

Code of Conduct

Providing Safety through our Conduct



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Dear colleagues

We are reliable, approachable and committed, making it easy for our customers to feel safe. Safety is created daily through our conduct. We base our conduct on fundamental ethical principles, such as honesty, fairness, transparency, decency and trust.

The Baloise Code of Conduct serves as a guideline for our everyday behaviour. The purpose of the Code of Conduct is to make employees aware of applicable statutory requirements, as well as making it their duty to comply with Baloise's ethical regulations and principles. In doing so, we are promoting and protecting our excellent reputation.

Gert De Winter
Chief Executive Officer



Our Baloise Code of Conduct contains general legal principles and our standard for ethical conduct. It is the basis for our cooperation with customers, colleagues, shareholders, business partners, competitors and the public.

All Baloise employees are under the obligation to abide by the regulations. The general principles are concretised by the instructions and guidelines which apply to your particular area of work, which you should know, understand and apply.

The Code of Conduct does not cover all possible situations and circumstances. This does not mean that unethical behaviour which is not expressly mentioned is permissible. If in doubt, you should therefore always consult the internal unit responsible.

Peter Kalberer
Group Compliance Officer



Ensuring Confidentiality

Handling information responsibly allows us to maintain confidentiality with regard to our customers and business partners at all times.

Confidentiality

Employees must not pass on confidential information about Baloise, its customers and business partners to third parties and must keep trade secrets. The applicable legal provisions and internal directives are to be strictly adhered to. The duty of confidentiality continues beyond the end of the employment contract.

Data Protection

Customer data are to be handled with care and confidentiality. The processing and passing on of data within Baloise or externally is only permissible within the framework of carrying out business transactions and in observance of all legal provisions and internal directives.

Use of Electronic Information and Communication Media

The use of Baloise's electronic information and communication media for illegal or unethical purposes is prohibited. Looking up, downloading or forwarding of information with a racist, pornographic or violent content is considered particularly gross misconduct.

Safeguarding Integrity

Our integrity creates and ensures security and transparency; it promotes our good reputation and fosters trust in Baloise.

Money Laundering Prevention and Embargoes

When in receipt of funds, all members of staff must observe the relevant due diligence obligations and ensure compliance with these requirements is documented. In particular, legal, regulatory and internal provisions regarding the identification and knowledge of the customer are to be observed, as well as applicable economic sanctions and corresponding internal regulations.

Insider Dealing

The use or forwarding of insider information with the aim of securing financial gain for oneself or another person is prohibited. Insider information is price-sensitive information about a company or a transaction that may, if disclosed, have a material influence on the securities price or rights of this company or any other. Furthermore, all employees are prohibited from using information about pending or current securities transactions for their own benefit or for that of a third party.

Cartels

Situations which may be deemed to be in breach of competition law must be avoided. Any arrangements or other coordinated negotiations with outside companies aimed at or bringing about a restriction in competition are prohibited.

Accounting

Accounting is to be carried out correctly and according to recognised principles. All transactions must be documented with the appropriate bills and receipts. Only entries that accurately document the actual transaction may be made. Baloise may not hold any substantial assets and liabilities that are not properly recorded in its accounts.

Records Management

Business documents and documents subject to compulsory archiving are to be kept, in accordance with legal requirements, with care, classified and protected from harmful exposure.

Dealing with Customers and the Public

Proper advice, customer contact and confidence on the part of customers are crucial to our success as a business. We create lasting relationships with our customers, shareholders, business partners and the public by keeping our word in an approachable, open and honest manner. We are fair to our competitors.

Mandates

The acceptance or resignation of any executive function or directorship, such as membership of an executive committee, supervisory board or board of directors of a commercial enterprise, association or other similar organisation, must be notified to the relevant internal office due to the potential public attention this may generate.

Conflicts of Interest

Members of staff must avoid any situation in which their personal interests conflict with the carrying out of their duties in the company. Where such a conflict of interest occurs, the appropriate internal unit is to be informed.

