

## **Code of Conduct**

Ensuring safety through  
our conduct

# Ensuring safety through our conduct

Dear Employees,

At Baloise, we pursue ambitious goals in a challenging environment. It is important that our conduct and everything we do and decide is always lawful, ethical and moral.

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. This ensures we are able to protect our employees and our excellent reputation.

All Baloise employees are obliged to take into account and comply with the provisions and principles of our Code of Conduct in their behaviour. The general basic rules are substantiated by additional directives and guidelines, which our employees must know and apply.

The provisions of our Code of Conduct do not regulate all conceivable situations and circumstances. However, it goes without saying that we behave ethically, morally and in accordance with the law, including for all those topics not addressed. If in doubt, the responsible internal unit should be consulted.



Michael Müller  
Group Chief Executive Officer



Peter Kalberer  
Chief 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**

The processing and transfer of personal details (pertaining to customers, employees or third parties) within or outside Baloise is only permitted in the context of the work order and in compliance with statutory provisions and internal directives. Since transparency about data processing is a central element of data protection, detailed information about this is published on Baloise's country-specific web pages.

## **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 sanctions**

All employees are required to observe the relevant due diligence requirements when accepting and issuing funds and ensure compliance with these requirements is documented. In particular, the legal, regulatory and internal provisions on the identification and knowledge of the customer (Know Your Customer) must be complied with. Further basic principles can be found in the [Anti-Money Laundering policy](#). In addition, applicable economic sanctions and relevant internal regulations must be observed.

## **Insider trading**

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.

## **Storage**

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**

Employees must avoid situations in which structural conflicts of interest could arise through multiple representation due to mandates in different organisations or personal conflicts of interest vis-à-vis Baloise. If such a conflict of interest arises, it must be disclosed immediately and in full. The appropriate compliance unit must be involved.

## **Gifts**

Acceptance of gifts or monetary donations from customers, business partners or third parties must be reported to the line manager and the appropriate compliance unit in accordance with existing rules. They must not be accepted if employees could be influenced in concrete decisions or persuaded to behave in a certain way. Any such gifts must be rejected in a friendly but firm manner. The acceptance of cash is prohibited in any case. Further principles can be found in the [Bribery and Corruption policy](#).

## **Donations**

Payments or donations to politicians, political parties, associations or other organisations 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.

## **Code of Conduct**

### **Complaints**

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

### **Consultation**

The careful consultation of customers is a central concern for us. The duties of due diligence, information and loyalty must be fulfilled in the 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.

# Employee relations

**Healthy, motivated employees are the basis of our success. Baloise is committed to high standards for its employees. These include:**

## **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 businesses 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

Violations of existing legal and internal obligations as set forth in the Code of Conduct may lead to disciplinary proceedings under labour law. xx

### 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.



# Contact

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  
Peter Kalberer  
Chief Compliance Officer  
Tel. +41 58 285 72 43  
[code\\_of\\_conduct@baloise.com](mailto:code_of_conduct@baloise.com)

## Baloise Group

Aeschengraben 21  
4002 Basel  
Switzerland  
[baloise.com](http://baloise.com)