



Code of Conduct Sontex Groupe

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Dear employees¹,

At Sontex SA, we have been combining Swiss precision with forward-looking technology for over 35 years. Our heat and water meters, our remotely readable systems and our solutions for transparent resource use stand for reliability, innovation and sustainable responsibility – values that are deeply rooted in our corporate culture.

In 2025, Sontex SA took a decisive step in its corporate development with the integration of E. Wehrle GmbH, including its subsidiary G. BERNHARDT's Söhne GmbH, and INTEGRA Metering Ultrasonic SAS.

These mergers gave rise to the Sontex Group (hereinafter referred to as Sontex) – an even stronger, European-based partner for precise, reliable and forward-looking metering solutions in the fields of heat, water and energy. What unites us is much more than technology: it is the shared conviction that accurate measurement forms the basis for transparency, efficiency and responsible use of resources – and thus for a more sustainable future.

Our Code of Conduct is an expression of this shared foundation. It combines the strengths and cultures of our now united companies and provides all employees – whether in Switzerland, Germany, Italy or France – with clear guidance for acting with integrity, respect and responsibility.

Against this background, we expressly commit ourselves to the ten principles of the UN Global Compact. Respecting and protecting human rights, promoting fair and safe working conditions, actively assuming environmental responsibility and consistently rejecting corruption – these universal values are not only an obligation for us, but a matter of course.

Furthermore, the social and ethical standards described in this Code of Conduct are based in particular on the ILO conventions, the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights (UN Guiding Principles on Business and Human Rights), the core labour standards of the International Labour Organisation (ILO) and the United Nations 2030 Agenda for Sustainable Development.

We comply with national and European regulations as well as EU directives on sustainability reporting.

To ensure implementation, we conduct regular reviews, organise training for our teams as needed, and maintain open dialogue with internal and external stakeholders, including employees, suppliers, customers, and local communities.

As our employee or business partner, please help to ensure that Sontex remains a respected company in the future and can continue to develop well.

Many thanks

Patrick Grichting



CEO Sontex Group

¹ For better readability, we use the generic masculine form in the following. The term "employee" also refers to female employees and persons not belonging to these groups.

1. Guiding principle

We comply with the law.

We comply with the laws of the countries in which we operate and actively manage risks in this regard.

We comply with recognised international standards, including the ten principles of the UN Global Compact, the UN Guiding Principles on Business and Human Rights, the core labour standards of the International Labour Organisation (ILO), the United Nations 2030 Agenda for Sustainable Development, national and European regulations, and the EU directives on sustainability reporting.

Unlawful conduct is not in the interests of our company because it is unethical, leads to serious damage to our image and can result in criminal prosecution, damages and loss of business.

Employees who violate applicable law run the risk of being prosecuted. Law-abiding behaviour therefore also serves to protect the employee. In cases of doubt, the supervisor or management should be consulted for clarification.

If necessary, targeted compliance training on the requirements of this Code of Conduct will be provided for employees. The Code of Conduct is publicly available on the Sontex website.

When working with our business partners, we also expect them to comply with the laws of the countries in which they operate and the minimum standards set out below, and to require the same of their own employees.

2. Ethical principles

We make ethical and value-oriented decisions.

Sontex's business success is based on the joint efforts of all employees. Sontex therefore requires its employees to make ethical, value-oriented decisions in their business dealings.

Sontex rejects discrimination in hiring or employment, in particular discrimination based on ethical or national origin, skin colour, gender, physical disability, age, religious beliefs or membership of a workers' organisation. We disapprove of physical, psychological or sexual violence and respect the right to freedom of opinion, freedom of expression and privacy. We require our business partners to comply with these requirements.

The right of employees to freedom of association in accordance with the respective national laws is respected. Sontex does not tolerate any form of illegal employment or undeclared work. We comply with national legal regulations on the employment of staff and the international minimum standards of the ILO (www.ilo.org). We select our business partners according to these principles and hereby oblige them to comply with these principles.

3. Maintaining fair competition

We are committed to fair competition.

We do not coordinate our competitive behaviour with competitors and comply with laws protecting fair competition.

