

Comet Supplier Code of Conduct

Policy owner

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Reviewed and approved by

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Comet Supplier Code of Conduct

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Introduction

At COMET we are driven by a commitment to innovation and a shared responsibility for our planet's limited resources. Our COMET values—Customer Orientation, Challenge and Empower, and Trustful Collaboration—inspire us to work closely with our stakeholders in search of solutions that foster sustainable progress, enhance safety, security, and our overall quality of life. Our suppliers and related business partners play a fundamental role in preserving these principles on a daily basis.

This Supplier Code of Conduct outlines our values and principles and describes the expectations that we have towards our suppliers and business partners when conducting business with us. We aim for a business environment that is good for everyone and takes care of the world around us. Based on the Responsible Business Alliance (RBA) Code of Conduct, this document helps us all follow the right ways to do business that match our goals.

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1 Our Values and Principles

1.1 Business Integrity and Ethics

COMET's suppliers and business partners are expected to follow all laws, rules, and ethical guidelines relevant to their industries and regions and to operate with the highest ethical standards regarding honesty, integrity, and transparency.

It is crucial for our suppliers to design and roll-out appropriate policies and procedures that prevent unethical business practices and ensure that the ethical guidelines are applied. Such policies can include Code of Conduct, Anti-Bribery-and-Corruption (i.e. ISO 37001), Delegation-of-authority guidelines, Data Privacy, Quality Management System – QMS (i.e. ISO 9001), Trade Compliance, Integrity Line (i.e. ISO 37002), Sales and Purchasing policies, Environmental Management System (i.e. ISO 14001), Information security management systems – ISMS (i.e. ISO 27001) etc.

1.2 Labor and Social Standards

Our suppliers and business partners must always respect and uphold the fundamental rights of their employees and all related stakeholders that are involved in the business activities. This includes for example ensuring fair wages, providing safe working conditions, and strictly prohibiting any form of abuse, harassment, mistreatment, or intimidation. We encourage suppliers to promote equal opportunities regardless of race, ethnicity, gender, age, religion, disability and more. Upholding these values not only strengthens workplaces but also enhances the overall impact on society.

COMET opposes any form of child labor in accordance with the International Labour Organization's Convention on minimum age (ILO C138). We do not tolerate human trafficking, slavery, or other forms of coerced or forced labor. We hold our suppliers to the same standards, expecting unwavering commitment to these principles.

It is crucial that our suppliers and business partners establish a comprehensive, transparent, and documented chain regarding their supply channels and third-party contractors that are relevant to the business activities. Such procedures and criteria can be summarized under the know-your-counterparty (KYC) policy. For example, The Financial Action Task Force (FATF) issued the FATF 40 Recommendations for KYC and Customer Due Diligence.

1.3 Health and Safety

Ensuring the well-being of people and the environment is of the utmost importance.

Our suppliers and business partners must create and maintain a work environment that at a minimum adheres to local occupational health and safety laws and is in full compliance with all relevant environmental laws and regulations.

This involves providing the necessary training and development programs to equip employees with the knowledge and skills needed to maintain a safe workplace, including monitoring hazards and implementing preventive measures, identifying and assessing emergency situations, establishing an occupational health and safety management system, as well as inspecting production equipment. By doing so, we collectively contribute to the protection of our workforce and the preservation of our environment.

We expect our suppliers and business partners to have a documented health and safety policy which is rolled-out and trained on a recurring basis.

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2 Environment

2.1 Resource Consumption

Suppliers are expected to embrace environmentally responsible practices and take all reasonable steps to ensure that the materials and minerals they source, including for example potential conflict minerals such as tantalum, tin, tungsten, and gold are produced in alignment with national and international laws and regulations (i.e. EU Conflict Mineral Regulation - 2017/821; Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour – DDTro). Furthermore, suppliers should continuously work to reduce the impact of their business operations on the natural environment and strive to minimize resource consumption.

The procurement policy of our suppliers should outline such commitments more specifically and describe actions taken to ensure compliance with relevant laws and regulations. Annually, COMET reserves the right to request information from the suppliers regarding the alignment and conformity with national and international laws and regulations regarding the procurement, handling and consumption of materials and minerals.

2.2 Hazardous materials

Suppliers are required to avoid using prohibited substances under the EU regulation regarding the “Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)”, as well as the ones mentioned on the Candidate List of SVHCs. They should make every effort to minimize the presence of highly concerning or specific hazardous substances in electrical and electronic equipment in accordance with the EU directive on the “Restriction of Hazardous Substances“ (RoHS 2 – 2011/65/ EU) and the applicable delegated regulations on RoHS. This must adhere to the standards outlined by relevant national and international regulations.

We expect our suppliers and business partners to have such procedures documented in the health and safety policy which is rolled out and trained on a recurring basis.

Annually, COMET reserves the right to request information from the suppliers regarding the alignment and conformity with national and international laws and regulations regarding the procurement, handling and consumption of critical substances.

2.3 Waste and emissions

Suppliers are responsible for the safe handling, storage, movement, usage, recycling, reusing, and environmentally friendly disposal of all materials and items no longer needed or usable (i.e., waste, scrap, rejects etc.). Any waste, wastewater, or emissions that could potentially harm human health or the environment should be managed, controlled, and treated appropriately before being released into the environment.

We mandate our suppliers to fulfill information obligations and adhere to the corresponding declaration requirements, ensuring transparency and accountability.

We expect our suppliers and business partners to have an appropriate environment, emission and waste policy in place that describes the procedures and actions taken to minimize negative impact.

