



# Code of Ethics and Business Conduct

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## Message from the CEO and Chairman

Dear ANYbotics Team,

At the heart of ANYbotics' success lies our exceptional A-team. Your dedication, passion, and integrity are the very essence that drives our pioneering innovations and long-lasting partnerships with our customers.

As we journey together into the exciting frontiers of robotics, our commitment to one another and to the world grows ever stronger. Responsible behavior, both within our team and with external partners, remains the bedrock of our achievements.

With our ambition of being an exemplary company to work with, we have crafted this Code of Ethics and Business Conduct, a compass that guides our path towards continued ethical and responsible conduct. The Code is our commitment to our shared values and the standards we set for all our interactions whether with customers, suppliers, partners, or team members.

We have put channels in place for communication, ensuring that your voice is always heard and valued. If you ever find yourself uncertain about a decision or feel something isn't aligning with our values, reach out. Whether your people lead, the newly appointed Compliance Officer, or others mentioned in this Code, they stand ready to guide and support you. Remember, at ANYbotics, silence or inaction is never the way forward.

The Board of Directors and the Leadership Team are proud to place boundless trust in each of you. With clear mechanisms for oversight and reporting to the Board, we aim to foster transparency and uphold the high standards outlined in our Code. We are confident that, together, we will embody these principles in every action, leading the way in ethical innovation and collaboration.

Here's to ANYbotics' future marked by innovation, collaboration, and ethical excellence!

Zurich, Sep 29, 2023

Péter Fankhauser

Co-founder & CEO



Hanspeter Fässler

Co-founder & Chairman



# Introduction

## Background

Creating a Workforce of Autonomous Robots: At ANYbotics, we have the bold vision to be the leading provider of autonomous robotic solutions to improve the safety, efficiency, and sustainability of industrial work.

In pursuit of this vision, we want to be a great place to work for a growing interconnected team, we want to be a trusted partner to third parties worldwide, and we want to be a responsible actor in society.

The Code of Ethics and Business Conduct ["Code"] is one important element to keep us on track during this journey and serve as a compass for decisions and behaviors. It ensures that our company values are upheld as we grow, so that we can all be proud to be part of this company. It also acts as a communication tool to other parties to set clear expectations of what we expect from others and what others can expect from us.

## Guiding Principles

The Code of Ethics and Business Conduct contains binding rules that are designed to help deal with ethical and legal challenges in our day-to-day work. They are rooted in our mission and our values.

The Code cannot cover all imaginable situations. Therefore, we expect from all employees to act responsibly and use their good judgment to determine their actions. If in doubt, the Quick Ethics and Business Conduct Test can help.

Even small violations of this Code by individual employees can severely affect the reputation of ANYbotics and cause significant damage. Neither any out-of-scope demands from customers or business partners, nor time pressure justify non-observance of the Code.

Any violation of this Code will be thoroughly reviewed and penalized. This can have consequences for the work relationship (in severe cases leading to immediate dismissal) and can lead, in addition, to criminal proceedings and damage claims against the violator.

## Scope

The Code applies to all representatives of ANYbotics worldwide. This includes all staff, interns, our leadership team and board of directors, as well as contractors working for us or on our behalf. Any reference to "we", "us" or "employees" in this document refers to all of the aforementioned stakeholders.

Our people leaders and functional leaders are special representatives of our culture. They act as role models in the implementation and enforcement of the Code. They must represent and exemplify the values set out at all times. They are expected to call out any behavior that is not consistent with the Code, and, if necessary, take measures to address the misconduct.

# PIONEERS



Dare to think big.  
Redefine what robots can achieve.  
Strive for excellence in all we do.

# ONE TEAM



Are passionate, dedicated  
and eager to learn.  
Trust, share and have  
each other's back.  
Are open-hearted and embrace  
collaboration and diversity.



# REAL IMPACT



Deliver added value through  
cutting edge technology.  
Improve work for humankind.  
Act entrepreneurially as a  
trusted partner.

# FULL RESPONSIBILITY



Create robots for the good of society.  
Deliver on what we promise.  
Care for our robots and their wellbeing.

## Quick Ethics and Business Conduct Test

The field of Ethics and Business Conduct is a wide and controversial topic. As a practical guidance, ask yourself these questions:

- 1. Is it legal?**  
It is not legal if the issue in question does, or might potentially, violate any legislation here or abroad.
- 2. Does it comply with our policies?**  
We have formulated various guidelines, procedures, and standards on how something should be done properly. Is it in line with these statements?
- 3. Does it responsibly align with our values?**  
At ANYbotics, we build the future of robotics. For this we strive to be Pioneers, deliver Real Impact, take Full Responsibility, and work as One Team.
- 4. Does it protect our overall company interests?**  
Our interests are defined e.g. in our mission statement, as well as formulated in our strategy and planning.
- 5. Would your leaders and shareholders approve?**  
If you come to the conclusion that they would not support the issue in question, it is most likely not O.K. to go ahead.
- 6. Would your friends, family, and community approve?**  
Going one step further: Is it also O.K. for people around you, outside of ANYbotics?
- 7. Would it look O.K. in the news?**  
Keep in mind: Public opinion goes beyond what is legally possible and O.K. for us internally.
- 8. Is it the right thing to do?**  
Listen to your gut feeling. Does it feel O.K. to do?

