

Burkhalter Group Code of Conduct:

Our values and duties

1. Our employees

The health, safety and satisfaction of our employees is important to us. We take the necessary measures to prevent accidents and illnesses. Furthermore, we are committed to establishing a motivating working environment in which our employees can apply their talents in the best possible way, develop themselves further professionally and be encouraged to become great achievers.

We advocate good working conditions. We comply with the regulations concerning working hours and occupational health and safety and pay our employees a fair wage. Alcohol, drugs and other substances that impair judgement and safety in the workplace are not tolerated, neither on the job nor during breaks.

Fair and respectful interaction forms part of our values. That is why we hold our employees in high regard and support them as best we can. Discrimination, harassment and unequal treatment in the workplace are not tolerated in any way.

2. Our market conduct

Fair competition is an important pillar of the economy. That is what we stand for and why we operate independently on the market. We adhere to the relevant regulations when it comes to competition. Every employee is jointly responsible for personally complying with the relevant regulations and their conduct towards customers, suppliers and competitors is fair and performance-oriented. Violations of the competition regulations shall be reported immediately.

We ensure market credibility with our products and the quality of our services. Our employees strictly adhere to all the relevant provisions against corruption and active and passive bribery, regardless of whether this is direct, via middle men or to private or public office-bearers. In particular, our employees do not accept any benefits within the scope of their business activities that could place them in a situation where they feel a binding dependency. Granting such benefits is also prohibited. Symbolic gifts or invitations that do not exceed the normal scope of business are excluded from this. Behaviour that violates the anti-corruption and anti-bribery laws shall be reported immediately.

3. Our environment

We know that our processes, products, materials and services have an impact on the environment. We strive to keep any negative impact to a minimum. That is why we deal with resources responsibly and manage our business in a sustainable manner. In doing so, we adhere to all applicable laws and industry standards. In our operations and decision-making processes we consider environmental criteria and strive to ensure that our products and services meet environmental standards as best they can.

4. Our role in society

We are part of society. In the regions where our companies operate we make a positive contribution to the environment and create economic, health and social benefits. We maintain long-term relationships with our partners and interest groups and strive to have an open and fair dialogue with them.

We have made it our goal also to put our principles into practice in our relationships with our business partners. We expect them to adhere to all the relevant laws, provisions and agreements so that they too are making a contribution to implementing our values.

5. Our public image

▪ **Social media**

New information technologies and social media platforms not only generate opportunities that can be exploited, but they also create responsibilities that need to be taken seriously. Our employees use social media platforms in a responsible manner, comply with our standards with their conduct and use these new channels to collaborate with customers, employees and other interest groups respectfully.

▪ **Confidentiality**

We place a great degree of trust in our employees because they are the foundation of our success. At the same time, we expect that confidential information about the Burkhalter Group shall not be made available to third parties or the general public. We take the protection of business and personal data seriously. Our employees' personal data is treated as strictly confidential and is processed in compliance with legal provisions. We also protect our intellectual property such as patents, trademarks, copyrights, designs, trade secrets and know-how.

▪ **Conflicts of interest**

Our employees always act in the interest of the Burkhalter Group. We endeavour to avoid situations in which personal interests conflict with the interests of Burkhalter Holding AG, even if it only appears this way. Appropriate organisational and personnel measures defuse there on a case-by-case basis.

▪ **Lobbying and working with the media**

Representation of interests is conducted in accordance with the relevant legal regulations. Lobbying activities are subject to internal monitoring and shall be disclosed. Media representatives are treated in an open, respectful and equal manner. Our employees are given information at the same time and to the same extent as the media and shareholders. The media is only provided with information that has been agreed in advance with Burkhalter Holding AG.

▪ **Insider information**

Confidential facts (e.g. key financial information, major acquisition projects, conclusion or termination of important contracts, litigation with a significant value in dispute or considerable changes in the capital or management structure), the disclosure of which could significantly affect the price of Burkhalter Holding AG's securities, may not be used for personal benefit or for the benefit of third parties and may also not be disclosed to third parties. Further information can be found in Burkhalter Holding AG's regulations governing trading in securities.

▪ **Donations/sponsorship**

We support non-political institutions within reason by donating money and goods. These donations may be used for sporting, cultural, artistic or social purposes and shall always be disclosed. As a basic principle, we do not make any contributions to political parties, political organisations or people who hold political office.

Zurich, 22 March 2018
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