

Supplier Code of Conduct for Responsible Procurement*

Edition 2025, 1st of December 2025

Introduction & Purpose

The Matterhorn Gotthard Bahn and the controlling companies of BVZ Holding AG (hereinafter referred to as the BVZ Group) are committed to implementing Environmental, Social, and Governance (ESG) principles throughout the entire value chain and to maintaining long-term partnerships with their suppliers.

This BVZ Group Supplier Code of Conduct outlines our values and expectations for responsible procurement practices. It defines the non-negotiable requirements we expect our suppliers to meet when conducting business with the BVZ Group and its subsidiaries.

The Supplier Code of Conduct is based on ESG principles and is aligned with international standards such as the conventions of the International Labour Organization (ILO), the United Nations Guiding Principles on Business and Human Rights, and other globally recognized sustainability frameworks. This Code of Conduct will come into effect in January 2025.

Our Business Practices

1. Compliance with applicable laws and regulations

Suppliers must comply with the laws and other regulations applicable at the locations where they operate. This Supplier Code of Conduct does not replace the legislation in these jurisdictions and must be observed in addition to those laws.

2. Transparency

If there is a substantiated suspicion or a reported violation of this Supplier Code of Conduct, the Supplier shall, upon request, disclose all known elements of its value chain and provide evidence of compliance with due diligence obligations (documentation / audit). This disclosure enables a joint assessment of potential risks and adverse impacts with the BVZ Group. Where the value chain is not fully known, the Supplier shall make reasonable efforts to obtain and transparently provide the missing information within an appropriate timeframe.

3. Climate protection

Suppliers are required to make ongoing efforts to minimize their environmental footprint and to play an active role in climate protection across all stages of their supply chain. This involves cutting down on greenhouse gas emissions, optimizing the use of energy and raw materials, and encouraging the adoption of circular economy principles and renewable energy in manufacturing and logistics processes.

4. Environmental management

Suppliers are required to use environmentally friendly materials where feasible and adopt resource-efficient processes throughout their operations, ensuring the proper handling of hazardous substances and minimizing environmental impacts. They must maintain an environmental management system certified to ISO 14001, EMAS, or an equivalent standard, or implement a documented management system that guarantees compliance with environmental due-diligence obligations.

* This English version is translated from the original German text. In case of any ambiguity or discrepancy, the German original will prevail.

Social Responsibility

5. Zero tolerance for child labour and forced labour

Suppliers must strictly comply with the laws and standards against child labor in accordance with ILO conventions. In addition, the BVZ Group has a zero-tolerance policy regarding any participation, whether direct or indirect, in practices such as modern slavery, forced or compulsory labor, human trafficking, or any other kind of involuntary work.

6. Discrimination

We do not accept any forms of discrimination. Suppliers need to ensure that all employees are treated with respect and dignity, regardless of their personal characteristics or beliefs. Any type of violence or inhumane treatment in the workplace is strictly prohibited. Furthermore, employees have the right to organize themselves in trade unions or join an association of their choice without restrictions or negative repercussions.

7. Fair wages, social benefits, and working hours

Suppliers must provide their employees with fair compensation and at least the minimum wage required by either the local law or industry standards, whichever is higher. The maximum working hours for employees must not exceed the limits set by the relevant ILO conventions.

8. Health and Safety

Suppliers are required to ensure and maintain a safe working environment in line with relevant industry standards and to promote protective measures. Suppliers must also take special care to protect particularly vulnerable groups, such as young employees, expectant mothers, and people with disabilities.

Governance

9. Anti-corruption

Suppliers are required to comply with all applicable national and international anti-corruption laws and regulations. They must not engage in corruption, bribery, or unethical business practices. Employees and members of management should not be offered, given, or promised any unlawful benefits that could provide an unfair advantage.

10. Fair competition

Suppliers are required to conduct their business in accordance with principles of fair competition and comply with all applicable national and international trade controls and sanctions regulations.

11. Conflict of interest

If conflicts of interest arise, even unintentionally or after the awarding of a contract or order, the supplier must immediately report them to the BVZ Group. Likewise, conflicts of interest between local legislation and this BVZ Group Supplier Code of Conduct must also be reported.

12. Information security, data protection, and confidentiality

Suppliers are required to treat all data and information exchanged during the business relationship as confidential and to fully comply with applicable data protection laws. Safeguarding information and respecting privacy are fundamental aspects of our partnership.

Compliance & Grievance mechanism

The BVZ Group expects its suppliers to demonstrate adequate due diligence across their full supply chain. Suppliers must take responsibility to ensure that the BVZ Group's Supplier Code of Conduct or a comparable set of standards is followed, both in their own companies and by their suppliers and subcontractors. This approach aims to make sure that these standards are maintained throughout the entire value chain. If suppliers become aware of any human rights violations within the supply chain, they are obligated to report these through the BVZ Group's grievance mechanism.

Suppliers, employees, and associated persons of the BVZ Group are required to report suspected or known violations of the Supplier Code of Conduct through the grievance mechanism provided below. Reports can be submitted anonymously, and all information received will be treated with strict confidentiality. This grievance mechanism is monitored by an independent third-party service provider.

Grievance mechanism: meldung@vms-oev.ch

The BVZ Group reserves the right to terminate the business relationship in accordance with applicable laws if a supplier fails to adhere to the Supplier Code for Responsible Procurement.

We sincerely appreciate your collaboration and dedication to maintaining the highest levels of ethical conduct. Through our joint efforts we can foster sustainable development. Your signature and company stamp serve as confirmation that you have thoroughly reviewed, comprehended, and agreed to the 2025 edition of the BVZ Group Supplier Code of Conduct.

Company name:

First and last name, Title:

Date, Signature:

BVZ Holding AG
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3900 Brig