
SIG GROUP **CODE OF CONDUCT**

Striving for professionalism throughout our business





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INTRODUCTION

SIG Group (SIG) strives to be a leader in packaging systems for liquid food and beverages. Ethics and Compliance are key factors to achieving our business goals and securing SIG's long-term business success. Ethical and compliant behavior is the responsibility of every individual at SIG. This Code of Conduct has been approved by the Board of Directors and the Group Executive Board of SIG Group AG. It is globally valid and applies to all entities of SIG. It is binding for everyone at SIG.

All directors, officers and employees of SIG are expected to follow the law as well as the internal SIG policies and guidelines and adhere to high ethical standards. They should demonstrate social and environmental responsibility, professionalism, and use good business practices when performing their work. Trust and integrity are fundamental SIG values which must be respected. All directors, officers and employees of SIG shall use good judgement and common sense in all situations when the requirement of the law or of good business practices appears unclear. In such situations, directors should seek advice and direction from the chair and officers and employees from their supervisors.

All directors, officers and employees of SIG bear a joint responsibility for SIG's reputation. Any misconduct and ethically questionable behavior, both internally and externally when dealing with business partners or the public, can have serious legal consequences and severely harm SIG and its reputation.

The principles contained within the Code of Conduct are based on:

- Ethical and legal behavior
- Fair, courteous and respectful treatment of fellow employees and others with whom we interact
- Fair and appropriate consideration of the interests of other stakeholders (customers, business partners, government authorities and the public) as well as of the environment
- Professionalism and good business practice

Any violation of this Code of Conduct is considered as misconduct and will be addressed appropriately.

In order to adhere to this Code of Conduct, please familiarize yourself with SIG's internal policies and guidelines, which can be found on the intranet.





Everyone at SIG is expected to follow the law as well as the internal SIG policies and guidelines and adhere to high ethical standards.

They should demonstrate social and environmental responsibility, professionalism, and use good business practices when performing their work.

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1. COMPLIANCE WITH THE LAW

SIG is committed to operating within the framework of the laws and regulations applicable to its business. Compliance with laws, regulations and internal guidelines is an absolute requirement for everyone at SIG.

All directors, officers, and employees of SIG are expected to understand and adhere to the laws, regulations, internal guidelines and binding standards affecting their work and must not encourage other employees or persons with whom SIG does business to breach any laws, regulations, applicable guidelines, and binding standards. SIG's Management is expected to provide necessary instruction and advice.

On occasion, there may be disagreement as to whether or not SIG is in full compliance with the law. Litigation may occur. At all times, SIG will act responsibly and abide by the final decisions rendered by the courts.

Issues of compliance with requirements of governmental agencies may also arise.

Each director, officer and employee has the responsibility to inform SIG management or Legal & Compliance immediately if he or she believes that a potential compliance issue may exist.

YOUR RESPONSIBILITIES

- Comply with all applicable laws, regulations and internal guidelines.
- Inform SIG management or Legal & Compliance immediately in case of any potential compliance issues.

In case of any questions contact Legal & Compliance.

2. EQUAL EMPLOYMENT OPPORTUNITY, HARASSMENT AND DISCRIMINATION

At SIG, we treat each individual with respect. Everyone at SIG is entitled to fair and respectful treatment by his or her supervisors, subordinates and peers.

SIG is committed to providing an inclusive working environment for its directors, officers, and employees, free of bias. All directors, officers, and employees should feel safe, valued, treated fairly and empowered. SIG does not tolerate discrimination or harassment of its directors, officers, and employees or suppliers' workers based on race, religion, national origin, political affiliation, gender, sexual orientation, disability, age or any other relevant category.

Discrimination is treating a person less favorably with respect to his or her employment because of a protected characteristic such as race, ethnicity, color, religion, gender, age, national origin, marital status, sexual orientation, gender identity or expression, disability, veteran status or other characteristic protected by either applicable legal requirements or specific corporate policy.

Harassment can be physical, verbal or written and can include unwelcome physical contact, sexual advances or requests for sexual favors, disparaging or derogatory jokes, comments, gestures, graphic statements, drawings, pictures, or engaging in offensive behavior.

