

PREFACE

Dear employees,

Switzerland Global Enterprise has been successfully working internationally in support of the Swiss economy for more than 95 years. As an institution with a federal mandate, our endeavors straddle economic, political and diplomatic interests. What we say and how we behave are often interpreted and taken within the context at hand.

That is why we consider it so important to adhere to the internal rules we set ourselves, alongside strictly complying with external requirements. When working with federal institutions, it is paramount that our actions are always transparent and correct. When dealing with customers, business partners, and members of Switzerland Global Enterprise, it is essential that we treat the information entrusted to us confidentially and handle it appropriately.

We are an advocate of global entrepreneurship. Thanks to our global presence and partners in Switzerland and abroad, we have a unique network and enjoy the trust of its members. We want to be mindful of both, and always show respect and appreciation towards their representatives.

This Code of Conduct defines the standards by which we conduct business and how we want to be judged by the various stakeholders. In the process, it is important to ensure that we always bring our three cultural success factors to life and exemplify them through tangible actions (our “success practices”):

Customer Focus, Collaboration, Continuous Learning

This underlying attitude is described on the following pages. Through this, we provide clarity about our business conduct as well as the rules that we adhere to as employees of Switzerland Global Enterprise.

Welcome to the global world of Swiss SMEs!

Ruth Metzler-Arnold
VRP

Dr. Simone Wyss Fedele
CEO

Fair and compliant management

We respect the relevant laws, regulations, provisions and any self-regulation in all countries in which we operate – without compromise. We follow the law in place and demand the same conduct from our employees and business partners.

We conduct all our business activities with honesty, integrity, reason and fairness in accordance with national and foreign legislation and the cultural standards of each of our target countries. In this respect, we attach great importance to carefully checking each case against our standards and regulations so we can comply with the necessary guidelines.

When in contact and dialog with business partners, customers, federal, regulatory or auditing bodies and other stakeholder groups, we do not do anything that could be mistaken as fraudulent behavior, coercion, manipulation or misleading conduct on the part of ourselves or our employees.

We respect international human rights and prevent any complicity in the violation of the same.

Services and contracts

We strive to ensure that we draw up fair contracts with business partners and customers alike, avoiding legal, reputational and loss risks.

We do not make any misleading promises, and only offer products and services that make sense and bring benefit to our business partners and customers. We must be able to fulfill our promises legally and reliably.

We handle complaints from business partners or customers quickly, fairly and sustainably. In this regard, we focus on our customers' needs and long-term, sustainable partnerships.

Communication with external groups

We strive to maintain a cooperative, open and honest relationship with regulators, authorities, the media and the public. Our declarations must be complete, accurate, honest, comprehensible and written in our interests.

It is therefore important that employees of Switzerland Global Enterprise;

- leave external communication, in particular with supervisory bodies and authorities, as well as with business partners, customers, associations and the media, exclusively to the individuals authorized for this purpose by Switzerland Global Enterprise;
- do not comment on or respond to queries concerning Switzerland Global Enterprise in front of the media and the public without prior agreement and authorization from the communications officer responsible;

- contact the communications officer for queries made directly to them in order to agree on how to proceed further.

We do not comment on rumors about Switzerland Global Enterprise. However, we do correct false reports.

These rules for communicating with external groups also analogously to dealing with social networks.

Conduct towards superior authorities

The provision of information to representatives of public authorities or supervisory bodies is solely the responsibility of the contacts appointed by Switzerland Global Enterprise; they will behave in an open and cooperative manner. Information relating to audits, investigations or examinations will be provided promptly and be complete and honest.

The destruction or alteration of information relevant to announced or ongoing audits, investigations or examinations is prohibited.

Conflicts of interest and external mandates

Conflicts of interest may jeopardize the integrity of the company. Potential conflicts must therefore be identified and resolved at an early stage. However, if a conflict is unavoidable, the laws in force provide us with the framework and scope for action.

Employees are obliged to look after the interests of Switzerland Global Enterprise at all times in their professional activities and to make this endeavor a priority. We separate our private interests from those of Switzerland Global Enterprise. Conflicts of interest in which our personal interests conflict with those of Switzerland Global Enterprise must be avoided as a matter of principle. Nevertheless, should such a conflict of interest arise, in particular through the exercise of part-time roles (e.g. political offices, mandates as a body or member of a body at a legal person, etc.), we will immediately disclose this and inform our superior accordingly.

