

Supplier Code of Conduct

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Contents

Supplier Code of Conduct	2
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Ethics	3
Compliance	3
Anti-corruption	3
Conflict of interest	3
Competition and antitrust	3
Fraudulent behavior	3
Correct accounting and communication	3
Data protection	3
Intellectual property	4
Insider trading	4
Foreign trade	4
Conflict minerals and metals	4

Labour and human rights	5
Remuneration, social benefits and working hours	5
Forced labor, human trafficking and slavery	5
Child labor	5
Fair treatment and non-discrimination	5
Freedom of association	5
General human rights	5

Health, safety and environmental protection	6
Occupational health management	6
Environmental compliance	6
Protection against negative environmental influences	6

Governance	7
Implementation	7
Due diligence and transparency	7
Documentation of conformity	7
Reporting concerns	7

Supplier Code of Conduct

The Hamilton companies Hamilton Bonaduz AG and Hamilton Medical AG and all their subsidiaries, hereinafter referred to as Hamilton, are committed to social responsibility as an integral part of their global business activities. Hamilton is committed to conducting its business in an environmentally and ethically responsible manner. As Hamilton, we are a participant in the United Nations Global Compact and are committed to implementing the ten principles of the Global Compact. Our suppliers (defined as a person or company supplying a product or service to Hamilton) play an important role as enablers of our sustainable growth and overall success.

Our Supplier Code of Conduct covers the following key topics:

Ethics, Labor and Human Rights, Health and Safety, and Environment.

It is an expression of Hamilton's shared value base and expressly obliges our suppliers to base their actions on generally applicable ethical values and principles, in particular to comply with all applicable laws and regulations.

We expect our suppliers to make a binding commitment to comply with these principles and values and to implement effective processes to effectively prevent violations of the commitments in this Code of Conduct. Suppliers that do not meet Hamilton's expectations in relation to the issues set forth in this Code of Conduct may be excluded from Hamilton's portfolio of suppliers.

Ethics

Suppliers are committed to fairness, professionalism, and respect in their business dealings. In concrete terms, this means:

Compliance

Our suppliers strictly adhere to all relevant laws, regulations, and standards as well as general integrity standards in the countries in which they operate. In addition, even the impression of non-compliant behavior should be avoided. Compliance risks that fall under the responsibility of our suppliers must be continuously and adequately identified, assessed, and dealt with in a risk-appropriate manner.

Anti-corruption

Our suppliers will not engage in any form of corrupt behavior and will strictly comply with all applicable laws and regulations relating to corruption and money laundering. They will not offer or accept bribes or otherwise offer, promise, or grant any unjustified or improper advantage in the conduct of their business in order to obtain unfair advantage in the awarding of contracts. Suppliers shall properly maintain their books and records and record any payment or benefit in the books.

Conflict of interest

Our suppliers make decisions relating to their business activities solely on the basis of objective criteria. They must avoid situations in which their own interests or those of their employees conflict, or could conflict, with the interests of Hamilton. Suppliers must notify us immediately of any conflict of interest of which they become aware.

Competition and antitrust

Our suppliers observe the principles of free and fair competition and ensure that all applicable laws and regulations relating to competition and antitrust law are complied with. They do not participate in restrictive agreements of any kind, price fixing, customer or territory allocation or agreements in tenders, nor do they abuse a potentially dominant market position. They also do not coordinate their behavior with competitors in any other respect. Our suppliers take appropriate measures to ensure that neither their employees nor their executive bodies are involved in violations of competition or antitrust law.

Fraudulent behavior

Our suppliers, their employees, but also their business partners distance themselves from fraudulent behavior or deception to gain an advantage, to avoid obligations or to harm third parties.

Correct accounting and communication

Our suppliers must keep their records in accordance with applicable laws and regulations. They must ensure that all data, information, and documents that they create or that are their responsibility are accurate and fair.

Data protection

Our suppliers comply with all applicable legal requirements when handling personal data and only handle personal data in accordance with the applicable laws and regulations. They undertake to sensitize their employees accordingly and to train and educate them in this context.

Intellectual property

Our suppliers and their employees protect their own intellectual property and are committed to respecting the intellectual property of us and others. They will comply with applicable laws and regulations and any agreements between Hamilton and them regarding intellectual property.

Insider trading

Our suppliers who receive material, non-public information about Hamilton or any other public company through their relationship with us are prohibited from trading on inside information for either their own profit or the profit of third parties. Confidential information about Hamilton's operations or business partners must be kept secret and never disclosed to unauthorized persons.

Foreign trade

As an international company, we must comply with applicable customs, trade and export control laws and regulations, as well as trade sanctions. Therefore, it is important for Hamilton to know where and by whom its products and services are accessed and where its raw materials, components and technologies originate. Our suppliers must comply with all applicable international trade laws and regulations, including applicable laws and regulations relating to imports, exports, sanctions and boycotts, and no supplier shall cause Hamilton to violate any such laws or regulations.