All directors, officers, and employees shall act in accordance with the letter and spirit of these principles.

YOUR RESPONSIBILITIES

- Create an atmosphere free of any discrimination or harassment.
- Do not engage in or tolerate any discriminating or harassing behavior.
- Speak up when you believe that you or one of your colleagues is being harassed or discriminated against. You can be sure that SIG has a zero-tolerance approach to discrimination and harassment.

In case of any questions regarding harassment and discrimination, contact your supervisor, Human Resources or Legal & Compliance.

SIG does not tolerate discrimination or harassment of anybody at SIG or SIG's suppliers' workers based on race, religion, national origin, political affiliation, gender, sexual orientation, disability, age or any other relevant category.

...SIG and its subsidiaries have adopted a comprehensive, proactive environmental protection policy that reflects its belief in sustainable development combined with environmental sensitivity.

3. ENVIRONMENT, HEALTH & SAFETY

SIG is committed to sustainable development, which requires balancing good stewardship in the protection of human health and the natural environment with the need for profitable growth of its operations.

In recognition of this principle, SIG has adopted a comprehensive, proactive environmental protection policy that reflects its belief in sustainable development combined with environmental sensitivity.

SIG will conduct its business in compliance with all applicable legislation providing for the protection of the environment, its directors, officers, and employees and the public. SIG will also continuously assess available technology to reduce environmental effects and implement improvements beyond compliance levels where economically viable.

SIG is committed to sourcing all raw materials as soon as practicable from sources certified as responsibly managed and strives to encourage our suppliers to increase their responsible sourcing activities. SIG equally commits to mitigate negative impacts in raw material sourcing by striving to ensure compliance with local and national laws and considering economic, environmental and social values – meaning not sourcing illegally, in violation of traditional and civil rights or threatening ecosystems and biodiversity.

The health and safety of its directors, officers, and employees is of utmost importance to SIG. SIG is committed to protecting the physical, mental and social health of its directors, officers, and employees and the surrounding community. To minimize the risk of workplace incidents, occupational illnesses and other health problems to the extent possible, SIG complies with all applicable statutory requirements and local safety rules and standards.

YOUR RESPONSIBILITIES

- Always comply with your facility's environment, health and safety rules and procedures, and be sure of the "safe way" to perform a task. If unsure, ASK!
- Understand the specific environmental requirements for your job function.
- Ensure that environmental permits have been obtained and are up-to-date, and that records, documents, and labels are complete, accurate, and truthful.

In case of any questions contact your local Environmental, Health and Safety representative.

4. HUMAN RIGHTS COMPLIANCE

SIG will act in accordance with nationally and internationally recognized human rights, including fair working conditions and national and international labor and social standards. The respect of human rights is one of SIG's core values.

SIG is highly committed to respect the human rights of its directors, officers, and employees, supply chain partners along our global value chain, the local communities in which it is operating and sourcing regions, distributors, customers, consumers, other business partners and external stakeholders.

SIG's commitment to human rights encompasses all internationally recognized human rights, including those covered in the Universal Declaration of Human Rights and the core labor standards of the ILO (International Labor Organization), the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises. If national law in our areas of operation extends or conflicts with internationally recognized human rights, we comply with national legislation and also strive to adhere to the principles of internationally recognized human rights to the greatest extent possible.

When conducting business, SIG will strive to prevent any adverse human rights impacts in connection with its business. As a part of its global value and supply chains, SIG expects that its business partners (customers, supplier, and other

third parties) also respect human rights as well as international labor and social standards.

SIG does not tolerate, engage in or support child and forced labor, including prison labor, slavery and any other form of labor that poses a threat to both adults and children. SIG is committed to prevent, mitigate and address the risks of child and forced labor in its global value chains.

YOUR RESPONSIBILITIES

- All directors, officers, and employees must respect internationally recognized human rights, including fair working conditions and national and international labor and social standards.
- Only conduct business with business partners and other supply chain partners who respect nationally and internationally recognized human rights, including fair working conditions and national and international labor and social standards.

