

Helvetia Group

Code of Compliance

«Responsible conduct is essential to maintaining the sound reputation Helvetia enjoys.»

Erich Walser

Dear Employees

Helvetia wants to be perceived as a reliable and compliance-aware insurance and pension services provider. In other words, we want to follow all relevant provisions and regulations and heed ethical principles in our conduct of business. We pursue our interests guided by the principles of fairness, transparency and trust-building.

Rules can sometimes be broken in daily business. Intentional rule violations are never in the interest of Helvetia, however. Misconduct of this nature can cause major personnel and financial problems. For instance, think of the elaborate clarification efforts and official investigations involved, to say nothing of the penalties, monetary fines, compensation payments, financial losses and damage to the company's reputation.

Responsible conduct is therefore essential to maintaining the sound reputation Helvetia enjoys and to ensuring sustained business success. This approach serves Helvetia and its stakeholders, particularly customers, employees, investors, and cooperation partners.

Common sense and the observance of ethical principles are central to ensuring compliance with legal regulations and internal work instructions. Management and senior employees should act as role models in this respect.

This Code of Compliance is an expression of our business responsibility and corporate culture. It links the guiding corporate principles and the internal work instructions. In the principles section, it describes the rules of conduct on key compliance issues.

The Code of Compliance is meant to help employees approach their work responsibly. It is also intended to aid in protecting both Helvetia and you from claims under civil and criminal law and from prosecution.

We count on your good judgement and thank you for doing your part in maintaining the solid reputation of Helvetia and the trust people have in the company.



Erich Walser
Chairman



Stefan Loacker
Group CEO



Table of Contents

Scope of application

Key compliance issues

1. Changes in the law and business conduct in conformity with the regulations
2. Data protection and privacy
3. Information security and IT security
4. Cartel law and unfair competition
5. Money laundering and financing of terrorism
6. Discrimination
7. Occupational safety and health protection
8. Fraud, embezzlement, theft
9. Bribery and corruption
10. Conflicts of interest
11. Intellectual property and intangible property rights
12. Environmental awareness
13. Taxes
14. Complaints
15. Communication with media, shareholders and authorities

Implementation

Violations and sanctions

Contact information

Scope of application

The Code of Compliance (hereinafter “Code”) applies to all business units and employees of the Helvetia Group. The specific legal provisions and the principles developed by the courts must also be heeded. In this sense, local provisions and internal rules extending beyond that scope supplement the Code.

Key compliance issues

The principles and behavioural instructions below are the guidelines for our business conduct.

1. Changes in the law and business conduct in conformity with the regulations

Helvetia seeks to follow valid laws and regulations, internal directives and guidelines and contractual agreements.

We know the rules applicable to our work and follow them. We are aware that rule violations are never in the interest of Helvetia.

2. Data protection and privacy

Helvetia protects the personal data of the persons affected and respects the privacy of individuals.

We are aware of the significance of data protection in our daily work. We protect data received from customers, employees, investors and business and cooperation partners against uncontrolled disclosure and respect these parties’ privacy.

Data protection

We process personal data in keeping with the consent given by the individual affected. We respect these individuals’ rights to view, alter or delete their personal data in particular. We make sure that data is reliably disposed of.

We ensure that the data given to our cooperation partners is protected with respect to data protection.

Business secrets

We treat confidential information and business secrets with care. We do so in particular with regard to non-published strategic projects and financial statements, forecasts of our own earnings, capital increases or decreases, product calculations, and personnel changes in key positions.

Insider dealings

We refrain from and prevent the exploitation or passing-on of pricesensitive information not known to the public about companies or transactions (insider information) that is aimed at deriving an asset advantage from the share price trend for oneself or a third party.

3. Information security and IT security

Helvetia aspires to achieve a high degree of security for information and data. IT security is based on reliable methods for protecting data, systems, equipment, installations and networks.

Data security

When sending, storing and archiving confidential data and information, we use only channels and equipment that ensure sufficient security against unauthorised access and modification.

Internet use and electronic communication

We use means of electronic information and communication responsibly and solely for legal operational and permitted or approved purposes.

