

Code of Conduct



Barcelona, Spain

Code of Conduct

Introduction

Cavotec Group (Cavotec or the Group) is a global engineering group that enables industries worldwide to improve productivity, safety and sustainability. The Group is united and aligned through a shared commitment, a common identity and adherence to this Cavotec Code of Conduct.

Our business concept and commitment

Cavotec's business concept is to design, engineer and supply innovative products and systems that enable a wide variety of industry sectors to improve safety, efficiency and environmental sustainability. We build long-term relationships with customers that drive operational efficiency and improve return on investment.

At Cavotec, we believe a responsible approach to business is a decisive factor determining the long-term success of our company. Our vision is powering a sustainable world. To realize this vision, we conduct our business taking into consideration long-term environmental and social sustainability.

The purpose of the Code

Cavotec's Code of Conduct (the Code) outlines the principles and standards that Cavotec expects and requires all Cavotec Group employees and directors to observe and uphold. The Code summarises the internal policy documents related to business ethics, quality as well as social and environmental performance.

Cavotec personnel create the Cavotec culture, its identity and its reputation. By respecting the Code, Cavotec personnel demonstrate their commitment to transparency and mutual respect that we believe must be inherent in our operations and across interactions with all our stakeholders.

Compliance with the Code is compulsory. All Cavotec employees are required to read and fully understand the Code and its implications. Poor knowledge of, or ignorance of the Code will be considered inadequate defence in the event of violation. All employees will be informed of any changes to the Code.

While the Code may not provide guidance for every eventuality, Cavotec expects its employees to exercise sound judgment. In essence, this requires that all Cavotec employees act in the interests of the Group, our customers and our shareholders before personal interest.

The Board of Directors and the Executive Committee fully support the Code and its implementation throughout the Group. The Code is indicative of the importance Management attaches to the Group conducting business responsibly and with integrity.

Regulations and guidelines

All Cavotec employees are required to comply with the laws and regulations of the jurisdictions in which the Group operates.

The main international ethical guidelines supported by Cavotec are:

- United Nations International Bill of Human Rights
- International Labour Organisation Declaration of Fundamental Principles and Rights at Work
- United Nations Global Compact

Our directives

Quality and client confidentiality

Cavotec Group is built on a culture of innovative engineering and customer focus. Our success has been and will continue to be built on developing close relationships with our customers. Cavotec is committed to treating our customers fairly and with respect.

Our objective is to develop, manufacture and market products and solutions that have the best possible quality, safety and environmental performance for its stakeholders.

Working closely with our customers and industry bodies, we look to develop long-term relationships that drive projects forward and help improve safety, efficiency and sustainability at a vast diversity of applications worldwide.

The Group exercises due care when receiving, handling and storing sensitive information from customers and other sources, and adheres to the highest standards of data security to prevent unauthorised use, access, modification or destruction.

Cavotec guarantees the confidentiality of any information entrusted to us by our customers, with the exception of when disclosure of such information is authorised by the customer or required by applicable laws, rules and regulations.

Environment

As part of Cavotec Group's commitment to powering a sustainable world, we recognise our responsibility and obligation to ensure that Cavotec's operation and products do not place the environment or the local community at risk and are designed to protect and enhance the environment. Our customers should feel confidence in Cavotec from an environmental and health perspective.

Due to the nature of our business, we are focusing our efforts on environmental protection to the following areas:

- We limit the environmental impact of transportation through production planning and logistics.
- Materials are as far as possible recyclable
- Chemical substances used are controlled and hazardous substances are replaced
- The full lifecycle perspective is taken into consideration when designing our products in to minimise the negative impact of our products
- Our products shall enable the systems of our customers to work as energy efficient as possible

Equal opportunities and diversity

The Cavotec culture builds on all human beings equal value and a working environment ensuring that all employees are treated with dignity and respect. The Group is committed to developing and sustaining a diverse workplace. Cavotec's staff are drawn from more than 40 countries and from a wide variety of backgrounds.

All employees at Cavotec should have the same opportunities regardless of their age, ethical and cultural background, gender, religion, sexual identity or disability. Cavotec has a zero tolerance on all forms of direct and indirect discrimination and harassment in the workplace.

