



SPT Group
Code of Conduct

Principles

At SPT, we push the limits of what is doable in ceramics to enable advances in medical devices and high-tech manufacturing.

Our organizational roots extend back over a century, marked by dedication to quality, reliability, and precision. To ensure we continue delivering to the highest standards, our organization consists of highly motivated people, who share a fascination with advanced technology and are all bound by a set of common principles.

Our Code of Conduct serves as the compass by which we navigate our professional activities. It guides us in our daily behavior and applies, without exception, to all employees and business associates.

We believe that how we work is as important as our results. Adherence to our principles is the foundation upon which the long-term success of our company is built. We expect all our employees to fully familiarize themselves and follow the Code of Conduct and will not tolerate misconduct.

We thank you for your continued commitment to delivering on our mission.



Andreas Tönnis
CEO SPT Group

- 1. We treat people respectfully and fairly**
- 2. We minimize risks to health and safety**
- 3. We protect the environment**
- 4. We are an ethical business partner**
- 5. We safeguard company's interest**

When in doubt ask yourself

Is my conduct compliant with SPT values?

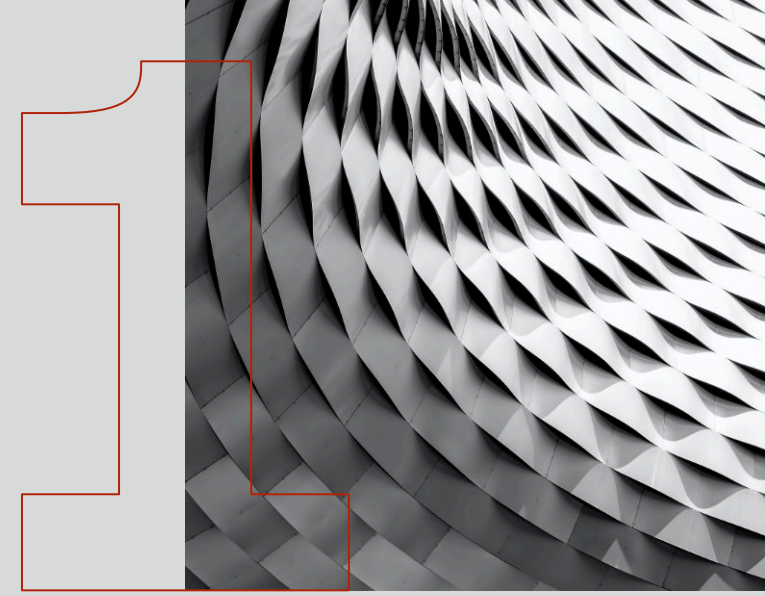
How will my conduct impact others?

Would my colleagues, customers, business partners and suppliers think that my conduct was OK?

Would I be comfortable if someone treated me the same way?

How would I feel if my conduct was made public?

We treat people respectfully and fairly



Fair working conditions

We ensure fair and ethical working conditions for all our employees. All work is voluntary, and all our employees are free to leave work at any time or terminate their employment. We do not engage in bonded, forced or child labor.

We provide our employees with fair wages based on their function, performance, and ethical conduct, in compliance with all applicable wage and labor laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Inclusion and respect

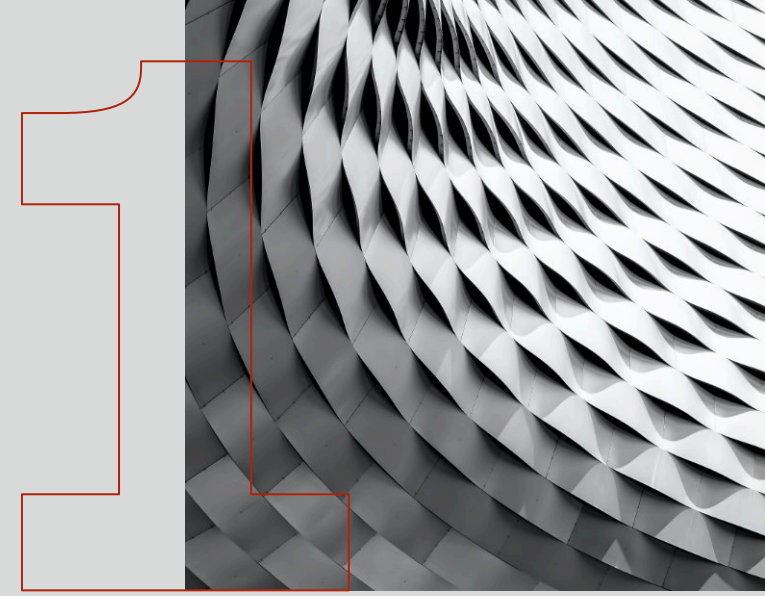
We serve our customers globally and believe a diverse workforce is critical to our success. We aim to attract, develop, and retain talented people with inclusive mindsets, independent of their background.

We treat all our employees respectfully and fairly, independent of ethnicity, age, gender, sexual orientation, or disability.

We treat each other with respect.

We do not tolerate any form of violence, harassment, abuse, coercion, or threats.

