



Interroll **Code of Conduct**

How we do business



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Foreword

Dear colleagues,

As a global player with a tradition of over 65 years in business, Interroll has an ecological responsibility towards the environment and a social responsibility towards its customers, partners, employees, investors, and the public. It is part of our corporate social responsibility that we comply, always and anywhere, with applicable law, respect ethical principles, and act as a role model when we act on behalf of Interroll.

Our strategies and activities are guided by laws and regulations based on – amongst others – the International Bill of Human Rights, Core Labor Norms of the International Labor Organization and the UN Convention against Corruption. We also strive to advance in social objectives aiming for an egalitarian and sustainable network. This is part of our DNA and cemented with the commitment we gave as a signatory of the United Nations Global Compact.

Each of us has this responsibility when acting on behalf of our company, from members of the Group Management to executives and every individual employee.

This Code of Conduct serves as a guideline to help us live up to this responsibility. It covers legal requirements, governmental regulations, essential aspects of internal company guidelines and policies, and the principles of responsible corporate governance. All of which apply to the interactions of our employees among each other and with business partners, shareholders, authorities, or the public. It serves us to make good and lawful decisions. But it also does more than that. It builds upon our shared values. That's why we count on every employee regardless of the hierarchical level to follow our Code and make decisions that will preserve the trust that our stakeholders have placed in us.

The Code of Conduct cannot describe every situation you may possibly encounter. Therefore, we expect you to take on personal responsibility, to demonstrate ethical behavior by complying with all applicable laws, international standards, and our internal company guidelines at all times.

Every employee is an ambassador of our brand. All employees' conduct and actions are perceived as representative of Interroll. We all contribute to sustain the positive image of Interroll, and in turn our social and economic success, through our work and our behavior. In doing so, executives and managers are role models for their team members, supporting them in all questions regarding compliance with legal regulations and this Code of Conduct, and helping them always to act with integrity.

We kindly request that you take the time to read and understand the content of this Code of Conduct and make use of it a guideline for your everyday behavior and actions.

📍 **Sant'Antonino, Switzerland,**
July 2026

Paul Zumbühl
CHAIRMAN OF THE BOARD OF DIRECTORS

Markus Asch
CHIEF EXECUTIVE OFFICER



Legal Compliance

Interroll conducts business responsibly and in compliance with all legal requirements and governmental regulations of the countries in which we operate. This Code of Conduct incorporates globally binding guidelines and acts as a constant guidance to all our employees and business partners on how we conduct ourselves and our business. Leaders set examples; therefore, executives and the entire group management are ambassadors of this Code of Conduct and role models for their team. We expect this document to be a clear form of our constant pledge to be accountable for our actions and always act with integrity.

Every employee represents Interroll, which means an individual employee's misconduct can affect the company's reputation and lead to significant (financial) damage. There is no tolerance towards willful misconduct, and it is investigated thoroughly. Managers especially are expected to be familiar with the fundamental laws, regulations, and corporate policies that are relevant to their areas of responsibility.

Misconduct can almost always be avoided if you seek advice early on. If you are unsure about what requirements exist or whether your conduct is legally and ethically unobjectionable, we expect you to discuss the matter with your supervisor, HR, the Local Compliance Coordinator or the Director Corporate Integrity.

Any Employee may be confronted with legal or ethical concerns in their everyday work. In such an event, the following questions can assist you in the decision-making process:



Does my decision comply with our company's fundamental principles?



Am I convinced that my decision is legal and does not violate any applicable law?



Am I convinced that my decision is in the best interest of Interroll?



Will my decision hold up to public scrutiny?



What impression would it make as a newspaper headline?



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Prohibition of Forced and Child Labor

Interroll acts with integrity in its business and business relationships. Hence, we are committed and abide by the standards set out by the International Labor Organizations (ILO) in all of our business activities. We also demand all parties - including ourselves and partners - to aid in the elimination of all forms of forced and child labor by implementing appropriate measures and control mechanisms.

The commitment towards the prohibition of forced and child labor is a fundamental part of our ethical and legal framework. We expect all individuals associated with our organization to uphold these principles.

We stand firm in our dedication to maintain an ethical and transparent supply chain and to create a workplace and business environment that is free from any form of forced and child labor, ensuring the dignity and freedom of all individuals. In cases where international standards differ from the local laws, Interroll operates based on the higher standards.

Remember:

- Be vigilant when engaging with third parties.
- Maintain proper documentation from all third parties and suppliers.
- Always speak up if you notice any unethical or human rights violation.
- Your decisions reflect on the company, so be an ethical leader.
- Managers must comply with all Interroll-established or legally required limitations on minimum hiring age.



There is a rumor that one of our suppliers is under investigation following allegations of forced labor even though previous site visits give no reason to believe the rumor. Should you ignore the rumor?