5. TRADE COMPLIANCE

SIG is committed to compliance with all applicable trade laws and regulations, including those regarding embargoes, boycotts and other economic sanctions.

As an international company, SIG conducts business with suppliers and customers in variety of jurisdictions. Our business with international partners may be subject to restrictions under domestic and international trade control laws. Such restrictions can be based on the nature of the product, on the country of origin or destination, or the identity of the business partner.

SIG complies with all local import and export laws. SIG does not unlawfully conduct business with countries or business partners (suppliers, customers, or third parties) that are subject to embargoes or economic sanctions. SIG follows all regulatory requirements, including those regarding classification, documentation, shipping and record retention.

YOUR RESPONSIBILITIES

- Ensure that business partners (customer, supplier, or third party) are not subject to sanctions
- Ensure that any required permits / licenses for exporting or importing goods are obtained.
- Inform the Head of Global Trade Compliance or Legal & Compliance in case of any suspicious business transaction
- Note that export control laws can be complex and are often subject to revisions. Consult the Head of Global Trade Compliance or Legal & Compliance if you have concerns about any SIG business in relation to a certain country or business partner.

For any questions regarding export control consult the Head of Global Trade Compliance or Legal & Compliance.



6. ANTI-CORRUPTION / ANTI-BRIBERY

SIG has zero tolerance towards any acts of bribery and complies with all applicable anti-corruption / anti-bribery laws.

No director, officer, or employee and no third party or agent on SIG's behalf, shall offer or make any payment (including kickbacks), or offer improper financial advantage to any party (including an official of a government or a government-controlled entity) for the purpose of obtaining business, authorisation or services or to avoid any unfavourable outcome, nor shall any director, officer, or employee extend unlawful benefits to any party (including customers) if such benefits are outside the usual local business practices or violate applicable laws.

SIG's directors, officers, and employees shall not accept inappropriate or illicit benefits which might be offered to them by any party (including customers, suppliers or other persons).

Modest gifts and reasonable entertainment may be given and received, where legally permitted and in accordance with local business practices, to and from persons doing business or seeking to do business with SIG. No gift or entertainment should be of such nature or value as to constitute an improper personal enrichment of the recipient or to create an obligation on the part of the recipient, or as would reflect unfavorably on SIG or the donor or recipient if subjected to public scrutiny. Cash or equivalents are not to be given or accepted.

Directors, officers, and employees are encouraged to be thoughtful with respect to gifts given and accepted in the context of those relationships to ensure that they are appropriate, and would reasonably be perceived as appropriate, in the circumstances. In case of any doubts about whether offering or receiving of any benefits are acceptable or not, directors, officers, and employees should discuss the question with their supervisor and/or contact Legal & Compliance.

SIG will investigate any suspicion of corruption and bribery and will take disciplinary and other appropriate actions accordingly.

YOUR RESPONSIBILITIES

- Act ethically and with integrity. Be thoughtful when it comes to giving and receiving gifts or other benefits.
- Do not make any corrupt payment or bribe in any form, regardless of amount, directly or through an intermediary.
- Do not accept or give money (or cash equivalents, e.g. vouchers) as a gift.
- Report any suspected acts of bribery or violations.

For questions on the various anti-bribery laws and for information on bribery or entertainment and gifts, contact Legal & Compliance.

7. ANTITRUST AND FAIR BUSINESS PRACTICES

Everyone at SIG is expected to compete fairly and in line with the law as well as internal guidelines whenever they do business on behalf of SIG with customers and other business partners, including suppliers, as well as competitors.

Decisions regarding the purchase of goods and services should be made only on sound business principles and in accordance with the law and ethical business practices. No director, officer, or employee should take unfair advantage of any other person through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair business practice. No director, officer, or employee should disparage or misrepresent competitors of SIG, either generally or in respect of a particular matter or transaction and should never seek to induce another party to breach a contract in order to enter into a transaction with SIG.

SIG is committed to observe all applicable antitrust and competition laws. SIG will not be part of formal or informal agreements or understandings with competitors or other business partners that violate such laws.

