



# Code of Conduct



SWISS PRIME SITE



# Formation and structure of our Code of Conduct

We are Switzerland's leading listed real estate company. Our business activities encompass the entire life cycle of properties – from acquisition, development, conversion and construction, to management, owner occupancy and letting. The Swiss Prime Site Group includes Swiss Prime Site Immobilien and Swiss Prime Site Solutions.

This Code of Conduct is structured according to our four principles, which are substantiated by regulations and standards.

You will find further information on the individual topics in the respective directives of your group company.

**Strategy and Business Model of Swiss Prime Site**

<https://sps.swiss/en/group/company/strategy>

## **Our principles**

Our principles form the foundation for our day-to-day conduct and hence the long-term success of our group of companies:

- 1 We act in accordance with the rule of law.
- 2 We treat each other with dignity and respect.
- 3 We respect our property and uphold the protection of confidential and personal data.
- 4 We have clear rules for dealing with conflicts of interest.

On the following pages, we outline our principles through regulations and standards that provide us with support on how we should conduct ourselves in difficult and complex situations.

## **Scope**

This Code of Conduct is mandatory for all employees of Swiss Prime Site and its group companies. It defines the conduct that is expected from each and every employee. All employees are obliged to comply with and respect these principles within the scope of their day-to-day work activities.

The management is responsible for setting a good example, paving the way for employees to live up to the significance and importance of the Code of Conduct.

## **Consideration of actions**

With all of our activities, we always diligently and proactively check whether the intended action is in accordance with the relevant laws, rules and internal directives.

We aim to avoid not only actual misconduct, but also the appearance of improper conduct. The following questions provide some guidance in the case that you are uncertain whether a specific action is appropriate in a given situation:

- Are there laws or regulations that apply to this situation and require from me a specific conduct?
- Am I viewing the situation objectively and independently, or is my opinion impaired or influenced?
- How would I feel if my actions were to appear on the front page of a newspaper the next day?
- What is my motivation and that of others involved for this action in particular being favoured?
- If my action were to become public knowledge, would it have the appearance of unlawfulness?

If you are uncertain as to whether a specific action is appropriate or inappropriate, please ask your superior or contact the person responsible for compliance.

## **Compliance with the code of conduct**

We require compliance with our Code of Conduct. Violations of the Code of Conduct can result in disciplinary consequences extending to termination of the employment relationship.

If you have any questions or uncertainties regarding compliance with the Code of Conduct, please contact your superior or the person responsible for compliance.

## **Reporting**

If you observe a possible act of misconduct or conspicuous activity, please report this to your superior or the person responsible for compliance at the company or group level, or anonymously via the integrity platform.

We treat all reports confidentially and follow up on every notification. We protect each individual that comes forward with a report in good faith, and prohibit any retaliatory measures.

**Report Violation**

(<https://sps.integrityline.io/>)



# We act in accordance with the rule of law

## **Compliance with laws**

We manage our group of companies in accordance with the Swiss rule of law. We have implemented various directives that provide us with support in recognising our legal obligations and acting in compliance with them. We all have a personal obligation to be familiar with the relevant laws and uphold them in our day-to-day working activities. In the event that we feel uncertain, we should seek assistance and support from the relevant experts.

## **Competition**

We believe that free and open competition leads to high-quality products and services. We refrain from acts that restrict competition – such as making arrangements with competitors regarding prices, costs or clients – and deal with our competitors fairly.



## **Money laundering**

Money laundering is defined as concealing funds from criminal activities through legitimate business operations. We do not tolerate money laundering. In our view, this means that in all business activities, we must have knowledge regarding the type of operations of our (potential) business partners. In order to recognise, avoid and report (potential) money laundering activities, we must ensure we know the origins of the money or property at issue as well as the underlying purpose thereof. If you notice suspicious transactions, report them.

## **Bribery and corruption**

Bribery is defined as offering, giving, requesting or accepting monetary payments, gifts or favours in order to influence the progress or outcome of business activities in a prohibited way. This includes both bribery and corruption of public officials, and bribery and corruption activities in the private sector. We denounce any type of bribery and corruption, foster a culture of combating fraud and accordingly pursue a zero-tolerance approach in this regard.

We neither offer or authorise payments for corruption or bribery, nor do we request or accept such payments from third parties. This also means that all Swiss Prime Site employees must be alert to possible instances of bribery involving invitations, gifts or other payments and favours, and should always scrutinise these activities with respect to reasons and amounts. Furthermore, Swiss Prime Site has issued clear rules on how to deal with gifts and favours, in order to avoid even the appearance of bribery and corruption.

