

# The Code of Conduct of Webcraft GmbH

Our Code of Conduct is designed to help employees implement our principles.





### **Preamble**

Webcraft GmbH firmly believes that business success and ethical responsibility should go hand in hand. In a digital world shaped by rapid change and endless possibilities, we recognise the responsibility resting on our shoulders and the significance of our influence on customers, employees, partners and society at large.

We are developing and operating the online shops supermagnete.com, cubeless.ch and qbendo.ch with great enthusiasm. We are a healthy and growing company with around 60 employees at two business sites. Our headquarter is in Uster, Switzerland. A subsidiary is located in Gottmadingen, Germany.

Our mission is not only to provide high-quality goods and services but also to operate in a manner characterised by integrity, fairness and social responsibility. Our Code of Conduct serves as both a guide and a promise. It obligates us to align our business practices with the highest ethical standards, to respect the needs and expectations of our customers, and to have a positive impact on the world around us.

This Code of Conduct defines the core principles and values that guide our business and provides a clear foundation for the development of trustworthy and sustainable commercial practices. We are committed to live by and to promote these principles to ensure that our company not only grows but also makes a positive contribution to society and the world we live in.

#### **Standards of Collaboration**

We expect all of our employees to always act in accordance with the highest professional standards and company guidelines. Employees who violate existing guidelines, rules or regulations in the course of their work or through their behaviour will face disciplinary measures.

#### **Open communication with employees**

We do not cover up wrongdoing. Should employees report actual or suspected misconduct in good faith, we will not tolerate any attempts at intimidation or reprisals against them. We understand "in good faith" to mean that employees believe their assertions to be true. This applies regardless of whether a later investigation confirms the employees' version or not.

#### Dialogue with cooperation partners

All business information of our partners and their company secrets are fundamentally treated as sensitive and with confidentiality. Required documents will be properly issued, stored or, where applicable, destroyed after the conclusion of the collaboration.

# **Customer focus**

We treat our customers and business partners fairly and with honesty. We note the wishes, needs and expectations of our customers and business partners to ensure a targeted implementation of products, services or other processes. Our ultimate goal is to build long-term and stable relationships with our customers and business partners that are based on trust.

## Corruption, acceptance of gifts and donations

We are committed not to engage in any form of corruption, be it actively or passively. We strictly comply with all applicable national and international anti-corruption laws and guidelines. The acceptance of any gifts and donations must be transparent and ethical. We do not accept gifts or donations intended to influence our independence, integrity or business decisions. Gifts and donations should always be treated in a manner consistent with our values and ethical standards. We are obligated to reject and immediately report any offers of gifts or donations that violate this policy. The acceptance of gifts and donations must be properly recorded and comply with applicable laws and regulations. Our zero-tolerance policy on corruption and our ethical approach to gifts and donations are an integral part of our commitment to transparency and integrity in all our business activities. We strive to conduct our business in an honest and responsible manner, and we expect all of our employees and business partners to fully follow these principles.



# **Data protection**

We treat all personal data of our customers, business partners and employees with utmost care. This includes names, addresses, telephone numbers, e-mail addresses as well as date of birth or information on the current health status. To safeguard the data, our employees are obligated to take every possible measure to protect our IT system from both internal and external data theft. This specifically applies to the improper use of passwords within the company as well as unauthorised downloading of files, especially inappropriate material from the internet.

## **Environmental protection**

Protecting the environment and the climate is important to us. Our employees are encouraged to be considerate in their use of all natural resources utilised in our company (i.e. energy, water, land). Our employees are expected to act responsibly in the production and distribution of our products and/or services. To protect our employees, we comply with all laws and rules relating to health and safety in the workplace. To this end, our managers in particular take measures to create a healthy and hazard-free work environment for our employees.

# Compliance with applicable law

We require our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility and to comply without exception. Our managers primarily bear a high level of responsibility when it comes to implementing the Code of Conduct. The business practices of our business partners and their suppliers must also take applicable laws into account.

## **Fair competition**

We are committed to fair competition and adhere to its laws and rules. We refrain from entering into agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not participate in any anti-competitive boycotts.

#### **Principle of non-discrimination**

As a matter of principle, any discrimination based on nationality, ethnic origin, age, gender, sexual orientation, marital status, pregnancy, disability, religion or belief is strictly prohibited. Promotions and new hires take place solely on the basis of individual competencies, without any discrimination.

### Handling of internal company assets

We regard it as very important that the products, the work equipment and the intellectual property of the company are handled carefully and responsibly.

## **Protection against child or forced labour**

We strictly reject child or forced labour without exception.