

## FOREWORD

Dear Colleagues

Switzerland Global Enterprise has been successfully promoting the Swiss economy for more than 85 years. In our government-commissioned role, we operate at the interface between economic, political and diplomatic interests. The things we say and do are often interpreted and defined within a specific context.

It is therefore essential that we adhere to our self-imposed internal rules in addition to achieving strict compliance with external regulations. When working with Switzerland's federal bodies, it is of utmost importance that we act transparently and correctly at all times. In our dealings with Switzerland Global Enterprise clients, business partners and members, it is crucial that we handle all information entrusted to us confidentially and correctly.

We stand for global entrepreneurship. Through our partners in Switzerland and our Swiss Business Hubs, as well as in cooperation with Swiss embassies and chambers of commerce around the world, we have a unique network at our disposal whose trust we enjoy. We should be attentive to both these component parts of our network, and always strive to show respect and appreciation to their respective representatives.

The following Code of Conduct lays down the standards we need to maintain in our business dealings and against which we want our stakeholders to measure us. In this respect, we must act with honesty at all times and live up to our core, cultural values by putting these into practice in an exemplary manner.

### Inspiring – Engaging – Go-Getting

We will flesh out this ethos on the following pages, defining how we should conduct ourselves in business as well as the standards that we need to meet as Switzerland Global Enterprise employees.

Welcome to the globalised world of Swiss SMEs.

Ruth Metzler-Arnold  
President of the Supervisory Board

Daniel Küng  
CEO

Zurich, April 2013

## Compliant and fair conduct of business

In every country in which we operate, we respect without compromise the relevant laws, regulations and requirements as well as any self-regulatory rules that may apply. We adhere to the applicable legislation and require our employees and business partners to do the same.

In all our business activities, we act honestly, appropriately, fairly and with integrity. We ascertain ourselves whether we are doing the right thing, because what others do is not always what we would do.

When dealing and engaging in dialogue with business partners, clients, government bodies, regulators, inspection authorities and other stakeholders, we do nothing that might lead us or our employees to be accused of fraudulent conduct, extortion, manipulation or deception.

We respect international human rights and must ensure that we do not contribute to the violation of human rights in any way.

## Services and contracts

We must strive to conclude contracts on fair terms with both business partners and clients, thus avoiding legal, reputational and loss risks.

We must not make any misrepresentations or false promises and offer only those products and services that are appropriate and beneficial for our business partners and clients. We must be capable of fulfilling promises lawfully and reliably.

We must handle complaints from business partners and clients quickly, fairly and thoroughly.

## Communication with external parties

We strive to be cooperative, open and honest in our dealings with supervisory bodies, the authorities, the media and the general public. The statements that we issue must be complete, accurate, honest, comprehensible and in our interests.

It is therefore important that Switzerland Global Enterprise employees

- leave the task of communicating externally, particularly with supervisory bodies and other authorities as well as with business partners, clients, associations and the media, solely to the parties authorised by Switzerland Global Enterprise to take on this responsibility;
- do not make comments to or respond to enquiries from the media or the general public regarding Switzerland Global Enterprise without prior consultation with and authorisation from the responsible communications officers;
- contact the communications officers responsible at Switzerland Global Enterprise to discuss how to proceed regarding any outside enquiries addressed directly to them.

We do not comment on rumours regarding Switzerland Global Enterprise. However, we correct false information.

These rules for communicating with external parties also apply analogously to the use of social networking platforms.

## Conduct towards authorities

Switzerland Global Enterprise's nominated contact persons have sole responsibility for issuing information to government and supervisory body representatives; such contact persons should conduct themselves in an open, cooperative manner. Any information issued regarding inspections, investigations or inquiries must be complete, true and provided without delay.

It is not permissible to destroy or change material information which relates to inspections, investigations or inquiries that have been announced or are already underway.

## Conflicts of interest and external mandates

Conflicts of interest between Switzerland Global Enterprise and its clients could cast doubt on the integrity of the organisation. Potential conflicts therefore have to be identified and resolved at an early stage. However, if a conflict of interest is unavoidable, the matter must be resolved in a fair and equitable manner in the interests of both Switzerland Global Enterprise and the client in question.