## **Reporting**

Precise accounting and completeness of business documentation are very important to us. We report our business activities transparently and communicate openly and fairly with our stakeholders. We prepare our company reports in compliance with applicable laws and regulations. Each and every one of us is obliged to ensure that the reporting of business activities and non-financial matters is complete, correct and comprehensible. We retain the corresponding documents in accordance with all applicable legal regulations.

A man in a blue button-down shirt and dark trousers is walking through a technical control room. He is holding a mobile phone to his ear with his right hand. The room is filled with large, cylindrical industrial equipment, likely part of a power plant or refinery, with various pipes, valves, and control panels. The floor is made of reddish-brown tiles. The lighting is bright, coming from overhead fixtures. A large white number '2' is overlaid on the bottom left of the image.

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# We treat each other with dignity and respect

## **Anti-discrimination**

Treating each other openly and respectfully is the decisive basis for successful collaboration within Swiss Prime Site as well as with third parties.

We do not tolerate any acts of discrimination, particularly on the grounds of race, nationality, gender, sexual orientation, religion or age. We ensure a climate of mutual respect and trust.

We do not tolerate personal attacks or any acts of discrimination, which can occur, for example, in the following cases:

- Offensive jokes, disparagements or insults
- Threats, hostilities or acts of intimidation
- Harassment, annoyance or exclusion of a person or group of people
- Hostile actions due to characteristics such as ethnic background, nationality, gender or sexual orientation
- Unwanted sexual advances, sexual jokes or viewing, disseminating or exhibiting pictures featuring sexual innuendo

This means that you should treat the people within Swiss Prime Site as well as third parties with dignity, respect and fairness, discriminating against no one.

### **Equal opportunity**

We provide equal opportunities for all employees regarding recruitment, performance assessments, further education opportunities and promotions. We make personnel decisions exclusively based on the requirements of the respective position and the qualifications of the applicants. We remunerate all our employees fairly and according to the performance principle.

### **Health and safety in the workplace**

All Swiss Prime Site employees have the right to work in a safe and appropriate environment. We ensure a safe workplace and protect the health of our employees.

Neither alcohol nor drug consumption by our employees is allowed during working hours.

If you become aware of any safety hazards or other circumstances that may put health or safety at risk, please report these immediately. The health and well-being of our employees are important to us.

Swiss Prime Site prohibits child labour and adheres to the UN Guiding Principles on Business and Human Rights (UNGP) and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work.

## **Sustainability**

Consideration of the present as well as future demands of society, the economy and the environment plays a significant role for us. We are aware of this responsibility and perceive it as a basic prerequisite for the long-term success of our business.

We are committed to using environmentally friendly technologies, renewable energy and sustainable approaches.

### **Our Sustainability Strategy**

(<https://sps.swiss/en/group/sustainability/corporate-responsibility>)

## **Risk**

We know our company's areas of risk and anticipate those that could have an impact on our activities. We take proactive measures to minimise risks. We ensure that our employees are well prepared for dealing with risks.

## **Conflict minerals**

We do not knowingly import or process any minerals or metals (tin, tantalum, tungsten or gold) from conflict and high-risk areas, insofar as we can verify this at all.

## **Suppliers**

In the collaboration with our suppliers, we attach particular importance to expertise, quality and sustainability. All suppliers and service providers must, within the scope of their business activities with us, deal with environmental and social issues responsibly.

The Code of Conduct for Suppliers of the Swiss Prime Site Group applies to procurement. Through our group companies, we aim to pursue a responsible and customer-orientated procurement policy. This Supplier Code of Conduct must be observed by all suppliers of the Swiss Prime Site Group and all its group companies and their directly or indirectly held or controlled subsidiaries. They are required to make proactive, systematic efforts to ensure compliance, including by subcontractors who provide services directly or indirectly on their behalf for the Swiss Prime Site Group.





# We respect our property and uphold the protection of confidential and personal data

## **Company property**

Each of us is responsible for protecting Swiss Prime Site's company property, which includes, for example, materials, merchandise, money, equipment, vehicles and buildings, as well as our intellectual property, such as expertise, data, brands and patents.

Each of us can make a contribution towards protecting our company property. In this context, we are all encouraged to secure valuable objects and documents and to undertake the relevant reporting if we observe anything unusual.

