

SUPPLIER CODE OF CONDUCT OF THE WALO GROUP

Foreword

The WALO Group as a construction company relies on trustworthy and responsible cooperation with its business partners. Occupational safety on our construction sites, fair working conditions and respect for human rights, a conscious approach to the climate and the environment, quality, adherence to deadlines and integrity in all business relationships are the foundations of successful project implementation.

This code of conduct sets out the expectations that we place on our suppliers, subcontractors, service providers and other business partners. It is based on internationally recognised frameworks, in particular the UN Guiding Principles on Business and Human Rights, the core labour standards of the International Labour Organization (ILO) and the Guidelines on Responsible Business Conduct of the Organisation for Economic Co-operation and Development (OECD). The code of conduct serves as a supplement to the relevant legal and contractual provisions that are applicable in each case.

We would like to thank you for upholding these expectations and putting them into practice in your day-to-day work.

Davide Di Falco, CEO

Dietikon, 16 June 2026

1. Purpose and scope

This code of conduct describes the expectations that the WALO Group places on all suppliers, subcontractors, service providers and other business partners. It applies to all business relationships domestically and abroad, and supplements but does not replace the applicable laws and contractual agreements. Where differing standards apply, the stricter of these shall prevail.

This code of conduct is based on internationally recognised frameworks, in particular the core labour standards of the International Labour Organization (ILO), the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises.

Business partners shall strive to comply with the principles of this code of conduct and, with a view to managing risk, shall also communicate and pass these on to their own suppliers and subcontractors.

2. Cooperation, innovation and quality

The WALO Group expects a collaborative partnership characterised by openness, fairness and professionalism.

Business partners undertake to:

- communicate transparently;
- continually improve efficiency and quality;

- promote innovations and sustainable developments, especially those with a reduced environmental footprint;
- ensure professional competence and provide staff with appropriate opportunities for development;
- ensure that these principles are also properly communicated to any subcontractors used.

3. Integrity and lawful conduct

Business partners undertake to comply with all applicable laws and regulations and to carry out their business activities transparently and with integrity.

In particular, they shall:

- reject all forms of corruption, bribery and fraud, and handle gifts and invitations responsibly – no benefits may be offered that could unduly influence business decisions;
- avoid breaches of competition law and conduct contrary to antitrust law, in particular price-fixing, quantity-fixing and market-sharing agreements;
- ensure that transactions do not contravene applicable economic sanctions, export and import control rules or regulations designed to prevent the financing of terrorism;
- disclose any existing or potential conflicts of interest;

- protect the intellectual property of WALO and third parties;
- maintain confidentiality and protect personal data in accordance with the applicable data protection laws;
- prevent any form of fraud, misappropriation or theft.

4. Human rights and working conditions

Business partners shall respect the human rights of their employees and comply, at a minimum, with the applicable labour legislation.

In particular, they shall ensure the following:

Forced labour: Every activity is voluntary. Employees can end their working relationship with an appropriate notice period. It is prohibited to withhold, destroy or confiscate identity documents or other documents. Employees must not be required to pay recruitment fees.

Child labour: The employment of persons under the age of 15 is prohibited in any capacity, in accordance with ILO Convention No. 138. Young people under the age of 18 must not carry out hazardous work or work night shifts or overtime.

Discrimination: No discrimination on the grounds of origin, skin colour, gender, age, religion, sexual orientation, disability or other characteristics protected by law. Equal opportunities are actively promoted.

Fair treatment: The workplace is free from corporal punishment, sexual harassment, psychological or physical coercion and intimidation.

Wages and working hours: Employees are paid in accordance with the applicable wage laws, and at least at the statutory minimum wage. The weekly working hours, including overtime, should not exceed 60 hours, except in exceptional circumstances. At least one day off per week must be granted.

Freedom of association: The right to freedom of association, collective bargaining and membership of a trade union is respected. Employees can raise concerns without fear of reprisals.

5. Occupational health and safety

Safe construction sites and workplaces are the top priority.

Business partners undertake to comply with all applicable health and safety regulations and to take appropriate measures to prevent accidents, work-related illnesses and hazardous situations. Certification to ISO 45001 or an equivalent standard is encouraged.

In particular, business partners shall ensure the following:

- regular risk assessments, including chemical, biological, psychological and physical hazards;
- appropriate training and instruction of all employees;
- the provision and consistent use of personal protective equipment;
- effective accident prevention measures;
- emergency and contingency plans.

Business partners shall ensure that their employees have the right and the duty to cease work and report any safety or health concerns without fear of reprisals.

6. Environmental and climate protection

Business partners undertake to comply with all applicable environmental regulations and to organise their activities in such a way as to avoid or minimise environmental impacts and negative effects on the climate as far as possible. Certification to ISO 14001 or an equivalent standard is encouraged.

Where relevant to the service in question and where economically feasible, they shall take appropriate measures to:

- reduce consumption of energy and resources, and record and continuously reduce greenhouse gas emissions (Scope 1 and 2);
- minimise waste and emissions;
- promote the circular economy;
- consider biodiversity and ecosystems;
- give preference to using sustainable materials and products where technically and economically feasible.

Business partners shall have systems in place for the safe handling, storage and disposal of hazardous materials, as well as for preventing and minimising unintentional releases of environmentally harmful substances.

Products and materials supplied must comply with the applicable regulations on substances. Business partners shall provide relevant environmental information on request, particularly with regard to carbon footprints and life cycle assessments.

7. Product quality and responsible procurement

Deliveries and services must be safe, high quality and compliant with standards. Certification to ISO 9001 or an equivalent standard is encouraged.

Business partners undertake exclusively to provide products, materials and services that satisfy the applicable legal, technical and safety requirements. They shall communicate proactively about potential quality deviations and about the safe use of said products, materials and services.

In particular, they shall ensure:

- the safety and conformity of products and materials;
- compliance with legal requirements regarding ingredients and hazardous substances;
- the responsible sourcing of raw materials and the communication of these requirements to their own suppliers.

Upon request, business partners shall provide appropriate evidence of the origin of key raw materials, in particular metal, timber, natural stone and conflict minerals, insofar as this is customary in the industry or required by law. In the case of high-risk raw materials, they shall endeavour to improve transparency within their supply chain.

8. Monitoring, audits and corrective measures

Business partners shall, upon request, provide appropriate evidence of compliance with this code of conduct, including periodic self-assessments of their sustainability performance. The WALO Group is entitled to carry out risk-based inspections or audits, either itself or through third parties.

Where discrepancies are identified, business partners shall implement suitable corrective measures and, upon request, draw up action plans setting out clear responsibilities and deadlines. The effectiveness of these measures must be confirmed within one year and may be verified through document reviews or follow-up audits. WALO shall support this process in a cooperative and proportionate manner.

The WALO Group reserves the right to suspend business relationships while a corrective action plan

is being implemented, and to terminate them in the event of serious or repeated infringements.

9. Reporting infringements

Business partners undertake to inform the WALO Group immediately and proactively of any suspicion of infringement of this code of conduct for suppliers and business partners or applicable regulations.

Reports can be made to the relevant contact person, a member of the management team or via the whistleblower system of the WALO Group <https://www.walo.ch/compliance>.

Information can also be submitted anonymously via the whistleblower system. Reports are handled confidentially and in accordance with the applicable data protection regulations. People who make reports in good faith are protected from any form of reprisals.

Reports can also be sent to the email address compliance@walo.ch.

The WALO Group senior management

Dietikon, 16 June 2026