

KELLER CODE OF CONDUCT

The Code of Conduct specifies the behaviour that KELLER expects of its employees and business partners. The following points serve as guidelines for day-to-day work at KELLER and go beyond simply complying with laws and regulations.

1. Dealing with employees

1.1. Human and labour rights

KELLER undertakes to comply with internationally recognised human rights and the labour rights stipulated in the applicable national and international laws and regulations.

1.2. Child labour

KELLER undertakes to observe the statutory minimum working age and prohibits all forms of child labour in the company.

1.3. Discrimination

KELLER expects equality and equal opportunities to be promoted. Discrimination when appointing or promoting employees is to be prevented. No employee shall be discriminated against on account of their gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religion, social status or political views. KELLER undertakes not to tolerate any physical, psychological or sexual discrimination or verbal abuse.

1.4. Forced labour

KELLER undertakes not to allow forced labour in the company.

1.5. Remuneration and working hours

KELLER undertakes to grant its employees remuneration and working hours in accordance with the applicable national laws and regulations.

1.6. Health protection and occupational safety

KELLER is committed to complying with the applicable national and international laws and regulations on health protection and occupational safety. This encompasses establishing and applying adequate occupational safety management, which includes containing actual and potential occupational safety risks as well as appropriate training of employees to prevent accidents and work-related illnesses as best as possible.

2. Business integrity

2.1. Prohibition of corruption and bribery

KELLER shall ensure that no form of corruption, bribery or other granting of advantages takes place. In particular, KELLER shall ensure that the conventions of the United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) to combat corruption and the relevant anti-corruption laws are enforced.

2.2. Invitations and gifts

Gifts, invitations and other kinds of benefits and privileges may be accepted and granted provided that they are of minimal commercial value and are in line with the customs of the relevant country. They may neither unlawfully influence a person nor even constitute an attempt to do so.

KELLER employees must ensure that offering or accepting gifts or entertainment does not give rise to any doubts regarding anyone's personal integrity or the integrity and independence of KELLER. KELLER's current or potential business partners must never be asked for gifts, invitations or entertainment. If there is any doubt as to whether a gift or an invitation can be accepted, employees must defer to company management for a decision.

2.3. Avoiding conflicts of interest

KELLER expects its business partners to make their decisions regarding their business with KELLER on the basis of objective criteria only. Conflicts of interest with private affairs or other economic activities, including with related parties or organisations, are to be avoided from the outset.



1.1. Free competition

KELLER behaves fairly towards its competitors and ensures that the company complies with the applicable antitrust laws. In addition, KELLER does not enter into agreements with competitors that violate antitrust law or abuse its position should it find itself dominating the market.

1.2. Money laundering

KELLER undertakes to comply with the relevant legal obligations relating to the prevention of money laundering and to shun all money laundering activities.

1.3. Privacy and property

KELLER respects the intellectual property of others. KELLER also complies with the applicable data protection regulations and takes all appropriate measures to maintain the privacy of confidential and internal information, including trade secrets, belonging to its business partners. In particular, KELLER may only use such information for the purposes permitted by contractual agreements.

1. Environmental protection**1.1. Sustainability**

KELLER undertakes to comply with the applicable environmental laws, regulations and standards.

1.2. Conflict minerals

KELLER undertakes to take appropriate measures to ensure that none of its products use raw materials that directly or indirectly finance armed groups or violate human rights.

2. Relations with business partners

KELLER expects each business partner to communicate all the principles and requirements described herein to their subcontractors and suppliers and to factor them into the selection of these subcontractors and suppliers. Business partners are to encourage their subcontractors and suppliers to comply with the standards on human rights, working conditions, prevention of corruption and environmental protection described herein as part of fulfilling their contractual obligations.

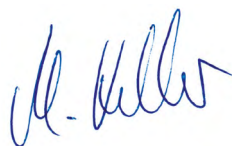
3. Applicability

The points of the Code of Conduct listed above apply to all KELLER employees and its subsidiaries. KELLER also expects all business partners or other representatives in a working relationship with KELLER to act in accordance with the contents of the Code of Conduct.

Winterthur, 01.07.2022



Tobias Keller
CEO and Co-owner



Michael Keller
Vice President and Co-owner