

Code of Compliance.

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**“Responsible behaviour is essential
if Helvetia’s good reputation
is to be preserved.”**

Doris Russi Schurter

Dear colleagues,

Helvetia is determined to be perceived as a reliable and compliance-aware provider of insurance and pension services.

In other words, we need to adhere to rules and rules and comply with ethical principles in our business activities. We pursue our interests in keeping with the principles of fairness, transparency and the forging of trust.

Infringements of rules can occur in day-to-day business. But intentional rule-breaking can never be in Helvetia's interest. Misconduct of this kind can entail significant financial and personnel consequences. Think costly clarification and official investigation procedures, sanctions, monetary fines, payment of damages, financial losses and loss of reputation.

Responsible behaviour is therefore essential if Helvetia's good reputation is to be preserved and the company's success assured in the longer term. This is for the benefit of Helvetia and its stakeholders, particularly customers, employees, investors, and cooperation partners.

A healthy dose of common sense and respect for ethical principles are both key in ensuring adherence to legal rules and internal directives. Management and senior employees must lead by example here.

This Code of Compliance is an expression of our sense of corporate responsibility and corporate culture. It acts as a bridge between corporate guidelines and internal directives and describes the principles of conduct that apply in the key areas of compliance.

The Code of Compliance is designed to help you go about your tasks in a responsible manner. It should serve to protect both Helvetia and you from being the target of claims under civil law or criminal prosecution.

We are counting on your sound judgement and would like to thank you for your contribution to preserving Helvetia's good standing and reputation.



Doris Russi Schurter
Chair of the Board of
Directors



Philipp Gmür
Group CEO

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Scope.

The Code of Compliance (hereinafter “Code”) is binding for all business units and employees of Helvetia Group. In addition, both specific statutory rules and the principles established by the courts must be respected. In other words, the Code is complemented by both further-reaching local guidelines and specific internal rules.



Key compliance areas.

The principles and behavioural instructions described herein are the guidelines for our entrepreneurial activities.

1. Development of legislation and compliant business practice

Helvetia is determined to comply with prevailing legislation and rules, internal guidelines and working instructions, and contractual agreements.

We know the rules that apply to our area of activity and act accordingly. We are aware that rule violations are never in Helvetia's interest.

2. Protection of data and individual privacy

Helvetia protects the data of relevant persons and respects individual privacy.

We are aware of the importance of data protection in our day-to-day work. We protect the data received from customers, employees, investors, as well as business and cooperation partners against uncontrolled disclosure, and respect the privacy of these parties.

• **Data protection**

- We process personal data where individual in question has given their consent. We respect their rights, particularly the right to inspect, amend or delete their personal data. We guarantee that data is disposed of in a secure manner.
- We ensure that any data forwarded to our cooperation partners is protected in keeping with the principle of data protection.

• **Commercial confidentiality**

We treat confidential information and commercial secrets with care. This is particularly true of unpublished strategic projects and financial statements, internal earnings forecasts, capital increases or decreases, product calculations, and Human Resources changes affecting key functions or senior management bodies.

• **Insider dealings**

We refrain from and prevent the exploitation or forwarding of price-sensitive non-public information about companies or transactions (insider information) aimed at gaining a pecuniary benefit for ourselves or a third party in connection with share price development (insider trading).



3. Information and IT security

Helvetia strives to achieve a high degree of information and data security. IT security relies on proven methods to protect data, systems, devices, installations and networks.

- **Data security**

When transferring, storing or archiving confidential data and information, we only use those channels and installations that offer a sufficient level of security against unauthorized access and modification.

- **Use of the internet and electronic communication**

- We use electronic information and communication technology media responsibly and only for lawful operational and permitted/authorized purposes.
- We are aware that any use of such media for unlawful or unethical purposes will have consequences. This is particularly true of any creation, downloading, or forwarding of information with a discriminatory, racist, pornographic or violence-glorifying or other offensive content, including any internet searches for the same.