Gifts

The acceptance of gifts or monetary donations from customers, business partners or third parties must be reported to line manager in accordance with current rules. They may not be accepted if they are likely to influence the members of staff in concrete decision-making or incite them to behave in a certain way. Such intentions are to be politely but firmly rejected.

Donations

Payments or donations to politicians, political parties, associations or other organizations may only be made within the legally permissible framework and with the approval of the Executive Committee. They must also be properly recorded.

Corruption

Neither direct nor indirect gifts or other benefits to public and private functionaries and decision makers may be made or offered for the purpose of securing unlawful gain.

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Complaints

Complaints help us to improve. Customer complaints are to be addressed speedily and according to the existing rules and reported to line managers.

Duty of Care

Giving thorough and accurate advice to our customers is of central importance to us. The duties of care and disclosure and the duties of fidelity are to be observed in contact with our customers.

Taxes

Baloise takes its social responsibilities seriously, acknowledging and respecting the state institutions and their functions. We observe taxation regulations and disapprove of tax fraud. Baloise and its employees refrain from any activity that facilitates tax evasion on the part of their customers, business partners or third parties.

Communications and Media

Baloise fosters open and honest communication and information policies. Representatives of the media who directly contact employees are to be referred to the responsible public relations unit without delay and according to the existing rules.

Environment

Baloise and its employees handle natural resources in a responsible and prudent manner.

Employee Relations

Motivated employees are the basis of our success. Baloise is committed to high standards in its treatment of its employees. Their basic premises are:

Health

To protect the well-being of our staff, high importance must be attached to safety in the workplace and to suitable working conditions.

Equal Treatment

Employees are not to be disadvantaged or discriminated against on the basis of their gender, age, sexual orientation, origin, race, religion, disability or ideological or political convictions.

Mobbing

Politeness, mutual respect, fairness and trust should be the hallmarks of interaction between staff. The use of mobbing as deliberate means to exclude or humiliate another employee is not tolerated.

Sexual Harassment

Sexual harassment will not be tolerated. This includes any form of unwanted approach or attempts at debasement in the form of gestures, comments, acts or deeds.

Members of staff who are victims of the types of behaviour described in this section or who witness such behaviour must contact the relevant internal unit or any other person in a position of trust.

We are responsible

Baloise supports its employees in the implementation of and compliance with the principles and provisions of this Code of Conduct. It creates the necessary framework for this purpose and offers targeted training and education. Company structures and business processes are to be designed such that the Code of Conduct may be followed at all times and possible violations may be recognised at an early stage.

Responsibility

Line managers are responsible for the promotion and embodiment of the Baloise values. They ensure that the legal regulations, internal directives and principles of the Code of Conduct are known and adhered to. Managers set examples. Wherever employees are unclear about laws, internal directives and guidelines they should seek the advice of their line manager or the appropriate internal unit.

Breaches

To ensure that no serious damage is caused to the company, we do not tolerate any unlawful and unethical modes of conduct. Breaches should be identified, addressed and, if appropriate, discussed with the line manager or the appropriate

internal unit. Such discussions will be treated confidentially. Our whistleblower system allows messages to be submitted anonymously if required.

Sanctions

Breaches of existing obligations as set out in the Code of Conduct may lead to disciplinary proceedings under labour law. Violations may also result in consequences in civil and criminal law. Investigations or civil, administrative or criminal proceedings against employees (connected with their professional activity) are to be reported to the internal compliance unit.

Performance assessment

Employees contribute to the achievement of the aims of Baloise through their professional dedication, knowledge and conduct. This includes compliance with the duties laid down in the Code of Conduct. Compliance with these responsibilities is therefore one of the elements considered by line managers when assessing the performance of members of staff.

Contacts

If you have any questions, have observed a violation or are unsure about something in connection with the rules of the Code of Conduct please contact your manager or the appropriate internal compliance unit of your work unit, your national subsidiary or the Baloise Group. If required, a message can also be submitted anonymously via our whistleblower system.

Baloise Group whistleblower system
<https://baloise.integrityplatform.org>

Contact Compliance Baloise Group

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