

# Code of Conduct

for Suppliers and Business Partners

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## Preamble

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You are a valued supplier and business partner to Speedgoat. Your products are key components of our test systems. These enable our customers, test engineers and R&D engineers and scientists around the world, to thoroughly test and certify embedded controllers, and to rapidly prototype complex control designs.

Speedgoat conducts business with integrity, transparency, and in compliance with all applicable legal regulations and ethical, ecological, and social standards, within the company and throughout our supply chain.

This Code of Conduct for Suppliers and Business Partners (hereinafter referred to as the “Code of Conduct”) defines a binding minimum standard of values, principles and legal requirements that must be maintained by Speedgoat and its suppliers and business partners (hereinafter referred to as “Suppliers and business partners”).

This Code of Conduct applies to

- **Suppliers**  
All contractors supplying Speedgoat with goods, materials, value-added work, or services
- **Other Business Partners**  
Business partners with in an intermediary and/or representative function, that act in the interest or on behalf of Speedgoat, such as authorized resellers and distributors.
- **All executives and employees of suppliers and other business partners.**

Many thanks for your commitment and contribution. Together, we responsibly accelerate technological and scientific breakthroughs for the benefit of future generations.



Martin Stoller  
CEO

## Protection of human rights and employment law

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For Speedgoat, respect for internationally recognized human rights forms the basis of all business relationships, as they protect the dignity and equal rights of every person. Our suppliers and business partners respect the rights of employees and other stakeholders and treat them according to the rules of the international community<sup>1</sup>.

### Human rights

Suppliers and business partners respect and protect globally applicable regulations to protect human rights as fundamental and universal requirements. This includes prohibiting all forms of child labor, forced labor, modern slavery, human trafficking, and any other exploitation of human beings. Speedgoat suppliers and business partners comply with the ILO Convention 138 on the minimum age of employment and the prohibition of child labor as outlined in ILO Convention 182. The employment of adolescents must never jeopardize their physical and mental development. Suppliers and business partners respect the rights of local communities, indigenous peoples, and minorities, and do not tolerate any form of threats, intimidation, physical or legal attacks against human rights and environment defenders. Human rights and environment defenders must have guaranteed access to grievance channels without fear of retaliation.

Speedgoat recommends the management and continuous improvement of a Human Rights Due Diligence (HRDD) compliance program.

### Equal opportunity and non-discrimination

Suppliers and business partners do not tolerate any discrimination or disadvantage on the grounds of ethnic or national origin, sex, religion, beliefs, age, disability, pregnancy and parenthood, gender identity, sexual orientation, skin color, political persuasion (in so far as this is based on democratic principles), social background, and any other legally protected characteristics, as outlined in ILO Convention 111. This applies in particular to the recruiting, hiring and promotion of employees and to disciplinary action and other conditions of employment. Harassment in any form whatsoever must not be tolerated. Suppliers and business partners refuse to tolerate any unacceptable treatment of individuals such as mental cruelty, sexual harassment or discrimination including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### Freedom of association and collective bargaining

Suppliers and business partners recognize the basic right of all employees to form or join existing trade unions and to engage in collective bargaining, and neither disadvantage nor prefer members of employee representation or trade unions. If this basic right is constrained by local laws, alternative and lawful possibilities to establish employee representation should be fostered.

### Fair working conditions

Suppliers and business partners provide their employees with a remuneration that is adequate to cover basic needs and enable a decent standard of living for employees and their families (living wage). This includes respecting all applicable compensation and social benefits regulations, such as minimum wages, overtime compensation, medical leave, and government-mandated benefits. Additionally, suppliers and business partners ensure that working hours and holidays comply with national law and/or the national requirements in force in the respective economic sector.

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<sup>1</sup> International human rights incorporated in the Universal Declaration of Human Rights, codified in the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR) by the United Nations and the ILO core norms.

## Occupational health and safety

Suppliers and business partners comply with the applicable legal requirements concerning health and safety at work. Through appropriate health and safety management, they ensure the safety of employees and external persons within their area of responsibility. Furthermore, a process enabling the continuous reduction of work-related health and safety risks must be established. Suppliers and business partners also provide training to employees to ensure they are educated about health and safety risks.

