

beyond gravity

RUAG International  
and Beyond Gravity  
**Code of Conduct.**

2024

## 3–8

Foreword  
Our values  
Are you on board?  
Leadership principles  
Application

## 9–21

Zero tolerance on corruption and fraud  
Fair competition  
Conflicts of interest  
Trade compliance and export controls  
Equal opportunities and non-discrimination  
Human rights, child and forced labor  
Prevention on money laundering  
Health and safety  
High performance and quality  
Environment  
Responsible sourcing and conflict minerals  
Data protection and information security

## 22–25

Guiding questions  
Sanctions and reporting of violations  
Contact

We are committed to our customers, high performance and quality, ensuring profitable growth and the sustainable expansion of our market position.

The basis for this is an outstanding reputation. Clear values and principles determine our daily thoughts and actions.

# Curious. Passionate. Together.

These are the values that represent us. This Code of Conduct summarises the values and principles to which we are committed. We are dedicated to achieving business success that is consistent with our culture.

For us, business relations with customers and business partners are based on integrity, trust and mutual respect. We continue to earn the trust placed in us each day.

We set ambitious targets, keep our word, comply with regulations and adhere to all applicable laws.

Our values describe our identity and mindset. They form the basis for our behavior today and in the future. We stand out from our competitors with our performance, reliability and high precision.

This Code of Conduct helps us to live up to the clear values and principles to which we are committed – within the company, but also towards our customers, business partners, suppliers, authorities, the communities and socio-political environments in which we operate, and towards our owner, the Swiss Confederation.

An action or behavior is only permitted if it complies with the applicable law and is in line with this Code of Conduct.

### Curious.

Progress requires us to look beyond the obvious and open our minds to new possibilities. We are born with an insatiable curiosity that has led to some of history's most groundbreaking inventions. Why – that's the most important question to ask in order to understand the needs of our counterpart and see the world through their eyes.

Our future demands that we maintain this sense of wonder and keep our curiosity alive. Curiosity means active listening, continuous learning, not settling for the first solution. In the face of uncertainty, we explore and fill gaps in our knowledge. Every day brings an opportunity to try something new, and we seize it.

### Passionate.

We love what we do and we have a lot of fun doing it in the coolest industry there is. We do not merely work on tasks but are intrinsically motivated to achieve great results. We literally work on missions and our motivation comes from within, a unique desire to tackle challenges and create value.

### Together.

We can only win together: with our colleagues around the world, our customers, suppliers and partners. Every role is important, diversity leads to broader solutions, and by joining forces we can achieve more. As a team, we need to rely on each other, trust each other and take responsibility. And last but not least, it is fun to work together!

# Humans are pioneers. They have always expanded the boundaries of knowledge, experience and space.

We have been involved in space missions ever since the first endeavors – and we have always pushed the boundaries. The boundaries of our innovative home country, the boundaries between European and American partners, the boundaries of our atmosphere, the boundaries of what is technically possible. Pushing boundaries is a mindset. Anyone who flies customers into orbit and sets their sights beyond the horizon needs to be passionate, curious and have the will to innovate in order to meet the challenges that new worlds present. At the same time, we are not daredevils, but have a down-to-earth attitude.