We treat people respectfully and fairly



Freedom of speech and association

We respect the right of every person to join an association, provided that local law is respected.

We recognize the right of every person to freedom of opinion, expression and speech, provided it does not interfere with their job responsibility or conflict with this Code of Conduct or any applicable laws and regulations.

We encourage our employees to openly communicate with management any ideas and concerns regarding working conditions and management practices.

Human rights

We strive to ensure that activities within our sphere of influence do not negatively impact fundamental human rights, as set out by the United Nation's Bill of Rights and the core conventions of the International Labor Organization, either directly or through our business relations.

We minimize risks to health & safety



Safety mindset

We systematically identify and manage health and safety in our activities.

We proactively foster and encourage a strong culture of safe behavior. Ensuring safety is an integral part of everything we do. Each of us is responsible for acting in a way that protects ourselves and others.

Safe products and services

We develop our products with human beings in mind and are dedicated to the delivery of safe, high-quality products and solutions to a wide range of markets.

We protect the environment



Environmental protection and safety standards

We follow environmental protection standards. We obtain approvals, maintain permits, and follow reporting requirements according to local rules and regulations where we operate.

We proactively manage waste, hazardous substances and air emissions to minimize negative environmental impact and ensure safe handling, storage, use, and disposal in line with established management standards and good practices.

Energy consumption and greenhouse gas emissions

We invest in methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

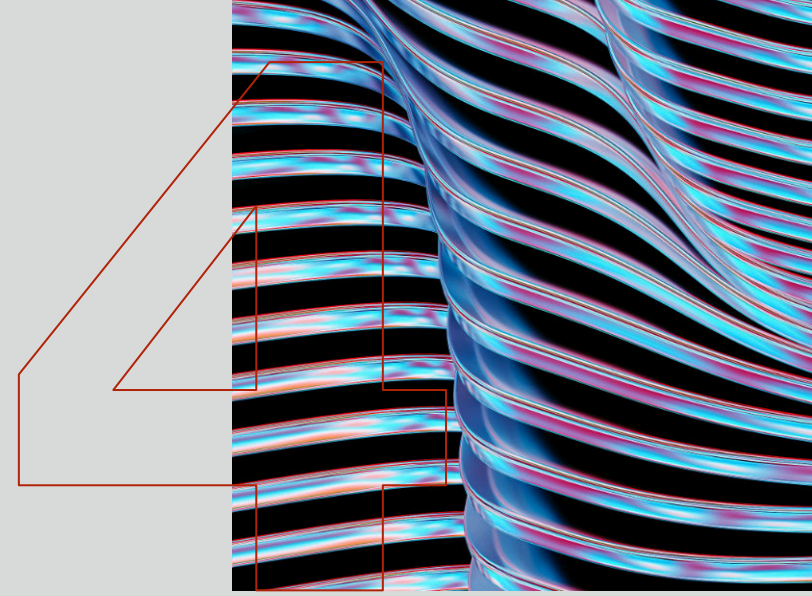
Pollution prevention and resource conservation

We make efficient use of natural resources and minimize the environmental impact of our activities using the renewable energy, recycling and reducing water consumption.

We invest in the development and use of environmentally friendly technologies in our operations.

We develop our products and services to minimize the environmental impact over their life cycle.

We are an ethical business partner



Commitment to all laws and regulations

We comply with all laws and regulations applicable to our activities.

Anti-bribery and corruption

We do not tolerate any form of bribery or corruption. We do not bribe any public official or private person and we do not accept any bribes.

Fair market practices

We are committed to fair competition and will not breach competition laws and regulations.

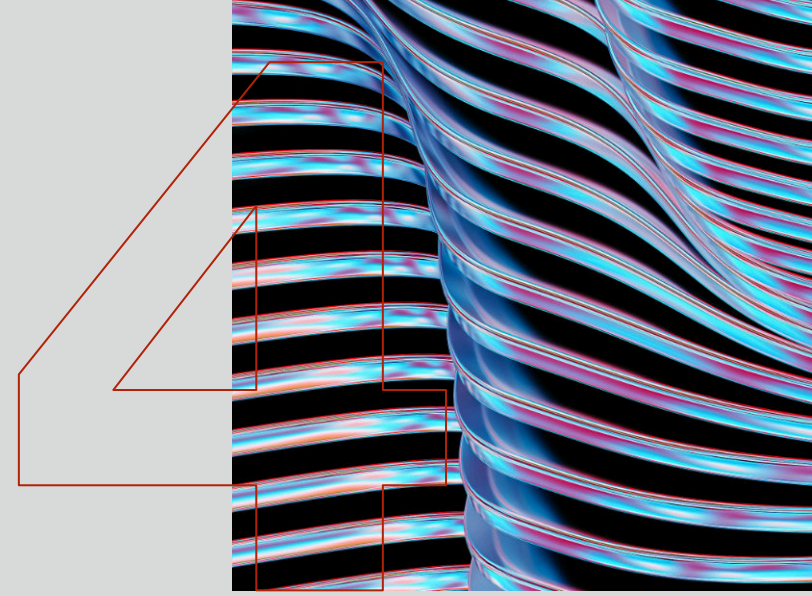
We market and sell our products in compliance with all applicable rules and regulations.