**If you answer “no” to any of the above, stop and get guidance, or speak up to report your concern [see section «Incident Reporting» of this document].**

Nevertheless, the above quick test does not release anyone at ANYbotics from complying with this Code of Ethics and Business Conduct.



# Our Policies

The following statements summarize our policies regarding our conduct at the workplace, when doing business with other parties, and our place in society.





## At the Workplace



### Occupational Health and Safety

The safety and wellbeing of our employees are paramount at ANYbotics. We ensure a safe work environment and must comply with relevant regulations. We uphold local occupational health and safety standards in all our facilities and develop products in compliance with legal, regulatory, and industry safety requirements.

### Diversity and Anti-Discrimination

Diversity is central to our *One Team* company value. We foster an inclusive workplace where all employees are treated with equal respect.

We strictly prohibit discrimination based on race, ethnic origin, gender, religion, political opinion, disability, age, or sexual identity. ANYbotics provides equal opportunities to all individuals.

This commitment to equal opportunity applies during each phase of an individual's career, including, but not limited to, recruitment, employment, job assignment, training, promotion, salary and other forms of compensation, and termination.

### Anti-Harassment

We have a zero-tolerance policy towards harassment, including sexual or any other form of mistreatment, within internal and external work relations.

Harassment is unwanted conduct towards other individuals, which violates another person's dignity or

creates an intimidating, hostile, degrading, humiliating, offensive, abusive or coercive working environment on or off the premises.

Harassing conduct can occur beyond ANYbotics' facilities or working hours; thus, this policy applies to any occasion where the conduct impacts the workplace.

It is important to remember that behavior that may be appropriate in a private social setting may nonetheless be inappropriate in the workplace or in work-related social settings.

### Protection of our Company Assets

At ANYbotics, we take *Full Responsibility* to safeguard our company's physical and intellectual property, as well as financial assets, from damage, theft, misuse, or waste.

Each employee ensures the protection and appropriate use of our physical assets, which include robots, equipment, materials and facilities.

We must also safeguard our proprietary assets, such as non-public ideas and business information, to maintain our competitive advantage. Unauthorized disclosure of such information is strictly prohibited.

### Data Privacy

We are committed to respecting the confidentiality of employee and third-party data, accessing such information only with proper authority and in compliance with data privacy laws. We treat confidential information from our customers, suppliers, and other partners with the same level of care as we do with our own.



# Doing Business with Third Parties



## Compliance with the Law

All Employees are obliged to comply with all relevant laws and regulations, as well as the internal instructions and policies at any time and regardless where they do business of any kind.

## Combating Corruption and Bribery

At ANYbotics, we uphold a zero-tolerance policy towards corruption and bribery.

Our employees must not misuse their positions for personal benefits or offer such benefits to public officials or employees of other companies. Accepting inappropriate gifts, invitations, or any indirect advantages is strictly prohibited.

All lawful and justified commissions and reimbursements must be transparently documented to avoid involvement in money laundering or unfair practices.

Donations and sponsorships are subject to approval by the CEO or CFO and must be documented with clear information about recipients and the purpose.

## Fair Competition and Antitrust Law

ANYbotics emphasizes fair competition as vital for market development, adhering to national and international regulations on product sales and interactions with competitors. Our commitment to integrity and lawful practices in the pursuit of market share is unwavering.

Employees must adhere to fair competition rules, refraining from discussions about pricing, conditions, or agreements that limit competition.

Activities such as non-competition agreements, fake tenders, customer segmentation, market territory division, and production program agreements are strictly prohibited. Informal agreements aiming to restrict competition are also not allowed.

## Conflict of Interest

It is strictly prohibited to use one's position within the company for personal gain or to benefit family members or close associates.

Employees must avoid conflicts of interest or loyalty in the course of their work. If any potential conflicts arise, employees must promptly and transparently inform their superiors to determine necessary preventive measures.

Activities such as concurrent employment or involvement with other companies that have business relations with or compete with ANYbotics are not allowed.

Additionally, employees must ensure that their interactions with customers, suppliers, consultants, competitors, and other business partners do not create any impression of preferential treatment based on personal relationships.

Personal interests must align with the company's interests, and any situations with potential conflicts of interest must be disclosed to superiors or business management for swift resolution.

## Embargo and Trade Control

As a globally active enterprise, ANYbotics operates within regulations that restrict the movement of goods internationally. Various national and international laws and embargoes govern the import, export, and domestic trade of goods, technologies, and services, as well as capital and payment transactions.

Compliance with these control regulations is mandatory for employees when dealing with goods, services, and technologies. Before taking any related actions, employees must verify if official permits or approvals are required.

## Anti Money Laundering

At ANYbotics, we are committed to conducting business only with reputable partners who engage in lawful activities and acquire funds from legitimate sources.