It is prohibited to agree on prices and conditions, divide markets and regions, allocate customers, boycott customers or suppliers, and coordinate bidding strategies. Not only explicit agreements are prohibited in this regard but also concerted practices.

Violations of these prohibitions are consistently prosecuted by the antitrust authorities and can result in sanctions that threaten the existence of the company.

Our business partners also undertake not to violate these prohibitions.

4. Bribery, corruption, gifts and other benefits

We reject bribery and corruption.

Bribery and corruption are unethical, illegal and pose a high risk to our employees and our company. Bribery and corruption are therefore not in the interests of Sontex.

We do not offer our business partners any improper advantages and do not accept any such advantages ourselves. We exercise restraint when accepting and giving gifts and other benefits (such as invitations to meals or events). Even modest gifts can be considered bribery or inducement under applicable law. Under no circumstances may these be designed in such a way that their acceptance must be concealed by the recipient or places them in a more than insignificant moral obligation. In cases of doubt, the matter must be discussed with the line manager. Extreme caution must be exercised in dealings with public officials; the legal regulations in this area are very strict worldwide. Commissions and remuneration to be paid to dealers, agents or consultants may only be paid for permissible services that have been rendered.

Our suppliers also undertake to combat all forms of bribery and corruption and to comply with the relevant laws.

5. Taxes and subsidies

We do not commit tax evasion or subsidy fraud, nor do we aid or abet such activities.

Tax evasion harms society, our company and everyone. Every employee must be aware that the risk of detection for tax offences is particularly high due to regular and thorough audits by the tax authorities.

Any suspicion can very quickly lead to the involvement of law enforcement agencies. It is often difficult to assess situations from a tax or subsidy law perspective. In cases of doubt, clarification must be sought by obtaining legal advice.

We expect our business partners to act accordingly.

6. International trade and money laundering

We comply with the regulations applicable to cross-border trade.

We comply with the regulations applicable to cross-border trade and require our business partners to comply with these regulations. This applies to compliance with existing import or export restrictions, obtaining the necessary permits and paying the prescribed customs duties and taxes. In case of uncertainty, the customs officer and/or supervisor should be consulted.

Compliance with these regulations is subject to regular checks by the authorities. Violations are subject to significant penalties.

We pay particular attention to all financial transactions to detect money laundering, i.e. the exploitation of proceeds from illegal activities through commercial transactions (e.g. unusual commission claims, cash payments of large amounts, dubious intermediaries), and we expect the same from our business partners.

7. Product safety and occupational safety

We ensure safe products and workplaces.

We set the highest standards for the quality and safety of our products and services. We monitor the performance of our products on the market and help customers to avoid hazards.

Sontex complies with the UN Charter of Human Rights and rejects any form of exploitation of children and young people, as well as forced labour, debt bondage, serfdom, slavery or similar human rights violations.

Our business partners also undertake to comply with these regulations and principles.

The regulations for ensuring health and safety in the workplace are strictly adhered to. Safety regulations must be continuously reviewed to ensure their effectiveness. Any non-conformities must be identified and rectified immediately. The ISO 45001 (occupational health and safety) certification of Sontex SA and E. Wehrle GmbH supports this process.

8. Environmental protection and sustainability

We take care of natural resources and create transparency about sustainability.

We use natural resources sparingly and responsibly and strive to do the same with our products. Within Sontex, ISO 14001 (environmental management) certification ensures that sustainability is strategically embedded in our processes and helps to systematically reduce our environmental impact and use resources more efficiently. To date, Sontex SA and E. Wehrle GmbH are ISO 14001 certified, with other locations following suit. E. Wehrle GmbH is also ISO 50001 (energy management) certified.

Sontex prepares and publishes sustainability reports (ESG reports) in accordance with the applicable legal requirements.

9. Critical materials and conflict materials

We check whether minerals and metals originate from conflict and high-risk areas.

We adhere to the guidelines of the Organisation for Economic Co-operation and Development (OECD) for fulfilling the documentation obligation and, where necessary, the duty of care to promote responsible supply chains for minerals from conflict and high-risk areas.