We respect our customers and business partners and treat them fairly.

Data protection

We respect the privacy rights of our employees, customers, suppliers, and other stakeholders. We inform individuals of collection and processing of their personal data, allowing them to make informed decisions and exercise their rights. We collect and process personal data for specific and legitimate business purposes only and secure such data against unauthorized access.

We are an ethical business partner



Third party integrity and supply chain responsibility

We expect all our business partners to comply with the law, to adhere to ethical business practices, and to observe requirements concerning labor, health, safety, environmental protection and management systems.

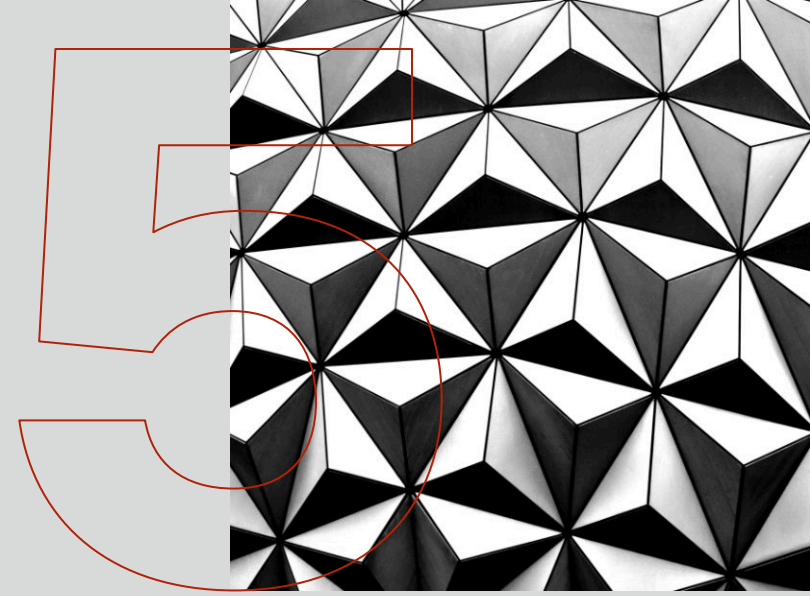
Conflict of interest

Personal interests must not influence our business judgment or decision making. Employees must disclose actual or potential conflicts of interest to their manager.

Responsible sourcing of minerals

We exercise due diligence on the source and chain of custody of the tantalum, tin, tungsten, and gold to assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

We safeguard company's interests



Financial integrity

We do not compromise our financial integrity. Financial risks and operational measures must be appropriately reviewed and approved.

We provide timely, accurate and complete financial information to our shareholders. We maintain effective controls over financial reporting to ensure a complete and accurate record of our financial transactions.

Business continuity

We believe that business continuity is critical for our customers, business associates and other stakeholders, and is part of responsible management practice. In the event of an emergency or significant business disruption, we are committed to doing our utmost to ensure uninterrupted supply of key products and services.

Company's assets

We properly use and maintain our assets ensure that they are protected from misuse, loss, theft, and waste.

Company assets must be used for legitimate business purposes. Personal use of Company assets is discouraged, but where permitted, should be kept to a minimum and must not have an adverse effect on productivity and the work environment.

Intellectual property and Information security

We protect our investments in the know-how by obtaining, enforcing, and defending intellectual property (IP) rights. We also respect legitimate IP rights of others.

We protect the confidentiality, integrity, and availability of critical information, regardless of its form and location.

Misconduct

Misconduct is any conduct that violates this Code of Conduct, or external law or regulation, or other company policies.

Engaging in misconduct or encouraging or permitting others to do so, exposes our Company to liability and puts our reputation at risk.

Misconduct will not be tolerated and can lead to disciplinary action up to and including termination of employment.

How to report potential misconduct

All employees are required to bring potential misconduct to the attention of SPT.

Employees or business associates who report potential misconduct or who provide information or otherwise assist in any inquiry or investigation of potential misconduct will be protected against retaliatory action.

Employees with knowledge of potential misconduct, either direct or received through a report of misconduct, must notify the Compliance Officer (CO) or report the issue via one of the other channels described below without further disseminating the information.

Associates can report potential misconduct to the CO in person or by letter, fax, direct phone, e-mail or through confidential hotline. The options for reporting are:

- The CO at compliance@spt.net
- The supervisor
- The Human Resources representative
- The Country Managing Director



Applicability

SPT Code of Conduct, which was approved by SPT Board of Directors in June 2023, is to be implemented by all affiliates of the SPT Group. It is applicable to all operations of the SPT Group.

Switzerland HQ

SPT Roth AG
Werkstrasse 28
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Switzerland

Singapore

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Development Zone
Wuxi, Jiangsu
P.R. China 214072

Philippines

No. 30 Philexcel Business Park M.A.
Roxas Highway
Clark Freeport Zone 2023
Philippines

Japan

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