Antitrust laws apply to all business arrangements, irrespective of their form (in writing or not), as well as to business conduct in general. Antitrust laws may vary in different jurisdictions, but generally forbid agreements or actions that unreasonably restrain free trade, are deceptive or misleading, or unreasonably reduce competition.

Antitrust laws apply if the negative impact on competition is effective in a country, even though the anti-competitive behavior is conducted outside that country.

YOUR RESPONSIBILITIES

- Comply with the principles and rules of fair competition and do not violate applicable antitrust laws.
- Brief internal Legal & Compliance sufficiently in advance of any anticipated contact with competitors
- Follow the internal Guidelines For Information Sharing / Contacts With Competitors whenever meeting with competitors.
- Never agree with competitors to fix prices or divide markets.
- Never enter into any understanding that might unlawfully restrict or reduce competition, which can include discussing pricing (price fixing), terms & conditions of sale, bid rigging, customer boycotts, and divisions of customers, territories or markets.
- Only attend meetings and trade association meetings with competitors in line with internal policies.

In case of any questions regarding antitrust, contact Legal & Compliance.



Breaches will be dealt with promptly and fairly in a manner that takes into account the seriousness of the violation and the conduct of the employee in response thereto.





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SIG is committed to observing all applicable antitrust and competition laws. SIG will not be part of formal or informal agreements or understandings with competitors or other business partners that violate such laws.

8. ANTI-MONEY LAUNDERING

SIG complies with all applicable anti-money laundering laws and requirements, such as reporting obligations.

Money laundering is the process of changing money obtained from criminal acts into an apparent origination from legitimate activities.

SIG takes all reasonable measures to prevent and protect itself from being used by criminals to “clean” their proceeds stemming from criminal activities.

In order to prevent money laundering, SIG only conducts business with reputable business partners to ensure that any monies are from legitimate sources. This is achieved by checking the identity and the credentials of the (potential) business partners and other third parties prior to entering into a business relationship.

SIG also complies with all reporting obligations under national anti-money laundering laws and regulations.

YOUR RESPONSIBILITIES

- Ensure that every new business partner (customer, supplier, or third party) is carefully reviewed and identified.
- Report any suspicious business transaction.
- Avoid the use of cash in business transactions.

In case of any questions regarding money laundering, contact Legal & Compliance.

9. CONFLICT OF INTEREST

Business transactions must be conducted with the best interests of SIG in mind. even the appearance of a conflict of interest should be avoided.

A conflict of interest arises where personal or financial interests of SIG's directors, officers, or employees potentially interfere with SIG's interests. Even the appearance of a conflict of interest can damage the reputation of the company.

Situations that may cause conflict, or give the appearance of conflict, between a responsibilities towards SIG and a personal interests should be avoided. Nevertheless, a conflict of interest, or the appearance thereof, may occasionally arise. Should such a situation occur, transparency and communication between SIG and its directors, officers, and employees is of utmost importance, and the parties concerned shall attempt to resolve the matter in good faith.

Therefore, all directors, officers, and employees are obliged to immediately disclose any potential or actual conflict of interest prior to taking any business decision which may be influenced by that conflict.

YOUR RESPONSIBILITIES

- Place compliance with laws and ethical principles above private gain.
- Immediately disclose any potential or actual conflict of interest to your supervisor or Legal & Compliance prior to taking any business decision.
- Do not have a position with, or a financial interest in, another business that interferes or appears to interfere with your duties or responsibilities, unless approved in advance by Human Resources or Legal & Compliance
- Do not conduct any SIG business with a family member or equivalent person unless approved in advance by Human Resources or Legal & Compliance.
- Do not supervise or have direct decision making power over a family member or equivalent person unless approved by Human Resources or Legal & Compliance.
- Report suspected conflict of interest to Human Resources, Legal & Compliance, or the SIG ethics and compliance hotline for your location.

In case of any questions regarding conflict of interest, contact Human Resources or Legal & Compliance.



10. INSIDER TRADING

Securities laws provide for criminal and civil liability for persons who engage in illegal insider trading or illegally transmit undisclosed material information relating to SIG or, in certain circumstances, the securities of entities with which SIG has entered into or may enter into a transaction.

