

Code of Conduct

This Code of Conduct applies to all Metrohm employees. The Code sets out the values, principles, and practices governing the business activities of Metrohm. Management's objective is to adhere to ethical standards and create a work environment that promotes integrity, respect, and fairness. A business strategy based on integrity and in compliance with the law serves the long-term interests of the company.

1 Commitment of management

We believe we have a duty to be aware of our economic, social, and environmental responsibilities and act accordingly. Metrohm therefore strives to conduct its business competently and ethically and to protect fair competition in all markets where it operates by respecting the applicable laws on cartel prohibitions, competition, and restrictions on competition. Unfair advantages over customers, suppliers, or competitors should be avoided.

2 Compliance with laws and regulations at home and abroad

In all our business decisions and activities, we strive to comply with the applicable laws and other regulations in Switzerland and abroad. Integrity and honesty promote fair competition, also in relation to our customers and suppliers.

3 Representation of political interests

We are open and transparent about our political interests, and lobbying is managed centrally. We comply with the statutory provisions on lobbying and avoid exerting in all circumstances any unfair influence on policies and legislation.

4 Conflicts of interest

Metrohm expects its employees to show absolute loyalty to the company.

All employees must avoid situations in which their personal or financial interests could conflict with those of Metrohm. In particular, employees are therefore strictly forbidden to work with competitors, suppliers or customers, or enter into private business relationships with them if this could lead to a conflict of interest.

The interests of Metrohm AG must not be compromised by a conflict of interests. Such conflicts of interest may arise in many situations: Therefore, no employee should accept — in any form whatsoever — anything that might reasonably be assumed to potentially influence Metrohm business decisions or transactions.

Invitations must be kept within the limits of normal business hospitality. Employees should not personally gain any benefits, either directly or indirectly, from their access to confidential information by virtue of their position at Metrohm.

All employees have a duty to promote the legitimate interests of Metrohm as much as possible. Any situation that constitutes competition with the company should be avoided. Any actual or potential conflict of interest must be reported to and discussed with the line manager in charge.

5 Interdiction of corruption

We are opposed to corruption and bribery. Activities involving business conducted using unfair means will not be tolerated.

Metrohm employees are not permitted to offer business partners or receive or accept from business partners any benefits that could impair the making of fair and objective business decisions.

6 Handling assets

All Metrohm employees are responsible for the proper and careful use of company property. All employees have a duty to protect the property of Metrohm against loss, damage, misuse, theft, embezzlement, and destruction. All employees have a duty to inform their line manager immediately of any misuse of assets contrary to the provisions above.

7 Confidentiality and data protection

Much of Metrohm's commercial information is confidential or protected by law, thus involving a duty of confidentiality. This does not apply to information that Metrohm has approved for publication or information that must be made public under the law or other regulations. In particular, the duty of confidentiality applies to intellectual property. This includes trade secrets, patents, trademarks and copyrights, business and marketing plans, designs, business papers, salary information, and any other unpublished financial data and reports.

Metrohm carefully uses and treats as confidential all personal information about employees, customers, business partners, suppliers, and other third parties, in full compliance with data privacy legislation. Utmost care must be taken to protect this information.

8 Fair working conditions

All Metrohm employees are responsible for maintaining a safe and healthy environment. Therefore, safety regulations and practices must be strictly observed. As a socially responsible employer, we consider our employees to be our greatest asset.

We demand a high level of commitment from our employees and share our corporate success with them in return. Metrohm's human resources policies advocate that opportunities for personal and professional development be made available to all employees.

We encourage open dialog, feedback, and ideas. Metrohm condemns unlawful discrimination or harassment of any kind.

9 Child labor

We oppose child labor in any form. We adhere strictly to the ILO Conventions, the UN Convention on the Rights of the Child, and national and international legislation.

10 Handling in-house knowledge

All Metrohm employees have a duty to ensure the quick and smooth exchange of information within the company. Information must be forwarded correctly and in its entirety to other departments affected, provided it does not involve an exceptional case with priority interests, such as duty of confidentiality.

Relevant knowledge must not be unlawfully withheld, falsified, or shared selectively. Dishonest reporting within the company or to other companies, organizations, or persons is strictly forbidden.

All Metrohm financial statements and annual reports, business documents, and accounts must accurately represent the company's operations and transactions and must comply with the law as well as accounting principles and Metrohm's accounting procedures.

11 Public representation and communications

Metrohm respects the right to freedom of expression and the protection of individual rights and privacy.

All employees should be aware that, even in their personal life, they may be perceived to belong to and represent Metrohm. We therefore request employees to conduct themselves in public in such a way as to protect the reputation of the company, in particular in any dealings with the media.

When expressing personal opinions, employees should ensure that their role or work at Metrohm is not linked in any way with their personal opinion.

12 Environmental and climate protection

Metrohm considers the sustainable protection of the environment and climate and the efficient use of resources to be important corporate goals. When developing new products and services and when operating production facilities, we ensure that our impact on the environment and climate is kept to a minimum and that our products make a positive contribution to environmental and climate protection for our customers.

All employees are responsible for conserving natural resources and behaving in a way that contributes to the protection of the environment and climate.

13 Implementation and monitoring

The rules of this Code of Conduct are a core component of Metrohm's corporate culture. Consistent adherence to these principles is essential. Every single employee is responsible for adhering to these principles.

If an employee has a concern or complaint about the points set out in this Code of Conduct, or has knowledge of a possible breach of its guidelines, they should seek immediate clarification from their line manager. This can be done anonymously or confidentially. If the employee is not satisfied with the clarification, they can also consult with the Human Resources department about their concern or complaint.

Metrohm will not permit any form of reprisal following a complaint that has been made in good faith within the framework of this Code of Conduct.

14 Responsibilities

The provisions of this Code of Conduct apply to all employees and members of the Executive Board, corporate management, and the Board of Directors of Metrohm. There may be penalties for violations of this Code of Conduct. In severe cases, this can lead to termination of employment.

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