- Always remember, Interroll condemns forced labor.
- The rumor should be investigated and brought to the attention of the Group Compliance.
- Contact the alleged supplier directly and request for more information.
- Arrange verification of supplier claims. In an event of non-compliance, explore scope of improvement.
- Develop a corrective action plan.
- Severe non-compliance with no immediate actions for improvement should result in termination of the relationship between Interroll and the supplier.



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Non-discrimination and Respect

Interroll complies with internationally acknowledged human rights set out by the United Nations (UN) and the International Labor Organizations (ILO) and respects its employees' rights and dignity in all operating locations. Hence, we are committed to create a work atmosphere characterized by respect and mutual trust that is free from harassment. We condemn any form of sexual harassment, physical or verbal abuse. Furthermore, our hiring activities solely rely on the talent of the individual and their capability of performing at the job.

Our employees represent the success of the company and in order for each employee to be able to contribute their skills and strengths, an inclusive culture is maintained and expected from all employees. We're one team, where we represent many ideas, experiences and backgrounds.

Interroll is committed to an efficient and safe process for reporting infractions. Any individual that believes an incidence of harassment has taken place, should report this through the integrity line knowing that it will be investigated swiftly and without prejudice.

Our Commitment:

- We hire, retain and promote based on qualifications, skills, achievements and other merits.
- We have zero tolerance for unwanted verbal or physical conduct.
- We personally commit to the success and wellbeing of teammates.
- We believe in championing the strengths of our differences.



Interroll's expectations from its employees in the workplace:

- Adhere to internal regulations governing respect for fellow colleagues.
- Lead by example regardless of your role.
- Show appreciation when colleagues/employees do well.
- Promote a climate that is fair, supportive and responsive.
- Always be self-aware and treat others the way you would like to be treated.
- Report instances of harassment to your manager, HR, Legal and Compliance, any member of management, or via the integrity line.



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Working Hours, Wages and Benefits for Employees

Interroll pays fair wages for labor and adheres to all applicable working hour regulations, wage and compensation laws globally. Our compensation systems are consistent and transparent. We pride ourselves on being an innovative workplace leader that provides safe and rewarding jobs, fair wages and benefits as well as unique opportunities for all employees. We strive to create a working environment that encourages collaboration, teamwork and free communication as we acknowledge that our success is built on the dedication and wellbeing of our workforce.

We believe that our employees should have access to benefits that promote their health and wellbeing. We provide our employees with health insurance, paid time off, and parental leaves. We also offer other benefits such as flexible work arrangements, on-site amenities, and professional development opportunities.

We also recognize the legal rights of workers to form or join existing trade unions and to engage in collective bargaining. We have a culture of trusting constructive collaborations with applicable employee representatives. We expect all employees to adhere to our policies and will take disciplinary action for any violations.

We also express the importance of labor practices in our committed Supplier Code of Conduct to ensure human rights practices throughout our supply chain.

Remember:

- Uphold honesty and integrity when utilizing company-provided benefits and resources.
- Be informed of company guidelines regarding overtime.
- Notify supervisors about any issues affecting working hours, such as unexpected emergencies or personal constraints without delay.



Our Commitment:

- We pay fair wages and on time.
- We are committed to equal employment opportunity.
- We comply with global standards and local laws regarding compensation and remuneration.
- We strive to be the preferred employer among our industry.
- We promote long-term employability by future-oriented training and supportive programs.
- We encourage employees to take advantage of benefits provided to them.



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Our Commitment:

- We assess workplace risks and hazards and eliminate unsafe and dangerous conditions immediately.
- We do not expose ourselves or our colleagues to unnecessary hazards through reckless behavior.
- We offer safety training to all employees.
- We have a workplace safety policy that outlines the company's commitment to safety.



Health & Safety of Our Employees

Interroll continuously strives to offer all its employees and stakeholders a safe and healthy state-of-the-art working environment in accordance with the applicable statutory and international standards. Our aim is to attain true excellence, with reaching zero injuries and work-related illnesses through our occupational health & safety management system. All employees are provided with training to ensure they are up to date with all health & safety issues including noise and they should strictly observe safety regulations established for their work location. This also applies to all external staff working at any Interroll site.

The health of our employees is catered via support programs in order to maintain a productive and healthy work environment. We consider the wellbeing of our employees as a top priority.

Every employee is personally responsible for safety, security, health and environmental protection at the workplace to the full extent required by their duties and to the best of their knowledge, ability and experience. We are all encouraged to identify areas for improvements and continuously work towards improved safety and a better environment.



Interroll's expectations from its employees:

- You familiarize yourself with our safety rules and take responsibility for yourself and everyone around you.
- You make sure not to introduce unnecessary health and safety risks at the workplace; internally and externally.
- You take responsibility for the safety of our visitors and colleagues.
- You try to recognize improvements in health and safety conditions to raise awareness.
- You abide by the rules defined by the Interroll Group in every Operating Unit.
- You acknowledge Health & Safety is part of your daily business.