SIG's directors, officers, and employees must generally protect confidential information, except when disclosure is authorized or legally mandated. Confidential information includes, among other things, any non-public information concerning SIG, including its businesses, financial performance, results or prospects, financial and other information about potential acquisitions and any non-public information provided by a third party with the expectation that the information will be kept confidential and used solely for the business purpose for which it was conveyed.

Insider trading laws are intended to ensure that no one who is in possession of or has knowledge of undisclosed material information takes advantage of such information by trading in securities of SIG or such other entities.

Anyone with access to confidential information that could significantly influence the market price of SIG securities is considered an insider.

SIG has therefore adopted a formal policy regarding insider trading, a copy of which has been provided to and must be reviewed and complied with by all directors, officers, and employees. It provides for blocking periods applicable to all SIG directors, officers, and employees and requires pre-clearance of any intended trades in SIG securities by certain persons.

YOUR RESPONSIBILITIES

- Never disclose confidential / insider information to a third party unless authorized or legally mandated.
- Do not take advantage of non-public information concerning SIG when trading in Securities of SIG; do not recommend trading to other persons based on that information.
- Observe all applicable trading restrictions, in particular blocking periods.
- Protect SIG's confidential or proprietary information by confidentiality agreements, appropriate storage and encryption.

In case of any questions regarding insider trading, contact Legal & Compliance.

11. PRIVACY & DATA PROTECTION

SIG is committed to ensuring the protection of personal data of everyone at SIG, its customers and suppliers. SIG will only collect and process personal data in line with the applicable legal frameworks.

Access to personal information about SIG's directors, officers, and employees, suppliers and customers must remain restricted to people with a "need to know" within SIG and will be transmitted to others or third parties only for legitimate and necessary business purposes or to satisfy legitimate investigative or legal requirements.

Directors, officers, and employees who are responsible for maintaining personal information must ensure that the information is not disclosed inappropriately or misused.

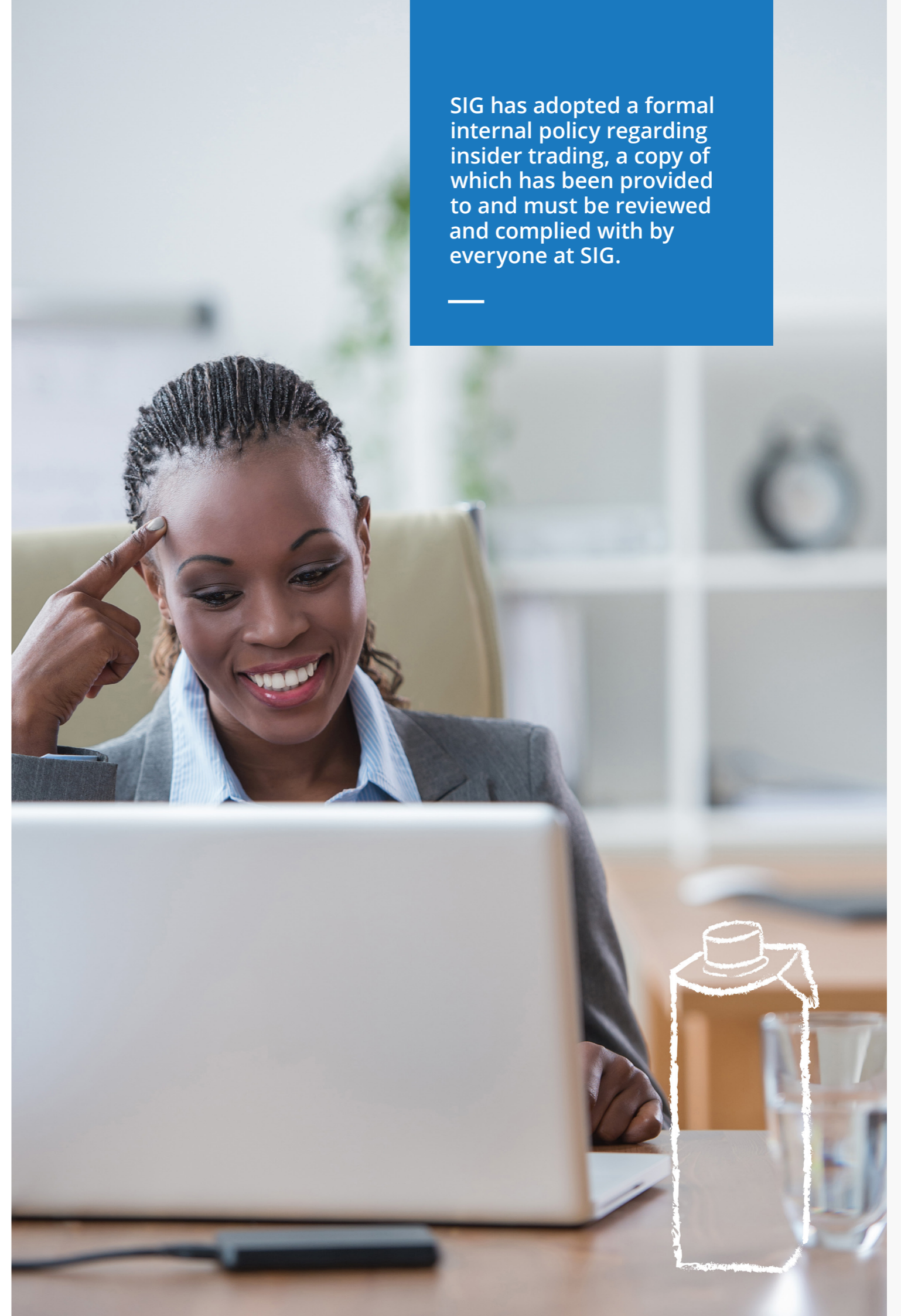
SIG will comply with all legal requirements regarding retention and destruction of information.