Money laundering, involving the concealment of illegally obtained money from criminal activities, including terrorism and drug trafficking, is strictly prohibited.

To ensure we are not unknowingly involved in money laundering, our employees adhere to comprehensive accounting, record-keeping, and financial reporting procedures concerning cash and other payments related to our business transactions.

We remain vigilant in detecting payment irregularities and suspicious behavior from customers and others. If any employee suspects or questions a proposed transaction, they are encouraged to raise concerns with their supervisor or local compliance officer for appropriate action.

## Product Safety and Product Quality

At ANYbotics, we strive for *Real Impact*. As its foundation, we prioritize the development of products that meet legal, regulatory, and industry safety standards.

We understand that products characterized by high quality, safety, and reliability are crucial for building stable, long-term customer relationships.

Employees contribute their expertise diligently throughout the product cycle to uphold these standards, continuously improving product quality based on customer feedback and suggestions.

## Our Place in Society



### Human Rights

*Enhancing human work* is a pillar of ANYbotics' mission. With our robots, we add value to human work. As the very foundation, we are committed to respecting and protecting human rights wherever we conduct business.

We will not knowingly do business with any individual or company that participates in the exploitation of children, including child labor, or forced labor.

### Environmental Protection

*Enabling sustainability* is a pillar of ANYbotics' mission. We are dedicated to environmental preservation for the benefit of current and future generations.

Our robots contribute to more sustainable industrial practices. Internally, we promote environmentally responsible conduct among our employees, strictly complying with environmental regulations.

We prioritize the efficient use of natural resources and energy. Waste prevention, proper disposal, and recycling are integral to our sustainability practices.

### Beneficial Machines for Humanity

*Promoting better societies* is a pillar of ANYbotics' mission. We develop autonomous robots with the uncompromising purpose of industrial deployment.

Robot safety and transparency hold paramount significance. We commit to creating robots that do not cause harm to individuals and exhibit complete transparency in their actions, for the benefit of humanity.

We support the industry's statement against weaponizing robots and are committed to our own far-reaching ANYbotics Principles Against Harmful Use of Its Products.

### Responsible AI Deployment

We commit to using AI responsibly, ensuring it benefits humanity and adheres to ethical principles. We define and act upon our AI principles for responsible use, embedding ethics and safety considerations into every aspect of our AI initiatives.

# Organization and Processes

In this section, we describe how we make sure that the Code is incorporated and maintained in our daily business operations.

## Roles and Responsibilities

The Board assigns a competent Employee as the Compliance Officer of ANYbotics. The Compliance Officer reports in his/her function and matters of this Code directly to the Chairman.

The Chairman:

- Supports the Compliance Officer in his/her duties, in particular, he/she acts as a sounding board for the Compliance Officer in all matters of the Code.
- Decides information policy and informs the Board on reported incidents as required.

The Compliance Officer:

- Oversees implementation of this Code and ensures that every employee is trained in matters of this Code
- Acts as advisor to the organization or individual employees in matters of this Code
- Maintains appropriate incident reporting, conducts and coordinates appropriate and timely investigation of reported incidents

Members of the Leadership Team:

- Support the Compliance Officer in his/her duties.
- Foster compliance to this Code of Ethics and Business Conduct in leading their organizations by example, in particular they encourage a culture of open discussion and reporting.

Every employee is expected to comply with the full content of this Code.

## Incident Reporting

Every employee is obliged to report any violation of this Code, whether effective or suspected, without any delay to his/her People Lead, the people team, the Compliance Officer, any member of the Leadership Team, or directly to the CEO or Chairman.

The report should include sufficient details allowing an initial assessment of the claimed violation. Such information, including the names of the employees concerned, will be treated with strict confidentiality.

Employees who provide information in good faith need not fear any disadvantages, even if the report should prove to have been unfounded. They are in the loop regarding next steps.

## Investigation

The Compliance Officer shall investigate reported incidents in an appropriate manner and in due time. The investigation should comprise of, but not be limited to, the following activities:

- Determination of the facts, in particular the involved persons, the timeline of events, and the place of occurrence.
- Initiation of immediate actions, and subsequent monitoring of their implementation.
- In-depth analysis of the events and root cause.
- Definition of preventive measures to prevent future recurrence.
- Elaboration of a report to the Chairman.



If required, the Compliance Officer requests external expertise to handle the issue. Such a request shall be placed with the Chairman.

## Accountability Reporting

The Compliance Officer will submit an annual report to the Chairman in relation to this Code. The report should contain at least information about:

- Number and type of reported incidents
- Details about the conducted investigations, specific actions taken, and measures for further prevention
- Training activities
- Recommendations to alter this Code (if any)

## Training

Every new Employee is introduced mandatorily to this Code as part of their onboarding process within the first six (6) months after they started their assignment.

Within every eighteen (18) months after the last training, every Employee receives a mandatory refresher training on the Code.

Attending the training implies that the Employee fully understands and accepts the Code as an integral part of their role and responsibility. We maintain a training record for all Employees.