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Grievance Mechanism

Interroll is aware that there may be times when employees need to file an official complaint about unjust concerns in the workplace, hence, we establish a personal grievance mechanism in each of our locations. In addition to the Integrity Line, the grievance procedure provides employees an opportunity to bargain and voice a grievance or complaint at the workplace. It is important for us to provide a safe space for our employees to be able to raise their concerns. This is an added measure to ensure our commitment towards providing a safe and respectful workplace for all employees.

Every employee should have the right to submit a grievance without fear. The grievance should be dealt with by the immediate manager. If local grievance mechanisms fail, we provide employees, who approach the Interroll Compliance Office protection under the whistleblowing umbrella.

Interroll encourages all its employees to resolve minor disputes with the help of a manager and a HR department representative. If the informal complaint is not fairly and constructively resolved, employees may file a formal grievance in the Integrity Line. We expect all employees to use the grievance mechanism in a respectful and professional manner.

Our Commitment:

- We treat all parties involved fairly.
- We adhere to a no-retaliation policy when employees file a complaint.
- We accept and investigate all appeals.
- We organize mediation meetings with the involved parties.
- We ensure a final agreement is reached and implemented.
- We maintain confidentiality.
- We maintain accurate records.



An employee experiences a grievance at work, what is Interroll's expectations from this employee for grievance mechanism:

- You should raise the grievance as soon as possible.
- You should provide evidence when applicable.
- You can invite a representative from the workers council to accompany you at any stage throughout the grievance procedure.

Employer's role in Grievance Handling:

1



Assure that it is a safe space and will not result in the employee being excluded in the workplace.

2



Be fair in evaluating the situation.

3



Record in writing the points of discussion and the agreement that has been reached.

4



Ensure that all parties are given a fair hearing.



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Remember:

- Be acquainted with internal rules that prohibit bribery.
- Exercise caution when giving or receiving gifts and things of value in all places we do business.
- Any breach of anti-corruption law is a serious offence and can cause material damage to the company and the employee.
- Keep accurate and comprehensive records.
- Report any request for or offer of a bribe to your supervisor.



Anti-bribery and Anti-corruption

Corruption and bribery in all of their forms are completely contrary to our business standards and we tolerate no form of corruption or bribery. We do not grant, offer or promise anything of value to a government official or any business partner to influence official action or to obtain an improper advantage. We act with integrity in all our business dealings and comply with all applicable laws in our unwavering commitment to combating corruption and bribery in all aspects of our operations.

Employees of Interroll, or any third party acting on behalf of Interroll shall not solicit, offer, make or authorize a payment or anything of value to influence a business decision, secure an improper advantage, and/or persuade any officials or employees of another company to act contrary to, or neglect to perform, their duties.

We work diligently to build and maintain business relationships with stakeholders, who share our commitment to conduct business in compliance with the law and in accordance with the highest ethical standards. Consequences for violating anti-bribery laws are increasingly harsh. This is as true for individuals as it is for corporations. Employees found guilty of corruption or bribery may face legal consequences.



What are the standard guidelines for gifts?

- No gift in cash or a cash equivalent is allowed.
- Gift-giving should always be transparent – do not send gifts to home addresses.
- A gift may be accepted as long as it is predominantly business-oriented and previously discussed, for example, transport to a business meeting.
- Each location defines an approval chain according to the [Gifts and Entertainment Policy](#).
- A gift that can influence your decision must not be accepted and the incident must be reported to the Group Compliance.
- A gift to a political exposed person or government official is prohibited.



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Remember:

- Do not disclose insider information or provide “tips” in any way.
- Do not influence or counsel any person or company to execute transactions in securities about which you have insider information.
- Do not trade securities based on insider information yourself or through any related parties of yours.
- Contact the Director Corporate Integrity when you are aware of insider trading.



Insider Trading

As a listed company, Interroll is subject to strict regulations of the capital market laws, which prohibit, among other things, insider trading by our employees. We are committed to upholding transparency, fairness, and trust in all financial transactions, and we expect our employees to adhere to these principles without exception by avoiding any actions that would constitute insider trading.

Insider information is “material non-public information” information about Interroll which should remain confidential until it is properly disclosed to the public, such as in an ad-hoc or press release, newspaper, or on our external website. The defined insiders should respect blackout periods announced by corporate finance whenever notified.

As provided by law, insider information must not be misused. Employees must handle insider information received during the course of their work with caution. Non-compliance may result in disciplinary measures and penalties.



You and your colleague overheard critical non-public information about the half-year sales of the company which could affect the company’s stock price. You two meet a common friend later in the evening, who already has shares in Interroll and discuss investments and stock prices. How should you behave after knowing non-public information?

- Stop the conversation as soon as you are aware of the potential exchange of insider information.
- Remind your colleague about the legal and ethical implications of his actions.
- In case of non-compliance report the incident to the Director Corporate Integrity.
- You should display the importance of upholding the highest ethical standards in and out of the workplace.