YOUR RESPONSIBILITIES

- Ensure that personal information is only collected and processed within the applicable legal framework.
- Exercise appropriate care, custody and control over SIG's files, documents and electronic data.
- Keep confidential information stored properly when it is not being used.
- Destroy unnecessary or outdated files and information only in line with statutory requirements and internal guidelines.
- Do not destroy files or information if you have reason to believe that they could become relevant in an upcoming crisis or in an anticipated or pending legal dispute or administrative procedure.

In case of any questions regarding data protection, contact the Data Protection Officer or Legal & Compliance.

SIG has adopted a formal internal policy regarding insider trading, a copy of which has been provided to and must be reviewed and complied with by everyone at SIG.




 A close-up photograph of a hand adjusting a black and white knob on a blue control panel. The panel features several other knobs, some with green caps, and a small white label with the word 'CONFIDENTIAL' printed on it. The background is softly blurred, showing more of the control panel.

SIG's assets include not only equipment, materials, systems, data, supplies and services that are purchased by SIG but business secrets and other confidential information.

12. THEFT AND MISUSE OF SIG'S ASSETS

Everyone at SIG should protect SIG's assets and ensure that they are used efficiently and only for legitimate business purposes in SIG's interests.

SIG's assets include not only equipment, materials, systems, data, supplies and services that are purchased by SIG but also its business secrets and other confidential information.

SIG does not tolerate theft or the misuse of its assets for personal reasons. SIG's assets may only be used in relation to legitimate business purposes for SIG.

However, directors, officers, and employees are permitted to also use SIG's technology resources (e.g., computers, phones, etc.) for incidental personal purposes in line with SIG's internal policies and guidelines. SIG's directors, officers, and employees are not permitted to use SIG's technology resources to engage in communication that contains, promotes or constitutes illegal or obscene information or activities, or other matters that could reasonably be expected to expose SIG to any criminal, civil or regulatory liability as well as matters that could negatively impact SIG's reputation.

SIG's directors, officers, and employees have the joint responsibility to protect SIG's assets against theft, loss, abuse, unauthorized access and disposal. The same applies to assets of our customers, business partners or other third parties which are in our possession.