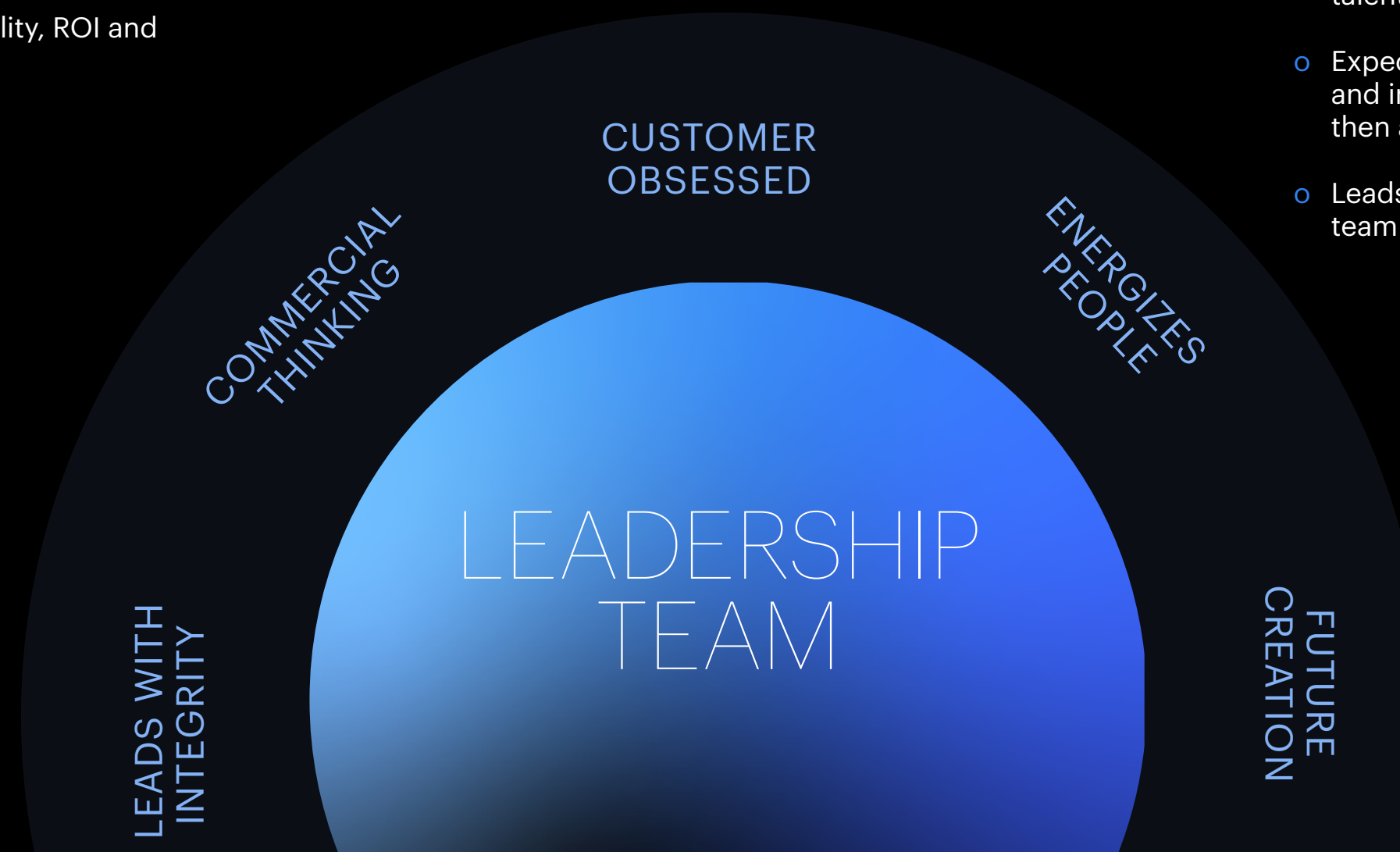
# Guided by principles: The commitment of our leaders shapes our actions, decisions and interactions.

We are united by a singular vision of leadership, articulated through our leadership principles. These principles – emphasizing integrity, commercial acumen, customer dedication, team motivation, and a forward-thinking mindset – serve as our beacon. They forge a shared ethos, clarifying the core values and priorities every leader within our organization should embody.

- Maximizes financial impact, reduces cost and anticipates risks
- Stays focused on strategic priorities
- Thinks group result beyond own P&L
- Driven by cash, profitability, ROI and focus on making money
- Executes, makes change happen, doesn't just develop plans for customers
- Delivers value to all customers
- Works vigorously to earn and keep customers' trust
- Agility and speed to respond to ever changing circumstances and customer demands
- With a genuine interest in people, creates an environment of trust, confidence and can-do mentality
- Hires and develops the best future leaders. Recognizes exceptional talent
- Expects and requires innovation and invention from their teams and then always finds ways to simplify
- Leads with curiosity, passion, and team spirit

- Straight authentic talker
- Relates openly and honestly
- Resilient and calm under pressure
- Consistently overdelivers on promises

- Challenges the status quo and insists on highest standards
- Embraces the opportunity and threat of digital disruption
- Excels at thinking ahead and shaping strategy
- Comfortable with ambiguity, complexity and uncertainty





# This Code of Conduct applies across the globe – wherever and whenever we operate.

This Code of Conduct is binding and applies equally to all employees, including our Board of Directors, Group Executive Board and managers.