In carrying out their professional duties, employees are obliged to act primarily and at all times in the interests of Switzerland Global Enterprise. We must separate our private interests from the interests of Switzerland Global Enterprise. Conflicts of interest in which our personal interests are at odds with those of Switzerland Global Enterprise should be avoided. Should a conflict of interest nevertheless arise, for example through the exercise of a secondary function (e.g. political office, directorship, membership of a governing body of a legal entity), we must disclose this immediately and inform our superiors accordingly.

Conflicts of interest and external mandates disclosed by employees, the authorisation granted by the responsible Executive Board member and any protective measures agreed are recorded in a central register. Once a year, such employees review and – if necessary – reconfirm the continued relevance of the conflicts of interest or external mandates that they originally disclosed.

## Insider dealing

Insider information refers to price-sensitive information about a company or transaction which could influence the published price of securities or other rights pertaining to that or any other affected company.

Switzerland Global Enterprise employees are prohibited without exception from using or sharing insider information obtained in the context of their business activities in order to gain a pecuniary benefit for themselves or another.

## Fair competition

We are unconditionally committed to fair competition and trading vis-à-vis our business partners and competitors. Whenever we acquire new clients for Switzerland Global Enterprise, the rules of fair trading must be adhered to – even amid increasingly fierce competition.

We must avoid anti-competitive activities and situations. In particular, we should not conclude any agreements, or engage in concerted practices with business partners or competitors, which have the object or effect of restricting competition unlawfully.

In terms of export promotion, Switzerland Global Enterprise normally only offers services to third parties in accordance with the principle of subsidiarity.

We offer competing companies advice – if at all – from a different expert each. The relevant Executive Board member should be notified of competitive situations such as these; he or she will decide on any measures that may be necessary to protect the interests of clients.

If there is any uncertainty as to whether specific activities are permitted under competition law, the CFO (Compliance Office) should be contacted.

## Bribery and corruption

Switzerland Global Enterprise prohibits all forms of corruption and bribery. In particular, practices should be avoided that give even the mere appearance of undue influence being exerted.

In dealings with business partners and clients, giving and accepting gifts, invitations and other benefits are often proper and appropriate in the circumstances. However, such practices must be proportionate to the business relationship in question, reasonable in terms of value, frequency and quantity, and in accordance with legal and regulatory requirements.

The provision and acceptance of gifts should not influence business decisions in any way. Wherever possible, Switzerland Global Enterprise employees should disclose gifts, invitations and other benefits before these are provided and accepted. Any gifts, invitations and other benefits that exceed the equivalent of CHF 250 per counterparty (annual total) must be approved by the employee's superior.

The Executive Board is responsible for making decisions regarding the acceptance of donations.

## International sanctions and money laundering

Switzerland Global Enterprise knows its business partners and clients. We do not operate in countries under sanctions, nor do we promote dual-use products. In order to clarify any issues in this regard, we must consult the responsible authority within the Bilateral Economic Relations division of the State Secretariat for Economic Affairs (SECO).

We only accept payments via financial service providers. Cash may be accepted in exceptional cases, provided that the amount does not exceed CHF 1,000 per day.

## Switzerland Global Enterprise assets and resources

We should only use the assets and resources of Switzerland Global Enterprise for the purposes of Switzerland Global Enterprise. Use for inappropriate or illegal purposes or for the personal or professional benefit of employees or third parties is prohibited.

## Switzerland Global Enterprise trademark and other intellectual property rights

Names, logos, service marks, trademarks, patents, copyrights, business secrets and documents classified as "confidential" or "secret" pertaining to Switzerland Global Enterprise or our clients may not be used without these parties' consent.

## Fraudulent or criminal activity

Switzerland Global Enterprise employees must not abuse their position for fraudulent or illegal purposes or in order to misappropriate, conceal, steal or receive money, assets, data, information or services.

## Data protection

Protection of personal data and safeguarding confidential or secret information are of crucial importance to us. We must therefore take appropriate measures to prevent unauthorised access, illegal use, loss, destruction or damage to such data or information.

We must treat the personal data of employees, business partners and clients as strictly confidential and treat and use such data with all due care. In addition, we should only request, collect, use, process, disclose or pass on such data to the requisite extent and for specified, legitimate and necessary business purposes.

In order to safeguard the rights of inspection of the relevant data subjects and responsible data protection authorities, the CFO (Compliance Office) should maintain an inventory of relevant physical and electronic data collections.