Conflict minerals and metals

The term conflict minerals and metals refers to ores and concentrates and/or metals containing and/or consisting of tin, tantalum or tungsten, and gold, which originate from conflict-affected and high risk areas, meaning areas in a state of armed conflict or fragile post-conflict as well as areas witnessing weak or non-existent governance and security, such as failed states, and in which there are widespread and systematic violations of international law, including human rights abuses. Our suppliers undertake to procure these raw materials or minerals only from responsible sources and therefore "conflict-free". In addition, our suppliers are obliged to document the countries of origin of the tin, tantalum, tungsten, and gold they purchase. Should these raw materials or minerals in the products supplied to Hamilton nevertheless originate from conflict and high-risk areas or neighboring countries, our suppliers are obliged to inform us of this in writing without being asked. This also applies to products whose origin is unknown.

Labour and human rights

Suppliers undertake to guarantee the labor and human rights of employees and to treat them with dignity and respect. In concrete terms, this means:

Remuneration, social benefits and working hours

Our suppliers comply with all applicable laws and regulations regarding wages and working hours, including regulations on minimum wages, overtime, and other prescribed components of remuneration. Remuneration must be in line with the skills, performance and experience of the employees and based on the applicable laws as well as local competitive conditions and market practices.

Forced labor, human trafficking and slavery

Our suppliers are committed to eliminating forced labor or human trafficking in their operations and supply chains. They must comply with all applicable labor laws and regulations that prohibit the recruitment, facilitation or any other use of slavery, servitude, forced or compulsory labor, human trafficking or sex trafficking.

Child labor

Our suppliers shall not use child labour as defined by (i) the ILO Conventions Nos 138 and 182 and (ii) national law, whichever is more stringent. In particular, suppliers shall not use any form of work performed within or outside an employment relationship by persons who are subject to compulsory education or who have not yet reached the age of 15, and any form of work performed within or outside an employment relationship by persons who have not reached the age of 18 if such work, by its nature or the circumstances in which it is performed, is likely to be dangerous to the life, health or morals of the young person concerned. Activities in the context of vocational training or light work within the meaning of Articles 6 and 7 of ILO Convention No 138 are not considered to constitute child labour.

Fair treatment and non-discrimination

Our suppliers must provide their employees with a dignified and respectful workplace that is free from harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse, in accordance with applicable laws and regulations. Our suppliers do not tolerate harassment, bullying or discrimination based on race, color, ethnicity or national origin, age, gender, sexual orientation, religion, language, disability, or any other relevant characteristic protected by applicable law.

Freedom of association

Our suppliers must respect applicable laws and regulations and thus the rights of employees to freely associate, join or not join unions, be represented, and join works councils, participate in collective bargaining, and exercise rights under local labor laws and regulations. Employees must be able to communicate openly with management about their working conditions without the threat of reprisals, harassment, or intimidation.

General human rights

Our suppliers respect and promote human rights as defined in the Universal Declaration of Human Rights. Suspected or actual violations of human rights must be reported and addressed by them. Our suppliers carry out risk-based due diligence in their sphere of influence.

Health, safety and environmental protection

Suppliers undertake to ensure a safe and healthy working environment, to act in an environmentally friendly and resource-saving manner, to conserve natural resources in procurement and to minimize the use of hazardous materials. In concrete terms, this means:

Occupational health management

Our suppliers must provide their employees with a safe and healthy workplace in accordance with the applicable health and safety laws and regulations.

They must also have procedures and tools in place to identify and manage potential risks and hazards to employees, including appropriate emergency plans.

Environmental compliance

Our suppliers undertake to comply with all applicable environmental laws and regulations. They also undertake to obtain all necessary environmental permits, licenses, information registrations, chemical registrations and restrictions and to comply with their operational and reporting requirements.

Protection against negative environmental influences

Our suppliers must act in an environmentally conscious manner and implement appropriate measures to minimize any negative impact on the environment. They are encouraged to use resources sparingly and to quantify, disclose and progressively reduce their greenhouse gas emissions. They must have systems in place to ensure the safe handling, movement, storage, recycling, reuse or management of waste, air emissions and wastewater discharges. All waste, wastewater or emissions that could have a negative impact on people and the environment must be adequately treated and controlled prior to release.

Governance

Suppliers undertake to comply with and continuously improve the principles and values contained in the Supplier Code of Conduct. In concrete terms, this means:

Implementation

Our suppliers undertake to comply with these obligations and to pass them on to their own suppliers in their own supply chain. Violations of this Supplier Code of Conduct, or the principles and standards contained therein, are considered a violation of the contractual relationship with Hamilton and will not be tolerated by us. Hamilton reserves the right to take appropriate action in such cases. We expect our suppliers to make measurable efforts to continuously improve their own processes and procedures.

Identified deficiencies must be remedied immediately and any misconduct identified must be corrected. The applicable laws, regulations, standards, and relevant customer requirements are independently determined and complied with by our suppliers.

Due diligence and transparency

Suppliers must have systems in place that enable them to conduct due diligence in their own supply chain. Suppliers provide Hamilton with supply chain transparency on human rights risks and conflict minerals and metals as required.

Documentation of conformity

Our suppliers must maintain the necessary documentation to demonstrate compliance with this Code of Conduct and applicable regulations. We reserve the right to require our suppliers to conduct self-assessments, disclose relevant documentation or participate in ESG assessment/rating platforms, or to conduct announced and unannounced on-site audits or assessments.

Reporting concerns

If our suppliers suspect or observe violations of applicable law or the Hamilton Supplier Code of Conduct, they are required to report these to Hamilton. Reports can also be made anonymously via Hamilton's whistleblowing office <https://hamilton.integrityline.io>.