**Private use of business property**

We use Swiss Prime Site's company property for business rather than private purposes, which also includes the communications and information media provided. Please refer to the individual company directives regarding the extent to which company property can be used for private purposes, for example, a private telephone conversation via a company device.

**Protection of personal data**

We respect the right to privacy of our employees and third parties and treat personal data as confidential. We ensure that we record only the personal information that is absolutely necessary, such as name, address, date of birth, gender, length of service and bank account details, which are relevant for the purpose of paying wages and salaries as well as social security accounting. We ensure that this personal data is viewed and processed solely by the few relevant employees authorised to do so. Moreover, we protect employees' personal data from unauthorised access by third parties.

**Protection of confidential data**

Within the scope of our business activities, we receive access to internal and external information. We must always assume that the information provided is of a confidential nature (for example, client data, personal data, business-relevant information, etc.).

We are obliged to handle such data diligently and use it solely for its original purpose. Furthermore, we protect this data from being accessed by unauthorised third parties.

**Copyrights and patent rights**

We respect copyrights and patent rights. Concepts and designs that are created by our employees in the performance of their duties of employment and in fulfilment of a contractual obligation – or which they help to create – become the property of Swiss Prime Site.



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# We have clear rules for dealing with conflicts of interest

## **Conflicts of interest**

Conflicts of interest are defined as, for example, personal relationships, external activities or interests of other associated companies that could influence our decisions.

All Swiss Prime Site employees are effectively obliged to avoid situations that could lead to conflicts of interest. If we become aware of any circumstances that may result in a (potential) conflict of interest, we should immediately notify our superiors.

## **Restrictive exchange of information (Chinese walls)**

We may obtain confidential information within the scope of our company activities that could also be interesting for other departments or external interest groups.

In order to avoid potential conflicts of interest, we ensure that there is no exchange of data among the departments and employees affected with regard to this confidential information (so-called Chinese walls). We only deploy employees who are free from conflicts of interest in the relevant projects and departments. We ensure strict separation and protected dissemination of any relevant sensitive information.

**Non-work-related activities**

We devote our working hours to the success of Swiss Prime Site. Non-work-related activities must not run counter to the interests of Swiss Prime Site. When taking up, for example, secondary employment or assuming mandates, public offices or duties in professional organisations, careful consideration must be given to whether such work could give rise to potential conflicts of interest with activities at Swiss Prime Site. Please find details regarding secondary employment – such as prohibited secondary employment or reporting procedures – in the individual company directives applicable to you.

**Insider trading**

Insider trading is defined as the trading of Swiss Prime Site shares or other securities based on relevant, non-public information or the passing of such information to third parties that subsequently execute the relevant transactions.

We are all prohibited from engaging in insider trading. We protect any information obtained confidentially and use such information solely for business purposes. Furthermore, we neither spread rumours nor mislead others with false information regarding Swiss Prime Site's business performance.



# Contact

If you are uncertain as to whether a specific action is appropriate or inappropriate, or if you have any general questions or uncertainties regarding compliance with the Code of Conduct, please contact your superior or the person responsible for compliance within your group company.

## Your point of contact for compliance at the Swiss Prime Site Group

### **Jürg Sommer, Attorney-at-Law**

General Counsel

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# Anonymus reporting / whistleblowing

We ask our employees to report incidents, anonymously if desired, via the integrity platform (<https://sps.integrityline.io/>). The integrity platform is operated by the EQS Group ([www.eqs.com](http://www.eqs.com)). All reports are sent via the secure server of the EQS Integrity Line and not via the company server. No IP addresses, times or metadata are recorded or stored when using the integrity platform. All data is encrypted. There is therefore no information that could link your computer with the integrity platform. The Integrity Line guarantees anonymity, unless you choose to give your name.

A blurred photograph of an office interior. In the foreground, a person in a brown suit is seen from the back, looking towards the right. In the background, other people in business attire are visible, some holding coffee cups. The scene is brightly lit, likely from large windows, creating a soft, out-of-focus atmosphere.

**Headquarters**

Swiss Prime Site AG  
Alpenstrasse 15  
CH-6300 Zug

**Zurich Office**

Swiss Prime Site AG  
Prime Tower, Hardstrasse 201  
CH-8005 Zurich

**Geneva Office**

Swiss Prime Site AG  
Rue du Rhône 54  
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