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Responsible Minerals Sourcing

Interroll is committed to ethical business conduct and responsible sourcing. We participate in industry initiatives to support human rights and to validate that the minerals and raw materials used in our products do not contribute to conflict or originate from conflict-affected and high-risk areas. Responsible sourcing is core to our business model. Therefore, we comply with applicable laws and regulations such as the European Conflict Minerals Regulation as well as international standards wherever Interroll operates.

We believe acting ethically is simply the right thing to do. Our values, including the responsible sourcing of the minerals used in our products, are principles that extend to our suppliers. We work closely with suppliers to source minerals from ethical sources as we rely upon them to identify the sources of Conflict Minerals and minerals of concern and to declare the Conflict Mineral status.

A committed [Supplier Code of Conduct](#) is available for our suppliers with detailed compliance rules to ensure a sustainable supply chain.

Our Commitment:

- We ensure due diligence.
- We collaborate with our suppliers to maintain all ethical standards.
- We aim to act as an advocate for responsible supply chain practices within our industry.
- We ensure our employees, especially those responsible for purchasing are trained in this regard.
- We aim to regularly review our best practices and make improvements where needed.



As a purchaser in Interroll, you have been made aware by a third party that one of the suppliers has not declared the Conflict Minerals status. What should you do:

- You should immediately investigate the issue.
- Report the issue to your supervisor.
- Closely work with the supplier to assess any risk and find a reasonable solution.
- You should document all relevant information regarding the incident.
- Severe non-compliance with no actions for improvement will result in termination of the relationship between Interroll and the supplier



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Conflicts of Interest

Interroll is dedicated to maintaining the highest standards of integrity, transparency, and ethical conduct in all aspects of its business operations. Our actions and decisions are based on sound business judgment and not motivated by personal interest or gain. We avoid putting ourselves in a position, where our judgment and decision making could be influenced by close personal or family relationships. Each of us has the responsibility to be proactive and whenever possible avoid situations that can lead to even the appearance of a conflict of interest.

We are aware that everyone at Interroll has activities, interests, and relationships outside of the company, but they should never influence, interfere or appear to influence the decisions when we act on behalf of Interroll.

Employees must not only avoid conflicts of interest, but also avoid situations, where an outsider might assume a conflict of interest is present even though it may be unintentional as perception matters.

Employees are expected to be transparent about every potential conflict of interest that may arise and report them to their managers and to the Local Compliance Coordinator.



CONFLICT OF INTEREST QUICK SELF-TEST

What if I take this course of action:

- 1 Will I feel obligated to someone else?
- 2 Am I dishonoring Interroll's core values?
- 3 Is there a chance – however small – of my independent judgment being compromised?
- 4 Could it give the appearance of impropriety or divided loyalty?
- 5 Am I using company resources, or my position for personal gain?



You are given the responsibility to hire a new employee, among the applications you notice your cousin with good qualifications has applied. What should you do next?

- Disclose your situation to your manager or the Local Compliance Coordinator.
- Remove yourself from the decision-making process to resolve the situation.
- Support the subsequent decision.
- Report the conflict of interest through the Integrity Line to our Group Compliance.

How can potential conflicts of interest arise?

- Outside business or employment with an Interroll business partner, supplier, competitor or customer.
- Pursuing a personal business opportunity that you learned about through your work.
- Having a personal relationship with a supplier or customer that could influence their decision-making.



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Fair Competition, Anti-trust

Interroll advocates the rule of fair competition. We act in accordance with national and international competition laws and do not participate in price fixing, market sharing or bid rigging with competitors. We believe in free and open competition that is grounded in integrity and fair dealing. Any kind of anti-competitive conduct is strictly prohibited. Additionally, our intellectual property is one of our valuable assets. Each of us is entrusted with the care of these assets, which include everything we use to conduct business.

While the legal requirements vary across the globe, competitive laws share the same objective—to ensure that markets operate efficiently by providing competitive prices. Every employee must be fully aware that violations of anti-trust law are against the interest of Interroll under all circumstances and are prohibited without exception.

We also ensure to maintain confidential and proprietary information created and gathered in our business in strict confidence, except when disclosure is authorized or required by law. The responsibility of the employee to protect and safeguard confidential and proprietary information exists both during and after employment at the respective Interroll company.

Remember:

- Respect the free market.
- Gather competitive information the right and legal way.
- Know and comply with our policies to maintain ethical relationships with our competitors.
- Respect the intellectual property rights of others.
- Do not discuss company information with others.



You are attending a trade show, and some competitors were discussing confidential information about pricing they had obtained. What should you do next?

- You should not attend a meeting with a competitor, where sensitive information is likely to be discussed.
- Excuse yourself from the room in order to avoid conflict.
- Work with integrity and make clear that you believe that the discussion is inappropriate.
- You should be aware that even casual conversation can be considered anti-competitive, so be mindful of that.
- Report the matter to your superior.