YOUR RESPONSIBILITIES

- Do not use SIG's assets for personal benefit without prior authorization.
- Do not use SIG's technology resources in any manner that might negatively impact on SIG.
- Report any loss, theft or misuse of SIG's assets immediately to your direct supervisor or Legal & Compliance.
- Store SIG's assets (such as computers and other devices) in a way to prevent loss, theft or unauthorized access.

In case of any questions regarding the dealing with SIG's assets, contact Legal & Compliance.

13. TRUE AND FAIR FINANCIAL REPORTING, FINANCIAL INFORMATION

Financial statements shall be prepared in compliance with local regulation as well as with the International Financial Reporting Standards (IFRS) reflected by SIG Accounting Guidelines and thus provide a true and fair view in all material respects.

Investors, creditors and others have a legitimate interest in SIG's financial information. The integrity of SIG's financial reporting is based upon the validity, accuracy and completeness of the information upon which its accounts and records are based. SIG expects its directors, officers, and employees involved in creating, processing or recording such information to take responsibility for its integrity. Without limiting the foregoing, directors, officers, and employees may not be involved in the submission of false invoices or expense reports, the forging or alteration of cheques or misdirection of payments, the unauthorized handling or reporting of transactions, the creation or manipulation of financial information so as to artificially inflate or depress financial results, or any improper or fraudulent interference with or coercion, manipulation or misleading of SIG's auditors.

Information in SIG's public communications, including stock exchange and securities commission filings and communications with investors, must be full, fair, accurate, timely and understandable.

All directors, officers, and employees who are involved in the SIG's disclosure process, including all senior financial personnel and all directors, officers, and employees with supervisory responsibilities with respect to SIG's public disclosure documents, are expected to act in furtherance of this requirement. In particular, these individuals are required to be familiar with and to comply with all applicable disclosure requirements and are prohibited from knowingly misrepresenting, omitting, or causing others to misrepresent or omit, material facts about SIG to others, whether within or outside SIG.

Directors, officers, and employees should have regard to the procedures for developing and making public disclosure and avoiding inadvertent or selective disclosure to analysts or others, all as set forth in SIG's internal policy.

Furthermore, the reliability of the financial reporting shall be enhanced by effectively operating internal controls.

YOUR RESPONSIBILITIES

- Make appropriate and timely entries in SIG books and records to record all transactions.
- Do not make any inaccurate, false, or misleading entry in SIG books and records.
- Do not make or approve payments without adequate supporting information or if any part of the payment is to be used for any purpose other than the purpose described in the supporting documentation.
- If you participate in the preparation of financial reports, know and follow SIG's accounting and internal control procedures.
- Do not create or maintain a secret or unrecorded fund or asset for any purpose.
- Diligently perform, and adequately document the performance of, all control procedures you are responsible for.
- Report any inaccurate, false, or misleading records.

For questions on financial procedures controls and records, contact Finance and Accounting.

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The integrity of SIG's financial reporting is based upon the validity, accuracy and completeness of the information upon which its accounts and records are based.





...SIG recognizes and encourages everyone's involvement in charity and community service and the making of charitable donations.

14. POLITICAL AND CHARITABLE ACTIVITIES

SIG recognizes the legitimate interests of everyone at SIG in being involved in political activities, including the support of political candidates and the expression of opinions on political or public issues so long as it is consistent with applicable laws.

SIG adheres to all applicable laws and regulations governing donations, sponsorships and charity activities. Any donations and other contributions, sponsorships and other benefits by SIG to political organizations must be in accordance with internal approval requirements.

SIG recognizes and encourages its directors', officers', and employees' involvement in charity and community service and the making of charitable donations. However, directors, officers, and employees should make it clear that they are acting or speaking on their own personal behalf and not on behalf of SIG in engaging in such activities or making such donations unless they are authorized by SIG to act on its behalf. Donations of SIG's funds or assets and the use of SIG's name in support of political or charitable causes may only be made with proper authorization.

Nothing in this policy is intended to restrict in any way any persons from participating in political activities of any type; however, unless specifically approved in advance no person should use SIG's resources for political activities or attribute any political position to SIG or any of its directors, officers, and employees.

