

Code of Conduct

Version: 1.0

4 March 2026

Approved by:

David Turner

Christopher Mutel

João Gonçalves

(Managing Directors)

This Code of Conduct is reviewed annually and updated as needed. The current version is available at cauldron.ch.

Our Commitment

Cauldron Solutions GmbH is committed to conducting all of our work with honesty, integrity, and respect — for our people, our clients, our partners, and the environment. This Code of Conduct applies to all workers at Cauldron Solutions, including employees, contractors, interns, and collaborators.

We expect everyone working with or for Cauldron Solutions to uphold these principles at all times.

1. Legal Compliance & Business Integrity

We comply with all applicable laws and regulations in Switzerland and in the countries where we operate, including laws relating to data protection, export controls, trade sanctions, and antitrust.

We have zero tolerance for bribery, corruption, extortion, or embezzlement in any form.

All conflicts of interest must be declared promptly. Business hospitality and gifts must be reasonable, transparent, and never intended to influence business decisions.

All financial and commercial transactions are recorded accurately and transparently. Participation in money laundering or insider trading is strictly prohibited.

2. Confidentiality, Data Privacy & Intellectual Property

We handle all client data, project information, and proprietary materials with the highest level of care and discretion.

- All information shared by clients or partners that is not in the public domain is treated as confidential and used only for its intended purpose.
- Personal data is collected, stored, processed, and disposed of in accordance with the Swiss Federal Act on Data Protection (nDSG). Where we process personal data relating to individuals in the European Union or European Economic Area, we additionally comply with the requirements of the EU General Data Protection Regulation (GDPR).
- Intellectual property belonging to clients, partners, or third parties is respected and never used without authorisation.
- Proprietary datasets, software licenses (including LCA databases such as ecoinvent), and third-party tools are used only within the terms of their applicable licenses.

3. Quality & Professional Standards

We deliver consulting, software, and technical services that meet the specifications and quality standards agreed with our clients.

We are committed to scientific rigour, methodological transparency, and accurate communication of results and uncertainties.

We do not misrepresent our capabilities, credentials, or the scope of our work.

4. Respect, Dignity & Non-Discrimination

All people who work with or for Cauldron Solutions are treated with respect and dignity.

We do not tolerate any form of harassment, abuse, intimidation, or discrimination — whether based on age, gender, gender identity, race, ethnicity, religion, nationality, sexual orientation, disability, or any other characteristic.

Employment at Cauldron Solutions is voluntary, freely agreed, and conducted under documented terms. We do not engage in or support forced labour, bonded labour, or human trafficking in any form.

5. Fair Employment & Working Conditions

We comply with Swiss employment law and meet or exceed minimum requirements for wages, working hours, benefits, and paid leave.

Working hours comply with the Swiss Labour Act (ArG). For office-based workers this means a maximum of 45 hours per week as the normal working week. Overtime is voluntary and compensated in accordance with Swiss law and individual employment agreements. We are committed to reasonable working hours and the wellbeing of our team.

Workers are free to join or refrain from joining any lawful association or union without interference or intimidation.

6. Health & Safety

We maintain a safe and healthy working environment, whether in our office, at client sites, or working remotely.

Workers are expected to follow safety procedures, carry out only work they are trained and qualified for, and raise any safety concerns promptly.

7. Environmental Responsibility

As a sustainability-focused organisation, we take our environmental responsibilities seriously. We aim to minimise our own operational footprint — including energy use, travel emissions, and waste — and to conduct our business in a manner consistent with the goals of the Paris Agreement.

8. Raising Concerns

If you have a concern about conduct that may violate this Code of Conduct, you are encouraged to raise it promptly. Concerns may relate to legal or regulatory breaches, ethical violations, data misuse, discrimination, harassment, or any other conduct inconsistent with this Code.

In the first instance, concerns should be raised directly with any member of the leadership team. If you are not comfortable doing so, you may contact us confidentially at:

Contact for raising concerns:

info@cauldron.ch

All concerns raised in good faith will be taken seriously, investigated appropriately, and treated with discretion. Workers who raise concerns in good faith are protected from retaliation, dismissal, or any other adverse consequence. This protection applies regardless of whether the concern is ultimately substantiated, provided it was raised honestly and without malicious intent.

Any attempt to retaliate against a person who has raised a concern in good faith is itself a serious violation of this Code of Conduct and will be treated as such.

9. Partners & Suppliers

We expect the third parties we work with — including subcontractors, freelancers, and service providers — to conduct themselves in a manner consistent with the principles set out in this Code of Conduct. When engaging external partners, we take reasonable steps to ensure they uphold equivalent standards in areas such as legal compliance, data protection, fair employment, and environmental responsibility.

10. Consequences

Violations of this Code of Conduct may result in disciplinary action, up to and including termination of employment or engagement.

Approval & Signatures

By signing below, we confirm that this Code of Conduct has been reviewed, approved, and adopted by Cauldron Solutions GmbH, and that we are committed to upholding its principles.

Christopher L Mutel

Christopher Mutel, Member and Chairperson of the Management Board

João Gonçalves

João Gonçalves, Member and Member of the Executive Board

David Turner

David Turner, Managing Director