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Our Commitment:

- We conduct thorough due diligence when selecting suppliers.
- We prioritize suppliers who share our commitment and values.
- We promote diversity and inclusion within our supplier network.
- We monitor and audit supplier performance regularly.
- We uphold transparency and open communication with suppliers.



Sustainable Supply Chain

At Interroll, we recognize that our supply chain is not merely a network of suppliers and partners; it is an extension of our values and commitment to responsible business practices. Hence, we are responsible for ensuring that our suppliers align with our dedication to conducting business with honesty and integrity. We require our suppliers to maintain the same rigorous standards as we do. We comply with the principles of non-discrimination with regard to supplier selection and treatment. We select our suppliers with reasonable assessments of their quality, environmental, social and commercial performance.

Our supply chain partners are expected to adhere to the highest ethical standards in all their operations. As employees of Interroll, we must uphold the highest standards of ethical conduct, environmental responsibility, and quality assurance when interacting with our supply chain partners.

A committed [Supplier Code of Conduct](#) is available for detailed compliance rules for the suppliers that we deal with. We ensure all our suppliers to be compliant to the code of conduct prepared for them.



Interroll's expectations from its employees:

- Report any ethical violations or concerns within the supply chain promptly.
- Collaborate with supply chain partners to achieve continuous improvement in ethical practices.
- Make responsible decisions and avoid suppliers with ethical violations.
- Be transparent and have open communication with suppliers.
- Commitment to uphold the company's values and ethical standards throughout the supply chain.



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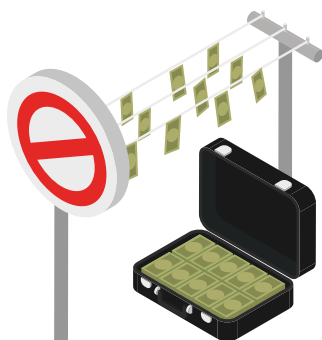
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Our Commitment:

- We assess our customers and other business partners.
- We contractually oblige our supplier to adhere to a uniform supplier code of conduct.
- We work closely with our suppliers to meet our expectations.
- We have a transparent bidding process.
- We report suspicious transactions and are attentive regarding suspicious requests, especially those that are financial in nature.



Anti-money-laundering (AML), Terrorism Financing

Interroll does not directly or indirectly facilitate money laundering or terrorism financing and fulfills its obligations regarding its prevention, which includes compliance with anti-money laundering laws. To protect our company and avoid any possible liability, we are constantly vigilant and rely on our employees to notify the Compliance and Finance departments of any unusual financial transactions, which may give rise to suspicion of money laundering. To limit the risks of money laundering, we avoid cash transactions.

We conduct customer and supplier due diligence to identify and assess their associated risks. Effective due diligence involves knowing a supplier and customer identity, their financial activities and the risk they pose. We take AML and terrorism financing seriously and will take appropriate disciplinary action against any individual, who violates our policies.

A committed [Supplier Code of Conduct](#) is available for detailed compliance rules for the suppliers that we deal with. We expect all our suppliers to be compliant to our Supplier Code of Conduct.



Interroll's expectations from its employees:

- Be familiar with purchasing policies and screening processes.
- Conduct thorough due diligence of the business partners.
- Support business partners in meeting Interroll's expectations.
- Be transparent about the bidding process.
- Raise concerns if any non-compliant activity is noticed.

Should you proceed with a payment if a supplier requests that you transfer funds to a newly designated offshore bank account?

- Be familiar with purchasing policies and screening processes.
- Conduct thorough due diligence of the business partners.



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Remember:

- Know what kind of information is considered “personal information”.
- Respect individuals’ privacy at all times.
- Only disclose personal data to those persons and organizations with authorized access.
- Suspicion of breach of personal data should be reported to the Local Compliance Coordinator immediately.
- Destroy personal data that is no longer necessary or after the legal retention period expires.



THE 6 PRINCIPLES OF GDPR

- 1 Lawful, fair and transparent processing
- 2 Collected for specific purpose
- 3 Purpose limitation
- 4 Accuracy
- 5 Storage limitation
- 6 Security

Respect Data Privacy

Interroll respects the confidentiality of personal information of all its stakeholders and takes privacy very seriously. Only data that is necessary for the operations of Interroll is retained by us, while personal data is processed confidentially and responsibly, with respect to everyone’s privacy. We guarantee to follow the requirements defined in our agreements with our employees as well as customers about how we access, collect, and handle personal data to ensure high data protection standards.

We recognize that privacy is a fundamental human right. We also acknowledge that protecting personal data is important to maintaining the trust of our stakeholders. All employees with access to such personal data are expected to apply the privacy principles of lawful, fair and transparent data processing, as well as, accuracy, storage limitation, integrity and confidentiality.