Different backgrounds, experiences and opinions broadens the Group's expertise and increases innovation. Cavotec's open, non-hierarchical working environment encourages the free exchange of ideas and mutual respect between individuals that underpin the Group's

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unique capabilities as a leading engineering group. We are convinced that a diverse workforce increases our competence base, brings new opportunities and enriches our business.

Health and safety standards

Cavotec is committed to provide a safe and healthy working environment for all employees. The Group integrates safety and health in the management of its business in order to prevent accidents and to protect people at work. The vision is zero work-related accidents.

Human rights

Respecting human rights is a fundamental part of Cavotec Group's responsibility as a company and is vital to operate our business in a sustainable manner. Cavotec is committed to respecting fundamental human rights in our operations, our value chain, and in the communities where we operate. Cavotec focusses its efforts on issues and relationships in which we have greater degrees of control and influence based on the operational context and or business relationships. Due to the nature of our business, we are focusing our efforts on human rights related to labour conditions in own operations and among our suppliers.

Bribery and fraud

Cavotec is determined to conduct all business in an honest and ethical manner. We have a zero-tolerance to fraud and bribery. We are committed to acting professionally, fairly and with integrity wherever we operate.

Cavotec is aware of the potential for conflicts of interest, and the Group takes all reasonable measures to identify and address such situations as they arise.

Cavotec undertakes appropriate due diligence and monitoring to assist in the identification of illegal or unfair practice. If such activities are discovered, Management are to be swiftly alerted and are expected to then take appropriate action.

In the society

Cavotec Group strives to exert a positive influence in the communities where it works and wider society. We set out to build enduring relationships with our stakeholders that are characterised by mutual respect, active partnership and long-term commitment.

Governance and implementation

Governance

The Board of Directors has ownership of the Code of Conduct, approves the Group's policies and performs content and compliance reviews. The Chief Operating Officers and the Senior Management team are responsible for developing and following up on Group strategies, objectives and policies, including financial, social and environmental performance, under the leadership of the Chief Executive Officer.

Transparency and accountability

In all communication both written and spoken, we are committed to being open, truthful and accurate within the limits of commercial confidentiality. Cavotec provides reliable and relevant information on our activities in a timely, regular manner to shareholders, our markets, the relevant authorities and the general public.

Independent external auditors, who have direct access to the Chairman of the Audit Committee, audit Cavotec's financial statements ensuring compliance with applicable Generally Accepted

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Accounting Principles and International Financial Reporting Standards. Furthermore, the Audit Committee is committed to ensuring the independence of the Internal Audit function.

Implementation

This Code of conduct summarises policies common to all companies in the Group. These policies, along with guidelines and instructions, are gathered in our policy portal, an internal database accessible to all employees through Cavotec's intranet.

It is the responsibility of each employee to be familiar with and adhere to Code of Conduct and Cavotec's policies. All employees are provided appropriate and relevant training. We will inform our key stakeholders on our commitments, policies and Code of Conduct.

Based on the Cavotec's policies, operational units prepare strategies and implementation plans. Each manager is responsible for the day-to-day reinforcement and compliance follow-up. Social and environmental performance indicators are reported and followed up on a Group level.

Compliance and reporting

Our reputation and organisational integrity are key requirements to operate sustainably and successfully. Internal reporting of suspected criminal or unethical conduct by or within Cavotec is vital for maintaining sound business conduct. Cavotec considers violations of the Code or other internal and policies as entirely unacceptable. Violations of external rules are viewed in the same way.

Failure by Management to take action against those who violate the Code is equally unacceptable and offenders will be dealt with accordingly.

Depending on the nature of the violation, disciplinary measures may include verbal or written reprimands or warnings, demotion and dismissal. Where a violation of the Code represents criminal behaviour, Cavotec will alert the relevant authorities.

Employees are encouraged to report any of these behaviours through the normal reporting channels (i.e. through their immediate manager or relevant Director) in order to keep an open dialogue. However, an employee may feel unable or uncomfortable raising a concern through the normal reporting channels. In this instance, the Cavotec Whistleblower policy provides a means for every employee to report, including anonymously, a concern outside the normal reporting channels. Cavotec strictly forbids any mistreatment of those who come forward believing a colleague has violated the Code.

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