

# CODE OF BUSINESS CONDUCT

## Introduction

We, CREALOGIX Holding AG and its Group companies within Switzerland and abroad, comply with the valid laws, guidelines and regulations applicable to us. These also include the local employment laws and export regulations in particular. In addition, we conduct our business operations in a professional and ethically responsible manner. This not only protects our integrity and reputation, but is also the only means of being sustainable and successful in the long term.

The following principles define our responsibility and obligation to engage in both lawful and sustainable business activities. Every individual employee, regardless of their level, is obligated to implement and live up to these principles. Breaches are not tolerated. We are committed to ensuring that our suppliers and partners comply with these principles too.

## Respect

We respect our employees and do not tolerate any form of discrimination. We promote equal opportunities and equal treatment of our employees, regardless of skin colour, race, nationality, social background, disability, sexual orientation, political or religious conviction, gender or age. We respect each individual's personal dignity, privacy and personal rights.

The corporate culture is characterised by fair working conditions and reasonable remuneration, clear and measurable employee targets, open communication and social skills.

## Integrity

We do not tolerate any form of corruption or bribery, including any kind of illegal offers of payment or similar donations to persons in the public or private sector, with a view to influencing decision-making processes. Passive bribery, i.e. accepting payments or donations, and such payments to third parties are treated in the same way.

The giving and acceptance of invitations (e.g. to a meal) and gifts is permissible in moderation. The upper limit is based on the local regulations and/or customs, but may only exceed the equivalent of EUR 150 per person/case or EUR 300 per person/year in exceptional cases approved by the compliance officer.

## Fairness

We comply in full with the rules on protecting open competition and the antitrust regulations. We win and award contracts based on objective and performance-based criteria. There are no agreements, e.g. price-fixing agreements, among competitors.

## Confidentiality

We protect the confidentiality of sensitive information concerning our employees, our customers and our business partners, who mainly operate in the banking sector. We do not disclose any private information, except when obligated to do so by law.

## **Transparency**

Our employees always act in the interest of CREALOGIX and avoid situations which could lead to a conflict between personal interests and interests of CREALOGIX. Possible conflicts of interests have to be disclosed and appropriately solved.

## **Sustainability**

We act with the long term in mind and are committed to ecological sustainability. In particular, we encourage economical use of energy.