



# Sustainability Policy

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## Revision History

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	23.08.2021	New document

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## 1 INTRODUCTION

### 1.1 Purpose

Sentec's Sustainability Policy summarizes the standards and behaviours which have been established in the organization, to ensure environmentally responsible business operations, product design, manufacture as well as that working conditions are safe, and workers are treated with respect and dignity.

### 1.2 Guiding Principles

Sentec's Sustainability Policy consists of five elements:

- Business Ethics
- Social Responsibility
- Diversity
- Health and Safety
- Environmental Responsibility

The policies, procedures, and work instructions of Sentec further supplement the rules and values laid down in this Sustainability Policy. It is an integral part of Sentec's corporate governance and as such is binding for the top Management Board as well as all further employees of Sentec. Moreover, Sentec aims:

- to comply with, and exceed where practicable, all applicable legislation, regulations and codes of practice.
- to integrate sustainability considerations into all our business decisions.
- to ensure that all staff are fully aware of our Sustainability Policy and are committed to implementing and improving it.
- to minimize the environmental impact of all office and transportation activities.

## 2 BUSINESS ETHICS <sup>[1], [4], [6], [7], [8], [9], [10]</sup>

To meet social responsibilities and to achieve success in the marketplace, Sentec upholds the highest standards of ethics including:

### 2.1 Business Integrity

Sentec has a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement. All business dealings are transparently performed and accurately reflected in Sentec's business books and records in full compliance with Swiss legal requirements and accounting principles as specified in the Swiss Code of Obligations, Art. 957-963b OR.

### 2.2 No Improper Advantage

In adherence to SR 311.0, Art. 322ter - 322decies of the Swiss Criminal Code, bribes, or other means of obtaining undue or improper advantage are not promised, offered, authorized, given, or accepted. This prohibition covers promising, offering, authorizing, giving, or accepting

anything of value, either directly or indirectly through a third party, to obtain or retain business, direct business to any person, or otherwise gain an improper advantage.

## 2.3 Intellectual Property

Intellectual property rights are respected, transfer of technology and know-how is done in a manner that protects intellectual property rights; and, customer information is safeguarded, as stipulated by the Swiss Intellectual Property Law.

## 2.4 Privacy

Sentec is committed to protect the reasonable privacy expectations of personal information of everyone the organization is doing business with, including suppliers, customers, users, authorities, and employees. Sentec complies with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared, as stipulated by the Swiss Federal law on data protection (DSG) and its relevant regulation (VDSG) respectively. On an international level Sentec complies with the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and other regulatory requirements, which is in force in the geographical areas where Sentec's products are marketed.

## 3 SOCIAL RESPONSIBILITY [2], [5], [15]

### 3.1 Human Rights and Working Conditions

Sentec is committed to uphold the human rights of workers, and to treat them with dignity and respect as stipulated by the Swiss Labour Law (ArG). This applies to all workers, including temporary, migrant, student, contract, direct employees, and any other type of worker. Of particular importance are the respect for human dignity and internationally recognized human rights such as, but not limited to:

- the prohibition of harassment and discrimination,
- ensuring the right to freedom of association and collective bargaining and
- compliance with all applicable labour regulations e.g. regarding working hours,
- wages, benefits and work safety.

## 4 DIVERSITY [16]

Sentec is committed to a workforce free of harassment and unlawful discrimination as defined in Swiss Federal Constitution (Article 8), based on race, colour, age, gender identity, sexual orientation, expression, national origin, disability, pregnancy, religion, political affiliation, union membership, marital status. This applies to the hiring process as well as employment practices such as, wages, promotions, rewards, and access to training.

## 5 HEALTH AND SAFETY [11], [21]

Sentec recognizes that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention as well as morale.

Sentec complies with all relevant national health and safety standards and regulations as stipulated by the Swiss Healthsafety Regulation (ArGV 3) in order to continuously minimize

health and safety risks and improve working conditions for the workforce including sub-contractors working on site.

## 5.1 Occupational Safety

Worker exposure to potential safety hazards (e.g., electrical, and other energy sources, fire, vehicles, and fall hazards), are controlled through proper design, engineering and administrative controls, preventive maintenance and safe work procedures, and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are provided with appropriate, well-maintained, personal protective equipment and educational material about risks associated with these hazards. Workers are encouraged to raise safety concerns.

## 5.2 Emergency Preparedness

Potential emergency situations and events have been identified and assessed, and their impact minimized by the implementation of emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans. These plans focus on minimizing harm to life, the environment and property.

## 5.3 Industrial Hygiene

Sentec adheres to ISO 13485, section 6.4 on Work environment and contamination control and thus ensures, that worker exposure to chemical, biological and physical agents is identified, evaluated, and controlled. When hazards cannot be adequately controlled by such means, worker health is protected by appropriate personal protective equipment.

## 6 ENVIRONMENTAL RESPONSIBILITY [3], [12], [13], [14], [17], [18], [19], [20]

Environmental responsibility is integral to producing high quality products. In manufacturing operations, adverse effects on the community, environment, and natural resources, are to be minimized, while safeguarding the health and safety of the public. Sentec operates in compliance with the Swiss Federal Law on environmental protection (Environmental Protection Act, USG).