Speedgoat recommends the certification and management of an appropriate occupational health and safety management system, such as ISO 45001 or equivalent.

## Diversity and inclusion

Suppliers and business partners develop and promote an inclusive culture where diversity is valued, and everyone can contribute fully and reach their full potential.

## Environmental protection and sustainability

Speedgoat takes responsibility for continually improving the environmental protection and sustainability of its products and services and as well as reducing the demand for natural resources. Our suppliers and business partners comply with all applicable environmental laws and regulations in all countries in which you operate and to prevent and avoid damage to the environment and our health.

Speedgoat recommends the certification and management of an appropriate environmental management system, such as ISO 14001 or equivalent.

## Management of greenhouse gas emissions

Suppliers and business partners are expected to provide for proactive reduction of greenhouse gas (GHG) emissions throughout the entire supply chain including the increase of carbon neutral energy sources. As part of the decarbonization efforts, suppliers and business partners undertake suitable measures to reduce the emission of greenhouse gases and to improve their energy efficiency. This also comprises the use of renewable energy sources. Speedgoat suggests its suppliers and business partners to establish transparency about their own emissions by leveraging international accounting standards, such as those defined by the Greenhouse Gas Protocol<sup>2</sup>.

Speedgoat recommends setting science-based, time-bound emission reduction targets and renewable energy goals aligned with the Science Based Targets initiative (SBTi) and the Paris Agreement. Suppliers and business partners should implement measures to drive decarbonization throughout the entire supply chain.

## Efficient use of resources

Suppliers and business partners are expected to actively contribute to maintaining high water, air, and soil quality and ensuring reasonable consumption of these resources. If your company identifies significant water consumption or pollution as an important environmental aspect, we expect you to develop a water management system aimed at reducing overall water consumption and ensuring the best water quality. Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products from operations must be characterized, monitored, controlled, and treated as required before discharge.

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<sup>2</sup> GHG Protocol ([ghgprotocol.org](http://ghgprotocol.org)) establishes comprehensive global standardized frameworks to measure and manage greenhouse gas (GHG) emissions from private and public sector operations, value chains and mitigation actions.

## Circular economy and waste management

During product development, production, product service life, and end-of-life recycling, suppliers and business partners are expected to avoid waste, reuse resources, and use secondary materials. The generation of electronic waste (commonly referred to as WEEE or e-waste) should be minimized as much as possible, with treatment and recycling conducted in compliance with the WEEE directive<sup>3</sup>. Additionally, we expect you to recycle and dispose of residual waste, chemicals, and wastewater safely, in an environmentally friendly manner, and in compliance with legal requirements.

## Handling of hazardous chemicals and substances

Suppliers and business partners are expected to identify, minimize, or eliminate the use of hazardous substances in manufacturing processes and finished products, and comply with all regulatory requirements. If you work with hazardous chemicals, you must implement and maintain a responsible chemical management system that meets the following requirements, in addition to legal obligations: handling, storage, and disposal processes; understanding and preventing health and safety risks; maintaining an inventory log; and conducting regular independent audits.

## RoHS and REACH compliance

Suppliers and business partners ensure that all products delivered to Speedgoat are RoHS<sup>4</sup> and REACH<sup>5</sup> compliant and confirm such compliance upon request through conformity declarations. For products for which compliance can only be provided through exceptions by the RoHS directive, work towards products available to Speedgoat not requiring any such exceptions, hence not including any materials listed by the RoHS directive.

## Product safety

Suppliers and business partners must comply with all applicable legal regulations and requirements related to product safety, including the safety, labeling, and packaging of products. You are responsible for implementing internal processes to prevent the use of safety-critical or counterfeit parts supplied to Speedgoat.

Speedgoat recommends the certification and management of an appropriate quality management system, such as ISO 9001 or equivalent. The requirements outlined in the AS5553D<sup>6</sup> and AS6174A<sup>7</sup> standards offer valuable guidance for avoiding, detecting, mitigating, and disposing of counterfeit electrical, electronic, and electromechanical (EEE) parts. These controls can be effectively integrated into the quality management system.

