

Code of Conduct

COMET's employees in Europe, China, Japan and the USA are linked by a common passion for technology and a distinctive corporate culture. We are committed to shared values and principles and to honoring this Code of Conduct.

How we conduct ourselves

Our personal conduct is crucial to our success. Every one of us helps shape our corporate culture, which is also expressed in how we treat our customers, suppliers and other partners. The values and principles set down here in writing form the foundation of our corporate culture and govern our actions.

This Code of Conduct serves as a standard and guideline for ethically and legally irreproachable behavior. We – all the employees of the COMET Group worldwide – adhere to this Code. The Code cannot anticipate every work situation that may arise, but we continually and proactively evaluate our choices in the light of the Code of Conduct and act in accordance with it. If we are unable to find an answer in the Code to a work-related ethical question, we turn first to our immediate supervisor. Should a question still remain unanswered, we contact the local human resources management. Our Corporate Human Resources department at the Group's headquarters in Flamatt, Switzerland, regularly reviews the Code of Conduct for completeness and updates it when required.

Compliance with the individual points of the Code of Conduct is mandatory. The most senior local manager at each COMET business location is responsible for ensuring that all of his or her employees are bound by this Group-wide Code of Conduct through their employment contracts.

What we are committed to

Obeying the law

We respect and fully abide by all laws, regulations and official standards at the local, national and international level. As COMET employees, we also comply with the company's internal directives and policies.

Maintaining an alert conscience

We consciously strive to live up to our responsibilities under the Code of Conduct, and regularly bring the Code to mind in order to act ethically in every situation.

Monitoring and control

The company's internal audit function regularly scrutinizes all organizational units of the COMET Group.

Anyone who suspects or becomes aware of a breach of ethics guidelines and principles should report it. The person to go to is usually our immediate supervisor, who is always required to treat the report as confidential. We are also welcome to contact our local Human Resources Management office. COMET does not permit retaliation of any kind (such as harassment or discrimination) for good-faith reports of suspected or actual violations.

Communication

We communicate openly and honestly. This is essential to the trust on which our working relationships both inside and outside the company are built. Our Code of Conduct is published on the intranet and the internet. It is important to us that our investors, customers, suppliers and other partners know how we at COMET define ethically correct business conduct, and what they can expect from us as a company.

An attractive employer

COMET is very serious about its responsibility and reputation as an attractive employer. By putting into daily practice the shared values and principles of our corporate culture, we can inspire – and be inspired – by example. Our culture puts us ahead both personally and as a company, and is an important pillar of our lasting success.

Protection from discrimination

COMET is strongly committed to providing equal opportunity in every aspect of employment. Illegal discrimination against employees by the company or by other employees on the basis of nationality, ethnic origin, religion, sex, age, sexual orientation or of any other protected class is strictly prohibited. We also categorically reject child labor and forced labor of any kind.

Respect for other employees

We treat each other respectfully and without prejudice. Sexual harassment, bullying (including “mobbing”, or bullying by a group) and other forms of abuse have no place in our corporate culture. We report any incidents that may occur – whether as victims or witnesses.

Health and safety at work

The organizational units of the COMET Group, and we ourselves as employees, are responsible for health and safety in the workplace. We all follow the applicable laws and safety standards. Deficiencies or violations are promptly reported so that they can be remedied as soon as possible and recurrences prevented. We constantly seek to make further improvements in workplace safety and health.

Routine medical screening (for early detection of illness) and preventive medicine – above all for pregnant women and young people – are important to the COMET Group. Health and safety are recurring themes in training and development courses. Everyone at COMET should feel good – both physically and mentally – in their workplace and work environment. In difficult situations, such as a personal crisis, we can count on the best possible counsel and support.

Pay and staff development

Pay at COMET is competitive with market rates. It is not based on gender but on responsibilities and performance.

As employees, we have the opportunity for professional and personal growth and the freedom to help shape the company’s structures and processes.

Acting with integrity

It goes without saying that integrity of conduct is at the root of our corporate culture. What we mean by integrity is described more closely in our statement of Values and Principles. We are guided by this standard on a daily basis – in working with our colleagues and in our relations with investors, customers, suppliers and partners.

Appropriate use of information technology

In our use of e-mail, the internet and other information technology, we follow COMET’s internal policies and directives. These provide clear and binding guidance.

Data protection and confidentiality

Confidential information is treated with care. We do not reveal trade secrets to unauthorized persons, even when we are no longer employed by the company.

We honor the obligations under our employment contracts.

We adhere to the statutory requirements that apply to us as a company listed on the stock exchange. We do not use confidential information as a basis for trading in securities of our own company or of other firms. As well, we do not pass such information to other persons, within the company or outside it.

Conflicts of interest

As COMET employees we are part of a greater whole and we therefore put the good of the company before our personal gain. We make decisions on an objective basis, and avoid situations where personal interests could come into conflict with those of the COMET Group. We never accept or give gifts of money. We also do not accept or give gifts in kind that exceed a reasonable value.

Charitable donations and sponsorships

As a company, we do not make donations to political parties, political organizations or individuals who hold political office. However, we support non-political and not-for-profit institutions (for example, those working for social and environmental causes) with appropriate donations in cash or in kind.

Anti-corruption

We do not tolerate bribery and we are committed to the highest standards in fighting corruption. In auditing our production plants and sales subsidiaries, our internal audit function also watches for signs of corruption. In countries rated by Transparency International as having an elevated risk of corruption, companies are audited particularly thoroughly.

Environmental protection

COMET trains and sensitizes its staff worldwide with respect to environmental protection, and also involves customers, suppliers and other stakeholders in this process. Only together can we do justice to our responsibility for the planet and keep our environment a good place to live. We reject any ruthless striving for profit at the expense of the environment, and instead seek a balance between financial, environmental and social objectives.

Good partners

The business environment in which we operate is one of ever-growing complexity and rapid change. As an international company we see it as our duty to also entrench our principles of ethical business in our relationships with our commercial partners. We expect our suppliers to adhere to our ethics standards, and we encourage our other partners to do so.

Fair competition

We practice fair competition. Price-fixing, cartels and other arrangements that distort competition are things we reject. We do not engage in illegal business transactions.

Social responsibility

Our innovative strength is one of our success factors. Through carefully chosen, beneficial partnerships, we share our ideas, expertise and development results with society.

Flamatt, Switzerland, January 2012

Hans Hess
President of the Board of Directors



Ronald Fehlmann
Chief Executive Officer