Any employee notifications of disclosed conflicts of interest and external mandates, approval by the board member responsible and the agreed protective measures will be recorded in a central register. Their ongoing relevance will be reviewed once a year by the employee and confirmed, if still applicable.

Insider trading

Insider information is price-sensitive information about an entity or a transaction which, when disclosed, may affect the price of securities or other stock rights of that company or any other company affected.

All employees of Switzerland Global Enterprise are prohibited from using or disclosing insider information obtained in the course of their business activities in order to gain a financial advantage for themselves or anyone else.

Competition, fairness, subsidiarity and procurement

We are unreservedly committed to fair and sincere competition. We always adhere to the requirements of competition law and the rules of fairness. In export promotion, we offer our services on a subsidiary basis, i.e. we do not compete with private suppliers.

In procurement, we maintain competition among suppliers and comply with the provisions of the Federal Law on Public Procurement.

We maintain competition among our partners as per applicable legislation, our mandate and our Code of Conduct. Critical situations must be presented transparently up to executive management level.

The Chief CS+D Officer should be contacted if there is any uncertainty about the admissibility of activities, subsidiarity or procurement under competition law.

Bribery and corruption

Switzerland Global Enterprise prohibits all forms of corruption or bribery. In particular, this is also achieved by avoiding conduct that gives the mere appearance of undue influence.

The granting or acceptance of gifts, invitations or other benefits is part of the decent and appropriate treatment of business partners and customers. However, they must be proportionate to the business relationship in question in terms of their value, frequency and quantity and comply with the applicable legal and regulatory requirements.

The granting or acceptance of gifts must not influence business decisions in any way. Switzerland Global Enterprise employees must disclose gifts, invitations or other benefits, whenever possible before they are exchanged. If they exceed the equivalent of 250 Swiss francs per giver/receiver (on a cumulative annual basis), they must be approved by a superior.

The Executive Board will decide on matters relating to receiving donations.

Country sanctions and money laundering

Switzerland Global Enterprise knows its business partners and customers. We comply with the relevant legislation and the instructions of SECO with regard to money laundering, sanctions and dual-use goods. We consult the responsible body at SECO-BW to clarify the relevant circumstances.

We only accept payments through financial service providers. In exceptional cases, cash may also be collected, up to a maximum of 1,000 Swiss francs per week.

Switzerland Global Enterprise's assets and resources

We use Switzerland Global Enterprise's assets and resources exclusively for its purposes. Their use for unreasonable or unlawful purposes or for the private or professional benefit of employees or third parties is prohibited.

Trademark and property rights of Switzerland Global Enterprise

The name, logo, service mark, trademark, patents, copyrights, trade secrets and documents classified "confidential" or "secret" belonging to Switzerland Global Enterprise or our customers must not be used without their consent.

Fraudulent and criminal activities

Employees of Switzerland Global Enterprise are obliged not to misuse their position for fraudulent or illegal purposes or to misappropriate, conceal, steal or accept funds, assets, data, information or services.

Data protection and data security

The protection of personal data and the safeguarding of confidential information are of paramount importance to us. We therefore ensure that these are adequately protected against unauthorized access, unlawful use, loss, destruction and damage.

We treat the personal data of employees, business partners and customers carefully and discreetly in accordance with international standards and the relevant legislation (in particular, the European General Data Protection Regulation and the Swiss Federal Act on Data Protection). In addition, we may only request, collect, use, process, disclose or pass on such data to the extent necessary and for specified, legitimate and necessary business purposes.

We ensure that personal data and confidential or secret information are protected during (electronic) transmission and storage through appropriate technical security measures (e.g. access restrictions, encryption, etc.) and that unauthorized individuals are prevented from accessing and processing such data and information.

We adhere to the [S-GE Information Security and Data Protection Policy](#). Any data security breaches and loss of personal data must be reported to the Chief CS+D Officer immediately.