### 6.1 Hazardous Substances

Chemicals and other materials, posing a hazard, if released to the environment, are identified and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal. Furthermore, Sentec is in full compliance to all applicable laws, regulations and customer requirements regarding prohibition, restriction or registration of specific hazardous substances in products and manufacturing. This includes labelling for recycling and disposal and where necessary, authorization or notification of chemical substances contained in the end product or production process according to the statutory requirements that apply to the corresponding market such as but not limited to:

- Restriction of Hazardous substances (RoHS): All products sold and distributed by Sentec AG comply to the RoHS Directive 2011/65/EU and Directive 2017/2102/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment.
- The regulation on chemicals known as Substances of Very High Concern (SVHC), and their safe use. REACH (EC) No 1907/2006.

- EU Directive on packaging and packaging waste; 94/62/EC.
- California Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65).
- Environmentally Preferable Purchasing (EPP) Standard.

## 6.2 Chemicals of concern

- Sentec's products are BPA and PVC free.
- Amounts of bromine and chlorine-based compounds, phthalates, persistent, bioaccumulative and toxic chemicals (PBTs), and non-halogenated flame retardants (FRs) are below the legally permitted thresholds for all products.
- No usage of stain- or water-repellent treatments that contain a perfluorinated compounds.

## 6.3 Disposal and Waste

Sentec's products are manufactured using environmentally friendly material. Proper waste disposal and recycling in relation to manufacture is performed by local waste-disposal facilities. Sentec's electromechanical products shall be disposed of according to the Waste Electrical and Electronic Equipment (WEEE), 2012/19/EU Directive and may be returned to any local Sentec representative for proper disposal.

Packaging should be as small as possible and environmentally friendly packaging materials should be used whenever possible. The secondary packing of Sentec products can be recycled after use to 100% and is in adherence to the EU Directive on packaging and packaging waste 94/62/EC.

## 6.4 CO<sub>2</sub> Emissions

Sentec AG has a management system in place, which helps to reduce the environmental impact of each employee. Business travels are reduced to a minimum. When business travel is necessary, public transport is the preferred means of travel. In addition, Sentec AG covers the costs of the regional public transport network for all employees.

## 7 REFERENCES

The following standards were used in preparing Sentec's sustainability Policy.

[1] Ethical Trading Initiative  
<https://www.ethicaltrade.org/>

[2] ILO Declaration on Fundamental Principles and Rights at Work and its Follow-up adopted by the International Labour Conference at its Eighty-sixth Session, Geneva, 18 June 1998 (Annex revised 15 June 2010)  
[https://www.ilo.org/wcmsp5/groups/public/---ed\\_norm/---declaration/documents/publication/wcms\\_467653.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_467653.pdf)

[3] ISO 14001 Environmental Management  
[www.iso.org](http://www.iso.org)

[4] OECD Due Diligence Guidance for Responsible Business Conduct  
<http://mneguidelines.oecd.org/OECD-Due-Diligence-Guidance-for-Responsible-Business-Conduct.pdf>

[5] Guiding Principles on Business and Human Rights  
[https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr\\_en.pdf](https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf)

[6] United Nations Convention against Corruption  
[www.unodc.org](http://www.unodc.org)

[7] Federal law on data protection (DSG)  
[https://www.fedlex.admin.ch/eli/cc/1993/1945\\_1945\\_1945/de](https://www.fedlex.admin.ch/eli/cc/1993/1945_1945_1945/de)

[8] REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data  
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=DE>

[9] Swiss Criminal Code, SR 311.0, Art. 322ter – 322decies  
[https://www.fedlex.admin.ch/eli/cc/54/757\\_781\\_799/de](https://www.fedlex.admin.ch/eli/cc/54/757_781_799/de)

[10] Swiss Code of Obligations, Art. 957-963b OR  
<https://www.fedlex.admin.ch/eli/fga/2012/10/de>

[11] Swiss Health Safety Regulation, ArGV 3  
[https://www.fedlex.admin.ch/eli/cc/1993/2553\\_2553\\_2553/de](https://www.fedlex.admin.ch/eli/cc/1993/2553_2553_2553/de)

[12] Environmental Protection Act, USG  
[https://fedlex.data.admin.ch/filestore/fedlex.data.admin.ch/eli/cc/1984/1122\\_1122\\_1122/20210101/de/pdf-a/fedlex-data-admin-ch-eli-cc-1984-1122\\_1122\\_1122-20210101-de-pdf-a.pdf](https://fedlex.data.admin.ch/filestore/fedlex.data.admin.ch/eli/cc/1984/1122_1122_1122/20210101/de/pdf-a/fedlex-data-admin-ch-eli-cc-1984-1122_1122_1122-20210101-de-pdf-a.pdf)

[13] Directive 2011/65/EU on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS)  
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32011L0065&from=DE>

[14] Regulation (EC) 1907/2006, concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).  
<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1907-20140410&from=DE>

[15] Swiss Labour Law  
[https://www.fedlex.admin.ch/eli/cc/1966/57\\_57\\_57/de](https://www.fedlex.admin.ch/eli/cc/1966/57_57_57/de)

[16] Swiss Federal Constitution  
[https://www.fedlex.admin.ch/eli/cc/1999/404/de#art\\_8](https://www.fedlex.admin.ch/eli/cc/1999/404/de#art_8)

[17] <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:01994L0062-20180704&from=EN>

[18] <https://oehha.ca.gov/proposition-65/law/proposition-65-law-and-regulations>

[19] <https://www.epa.gov/sustainable-marketplace-greener-products-and-services/about-environmentally-preferable-purchasing>

[20] <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02012L0019-20180704&from=EN>

[21] ISO 13485, Medical devices - Quality management systems - Requirements for regulatory purposes, Section 6.4