



## **Our Values in Action**

Integrity | Excellence | Teamwork | Commitment  
**Code of Conduct** of the Prografica Group

Dear Fellow Employees

The Prografica Group was founded in 1946 and has been doing business for more than 70 years. This long-standing success is based on the excellent reputation of our company. Our reputation is founded on our company culture and influenced by the way we all behave. It is crucial we all understand that our culture is not just about performance and attaining our financial goals, but most importantly about doing business the right way and with integrity. What each of us does each day contributes in its own way to our reputation and the way we are regarded by others.

Our Company culture and above all the behaviour of each of us towards suppliers, customers and colleagues become today more and more important. This is why we want to settle this code of conduct in written form.

The purpose of this Code of Conduct is to guide you in your daily business conduct and in this way to encourage, and build a company culture of integrity, fairness and trust. Please study the Code carefully. The rules of the Code apply to every one of us, regardless of job or function.

We are counting on your personal commitment to comply with the Code, and thank you for personally contributing to a highly respected company culture and our long term success.

Best regards  
Prografica Ltd.



Peter Urs Naef  
President of the Board

January 2019

# Code of Conduct

## 1 Compliance with laws

Upholding Prografica's reputation for integrity requires absolute compliance with laws and other standards with binding character in the countries in which the Prografica Group is active. We are committed to conduct business in full compliance with applicable laws. Employees are responsible for understanding and acting in compliance with the legal requirements relevant to their jobs. Management on all levels will inform themselves about the relevant legal and regulatory framework in their field of activity and will provide their teams with the necessary instruction and advice. All employees are committed to operate in a fair way within their areas of business.

## 2 Health, safety and environment

We are committed to protect the environment and to respect local standards designed to protect health and safety at the workplace and to operate facilities in accordance with such requirements.

## 3 Relationships with competitors and business partners

We fully adhere to fair competition ensuring fair pricing and customer/consumer protection. This behaviour guides our relations with our competitors, suppliers, dealers, distributors and customers. We refrain from practices which share proprietary or competitively sensitive information. Fair competition affects all aspects of business activities.

## 4 Improper payments

The Prografica Group's reputation for its trustful, honest and fair behaviour must not be put at risk by offering or receiving bribes or engaging in any other form of corruption. In dealing with customers, suppliers and their network of relationships all employees must not directly or indirectly offer, promise, provide or receive anything of value in order to obtain, retain or conclude business or to gain any unfair advantage in the conduct of business. This includes offering and receiving gifts, payments, entertainment or services which might reasonably be believed to influence the conduct of business or business transactions. This does not apply to customary business hospitality.

## 5 Finance and accounting

The Prografica Group's worldwide business transactions must be properly authorized and be completely and accurately recorded in the group company's books and records in accordance with applicable accounting principles and established financial policy of the Prografica Group. Each group company prohibits false or misleading entries in its books and records or in any governmental filings and all employees shall refrain from such actions.

## **6 Employment relations**

All employees may expect its group company to fulfil its responsibilities as an employer in a timely and correct manner and the group company expects its employees to perform to the best of their abilities. The following principles apply:

- We promote a working culture that fosters mutual respect, openness and individual integrity. We promote entrepreneurial thinking and acting employees because they contribute to the success of our customers and our Group.
- We respect local standards of occupational safety and health regulations.
- We base access to employment and promotion on personal skills, abilities and performance, not on gender or race or other discriminatory factors.
- We encourage employee/management communication.
- We do not tolerate work place violence including threats, threatening behaviour, harassment, intimidation and similar conduct.
- We protect employees' personal data and privacy.

All employees are expected to perform their work unimpaired by drugs or alcohol. The possession, distribution and use of illegal drugs are prohibited. Alcohol during work shall be restricted according to internal rules of the group company or local rules, independent of whether on the regular work place or at a site of a customer.

## **7 Conflicts of interest**

All employees avoid any conflict of interest which could arise when their own personal, family or financial activities interfere with their objectivity and loyalty to the Prografica Group. If an employee considers undertaking any activity that may create a conflict of interest, he or she must seek approval in advance from the managing director of the respective group company.

## **8 Business data protection**

All employees are requested to handle any data diligently and to protect them from loss, theft, abuse and unauthorized use, access or disposal. Confidential information (including technical, commercial and legal information) and trade secrets are important assets. All employees must not disclose such information to unauthorized persons, either within or outside the Prografica Group, and must protect confidentiality of such information from third parties, for example customers or suppliers. Examples of confidential information are:

- Personal data
- Procurement plans, supplier, customer or price lists
- Cost, pricing, marketing or service strategies
- Non-public earnings reports and other financial reports.

## 9 Use of information technology

Regarding the use of computers, the internet and the software at work, all employees are requested to follow the guidelines issued by the group company they work for. Any employee is requested to protect the networks of the Prografica Group, avoid criminal acts and the misuse of software.

## 10 Cases of doubt

If you have questions about the Code or if you need support in the interpretation or application of its principles, please refer to and seek advice from your superior or the managing director.

## Violation

Any employee of the Prografica Group who violates this Code is subject to appropriate measures, including termination of the employment agreement. Reporting violations or breaches of this Code shall not result in any disadvantage to the employee who reported them. Violations are to be reported either to the superior or the managing director.

## Introduction and implementation

Each managing director of a group company is responsible for implementing this Code in his group company and to ensure compliance with the Code.



Daniel Broglie



Christian Broglie



André Stettler

**chromos**  
strong brands, powerful solutions

**FUJIFILM**  
Value from Innovation

**imsag**  
And it works.

  
**KELVA**

**reico**