4. Antitrust law and unfair competition

Helvetia subscribes to the principles of free and fair competition. Helvetia prevents any illegal anti-competitive practices on the part of employees. Where necessary, Helvetia cooperates with the authorities.

We practice an independent and autonomous market activity and avoid any anti-competitive conduct.

• **Competitive restrictions**

We avoid situations that involve competition concerns from a legal perspective. We refrain from entering into and prevent illegal competitor collusion. We avoid engaging in concerted practices with other companies with the purpose or effect of an impermissible competitive restriction.

5. Money laundering and financing of terrorism

Helvetia prevents money laundering and the financing of terrorism.

We adhere to mandatory due diligence obligations. We review the identity of the customer, the plausibility of the transaction and the authorization of the counterparty, and ensure documentation of the audit results.

We review both new and existing business with regularly updated systems. We make use of official sanction and terrorist lists. We review any business with politically exposed persons.

We scrutinize unusual patterns of activity or behaviour in particular. In cases where there are clear grounds for suspicion, we initiate the necessary steps and inform the responsible authorities. We support the authorities in their investigations.

6. Discrimination

Helvetia sets great store by equal treatment and equality of opportunity for its employees.

We refrain from discriminatory actions on the basis of gender, religion, age, race, origin, disability, sexual orientation, political or trade union activities.

7. Occupational health and safety

Helvetia provides a working environment free of employee harassment. Helvetia ensures that the health and safety of employees at the workplace is protected.

We refrain from any form of harassment (undesired approaches or degradation, threats), bullying (deliberate marginalization, humiliation), and stalking.

8. Fraud, embezzlement, theft

Helvetia takes the appropriate measures in order to identify and avoid criminal activities at an early stage. Helvetia punishes criminal actions such as fraud, embezzlement or theft, falsification of documentation or records, and abuse of confidential business information.

We refrain from and seek to prevent criminal activities.

9. Bribery and corruption

Helvetia prevents bribery or corruption, and punishes any violations in this area.

It is only a small step from minor, acceptable gifts that are designed to cultivate stable business relationships to bribery or corruption aimed at achieving a dishonest private or business advantage.

We refrain from and avoid monetary or fee payments, gifts, gratuities or invitations to business partners and political or government function-holders with a view to achieving an unlawful advantage.

- **Gifts and donations**

We inform line managers of any gifts, gratuities, invitations and special concessions that could influence our independence in a business relationship or a specific decision-making process.

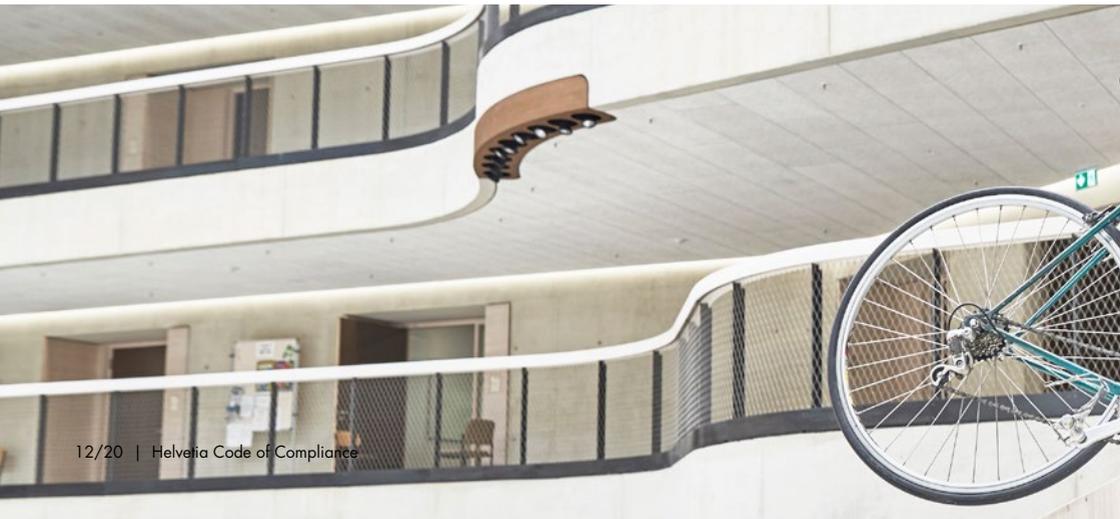


10. Conflicts of interest

Helvetia is aware of the business areas and activities that harbour potential conflicts of interest.