Each of us must do our part to protect the amount of personal data we receive. We must stay alert to phishing scams or other attempts to uncover sensitive personal or corporate information.



How to conduct yourself when you have access to private information:

- Only process personal data when it is explicitly needed to complete a task.
- Consider data processing principles whenever needed.
- Conduct yourself with caution and be aware when discussing confidential information with anyone.
- Minimize risk by being aware of the data privacy policy.
- Destroy or correct any inaccurate or incomplete data.
- Never leave printed material containing confidential information in public places.
- Promptly report cases of data breach for example through phishing.



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Information and Cybersecurity

We are increasingly reliant on networks, databases, and the data they store and transmit. In an increasingly digital world, safeguarding information and ensuring cybersecurity is important to our Interroll operations. Our commitment to cybersecurity means that we prioritize the protection of sensitive data, whether it concerns our company, employees, or business partners. This commitment extends to every employee, as we expect them to play an active role in maintaining a secure digital environment for themselves and all our stakeholders.

Cybersecurity is the collective responsibility of every individual within our organization. Our dedication to cybersecurity means that we recognize the critical importance of protecting sensitive information, including proprietary data, customer information, and employee records. Employees are expected to remain vigilant while opening emails and suspicious links. Every employee's commitment to cybersecurity is integral to our collective success in preserving data integrity and preventing data breaches.

Cybersecurity information / trainings are provided by Corporate IT on a regular basis, mandatory to all employees.

Remember:

- Treat all company data as sensitive and confidential.
- Be cautious of phishing emails and suspicious links.
- Keep software and security systems updated.
- Follow company cybersecurity policies and guidelines.
- Use secure Wi-Fi networks when accessing company resources remotely.
- Report any security incidents or breaches immediately.



Among all your work emails, you receive a time critical email asking to update your password before it expires, or you will be logged out from the company's system. What do you do?



- First, check where the email came from.
- Identify if the source is legit or if it is a possible phishing attack.
- In case of confusion, ask the IT team regarding your password update.
- Do not click any links before clarifying.
- If the email is identified as fake, ignore the email and report it as phishing.
- Keep yourself informed, take the cybersecurity awareness training again to remind yourself of your responsibilities.



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Observe Export Control and Customs Regulations

Interroll conducts operations worldwide, handling the importation, exportation, and transit of diverse products. We are dedicated to adhering to all relevant laws governing international trade, particularly export control and customs regulations. It is imperative that all employees involved in foreign trade activities abstain from engaging in transactions that violate national or international export control regulations.

Prior to exporting or delivering any Interroll products, services, or technology, we rigorously verify that they possess the necessary authorization under export regulations and relevant laws.

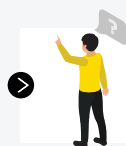
Numerous countries impose restrictions or regulations on exports, trade, and commercial interactions with other nations, entities, and individuals. Non-compliance with these laws can lead to severe repercussions, including substantial fines and/or imprisonment. We are committed to abiding by all customs regulations to ensure that our products are imported and exported in strict accordance with applicable laws and regulations.

Remember:

- Ensure products, services, or technology have export authorization.
- Understand and comply with restrictions on exports.
- Noncompliance may lead to fines or imprisonment.
- Adhere to all customs regulations.
- Report violations within appropriate time to the Director Corporate Integrity.

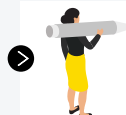


You want to initiate a business relation with a potential new customer. What should be part of the customer onboarding process?



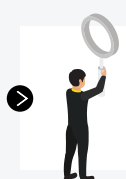
Screening:

Verify customer and associated parties against export control lists to prevent dealings with restricted entities.



Documentation:

Collect and review necessary paperwork such as end-user certificates to ensure transaction legitimacy and compliance.



Monitoring:

Implement ongoing monitoring mechanisms to detect and address any changes in customer activities that may affect export control compliance.



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Remember:

- Safeguard internal company materials, including emails.
- Refrain from using company email address and phone number to create personal social media accounts.
- You are responsible for what you publish from your personal social media accounts, therefore be mindful of the company values.
- In case of doubts, contact the Local Compliance Coordinator immediately.



Communications & Social Media

We are committed to maintain a clear and consistent message through official and personal communication platforms when conveying information to the public, media and shareholders regarding Interroll's products or operations. This commitment helps our employees to be well-informed and promotes trust among our stakeholders. We also expect that our employees exercise discretion and good judgement when using personal social media platforms.

We commit to maintaining transparent, respectful, and consistent dialogue, both within our organization and with external stakeholders, including the media. Our employees play a pivotal role in upholding our standards of communication, ensuring that information is accurate, timely, and aligned with our values. When using personal or professional social media platforms, employees must adhere to internal policies and not voice an opinion or political statements, which may look like it is said on behalf of Interroll. A dedicated [Crisis Communication policy](#) and [Communications Policy](#) is available for detailed compliance rules. We must ensure that all external and internal communications remain neutral and aligned with the Interroll's professional standards.

