

Zurich, Januar 2022

## **Code of Conduct**

Our Code of Conduct is intended to be a guideline for the employees, partners and suppliers of Finaco Treuhand AG. It represents the demand we place on ourselves to live up to the values and principles listed therein and, at the same time, it signals to the outside world responsible behaviour towards our business partners, customers and our employees.

### Commitment of the management

Finaco Treuhand AG is committed to act economically and in an environmentally responsible manner. Finaco Treuhand AG is committed to conducting its business competently and on an ethical and moral basis and to competing fairly in all the markets in which it operates. This includes compliance with applicable laws and acceptance of anti-trust prohibitions or restrictions on competition.

### Implementation and enforcement

Finaco Treuhand AG is committed to make all necessary efforts to live up to the principles and values described in this Code of Conduct.

Fredy Eckstein,  
President of the Board

## Team spirit, constructive collaboration

We constantly question existing solutions and develop new ideas for the benefit of our customers. To this end, we encourage constructive teamwork among our employees. Their interests and demands on us are decisive for our work and further development.

## Standards of cooperation

We expect all our employees to act in accordance with the highest professional standards and our company's guidelines at all times. If employees violate existing guidelines, rules or regulations in the course of their work or through their conduct, they will be subject to disciplinary action.

## Dialog with cooperation partners

All business information of our partners and their trade secrets are treated sensitively and confidentially as a matter of principle. Necessary documents are properly prepared, stored or, if necessary, destroyed after the end of the cooperation.

## Customer orientation

We behave fairly and honestly towards our customers and business partners. We record the wishes, needs and expectations of our customers and business partners in order to ensure a target-oriented implementation in products and services. Our primary goal is to build a long-term and stable relationship with our customers and business partners on the basis of trust.

## Acceptance of gifts, donations

### *Gifts to our employees*

Our employees do not request or accept personal benefits from customers or suppliers that could influence or affect their own behaviour with regard to their work for the company.

If gifts are offered by third parties, they may only be accepted if they are common practice and can be recognized as a courtesy or kindness (promotional gifts bearing the logo of the donating company, such as calendars or pens).

### *Donations*

As a matter of principle, Finaco Treuhand AG does not make donations to political parties, to individuals or to organizations whose objectives contradict our corporate philosophy or damage our reputation. Donations are always made in a transparent manner.

## Bribery and corruption

We do not tolerate any form of corruption and bribery. We have control mechanisms in place to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering.

Our employees are prohibited from accepting or granting favours of any kind (cash, travel, gifts, etc.) Our business partners are also required to avoid conflicts of interest that involve a risk of corruption.

## Data protection

We treat all personal data of our customers, business partners and employees with the utmost care. This includes names, addresses, telephone numbers as well as date of birth or information about the current state of health. Our employees are obligated to take all measures to secure the data, which are suitable to protect our IT system against internal as well as external data theft. This applies in particular to passwords misused in the company and unauthorized downloading of files, especially of inappropriate material from the Internet. Please also refer to our separate data protection and privacy policy declaration.

## Compliance with applicable law

We are a qualified, certified, regulated and, on a regular base, audited member of the Self Regulatory Body ("SRB") of the SFA, as requested by and according to the Swiss Anti Money Laundering Law ("AMLL"). This SRB is supervised by FINMA, the state organized integrated financial market supervisory authority, which regulates Banks, Insurance companies and Financial Intermediaries ([www.finma.ch](http://www.finma.ch)). Accordingly, we maintain an AML policy and programme that includes policies, procedures and internal controls reasonably designed to prevent, detect and report money laundering. We adequately train our staff and perform appropriate due diligence to comply with generally accepted compliance rules to identify each client and his source of wealth. This policy and programme meet fully the requirements of the anti-money laundering laws and regulations currently in force in Switzerland.

The business practices of our business partners and their suppliers must also comply with applicable laws.

Violations of economic embargoes and sanctions as well as trade import / export control regulations must also be ruled out by our business partners, as must the financing of terrorism.

## Protection against child or forced labour

We strictly reject child or forced labour without exception.