A conflict of interest is deemed to exist if individual private (personal or family) interests act to the detriment of the working obligations or interests of Helvetia in any way. In particular, these may arise as a result of any business activity or fulfilment of mandates outside of Helvetia, such as membership of other boards of directors or associations, the holding of political or public office, secondary employment (as a supplier, consultant), or through investments, participations, gifts, donations and invitations, or inappropriate incentive systems.

We inform our line managers about our private activities in which personal interests could come into potential conflict with our business tasks and fulfilment of our obligations.



11. Intellectual property and other intangible property rights

Helvetia respects the intellectual property of third parties, i.e. intellectual copyright, brand rights, patent rights, and licences.

We acknowledge the restrictions that apply in respect of the use or copying of protected works by obtaining the corresponding licence from the relevant party.

12. Environmental awareness

Helvetia strives to avoid placing any excessive burden on the environment.

We adopt a conscientious approach when dealing with natural resources.



13. Taxes

Helvetia adheres to prevailing tax regulations and condemns all forms of tax offence.

Within our area of influence, we refrain from measures that lead to unlawful tax advantages for Helvetia, its employees or its customers.

14. Complaints

Helvetia takes customer complaints seriously.

We process complaints fairly and swiftly.

15. Communicating with the media, shareholders and authorities

Helvetia pursues an open, honest and credible communication and information policy.

We consistently forward enquiries from the media, shareholders and authorities to the responsible communications officer.

In the event of internal information unintentionally ending up with third parties, we ensure that this information is destroyed to the exclusion of any reproduction. We immediately inform line managers and the responsible communications officer.



Implementation.

The Code cannot describe all the critical situations that we may encounter in our area of activity. In cases of doubt or in uncertain situations, line managers, Human Resources or Compliance will answer your questions and help you to make a decision if you find yourself in a dilemma.

Helvetia sets out specific aspects of the Code in internal working instructions to cover day-to-day work where necessary in line with the above-mentioned principles and core concepts.

Helvetia informs employees about the pertinent rules and ensures expedient training.

Responsibility for compliant behaviour lies with the individual business units as well as all employees themselves, from senior management right down to the most recent recruit. It is primarily for the relevant business area to ensure that the pertinent rules are followed.



Violations and sanctions.

Helvetia is determined to avoid illegal and unethical forms of conduct. Critical situations should be discovered as early as possible in order to prevent the company from suffering any serious damage.

A decisive element in effective prevention is a well-functioning and prompt exchange of information between the operating side of the business and the controlling and support functions such as Compliance Management, Internal Audit, Risk Management, Legal and Human Resources.

• **Violations**

Helvetia counts on the support of employees and employee representatives in the event that they become aware of any serious violations of the rules. Helvetia explicitly encourages employees to talk to managers, Human Resources or Compliance in the event that they identify any improper behaviour. These cases of fraud, embezzlement, corruption, cartel collusion and other unfair competition practices, accounting falsification and any other actions that could result in criminal or civil law consequences. Reports of this kind are in Helvetia's interests. The reporting employee need not fear any negative repercussions as long as the situation in question has been reported to the best of his/her knowledge and in good faith.

• **Sanctions**

Helvetia sanctions violations of rules. In addition to consequences under employment law, these may also entail consequences under civil or criminal law. Specifically, these may involve a reminder or warning and disciplinary measures right through to termination, compensation for damages, and criminal charges.



Contact points.

In cases of doubt or when faced with a dilemma, please contact your local Compliance unit or the Compliance unit of Helvetia Group.

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