It is one of the key responsibilities of our managers to ensure that this Code of Conduct is adhered to in their respective areas of responsibility. This includes setting a good example on compliance issues, demonstrating the essence of the Code of Conduct to all employees and providing them with guidance and advice.

We maintain a Compliance Management System (CMS) based on ISO 37301 and expect from our business partners to have an appropriate CMS in place that considers their size and industry.

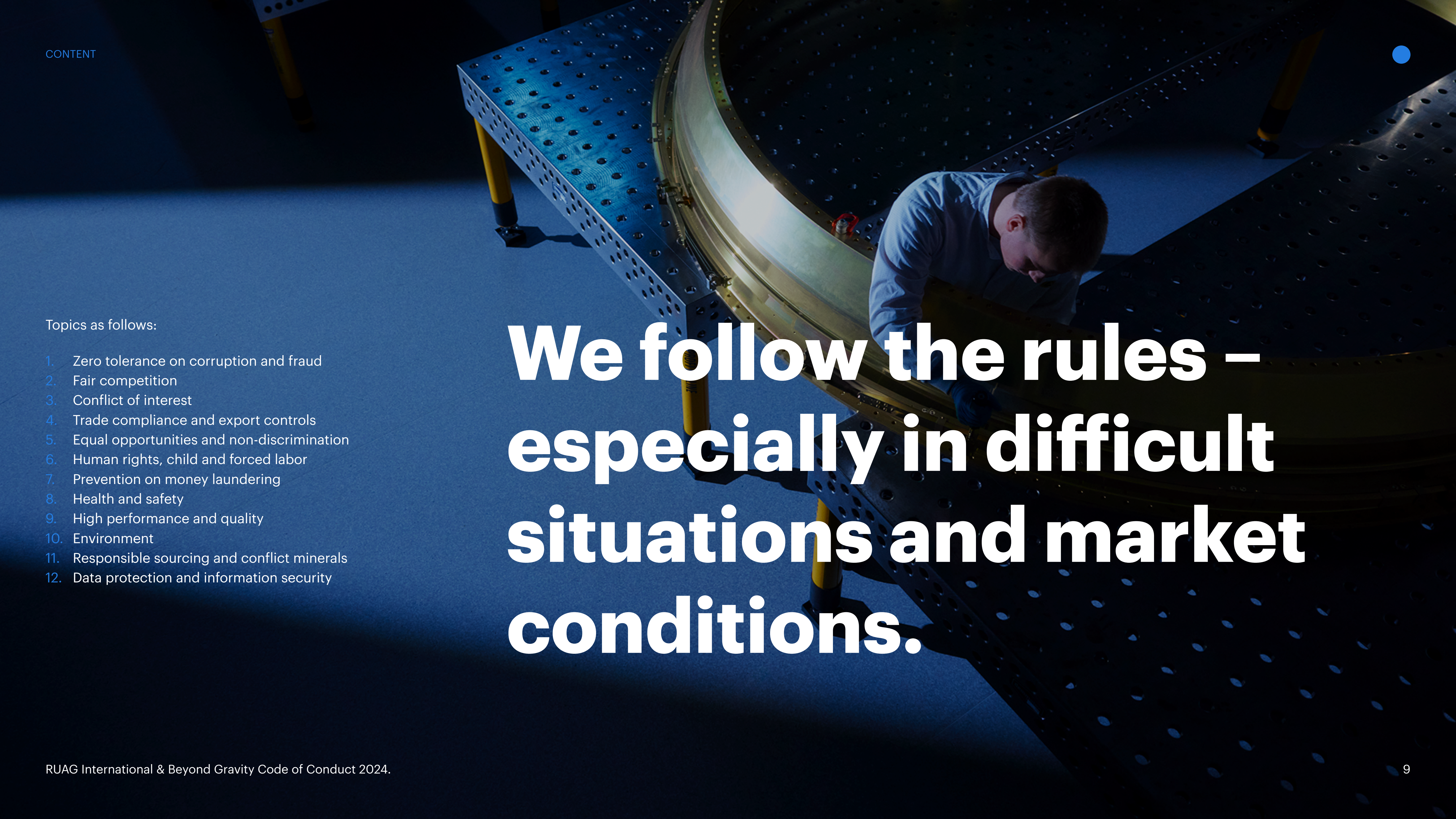
We also expect all our business partners to adhere to this Code of Conduct and reserve the right to terminate a business relationship with a business partner in the event of any compliance violations. We may monitor a business partner's CMS if needed.