## Business secrets

We must protect confidential and secret information and business documents relating to Switzerland Global Enterprise, its employees, business partners, clients and other stakeholders on an integral basis (i.e. from their original logging until their safe disposal) and may not pass these on without the consent of the parties in question, even if such consent is only given informally.

Switzerland Global Enterprise must designate the relevant owners of such documents, records and data, who will be responsible for their classification ("confidential" or "secret"), careful management, secure storage and protection from access by third parties or unauthorised colleagues.

Our duty to protect confidential and secret information also continues to apply following termination of our employment with Switzerland Global Enterprise.

## Data security

We must ensure that personal data as well as confidential/secret information are protected during (electronic) transmission and storage through adequate technical safeguards (e.g. access restrictions, encryption) and that unauthorised access and processing is prevented.

Before we transfer such data across borders (to Swiss Business Hubs, for example), the CFO (Compliance Office) should be consulted in his or her capacity as data controller for Switzerland Global Enterprise; the CFO will verify whether equivalent data protection rules apply in the destination country.

We must report data security breaches as quickly as possible both to the CFO (Compliance Office) in his or her capacity as the data controller for Switzerland Global Enterprise and to our own superiors.

## Storage and disposal of records and data on relevant business transactions

For business, legal and tax reasons and for the purpose of reporting on how Switzerland Global Enterprise is performing, we must maintain complete and accurate records and data.

It is therefore important that we:

- carefully and comprehensively document relevant business transactions;
- process financial data correctly and in a timely manner in accordance with applicable accounting standards;
- make records and data on relevant business transactions available and accessible to authorised persons only and deny unauthorised persons access to the same;
- do not change or falsify records and data on relevant business transactions;
- retain records and data on relevant business transactions – including electronic data and e-mails – for as long as required by law or other regulations, and thereafter dispose of such records and data correctly, unless a court, a public authority or Switzerland Global Enterprise itself suspends the disposal/deletion of all or certain categories of documents or data, for example because of pending litigation or an imminent (government) audit.

## Equality and harassment at the workplace

Switzerland Global Enterprise employees treat each other with respect and dignity.

We do not tolerate any harassment or discrimination at the workplace; this also applies to all personnel-related decisions. Victims and witnesses alike are urged to report any instances of discrimination, harassment or bullying.

We do not accept any form of forced, compulsory or child labour.

## Health, safety and the environment

Switzerland Global Enterprise offers its employees secure, healthy working environments, i.e. by

- providing clean workplaces that pose no accident, emergency, health or safety risk;
- avoiding measures and conduct that could pose a risk to employees;
- rapidly eliminating any safety or health risks that are identified;
- giving due consideration to environmental factors in day-to-day business;
- optimising efforts to protect the environment.

## Implementation and monitoring

It is incumbent upon line managers at all functional levels, as well as every individual employee, to implement and monitor this Code of Conduct within their respective areas of responsibility. In consultation with the CEO and the Supervisory Board, the CFO (Compliance Office) is responsible for defining the risk-based focal points of compliance activity within the context of the business plan. In particular, the annual plan must also set out the training and monitoring activities that relevant line managers and their respective employees are expected to perform. Compliance with the Code of Conduct is reviewed at regular intervals.

## Reporting concerns or violations

Switzerland Global Enterprise employees are required to report any concerns or violations. Any information that they pass on will be treated confidentially and, if expressly requested, anonymously.

Within Switzerland Global Enterprise, any concerns or violations should be reported to the CFO by the line manager in question, either directly or indirectly via the relevant internal channels.

Concerns or violations within the financial department must be reported to the CFO or to the Chair of the personnel and audit committee.

As part of this reporting process, discrimination against employees who have filed reports in good faith will not be tolerated; any such behaviour will result in disciplinary action.

## Applicability and penalties

This Code of Conduct is binding for Switzerland Global Enterprise employees, irrespective of function. For employees at Swiss Business Hubs, this Code of Conduct applies on a subsidiary basis in conjunction with any federal provisions.

It is the responsibility of every individual Switzerland Global Enterprise employee to adhere to this Code of Conduct. Any instances of non-compliance will be penalised by the responsible Executive Board member. The HR Head or CFO must be consulted regarding any sanction. They are responsible for advising the relevant Executive Board member in determining what action should be taken, thus ensuring equality of treatment.