

Policy on Donations and Sponsorship



1. Introduction

The Siegfried Group (**Siegfried**) is committed to responsible corporate behavior and social responsibility. Our activities are always in line with our core values and add to our belief:

What we do matters.

- We are aware of the importance of our communities as vital factor for our success.
- We want to give back and do so by either encouraging our employees to engage in local projects and supporting them – be it with financial donations, knowledge or logistics – or support projects that make a difference and will have a positive effect on society around all sites of the Siegfried network.



2. Scope

By making donations and awarding sponsorships for projects that uphold our values, we express our commitment and responsibility towards society in a broader context.

This policy on donations and sponsorships (**Policy**) covers the guidelines and delineates the roles and responsibilities with regard to the realization of donations and sponsorships by all Siegfried entities. As a general rule, project-specific donations shall not exceed CHF 5'000.00 respectively CHF 20'000.00 for sponsorships. Exceptions require the prior written approval of our Executive Committee (**ExeCom**). The Policy does not cover our activities in the fields of advertising and branding, primarily aimed at enhancing the publicity and profile of Siegfried for commercial reasons.

Donation: A Donation is a voluntary contribution in the form of monetary or non-monetary gifts for which no return service or payment is expected or made. For the avoidance of a doubt, contributions to industry associations and/or fees for memberships in organizations that serve Siegfried's business interests are not considered Donations.

Sponsorship: Sponsorship refers to partnering with external organizations to deliver mutual benefits through an exchange of f.e. know-how, funds, products, services. Siegfried's sponsorship engagements must always be documented in writing.

3.

Principles

3.1. Always Respect Laws and Regulations

All Donations and Sponsorships provided by Siegfried must be compatible with our business activities and reflect our commitment to social responsibility. In particular, Donations or Sponsorships may only be awarded when:

- (i) they are in full compliance with all applicable laws and the Siegfried Code of Business Conduct; and
- (ii) they are made to private individuals or companies for a charitable or non-commercial purpose in line with our focus activities (section 4).

3.2. Focus on Local Impact

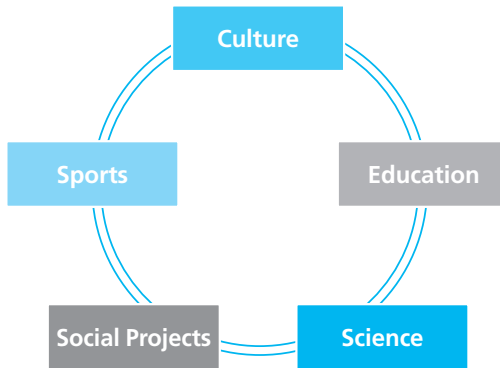
As a global company with strong local roots, we see the diversity of communities as an enrichment. Therefore, we plan to support a wide range of different local projects in the vicinity of our sites – preferably, when Siegfried employees are involved – rather than concentrating on large projects. We support civic engagement of our employees, especially in all fields of our focus activities.

3.3. Ineligible Projects

Siegfried does not support religious groups, political parties or the election campaigns of private individuals. When it is in Siegfried's interest, we want to make sure our voice is heard in the political opinion-forming process directly or through membership in the appropriate industry associations.

4. Focus Activities

We concentrate our Donation and Sponsorship projects (**Projects**) on the following areas:



5.

Process

5.1 Budgeting

The ExeCom shall annually determine (i) the corporate and (ii) the overall local budget for Donation and Sponsorship Projects. In addition, the ExeCom shall decide on the allocation of the overall local budget to each Siegfried site.

5.2 Project Requests

Siegfried employees and third parties are encouraged to send a corporate or local Project request to sponsoring@siegfried.ch.

5.3 Selection and Approval of Projects

Corporate Projects

The ExeCom shall designate the members of the corporate Sponsorship board (**Sponsorship Board**). The Sponsorship Board shall meet quarterly and be responsible for the evaluation, allocation and the cost control for Projects financed from the corporate budget up to and including CHF 5'000.00 for each Donation Project and CHF 20'000.00 for each Sponsoring Project. Projects exceeding these thresholds or the corporate budget require the prior written ExeCom approval.

Local Projects

Each site leadership team shall designate one or more accountable person(s) as subject matter expert(s) (**SME**) for local projects. The SME shall pre-assess and present all suitable local Project requests to the site leadership team on a quarterly basis. The site leadership team shall make the final decision on awarding local Project requests. Projects exceeding the local budget require the prior written ExeCom approval.

5.4 Reporting and Governance

The Sponsorship Board and the SMEs shall track and report the expenditures for all selected Projects to the ExeCom on a yearly basis.

We encourage you to send us your request for a Donation or Sponsoring Project.

Please send all requests to sponsoring@siegfried.ch.

Contact

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