



## **STUCKY's code of ethics and business principles**

STUCKY's code of ethics is based on the following fundamental principles:

- **Professional integrity and quality of services**
- **Legal compliance**
- **Sustainable development**

STUCKY's mission is to provide high-level engineering services. As an engineering firm, STUCKY has a technical responsibility, but also a commitment towards sustainable development, which is based on economic, social and environmental responsibility. In this respect, STUCKY's staff is committed to fully enforce the following code of ethics:

### **Legal compliance**

STUCKY will comply with applicable laws and regulations in the jurisdictions in which it operates.

### **Providing equal opportunity**

STUCKY will not discriminate against any individual on the basis of race, colour, sex, national origin, age, religion, marital status, sexual orientation, disability or any factors prohibited by applicable law.

### **Safe and healthy working environment**

STUCKY is committed to providing safe and healthy working environments. It will comply with all applicable safety and health statutes and regulations.

### **Committed to environmental protection**

STUCKY applies the precautionary principle and seeks to minimise the environmental impact of its activities. It will promote environmental responsibility.

### **In support of free enterprise**

STUCKY will compete fairly and vigorously in its markets. The company will comply with anti-trust and competition laws throughout the world.

### **Communicating standards**

STUCKY will make its standards and policies publicly available. Consultants, representatives, independent contractors, external temporary workers and suppliers are expected to observe the same standards of conduct as STUCKY employees when doing business with or on behalf of STUCKY.



### **No political contributions**

STUCKY will make no contributions or payments to political candidates or movements. Nevertheless, the company will engage in public debate on issues, which are of legitimate concern to it. STUCKY acknowledges the right of employees to run for public office and to be politically active.

### **Gifts and other payments within limits**

STUCKY will not accept or offer gifts, gratuities, entertainment or favours unless they are of nominal value and are normal and customary in the business circumstances.

### **No bribes**

Making bribes, kickbacks or other improper payments to government officials, civil servants or anyone else in order to influence them is prohibited. The fact that bribery may be an accepted local practice in a country does not relieve STUCKY of the duty to comply with this policy.

### **Avoiding conflicts of interest**

STUCKY employees have the right to engage in business, financial and other activities outside their jobs at STUCKY. However, these activities must be communicated to management and must not conflict with the employee's responsibilities at STUCKY.

### **Protecting STUCKY's information and ideas**

STUCKY employees will not disclose confidential data such as strategic plans, financial details, information about negotiations, agreements or dealings between STUCKY and others, employee-related information, trade secrets and similar information from partners or others.

### **Insider trading**

In the course of their work for STUCKY, employees may become aware of material information about other companies, which is not available to the public. The use of material non-public information by employees for their own financial benefit or that of a spouse, relative or friend is against STUCKY policy and a breach of the law.

This code of ethics is signed by the Board of Directors, the management and the entire staff.

Renens, December 31, 2006