

## Code of Conduct

### General principles

At nspm, we believe that society and business are best served by responsible business behaviours and practices, which go beyond the minimum duty of being fully compliant with applicable laws, rules and regulations. We believe that responsible business behaviour evolves over time and that continuous improvement is required.

We are committed to economic, social and environmental sustainability in our business activities, adhere to high ethical standards, and are aware of our role in supporting our clients to adhere to their own ethical standards.

### Work ethics and business integrity

We abide by the highest work ethic and integrity standards. We do not tolerate bribery, extortion, embezzlement or any other form of corrupt business behaviour by our employees or suppliers. We are committed to conducting our business consistent with fair competition and in compliance with all applicable anti-trust laws. We employ fair business practices, including accurate and truthful advertising.

### Privacy rights

We adhere to the Swiss Federal Act on Data Protection and the European General Data Protection Regulation and are committed to safeguarding and using confidential information in a proper way to ensure that privacy rights of all involved parties are protected.

### Labour ethics, non-discrimination and fair treatment

We are an equal opportunity employer, fully committed to upholding human rights as per the United Nations Guiding Principles on Business and Human Rights, and to treating employees with dignity and respect. We do not discriminate against any employee or business partner because of age, gender, disability, marital status, ethnicity, colour, national origin, religion, political affiliation or union membership. We are committed to providing a working environment that guarantees the personal integrity of our employees in adherence with all labour laws and regulations in Switzerland and the United Kingdom as applicable. Any abuse, harassment or other harsh and inappropriate behaviour is not tolerated at our workplace. We do not use forced, bonded, indentured or involuntary prison labour, child labour or young workers below a country's legal age for employment. Our suppliers must meet the same standards.

We are committed to paying employees according to applicable wage laws, including minimum wages, overtime hours and mandated benefits. We support equal pay for equal work, providing equal remunerations for men and women in the same function.

### **Employee health and safety**

We train and inform employees to ensure safety while at work and require hazardous tasks to be accomplished by appropriately trained personnel. Potential emergency situations in the workplace have been identified and emergency plans and response procedures have been implemented where applicable.

### **Creating a healthy and cooperative work environment**

We encourage open communication and direct engagement with workers to resolve issues. Rights of workers, as set forth in local laws, are respected and our employees are able to communicate openly with our management regarding working conditions or illegal activities in the workplace without threat of reprisal, intimidation or harassment. Reported cases will be investigated and corrective actions taken as needed. We are aware of cultural differences and challenges associated with managing universal expectations and understand that the methods for meeting these expectations may be different and must be consistent with the laws, values and cultural expectations of different societies across the globe.

### **Environmental and economic sustainability**

We strive to operate in an environmentally responsible and efficient manner, in an attempt to minimise adverse impact on the environment. We encourage our employees to conserve natural resources, engage in activities that reuse and recycle, and avoid the use of non-environmentally friendly materials where possible. We strive to ensure that our suppliers adhere to the same standards and adhere to applicable environmental regulations. When possible, we help foster social and economic development and contribute to the sustainability of the communities in which we operate.

### **Our commitment**

We are committed to following the above principles, implementing them consistently and continuously in our services, surveying the behaviour of our employees and suppliers, and to take immediate and transparent actions in the event of any breaches. We are continuously improving our management system and policies to commit to the above, allocate appropriate resources, ensure awareness and adherence to applicable laws and regulations, document actions, and provide training, where necessary, to improve competencies of employees.