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3 Compliance with Laws and Regulations

3.1 General Laws

Suppliers commit to following all national and international laws and regulations, minimum industrial standards, ILO (International Labor Organization) and UN conventions, as well as all other provisions of applicable legal systems. This includes but is not limited to declaration of all relevant commercial information on the shipping documents and notifying COMET's purchasing department directly of goods subject to authorization (in accordance with the Swiss Ordinance on the Export, Import and Transit of Dual Use Goods, Specific Military Goods and Strategic Goods – GCO; United States Munitions List – USML; US Export Administration Regulation – EAR; International Traffic in Arms Regulations – ITAR).

3.2 Corruption and Bribery

COMET forbids any business conduct that could lead to or involve offering, giving, or receiving bribes, kickbacks, corruption, or any type of fraudulent activities, either directly or indirectly. We will report any confirmed occurrence to the respective authorities and terminate the business relationship with the respective counterparty.

Suppliers must adhere to all national and international anti-corruption and bribery laws that apply to their operations and should have a respective policy in place that is aligned with generally accepted standards (i.e., ISO 37001, FCPA, UK ABC Act, etc.).

3.3 International Trade Regulations

Our suppliers and business partners must operate in alignment with all pertinent export and import laws, including trade sanctions, embargoes, and other trade-related rules, as well as government directives and policies.

We expect our suppliers to complete thorough due diligence procedures before pursuing or accepting new business opportunities and declare all relevant commercial information on the shipping documents. Such information can include for example obtaining an Export Control Classification Number (ECCN) for US related transactions, using the Harmonized Commodity Description and Coding System provided by the World Customs Organization (WCO) or issuing a Certificate of Origin (CoO).

All such procedures and related activities should be documented in a trade compliance policy which is effectively rolled-out, monitored and trained on a recurring basis.

3.4 Fair and Free Markets and Antitrust Laws

COMET is dedicated to promoting Fair and Free Markets. We require our suppliers to act in accordance with both national and international antitrust and competition laws, and to abstain from participating in practices such as price fixing, cartels, or any other arrangements that distort competition. We further expect our suppliers to comply with the principles of non-discrimination in relation to the selection and treatment of suppliers.

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4 Conflict of Interest

Our suppliers and business partners are obligated to prevent any conflicts of interest that could jeopardize their ability to fulfill contractual obligations. Suppliers must proactively identify, reveal, and manage conflicts of interest that might compromise impartiality, judgment, decision-making, or harm business relationships.

5 Accuracy of Records and Reporting

Suppliers are expected to uphold the highest standards of integrity when it comes to creating, maintaining, and reporting company records. COMET reserves the right to ask suppliers for information regarding their management practices and compliance, aligned with all relevant legal and regulatory standards.

6 Confidentiality of Information

Preserving the utmost confidentiality is fundamental to our business. Our suppliers and business partners are entrusted with confidential information, including customer data, financial records, and intellectual property. This information must only be disclosed as required by law or authorized by management.

Our suppliers must treat confidential information with the utmost care during storage and transmission. COMET expects its suppliers and business partners to comply with general data privacy standards (i.e., EU GDPR) and have a proper Data privacy and IT security policy (i.e. ISO 27001) in place.

Any unauthorized access, disclosure, or use of confidential information is strictly prohibited. A potential breach that involves data that might be directly or indirectly related to COMET must be communicated to the COMET purchasing manager promptly.

7 Management systems

7.1 Monitoring and compliance

Suppliers should use management systems to ensure compliance and ongoing improvement with these principles. If the supplier breaches this Supplier Code of Conduct, COMET retains the right to terminate the business relationship in line with relevant laws. The supplier's officers, directors, managers, employees, representatives, and agents are solely responsible for adhering to this Code of Conduct. COMET and its subsidiaries maintain the right to verify compliance through on-site inspections and/or record reviews.

7.2 Incident Reporting

Suppliers must promptly inform COMET if they become aware of any misconduct by themselves, their suppliers or affiliated individuals towards COMET or its representatives. They need to make reasonable efforts to ensure compliance by their suppliers with the principles and requirements outlined in this document.

7.3 Incident reporting

Suppliers can seek guidance and raise concerns via the COMET Integrity Line, accessible through this link:

Integrity Line: <https://cometgroup.integrityline.com/>

This platform enables anonymous reporting of concerns, treated with confidentiality.

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Supplier Acknowledgment & Attestation

We, the undersigned, as authorized representatives of _____,

hereby acknowledge that we have received and reviewed COMET's Supplier Code of Conduct. We commit to upholding and ensuring compliance with the principles outlined in this Code throughout our contractual relationship with COMET.

Place, Date: _____

Signature: _____

First Name, Surname: _____

Function: _____

Company stamp:

ISO Certification Status

Please indicate your certification status for the following ISO standards:

| Standard | Certified | Implemented but not certified | not implemented / not applicable |
|---|-----------|-------------------------------|----------------------------------|
| ISO 9001 – Quality Management Systems | | | |
| ISO 14001 – Environmental Management | | | |
| ISO 27001 – Information Security Management Systems | | | |
| ISO 37001 – Anti-Bribery Management Systems | | | |
| ISO 37002 – Whistleblowing Management Systems | | | |
| ISO 45001 – Occupational Health and Safety Management | | | |
| Other: | | | |

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| 01 | 01.01.2021 | First issue | M.Hoekstra |
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| 03 | 01.03.2024 | Revision: New Comet CoC | O.Postel |
| 04 | 11.11.2024 | Typo 3.1 Comet Group changed to Comet: 7.1.,7.2.,7.3 | O.Postel |