Employees must refrain from publishing images of their company computer screen, security pass, or other identifiable security features on their personal social media platforms. Employees must decline any offers to participate in paid surveys or paid consultation approaches through consultant agencies requesting market information, as doing so may compromise confidentiality and violate our business secrets.



You are a part of a product development team that recently developed a product and have all the insights. You see a post online that gives false information about the product.

What do you do?

- Maintain composure and avoid any reaction.
- Inform the Local Compliance Coordinator and the relevant department about the post.
- Only when authorized, write a response that respectfully corrects the false information as Interroll is listed on the SIX Swiss Exchange.
- Respond through official company channels, such as the company's website, or customer support email.
- Share accurate information to counter any misconceptions.
- Report any potential communication violations to the Local Compliance Coordinator.



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Fraud Prevention

Our stakeholders trust us to maintain good financial controls and demonstrate accuracy and transparency in all of our accounting practices. Our commitment to financial integrity includes maintaining our records and financial statements, including time and expense reports, in accordance with legal requirements. It also includes recording and reporting on our financial statements in an honest, accurate and timely manner.

Good records management is an important part of Interroll's commitment to integrity and ethical business practices, where we constantly monitor our activities, processes and business practices to prevent any form of fraud.

It is everyone's responsibility to watch for and avoid fraud, deliberate error or misleading entries in our books, records and financial statements. If you believe that you have identified false or misleading information or an error, whether intentional or not, you must report your concerns to our Group Compliance.

Remember:

- Maintain complete and accurate records of all financial transactions and assets.
- Verify the facts and completeness of the information before approval.
- Pay close attention to safeguarding all the relevant information.
- Be candid and transparent regarding all financial statements.
- When in doubt, ask or report to your superior.



What to watch out for if you are dealing with financial bookkeeping?

- Financial transactions with an error (e.g.: wrong order, wrong date, wrong description, wrong amount etc.).
- Decisions that are inconsistent with the business model or performance.
- Efforts to dispose an asset without proper authorization.
- Any absence of controls on transactions such as dual signatures on checks.
- Fraudulent documents.
- Particularly where cash is involved, proper approval from authorized people.





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Our Commitment:

- We are committed to conducting our business operations sustainably.
- We monitor and transparently report on progress towards climate-related goals.
- We comply with the terms of environmental permits and authorizations.
- We collaborate with suppliers and partners to improve the environmental performance throughout the value chain.
- We engage employees in sustainability initiatives and provide trainings via workshops.



Mitigate Climate Change

Interroll recognizes the criticality of mitigating climate change, due to which we integrate sustainable practices across all facets of our operations. By prioritizing sustainability in our business strategies, our mission is to reduce our carbon footprint. We continuously challenge ourselves to run our operations more efficiently, develop and implement sustainable technologies and business practices, and expand our efforts and initiatives. We aim to lead by example in our industry, contributing to a resilient future and supporting global efforts to combat climate change. This dedication is not only moral but also fundamental to our long-term success and the wellbeing of the communities we serve.

As an intralogistics engineering and manufacturing company, climate protection and energy efficiency are at the core of our product portfolio. Each employee is integral to our responsibility towards mitigating climate change, bringing forth ideas, expertise, and a collective commitment to environmental stewardship. Therefore, our employees are encouraged to bring forth any suggestions and ideas they may have. Through their daily actions and innovative approaches, our employees drive the implementation of our carbon footprint reduction targets.



Following Interroll's commitment towards reducing carbon footprint, you notice that many lights, parts of the HVAC¹ system and electronic devices are left on overnight in the office, contributing to unnecessary energy consumption and greenhouse gas emissions. What should you do?

- As a first step, ensure that lights and air conditioning units are turned off whenever they are not in use or found to be left on.
- Inform your supervisors about the observed energy waste issue in a constructive manner.
- Emphasize the environmental impact of unnecessary energy consumption and greenhouse gas emissions.
- Highlight the potential cost savings and benefits of reducing energy usage for the company.
- Suggest practical solutions or ideas for raising awareness and promoting energy conservation among employees.
- Emphasize the importance of Interroll's objectives in the [Climate protection Policy](#).

¹ Heating, ventilation and air conditioning system



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Reduce Environmental Impact

Interroll prioritizes the need to conduct business in a way that protects and improves the state of the environment for future generations. We comply with all environmental regulations such as the European Union's REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) Regulation. We are dedicated to reducing our environmental impact by implementing sustainable practices, minimizing noise pollution, and controlling the release of toxic air substances. Our commitment extends to continuous improvement in our environmental performance, ensuring that we contribute positively to global environmental goals and set a benchmark for responsible business practices.

We acknowledge the value of integrating environmentally friendly principles into our practices, such as incorporating recycled and upcycled materials into our packaging, to improve our environmental performance. It is our responsibility to consistently enhance our environmental performance with the assistance and engagement of both our internal and external stakeholders.