In case of contradictions, the English version of the Code of Conduct shall prevail.



Topics as follows:

1. Zero tolerance on corruption and fraud
2. Fair competition
3. Conflict of interest
4. Trade compliance and export controls
5. Equal opportunities and non-discrimination
6. Human rights, child and forced labor
7. Prevention on money laundering
8. Health and safety
9. High performance and quality
10. Environment
11. Responsible sourcing and conflict minerals
12. Data protection and information security



**We follow the rules –  
especially in difficult  
situations and market  
conditions.**



# We have a zero-tolerance policy towards corruption and reject any form of bribery or other corrupt or fraudulent behavior.



## What we are committed to

Benefits must always be of a lawful, neutral, suitable, appropriate and transparent nature.

Gifts, entertainment or other benefits should only be offered, given or received in good faith and only if they are appropriate and in line with customary business hospitality and our policies and regulations. For contracts with third parties to support sales activities, we have specific approval procedures to minimise the risk of bribery.

We do not make donations to political parties.



## What we are not allowed to do

It is prohibited to offer, provide or accept a benefit with the intention or effect of influencing the decision-making process of a business partner or public official. In the same way, no benefits may be accepted that could influence our own decision-making process.

We do not accept or participate in kickbacks or similar schemes, forgery, falsification of company records or other documents.

Gifts of excessive value or other inappropriate gifts must not be offered, given or accepted. In particular, it is also prohibited to offer or give benefits to public officials for routine government actions to initiate or expedite the performance of non-discretionary duties (facilitation payments). Exceptions may apply in cases of danger to personal health and safety.

We do not tolerate the misuse or misappropriation of company funds or other assets, nor do we tolerate fraud or theft.

We believe that well-functioning markets drive innovation, technological progress and continuous quality improvement. This is why we act as a fair and responsible competitor.



#### What we are committed to

We only exchange with competitors when necessary for a legitimate business purpose.

We must ensure that no information is exchanged in oral or written communications with competitors or in the public arena that could lead to conclusions about our current or future market behavior or that of our competitors.

Employees must immediately report to the line manager any attempt by a competitor to exchange market-relevant information or to enter into an agreement restricting competition, so that the line manager and the compliance officer can document in writing that no violation has occurred. Such information from competitors may not be disclosed except to the compliance officer.



#### What we are not allowed to do

It is prohibited to agree with competitors on end-user prices or other market-influencing measures.

No market-relevant information may be exchanged with competitors.

We will not abuse any dominant market position we may hold and, in particular, will not discriminate against any customers or obstruct any of our competitors.

# Our employees must avoid situations where their interests conflict with those of the company or where there is a risk of such a conflict.



A conflict of interest exists when a person who works for us is in a situation where an interest may make it difficult for them to perform their duties objectively, or when that person or a member of their family receives inappropriate benefits as a result of a decision they make on behalf of the company or a third party.



## What we are committed to

Employees who find themselves in an actual or potential conflict of interest must report it immediately to their line manager and the compliance officer. This also applies to the mere appearance of a conflict of interest.

Conflicts of interest must be documented in writing together with the line manager and the compliance officer.

All employees are required to use our company assets carefully and economically and, in particular, to ensure that they are not misused for private purposes.

Voluntary activities or paid secondary employment that may interfere with work for the company must be disclosed to the line manager and the relevant People & Culture manager so that the appropriate steps can be taken to avoid a conflict of interest.



## What we are not allowed to do

Employees must not use their working time or the company's property for personal use.

An individual must not abuse his or her position in the company for personal gain or for the benefit of relatives or friends.

