoid or resolve a conflict of interest. If we cannot avoid or resolve it, we disclose the conflict before it affects our business decisions. As employees, we can disclose a conflict to our superior and the HR department.

8 Free and Fair Competition

- *cl. 13* SUTER complies with all applicable competition laws and are committed to support fair, free, undistorted, and effective competition. We are committed to a well-functioning competition which is fundamental for growth and employment and ensures innovation and best prices in the interest of all market players and the final consumer.
- *cl. 14* SUTER does not participate in illegal exchanges of competitively sensitive information. We do not participate in cartels (price fixing, allocation of markets or customers, etc.) and do not engage in an abuse of market power.
- *cl.* 15 We remove and distance ourselves from conduct that violates competition laws.

9 Compliance with Provisions of Foreign Trade Law

- *cl. 16* SUTER ensures compliance with the relevant national and international foreign trade legislation and customs regulations, such as the applicable laws on the import and export of goods, services, technologies, software and information, as well as embargoes and other sanctions.
- *cl. 17* We undertake to comply with the relevant requirements of national and international customs and foreign trade law that are necessary for compliance with the relevant customs and foreign trade law on importation (for example, official permits to be obtained or existing reporting obligations).

10 Data Protection and Privacy

- *cl. 18* We ensure the proper use and protection of personal data and privacy and thus subordinate ourselves to the applicable data protection directives. We collect and process personal data carefully and responsibly and only for legitimate purposes. We protect personal data against loss, modification, and unauthorized use. We respect everyone's privacy.
- *cl. 19* In case of doubt about the proper collection and processing of data, we ask the Data Protection Department for advice. We immediately inform our Data Protection Department in case of any data breach involving personal data.

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11 Release & Change Log

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