



**Responsible Business Partner Policy**  
of  
**Swiss IT Security Holding AG**  
and its subsidiaries

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## **1. INTRODUCTION**

Swiss IT Security Group (“SITS Group”) is committed to responsible business practices and conducting business with the highest ethical standards. SITS Group wants to maintain stable and honest business relationships with all its business partners, including, but not limited to, suppliers, advisors, agents, and customers. This policy is intended to support SITS Group as it strives to meet the increasing demand for transparency regarding the broad range of operational, social, and environmental responsibilities a business needs to manage. SITS Group expects their business partners to adopt the principles set out below to ensure alignment with SITS Group’s own commitments to social responsibility.

## **2. SCOPE AND APPLICABILITY**

SITS Group reserves the right to conduct enquiries and investigations of business partners’ conduct to make sure that these principles are being met. Upon request by SITS Group, the business partner shall provide appropriate records and information demonstrating how the business partner complies with the principles and requirements of this policy. Note that failure to demonstrate compliance with these principles will require the implementation of corrective action by the business partner and may result in contract termination.

## **3. PRINCIPLES**

### **3.1 COMPLIANCE WITH LEGAL REQUIREMENTS**

Business partners will comply with all applicable laws and regulations in all locations where they conduct business including those relating to international trade (such as those relating to sanctions, export controls, and reporting obligations), data protection, insider dealing and anti-competition laws. SITS Group requires its business partners to comply without exception with the provisions conveying the core labour standards of the International Labour Organization (ILO) and ILO standards 1, 102, 131, 155, and 170 into their respective national laws.

Legislation also aims to prevent or eliminate human rights violations in corporate supply chains. These include:

- Child labour
- Forced labour and slavery
- Lack of minimum labour protection and safety standards
- Denial of labour rights
- Discrimination based on national, social, ethnic origin, etc.
- Inadequate remuneration
- Unlawful expropriation
- Recourse to security forces that enforce corporate interests through violence, torture, murder, etc.

Damage to the environment may also lead to human rights violations. Therefore, attention must be paid to whether companies in the global supply chain are, for example, illegally cutting down forests, polluting water or air, or emitting pesticides on a large scale.

Another goal is to reduce the competitive disadvantage of companies that already pay attention to a “clean” supply chain.

### **3.2 ACTING WITH INTEGRITY IN ALL BUSINESS DEALINGS**

SITS Group acts with integrity at all times, and we expect our business partners to behave in the same way. Business partners will not engage in personal activities or public comments that are intended to damage SITS Group’s business interests or reputation. Business partners shall record all business transactions accurately, prudently, and transparently, in compliance with applicable accounting standards and recognised best practice. Business partners should insist and ensure that their agents, suppliers, and others working on their behalf act lawfully and in accordance with the standards set out in this policy.

### **3.3 ANTI-BRIBERY AND CORRUPTION**

Business partners will comply with all applicable anti-bribery laws, including the U.S. Foreign Corrupt Practices Act and all applicable local laws where SITS Group and its subsidiaries operate. Business partners will not offer, promise, give (including facilitation payments), demand,

or accept bribes or other improper advantage, including excessive gifts and entertainment, in order to obtain, retain, or give business.

### **3.4 GIFTS AND HOSPITALITY**

Business entertaining and hospitality involving individuals representing SITS Group shall be kept within reasonable and proportionate limits and offered entirely for the purpose of maintaining good business relations and not to influence any future business decisions in an unfair manner. Gifts should be given infrequently and in line with company policy.

### **3.5 COMPETITION LAW**

SITS Group believes in competing fairly in the marketplace. Business partners will comply with all applicable antitrust and competition laws, which prohibit agreements, business practices, or conduct that are anti-competitive or unreasonably restrain trade. Competitor information will be obtained and maintained in accordance with applicable competition laws at all times.

### **3.6 EQUAL OPPORTUNITIES AND HUMAN RIGHTS**

Business partners should recruit, select, and promote their employees solely based on qualifications and skills. SITS Group will not accept any form of employment discrimination including hiring, compensation, advancement, termination, or retirement because of colour, religion, gender, sexual orientation, national origin, age, or disability. SITS Group requires its business partners to uphold all internationally recognised human rights wherever their operations are located. SITS Group will not tolerate its business partners or their supply chains using child or forced labour, human trafficking, slavery, and any behaviour that does not maintain human dignity and respect.

### **3.7 CONFLICTS OF INTEREST**

Business partners must avoid any situation or relationship that may involve an inappropriate conflict or the appearance of a conflict with the interests of SITS Group. Business partners must declare each and every conflict of interest in any business dealing to SITS Group to allow SITS Group to take appropriate action.

### **3.8 HEALTH, SAFETY, AND SECURITY**

Business partners will provide their employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Business partners should protect their employees, physical assets, information, and reputation from potential security threats including cyber security threats.

### **3.9 CONFIDENTIAL INFORMATION**

Business partners will protect all intellectual property and other confidential information provided by SITS Group. All information provided by SITS Group that is not publicly available is considered confidential and should only be used for its intended purpose.

### **3.10 ENVIRONMENT**

Business partners will operate in a manner that protects the environment and must comply with all applicable environmental laws, regulations, and standards. Operations, sourcing, manufacture, distribution of products, and the supply of services should be conducted with the aim of protecting and preserving the environment.

### **3.11 FINANCIAL RECORDS AND MONEY LAUNDERING**

All business dealings shall be conducted in a transparent manner and recorded accurately in books and records. SITS Group will not tolerate any actual or potential involvement in money laundering or market abuse.

### **3.12 COMMUNICATION**

Business partners will make these principles known to employees dealing with SITS Group and promote and monitor compliance.

### **3.13 MAINTAINING RECORDS**

Business partners will maintain documentation necessary to demonstrate compliance with these principles.

Accordingly, the business partner shall ...

1. set up a risk management system to identify, minimise and prevent human rights violations;
2. define internal responsibilities;
3. conduct regular risk analyses to identify human rights and environmental risks in their own business and at direct suppliers;
4. issue a policy statement on the internal human rights strategy;
5. establish preventive measures within their own business unit and towards direct suppliers;
6. establish a complaints procedure;
7. implement due diligence on risks with indirect suppliers – not as a preventive measure to address human rights risks in the lower links of the supply chain, but in case of hard evidence;
8. document their efforts and publish reports.

#### **4. CONTACT DETAILS OF THE COMPLIANCE OFFICERS**

You can always reach our Compliance Team or the Compliance Officers using the contact details on our compliance landing page if you have any questions regarding this policy or compliance in general. Suspicions/observations regarding violations of this policy should also be directed to our Compliance Officers.

**Follow the link:** <https://www.sits-group.ch/en/compliance/>

#### **5. REVIEW AND UPDATE OF THE POLICY**

As part of further development, this policy will be reviewed, amended, and supplemented on a regular basis.