# We live up to our responsibility as an international supplier of high technology products for space applications.



## What we are committed to

In international trade, we comply with national customs and tax regulations and international agreements.

We supply military and dual-use items only to identified, reputable business partners, contributing to security, independence and stability.

We strictly comply with applicable national and international regulations and laws.

Irrespective of the place of manufacture, all exports of military and dual-use items must comply with international law, Switzerland's international obligations and the principles of Swiss foreign policy.



## What we are not allowed to do

Our employees must not issue customs declarations, customs values or certificates of origin without prior verification.

This Code of Conduct prohibits any export of goods that would not have been permitted from a Swiss location under Swiss regulations and export control practices, even if permitted from a specific location under applicable local regulations and laws.

# Diversity & Inclusion: We offer equal opportunities to all employees and condemn any form of discrimination, harassment or mobbing.



## What we are committed to

We expect all employees to treat each other with respect, regardless of differences and divergent personal views.

We foster a culture of inclusion. Our policies and procedures are regularly reviewed to ensure that they provide fair treatment and equal opportunities.

We encourage each other to speak up and to continually improve.

We support freedom of association.



## What we are not allowed to do

We do not tolerate discrimination on the basis of age, ethnic origin, religion, nationality, political or other beliefs, gender identity, sexual orientation, physical condition, marital status or membership of employee representative bodies.



We are committed to upholding the human rights of workers and treating them with dignity and respect. Child labor will not be used at any stage of production.



#### What we are committed to

We respect the United Nations Universal Declaration of Human Rights (including ILO Minimum Age Convention No. 138 and Child Labour Convention No. 182).

All employment must be freely chosen.

All salaries comply with local laws and industry standards.

We comply with applicable national laws and regulations on working hours, wages and benefits and recognize the right of workers to form or join trade unions.



#### What we are not allowed to do

We shall not employ workers under the age of 15 or the applicable minimum legal age for work, whichever is higher.

We shall not use any form of forced or compulsory labor or any form of slavery.

We shall not tolerate retaliation against human rights defenders.



# We prevent money laundering and terrorist financing.



## What we are committed to

We comply with applicable anti-money laundering laws and regulations.

We only do business with reputable business partners and with funds derived from legitimate sources.

We shall prevent and take measures to detect unacceptable or suspicious forms of payment and activities that disguise the origin of funds derived from criminal activities such as drug trafficking, theft or fraud.

We want to know from our business partners who they are, what business they are in and where their funds come from.

We will report suspicious activity to the appropriate authorities.



## What we are not allowed to do

We shall not knowingly facilitate the laundering of money or the financing of terrorism.

We shall not accept payments in cash or from unusual sources, including transfers of funds to or from countries or entities unrelated to the transaction or business partner, complex or unusual, not reflecting a business purpose, or attempts to evade record-keeping or reporting requirements.



# Our employees have the right to work in a healthy and safe working environment.



## What we are committed to

As an employer, we provide a healthy and safe working environment and protect our employees from excessive exposure to chemical, biological and physical risks.

Our employees must comply with internal health and safety rules. They share responsibility for the health and safety of their colleagues.

All employees shall actively contribute to the continuous improvement of health and safety in their individual working environment.



## What we are not allowed to do

We shall not fail to wear the necessary personal protective equipment when carrying out certain tasks.

We shall not fail to properly control and maintain equipment, tools and machinery that may cause accidents and injuries.

# We are committed to our customers, high performance and quality.



## What we are committed to

We deliver high performance quality products to our customers in accordance with internal policies and guidelines, regulatory requirements or standards like AS/EN9100 and ISO 9001. Our goal is 100% mission success.

We are passionate and proud that our products and services fulfil our customers' vision with high quality.

We remain innovative to continually improve quality.



## What we are not allowed to do

For us, quality is non-negotiable.

We do not tolerate shortcuts that could sacrifice quality.

We do not tolerate manipulation of quality or product records.

We recognize that environmental responsibility is an integral part of the production of world-class products.



#### What we are committed to

We create responsible and sustainable operations by reducing our environmental impact and implementing an effective system to identify and eliminate potential environmental hazards.

We promote environmentally friendly technologies and processes not only in our own operations, but also throughout our supplier base, and ensure the safe handling and disposal of hazardous and restricted substances.