YOUR RESPONSIBILITIES

- Do not represent your personal political activity as being SIG's political activity.
- Do not create the appearance that you might be acting on SIG's behalf when engaging in politics.
- Do not force or pressure any employee to contribute to any political candidate or party.
- Do not use SIG's assets or reputation or directors, officers, and employees in support of political activities without approval of Legal & Compliance.
- Political involvement can result in a conflict of interest. Such a potential conflict of interest needs to be disclosed immediately once it arises.

For questions regarding political contributions and activities, contact Legal & Compliance.

15. REPORTING VIOLATIONS

Based on SIG's culture of integrity and honesty, any questions or doubts should be discussed and addressed immediately in order to prevent any violation.

All directors, officers, and employees are expected to report any violation of law, regulation or this Code of which they become aware. Similarly, any director, officer or employee who is unsure as to whether a violation has occurred or who needs guidance as to whether to take a particular action that may be, or may appear to be, a violation, should seek advice and consult with the appropriate contact persons. No individual who, in good faith, reports a violation or potential violation or who cooperates in the investigation of a violation or potential violation will be subject to harassment, disciplinary measures or retaliation as a result of such report. SIG will protect any director, officer, or employee who reports a violation or potential violation in line with the statutory requirements.

Violations should be reported through any available channel including supervisors and managers, representatives of Human Resources, Legal & Compliance, Internal Audit or the SIG Ethics & Compliance Hotline. The Hotline allows to place reports via a toll-free phone number, in local language, and on anonymous basis (except where this is prohibited by law) if so requested by the reporting director, officer, or employee, and also by email.

Information and local phone numbers of the SIG Ethics & Compliance Hotline can be found on the intranet.

YOUR RESPONSIBILITIES

- Speak Up!** Use the – in your personal judgment – most appropriate channel including your colleagues, your supervisor, Controlling, Internal Audit, Human Resources, Legal & Compliance or contact the SIG Ethics & Compliance Hotline to address any questions or report a violation.
- Respect anyone who, in good faith, raises or helps addressing unlawful behavior, a violation of the Code of Conduct or other internal policies or guidelines other any ethics or integrity concern.**

For further information or questions regarding reporting violations, contact your supervisor, Human Resources or Legal & Compliance.

In case of questions or to report violations of this Code please contact Legal & Compliance.

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Neuhausen/Rheinfall
Phone: +41 52 674 6111

www.sig.biz



Violations can be reported through any available channel including supervisors and managers, representatives of Human Resources, Legal & Compliance, Internal Audit or the SIG Ethics & Compliance Hotline.





Everyone at SIG shall receive a copy of this Code of Conduct. It is the duty of management to include the Code of Conduct in employee training programs.

16. IMPLEMENTATION OF THE CODE AND CONSEQUENCES OF VIOLATION

Compliance and the adherence to the Code of Conduct is the responsibility of everyone at SIG. Monitoring the compliance with this Code is ultimately the responsibility of the SIG Board of Directors.

The monitoring of compliance is achieved through systems and processes implemented by SIG management that are designed to result in wide dissemination of the Code, to encourage compliance with its provisions and to facilitate the reporting of actual or suspected breaches. Such breaches are investigated as appropriate and, depending upon the nature of the breach and other relevant circumstances, either dealt with by management with the results reported to the board or referred to the board for further action.

Each director, officer, and employee shall receive a copy of this Code of Conduct. It is the duty of management to include the Code of Conduct in employee training programs. Management shall monitor compliance with the Code and, if need be, implement special monitoring programs. Breaches will be dealt with promptly and fairly in a manner that takes into account the seriousness of the violation and the conduct of the employee in response thereto. Self-reporting by directors, officers, and employees is encouraged and will be given due consideration by SIG in dealing with any violation. Disciplinary action can include, but is not limited to, an impact on the applicable individual's record or remuneration, suspension or termination of employment, pursuit of any and all remedies available to SIG for any damages or harm resulting to it from a violation, and referral to the appropriate legal, regulatory or law enforcement body.

Self-reporting by everyone at SIG is encouraged and will be given due consideration by SIG in dealing with any violation.

CONTACT

In case of questions or to report violations of this Code please contact:

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