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<sup>3</sup> Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE).

<sup>4</sup> Directive 2011/65/EU of the European Parliament and of the Council of 8 June 2011 on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS), as amended by Directive (EU) 2015/863.

<sup>5</sup> Regulation (EC) no. 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the registration, evaluation, authorization and restriction of chemicals (REACH).

<sup>6</sup> SAE International Standard AS5553D Counterfeit Electrical, Electronic, and Electromechanical (EEE) Parts; Avoidance, Detection, Mitigation, and Disposition

<sup>7</sup> SAE International Standard AS6174A Counterfeit Material; Assuring Acquisition of Authentic and Conforming Material

## Fair and transparent business relations

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Integrity and transparency are essential for building trust in business, and trust is the foundation of successful cooperation. Speedgoat is a trusted and reliable partner and expects the same from its suppliers and business partners.

### Anti-corruption and bribery

Suppliers and business partners do not tolerate corruption. They ensure that their employees, subcontractors, or representatives do not grant, offer, or accept any bribes, kickbacks, inadmissible sponsoring or donations, or other improper payments or benefits to or from customers, officials, or other third parties. This also includes facilitation payments (illegal payments to expedite routine administrative matters).

### Avoiding conflicts of interest

Suppliers and business partners make decisions based solely on objective criteria, avoiding personal interests or relationships. Any potential conflicts of interest with private concerns or other commercial or non-commercial activities, including those involving relatives or other related parties, are promptly addressed and eliminated.

### Gifts, hospitality, and invitations

Suppliers and business partners do not misuse gifts, hospitality, or invitations to exert influence. They neither directly nor indirectly offer Speedgoat employees or third parties inappropriate benefits in the form of gifts, hospitality, or invitations to unduly influence them. Likewise, suppliers and business partners do not request or accept such inappropriate benefits from anyone.

### Dealing with public authorities

Suppliers and other business partners consistently comply with legal provisions when dealing with governments, authorities, and public institutions, ensuring a high degree of transparency in their communication with representatives of authorities. When participating in public tenders, they adhere to the respective legal requirements and abide by the rules of free and fair competition.

### Free competition

Suppliers and business partners comply with applicable competition and antitrust laws. They must not engage in anti-competitive arrangements or agreements with competitors, suppliers, customers, or other third parties, nor abuse any dominant market position. Suppliers and business partners must ensure that no competitively sensitive information is exchanged, and that no behavior restricts or could potentially restrict competition improperly.

### Export control and trade compliance

Suppliers and business partners must comply with all EU, US and any other applicable legal regulations concerning the import and export of goods, services, and information, including sanctions, embargoes, regulations, government orders, and guidelines. This includes the transportation of goods and the transfer of data and know-how. Speedgoat requires its suppliers and business partners to implement appropriate processes ensuring that their transactions with third parties and Speedgoat comply with export control and sanction regulations. Suppliers and business partners must make accurate customs declarations, not misrepresent the value or nature of goods, and obtain (or assist in obtaining) any necessary licenses, approvals, or permits. Additionally, any required evidence and information must be readily supplied to Speedgoat.

## Money laundering and financing of terrorism

Suppliers and other business partners comply with applicable legal regulations to combat money laundering and the financing of terrorism. They neither participate in nor enable activities related to money laundering or the financing of terrorism.

## Tax and reporting

Suppliers and business partners are required to comply with applicable tax regulations and to report their business activities truthfully and in accordance with the law.

## Responsible supply chains

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Due to their significant impact on people and the planet, raw material supply chains require due diligence from all actors along the supply chain. Speedgoat outlines its objectives and expectations for responsible raw material supply chains in this Raw Materials Policy.

### Conflict minerals and commodity supply chain

Speedgoat expects you to comply with all applicable laws on conflict minerals, including the EU Conflict Mineral Regulation 2017/821, the Dodd-Frank Act, and the Swiss Ordinance on Measures Related to the Situation in Ukraine (SR 946.231.176.72).

