

# Code of Conduct

Our Code of Conduct is intended as a guideline for the entire Traxess AG organisation and therefore applies equally to all of us. Specifically, it is aimed at top management, executives, all our employees and our suppliers. On the one hand, it represents the demands we place on ourselves to live up to the values and principles set out therein and, at the same time, signals responsible behaviour towards our business partners, customers and our employees to the outside world.

## Management commitment

Traxess AG considers it its duty to act economically and environmentally consciously. The company endeavours to conduct its business competently and on an ethical and moral basis and to compete fairly in all markets in which it operates. This includes complying with applicable laws, the acceptance of antitrust prohibitions and restrictions on competition. We want to avoid gaining unauthorised advantages over customers, suppliers or competitors.

## Implementation and enforcement

Traxess AG undertakes to make the necessary efforts to comply with the principles to fulfil the principles and values described in this Code of Conduct values described in this Code of Conduct:

Zurich, 1 October 2023



Anthony Helbling  
Chairman of the Board



David Hari  
Chief Executive Officer

## **Our values**

- **We treat everyone fairly, with respect and dignity.**
- **We are honest and transparent in everything we do.**
- **We pursue a long-term perspective that enables sustainable growth.**
- **We take the needs of our customers as the starting point for all our endeavours.**

**By adhering to these values, we are becoming an even more remarkable corporate.**

## **Acceptance of gifts, donations**

### a) Gifts to our employees

Our employees do not demand or accept any personal advantages from customers or suppliers' personal benefits that influence or could influence their own behaviour regarding 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 recognised as a courtesy or favour can be recognised as a courtesy or favour (promotional gifts with the logo of the company, such as calendars or pens). In the case of gifts with a value exceeding CHF 20, the management must be informed. If this is not possible, these gifts must always be refused.

### b) Gifts from our employees

Gifts on our part may also only be offered within a framework that is customary for the business relationship and to a materially appropriate extent. The recipient must not be able to associate this with any obligation that would influence their business decisions.

### c) Donations

As a matter of principle, Traxess AG does not make donations to political parties, individuals or organisations whose objectives contradict our corporate philosophy or damage our reputation. The allocation of donations is always transparent.

## **Bribery and corruption**

We do not tolerate any form of corruption or bribery, regardless of whether this damages our company assets or the assets of third parties. We ensure control mechanisms to prevent bribery, theft, embezzlement, fraud, tax evasion or money laundering is prevented.

Our employees are prohibited from accepting or granting favours of any kind (cash (cash, travel, gifts, etc.) that are linked to an improper advantage (awarding of contracts, project bonuses, etc.).

Our business partners are also required to avoid conflicts of interest that harbour 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 and date of birth or information about current health status.

Our employees are obliged to take all appropriate measures to protect our IT system from both internal and external data theft. This applies in particular to passwords that are misused within the company and unauthorised downloading of files, especially inappropriate material from the Internet.

### **Compliance with applicable law**

We require our managers to familiarise themselves with the laws, regulations and rules relevant to their area of responsibility and to comply with them without exception. Our managers in particular bear a great deal of responsibility for the fulfilment of the Code of Conduct.

The business practices of our business partners and their suppliers must also comply with the applicable laws. This applies to import, export and domestic trade in goods, technologies or services, but also to payment and capital transactions.

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

### **Fair competition**

We are committed to fair competition and adhere to these laws and rules. We refrain from agreements on prices, conditions and strategies with competitors, suppliers, other companies and dealers that hinder fair competition. We do not take part in any anti-competitive boycotts.

### **Prohibition of discrimination**

Any form of discrimination is prohibited as a matter of principle. Regardless of whether this relates to nationality, ethnicity, age and gender, sexual orientation, marital status, pregnancy or disability, religion or ideology. Promotions and new appointments are always free of discrimination.

### **Dealing with internal company information**

It is important to us that the software solutions developed, the tools used, and the company's intellectual property are handled carefully and responsibly.

### **Protection against child or forced labour**

We strictly reject child or forced labour without exception.