

SWOBODA

CODE OF CONDUCT

Compliance with law and regulations

We respect and act in compliance with all applicable laws at every single location.

Fair competition

We value fair competition and act in all aspects in accordance with it.

Prevention of fraud - introduction of FRAUD management

A FRAUD management system prevents us from fraud, abuse or deception.

Equal treatment, non-discrimination

We enforce equal treatment and non-discrimination in all matters.

Human and employee rights

Human and employee rights are very important and we act appropriately to comply with them.

Health and safety

We ensure a safe and healthy working environment in all our facilities.

Company property

We always respect and take care of the property and assets of the company.

Data protection and information security

We protect all sensitive and confidential information with appropriate measures.

Conflict minerals

We avoid conflict minerals by a thorough investigation of our supply base.

Obligation to report / Whistle blowing

We expect our employees to alert management to any nonconformance to this "Code of Conduct" and we will address these issues with no adverse effect to those individuals that make us aware.

The above list represents the rules, which are most important for the company, but does not claim to be exhaustive, but is supplemented by many other rules, described in other documents.**July 2018, The Board of Swoboda**