You must also fulfill your duty of care to create a responsible supply chain for conflict minerals. These include tin, tantalum, tungsten, their ores, mineral derivatives, gold, cobalt, and mica (hereinafter referred to as “minerals”). You are required to improve transparency and traceability within your supply chain, from raw material extraction onward, and take appropriate measures to reduce the risks of serious human rights violations, such as child and forced labor, slavery, and the direct or indirect financing of armed groups or other negative impacts. Even if the EU Conflict Mineral Regulation 2017/821 and the US Dodd-Frank Act are not applicable for your company, you are required to take reasonable efforts to avoid raw materials from conflict-affected or high-risk areas<sup>8</sup>. This includes the maintenance of a completed Responsible Mineral Initiative Conflict Minerals Reporting Template (CMRT) published by the Responsible Minerals Initiative (RMI) including the monitoring on whether any non-compliant smelters or refineries are indicated by your suppliers, and to work with your suppliers on the removal of such smelters or refineries from the supply chain.

## Protection of data, business secrets, and company assets

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Confidential data, business secrets, and company assets are valuable and must be protected by Speedgoat suppliers and business partners.

### Data privacy and data protection

Process personal data confidentially and responsibly, respect everyone's privacy, and ensure that personal data is effectively protected and used only for legitimate purposes.

If Speedgoat and its suppliers and business partners exchange personal data, both parties will process such data in accordance with applicable laws, with particular attention to the requirements of the European General Data Protection Regulation (GDPR). They must ensure that no unauthorized third parties access such data without the data subject's consent.

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<sup>8</sup> Conflict and high-risk areas are characterized by armed conflict, the widespread occurrence of violence or other hazards that are harmful to humans. Human rights violations and breaches of national and international law are also often on the increase in these regions.



Both parties will process personal data strictly confidentially and exclusively for contractual purposes. The party processing the data is responsible for the legality of its processing activities and for safeguarding the data subjects' rights. It is important that personal data is collected only when appropriate, proportionate, and necessary, and deleted when no longer required.

### **Confidentiality and protection of intellectual property**

Suppliers and business partners respect and protect Speedgoat's and third parties' intellectual property rights and require their employees to do the same.

Employees with access to confidential information, including details about research and development projects, production processes, business plans, financial data, marketing and sales strategies, customer data, new product launches, and corporate mergers and acquisitions, must keep this information strictly confidential. You will instruct your employees, suppliers, and subcontractors accordingly and ensure that confidential information is safely stored and used securely. You agree to sign a non-disclosure agreement (NDA) upon Speedgoat's request.

Speedgoat recommends the certification and management of an appropriate information security management system, such as ISO 27001 or equivalent.

### **Usage of artificial intelligence**

Privacy and security are crucial requirements for the use of Artificial Intelligence (AI). Our suppliers and business partners must ensure that all AI developments comply with applicable laws and regulations. AI systems must be robust, reliable, and free from discrimination. Control of AI applications must remain with humans.

### **Security of the international supply chain**

Suppliers and business partners must ensure that business premises and handling areas where goods destined for Speedgoat are produced, stored, processed, loaded, and transported are secure against unauthorized access by third parties. Additionally, all employed personnel must be reliable.

### **Compliance with the Code of Conduct and legal consequences of any violations**

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Speedgoat suppliers and business partners commit to adhering to the principles and requirements outlined in this Code of Conduct. Compliance is verified through a self-declaration form, and audits can be conducted in consultation with the suppliers or business partners.

Suppliers and business partners must ensure their subcontractors and own suppliers follow the principles in this Code of Conduct and that these principles are maintained throughout the supply chain. If any risks related to compliance with these principles are identified within the supply chain, appropriate actions must be taken to mitigate such risks. Any identified violation of the defined principles within the supply chain must be promptly reported to Speedgoat.

If a Speedgoat supplier or business partner is suspected of non-compliance with this Code of Conduct, Speedgoat reserves the right to request information about the matter. Speedgoat also has the right to immediately terminate all contractual relationships with any supplier or business partner that does not comply with this Code of Conduct, fails to meet its obligations, or is unwilling to make or implement improvements after being given an appropriate period to do so.

### **Reporting misconduct**

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Suppliers and business partners must provide access to a protected grievance and whistleblowing mechanism for their employees to report any violations of the principles outlined in this Code of Conduct.