Furthermore, we actively endorse environmental protection initiatives and try to identify opportunities to support such endeavours. We actively encourage our employees to propose any projects they believe would align with our commitment to environmental sustainability.

Our Commitment:

- We engage internal and external stakeholders to achieve our environmental goals.
- We aim to use only eco-friendly packaging materials.
- We adopt sustainable sourcing and procurement practices.
- Supporting environmental protection projects and initiatives.



Interroll's expectations from its employees:

- Be familiar with the environmental policy of Interroll.
- Be aware of the environmental impacts relevant to your work and how specific environmental requirements are met in your work function.
- Be mindful of energy and resource consumption.
Take personal actions like turning off all power after leaving the workspace.
- Report any environmental concerns or opportunities for improvement to your supervisors.



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Our Commitment:

- We foster the culture of the 3R's (reduce, reuse, and recycle).
- We aim to sort, label and dispose our hazardous waste properly.
- We develop and seek new technologies and innovations to reduce the environmental impacts of waste from our operations and value chain.
- We provide separate waste bins in our offices to ensure that everyone disposes their waste appropriately.



Circular Economy and Minimizing Waste

Interroll is committed to minimizing waste and to contribute to an effective use of resources through efficient resource management. We strive to reduce, reuse, and recycle materials across all our operations, and ensure all kinds of waste are managed in an environmentally responsible manner. We aim for a circular economy that minimizes our environmental impact. Therefore, we abide by all relevant laws concerning waste and try to not only meet but exceed the regulatory requirements. As a dedicated company fostering a culture of sustainability, every employee of our company shares a vital role by making sustainable choices in our daily work.

It is important that everyone does their bit when it comes to minimizing waste. This is why we are collectively working towards more circular systems for packaging, reducing waste sent to landfills and why we want to prevent waste from occurring in the first place. As part of our production operations, we look for new ways to reduce our waste generation. Our approach focuses on reducing the amount of waste at its source, maximizing resource use efficiency, increasing recycling rate, and encouraging business partners to practice good waste management.

Each entity is responsible for their own hazardous and non-hazardous waste management system compliant to the regulations of their location.



Interroll's expectations from its employees:

- Actively contribute to waste reduction and waste separation efforts.
- Reduce waste and recycle whenever you have the opportunity to do so.
- A sort-clean waste separation also helps to minimize disposal costs as well as to maximize the sale of scrap and metals.



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Whistleblowing

Interroll offers its employees and all stakeholders (public) the opportunity to report potential violations of the principles of this Code of Conduct and any other misconduct or violation of laws anonymously and confidentially via the whistleblowing **INTEGRITY LINE**. If we know of or suspect a violation of laws, rules, regulations or this Code of Conduct, we must report our concern. We have an affirmative obligation to do so. We are committed to maintaining a culture, where employees feel comfortable raising concerns, which is why we never tolerate retaliation against anyone for raising a concern in good faith.

If you witness or suspect any actions that may be illegal or unethical, it might seem simpler to ignore them or expect someone else to address the situation. However, such misconduct impacts everyone. When you raise concerns, whether through questions or reporting questionable behavior, you are safeguarding yourself, your colleagues, and the reputation of Interroll. Our integrity, image, and brand are entrusted to your care, and we depend on you to safeguard them.

If an investigation reveals that an employee or the company has directly or indirectly contributed to any adverse consequences, appropriate corrective actions will be taken. Employees found to have violated our ethical standards, as outlined in this Code of Conduct, will face sanctions in accordance with national labor laws, which may include termination of employment.



SPEAK UP!
INTEGRITY
LINE

CLICK HERE



You are aware of a human rights violation or violations to this Code of Conduct. How should you respond to this situation?

- We encourage our employees to be able to speak up without fear.
- Discuss the concern with your immediate supervisor or the next level of management.
- In special situations where anonymity should be maintained, use the **Integrity Line**.
- Provide as much information as you can in order for a fair and quick response.



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If you have any questions, concerns, or need assistance related to our Code of Conduct or other ethical matters, please do not hesitate to contact us. Your adherence to our values is essential to maintain the integrity of our organization.

All inquiries and reports will be handled confidentially and in accordance with applicable laws and regulations. We are committed to protecting your privacy.

We will not tolerate retaliation against individuals who report concerns in good faith. Violations of this prohibition will be viewed as compliance violations.

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Interroll Group Compliance:
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VERSION	DATE	POLICY OWNER	POLICY AUTHOR	APPROVED BY	CHANGES
1.0	January 2025	Patrick Wedewardt	Tanjena Afreen	Patrick Wedewardt	Original
1.1	March 2025	Patrick Wedewardt	Tanjena Afreen	Patrick Wedewardt	Change in CEO
1.2	July 2026	Patrick Wedewardt	Tanjena Afreen	Patrick Wedewardt	Rebranding