#### What we are not allowed to do

We shall not tolerate any hazard to the soil, water or air and shall avoid the use of any chemical substance that is no longer authorized.

We shall not exceed the limits set by the environmental authorities in the countries in which we operate.

We shall not endanger the health and safety of employees and the environment and shall declare the quantity of substances of very high concern under the REACH and RoHS regulations.

We only apply for exemptions from the use of critical substances, which are usually granted, if there are currently no reasonable alternatives known for our industry.



# We are committed to environmental sustainability and the responsible sourcing of conflict minerals.



## What we are committed to

We ensure responsible sourcing of raw materials and challenge our supply chain to ensure the source of our raw materials.

We conduct due diligence on the source and supply chain of tantalum, tin, tungsten and gold in our products to provide reasonable assurance that they are sourced in a manner consistent with the OECD Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas.

We have a separate Code of Conduct for Business Partners to ensure that suppliers and customers pay equal attention to compliance issues and that all suppliers accept their responsibility for sustainable and responsible sourcing.



## What we are not allowed to do

We shall not contribute to the violation of human rights, to corruption, to the financing of armed groups or to similar negative effects.

We shall avoid purchasing products containing conflict minerals sourced from conflict-affected and high-risk areas.

We comply with applicable laws, regulations and best practices to ensure the confidentiality, integrity, availability and privacy of all information entrusted to us.



#### What we are committed to

We are committed to data protection and privacy.

The aim of our data protection policy is to ensure data protection and privacy throughout the company and to comply with applicable laws in various countries, in particular the EU General Data Protection Regulation (GDPR) and the Swiss Data Protection Act.

We comply with and enforce applicable requirements for confidentiality, integrity and availability of information, and monitor and adhere to continuous improvements and changes in international standards and regulations. The company operates an ISO 27001 certified information security management system.



#### What we are not allowed to do

Confidential business information about the company or any of our business partners and personal information about employees or business partners must not be disclosed to third parties without prior permission.



**We do **not** neglect or disregard these basic rules to ensure the success of our business.**

When in doubt about any business behavior, our employees should ask the following control questions:

1. Would I feel comfortable if my behavior could be seen on the Internet, on television, or if I could read about it in the newspaper?

4. Would I feel good about telling family members or other people close to me about my behavior?

2. Would I feel comfortable if I had to explain my behavior to my manager?

5. Would our customers approve of my conduct?

3. Would my manager or colleague be compliant if they behaved like me?

!! If you answer 'no' to any of these questions, you need to change your behavior!



Depending on the severity of the violation, sanctions may range from reprimands and warnings to immediate dismissal, civil claims for damages and criminal prosecution. Deliberately ignoring violations of the Code of Conduct by others or obstructing the investigation of violations against it are also considered a violation.

Employees should have an objective basis for believing that the information they report and any related allegations are substantially true. Employees who report known or suspected violations in good faith will be protected from retaliation.

Any form of retaliation against employees who have reported violations in accordance with these principles is a clear and serious violation of this Code of Conduct and will be appropriately sanctioned.

Conversely, reports made for the purpose of falsely accusing colleagues or managers will not be tolerated. Such behavior is always a violation of this Code of Conduct and will be dealt with appropriately.

In line with our values, all employees are expected to report any information regarding violations of this Code of Conduct or of any applicable legislation without delay. Any violations of this Code of Conduct will not be tolerated and will be subject to appropriate disciplinary action.



We ensure compliance with the principles of this Code of Conduct through regular reviews and reporting in accordance with our Compliance Management System, which is based on ISO 37301 standards.

## Contacts.

Employees may report known or suspected violations of this Code of Conduct to the following contact persons:

1. Line managers
2. People & Culture managers
3. Compliance officer
4. General counsel

## Speak up!

In addition, our employees and third parties can use the whistleblowing tool available on the RUAG International and Beyond Gravity websites and intranet, which allows anonymous reporting in writing and, if necessary, by telephone. The tool is designed to make it safe and easy for anyone to report concerns about misconduct.

The compliance officer and the general counsel will ensure that the identity of anyone reporting known or suspected violations of this Code of Conduct is kept strictly confidential.