Trade secrets

We protect confidential and secret information, along with business documents about Switzerland Global Enterprise, its employees, business partners and customers as well as other stakeholder groups, in an integrated manner (i.e. from their initial collection to their safe

disposal) and do not pass them on without the consent of the parties concerned, even if only on an informal basis.

Switzerland Global Enterprise designates the responsible owners of such documents, files and data; they are in charge of classification (“confidential” or “secret”), careful management, safe storage and protection from access by third parties or colleagues not involved with the materials in question.

Our obligation to protect confidential and secret information remains in place even after termination of our employment with Switzerland Global Enterprise.

Provision of information regarding data protection

Enquiries concerning stored personal data and corresponding erasure requests will proceed in line with the predefined process.

Retention and disposal of data on relevant business transactions

We are required to keep complete and accurate records and data for business, legal and tax reasons, and in particular for reporting on the performance of Switzerland Global Enterprise.

It is important that we:

- document relevant business processes properly and in full;
- process financial data correctly, promptly and in accordance with the relevant accounting principles;
- make records and data regarding relevant business transactions available or accessible to authorized individuals only and deny unauthorized individuals from accessing them;
- do not alter or falsify records and data regarding relevant business transactions;
- retain records and data regarding relevant business transactions, including electronic data and emails, for as long as required by law or other policy, and dispose of them appropriately after that period. This is unless a court, public authority or Switzerland Global Enterprise itself has suspended the disposal or deletion of all or certain categories of documents or data; for example, due to a pending litigation or audit (by a government body).

Equality, harassment, and bullying at work

Employees of Switzerland Global Enterprise treat each other with respect and dignity.

We do not tolerate harassment or discrimination in the workplace, including in all personnel-related decisions. In the event of discrimination, harassment or bullying, victims and witnesses

alike are encouraged to make a prompt report to the HR department (People + Culture) or an external contact point.

We do not tolerate any form of forced, compulsory or child labor.

Health, safety and the environment

Switzerland Global Enterprise offers its employees safe workplaces that protect health, i.e.:

- clean workplaces that do not pose any risk relating to an accident, emergency, health or safety;
- avoiding measures or behaviors that could pose a risk to employees;
- promptly eliminating safety or health risks that have been identified;
- adequately considering environmental aspects in day-to-day business;
- optimizing services to protect the environment.

Implementation and monitoring

The implementation and monitoring of this Code of Conduct for the area of authority in question is the responsibility of supervisors at all functional levels and of each individual employee. The Chief CS+D Officer will define the risk-based focus of the compliance activities in consultation with the CEO and the Board of Directors; compliance with the Code of Conduct is reviewed on a periodic basis.

Notification of concerns and violations

Employees of Switzerland Global Enterprise are encouraged to report concerns and violations. This information will be treated confidentially without exception and, upon express request, handled anonymously.

Reports of concerns and violations of the Code of Conduct can be reported within Switzerland Global Enterprise via the channel that the individual concerned finds most trustworthy (direct supervisor, HR department or the Chief CS+D Officer). «Krisenintervention Schweiz» (052 208 03 20 / info@kriseninterventionschweiz.ch), our external contact point, can be contacted if it is not possible to contact an internal individual. Any concerns and violations within the Finance department must be reported to the CEO, the Chairman of the Personnel and Audit Committee or «Krisenintervention Schweiz».

As part of this reporting process, the penalization of employees who have issued a report in good faith will not be tolerated; violations of this will be punished.

Enforceability and sanctions

This Code of Conduct is binding on all employees of Switzerland Global Enterprise, irrespective of their specific function. It applies to employees at Swiss Business Hubs on a subsidiary basis, in addition to any federal regulations.

Each individual employee of Switzerland Global Enterprise has a responsibility to comply with this Code of Conduct. Line managers are required to make subordinate employees aware of the lawful compliance with the Code of Conduct, to check this and, in the event of non-compliance, to report any violation promptly to the members of the Executive Board responsible. Violations will be sanctioned by the members of the Executive Board responsible for doing so. The Chief People + Culture Officer or the Chief CS+D Officer must be involved in determining the steps to be taken; this serves to ensure equal treatment.

I hereby confirm that I have read and understood the Code of Conduct. The Code of Conduct is binding and constitutes an integral part of the employment agreement.

Last name and first name

Place and date

Signature