We are committed to and require our business partners to source critical and conflict materials, such as tin, tantalum, tungsten and gold (3TG), as well as rare earths, such as bauxite, cobalt, titanium and lithium, and to ensure compliance with due diligence obligations to promote responsible supply

chains for minerals from conflict-affected and high-risk areas. Business partners will report on the supply chain upon request, while maintaining legitimate trade secrets.

10. Avoiding conflicts of interest

We promote the interests of Sontex and avoid anything that runs counter to these interests.

Employees must perform their duties in such a way as to avoid actual or potential conflicts between personal or third-party interests and the interests of Sontex. Any secondary business activities require the prior approval of the respective supervisor. This applies to secondary activities for competitors, customers or suppliers of Sontex or financial investments in these. If family members are involved in such activities or investments, this must be reported to the management.

We strictly separate business and private interests and do not use our position at Sontex to gain private advantages. The commissioning of Sontex business partners for private purposes is to be avoided. Business partners may not be given preferential treatment for private interests.

11. Company property, trade secrets and data protection

We protect intellectual and material property.

We treat operating resources with care and in accordance with their purpose. We handle Sontex's assets responsibly. Unnecessary costs must be avoided. Sontex makes business decisions based on commercially sound analyses of opportunities and risks. In doing so, we also pay attention to the integrity of our business partners.

As a technology company with high expenditure on research and development, Sontex is particularly dependent on the protection of its inventions and know-how. We therefore handle business secrets with particular care and treat them as confidential. Before disclosing information to third parties, we conclude a confidentiality agreement. It must be ensured that confidential information does not reach unauthorised third parties. This also applies to confidential information that we receive from business partners.

We use the personal data of our employees and contractual partners exclusively for the purposes for which it has been made available to us and treat it confidentially. The laws enacted to protect personal data must be strictly observed.

Employees must familiarise themselves with Sontex's principles regarding electronic data protection and the use of IT infrastructure. Access to and use of any part of this system is granted to authorised personnel for the sole purpose of operating Sontex's business.

We also expect our business partners to ensure adequate protection of all sensitive, confidential and other protected information and trade secrets.

Business partners must comply with applicable data protection laws, in particular the General Data Protection Regulation (GDPR) and national laws, when collecting, processing and transmitting personal data and information. Business partners may only use this information for the business purpose for which the information was provided. Prior approval from the owner of the information is required for use for other purposes (e.g. advertising, public relations and similar).

Business partners must protect the sensitive, confidential and copyrighted information and trade secrets of others, including personal data/information, from unauthorised access, destruction, use,

alteration and disclosure through appropriate physical and electronic security procedures, including mitigating emerging risks to information systems through the implementation of appropriate IT cybersecurity programmes.

12. Documentation of business transactions

We document significant business transactions in a comprehensible and timely manner.

Internal and external reports must be accurate and complete so that the recipient can form an accurate picture. In doing so, we adhere to the presentation of facts and objective language. Premature conclusions are to be avoided.

Documents that are required for ongoing or anticipated internal investigations or official inquiries must not be destroyed, removed or altered. The retention periods must be observed.

13. Communication

We do not disclose internal information from our professional environment.

Whenever we communicate about Sontex, we comply with applicable laws, regulations and internal guidelines. Only authorised persons communicate on behalf of the company with media representatives, such as the press, TV and radio. When using social media platforms such as X (formerly Twitter), Facebook and LinkedIn, we also observe the guidelines and do not disclose any internal information from our professional environment.

14. This code of conduct applies worldwide

This Code of Conduct is binding for all employees of the Sontex Group.

Questions about this code of conduct or the correct behaviour in individual cases will be answered by the respective supervisor or the management of the respective company. Violations of this code of conduct will not be tolerated and may result in disciplinary measures, including termination of employment.

Reports can be made to the respective supervisor, the management or the internal reporting office. All reports of such violations will be investigated. Sontex treats all reports confidentially. If employees make a report that is not confirmed by the subsequent investigation, Sontex will not take any disciplinary action, provided that these employees did not act in bad faith when making the report.

In case of uncertainty due to translations, the German text shall serve as a reference.

15. Disclosure to business partners

Our business partners adhere to our principles.

Sontex obliges its business partners through its Supplier Terms and Conditions to comply with the requirements and principles described in this Code of Conduct throughout the entire supply chain and to implement them by means of appropriate measures.