We are aware that there are consequences for illegal or unethical use. These consequences apply in particular to composing, seeking out, downloading or forwarding information with content that is discriminatory, racist or pornographic in nature or that glorifies violence or otherwise infringes on personal rights.

4. Cartel law and unfair competition

Helvetia abides by the principle of free and fair competition. Helvetia prevents its employees from engaging in misconduct under cartel law. Helvetia cooperates with the authorities wherever necessary.

We conduct ourselves independently and autonomously on the market and avoid anti-competitive behaviour.

Restrictions to competition

We avoid situations that are questionable with respect to competition law. We refrain from entering into and prevent illegal agreements on competition. We avoid engaging in concerted practices with other companies if the aim or effect of these practices is to restrict competition inadmissibly.

5. Money laundering and financing of terrorism

Helvetia prevents money laundering or the financing of terrorism.

We comply with the required observation of due diligence. We check the customer's identity, the plausibility of the transaction, and the authorisation of the contracting party and document the results of such checks.

We check new business and the existing portfolio using regularly updated systems. In particular, we use the official sanctions and terrorist lists. We check business with politically exposed persons.

We check unusual patterns of action or conduct in particular. In cases where suspicion is warranted, we take the necessary steps and inform the competent authorities. We assist them in their investigations.

6. Discrimination

Helvetia champions the equal treatment of and equality of opportunities for its employees.

We refrain from discriminating on the grounds of gender, religion, age, race, origin, disability, sexual orientation, political or union involvement.

7. Occupational safety and health protection

Helvetia creates a work environment free of harassment by employees. Helvetia ensures the protection of its employees' health and safety at the workplace.

We refrain from harassment in any form (unwanted advances or attempts at debasement, threats), mobbing (conscious exclusion or humiliation of an individual) and stalking.

8. Fraud, embezzlement, theft

Helvetia takes suitable action in order to detect criminal offenses early on and to avoid them. Helvetia punishes criminal offenses such as fraud, embezzlement or theft, forgery of documents or records and misuse of confidential business information.

We refrain from criminal actions and try to prevent such.

9. Bribery and corruption

Helvetia prevents bribery or corruption and punishes any violation.

There is a fine line between minor acceptable gifts for cultivating stable business relations and bribery or corruption aimed at obtaining a dishonest private or business advantage.

We refrain from and avoid giving monetary or fee payments, gifts, gratuities or invitations to business partners and political and administrative officeholders to obtain an illegal advantage.

Gifts and gratuities

We inform our superiors about gifts, gratuities, invitations and special concessions that could influence our independence in a business relationship or an actual decision-making process.

10. Conflicts of interest

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

Conflicts of interest exist when private individual (personal or family) interests encroach in any way upon the work duties or interests of Helvetia. These conflicts can occur in particular as the result of some kind of business activity or the taking on of a duty outside Helvetia, for example as membership on a board of directors, in associations, in political or public office, as the result of secondary occupations (as supplier, consultant), and as the result of gifts, gratuities and invitations or inappropriate incentive systems.

We inform our superiors of our private activities in which our personal interests could be at odds with business responsibilities and the performance of duties.

11. Intellectual property and intangible property rights

Helvetia respects third parties' intellectual property such as copyrights, trademark rights and patent rights or licences.

We take into account restrictions in the use or copying of protected works by obtaining the appropriate permission (licence) from the authorised party.

12. Environmental awareness

Helvetia seeks to avoid having an excessive impact on the environment.

We are vigilant about treating natural resources with awareness.

13. Taxes

Helvetia abides by applicable tax regulations and condemns tax offences in whatever form.

We refrain, within the scope of our influence, from actions that result in illegal tax advantages for Helvetia, employees or customers.

14. Complaints

Helvetia takes customer complaints seriously.

We handle complaints quickly and fairly.

15. Communication with media, shareholders and authorities

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

We always pass on enquiries from media, shareholders and authorities to the assigned and authorised communication manager.

If third parties obtain an item of internal information unintentionally, we ensure that it is destroyed without being replicated. We advise our superiors and the responsible communication managers immediately.

Implementation

The Code cannot address all critical situations we might encounter in our area of activity. Superiors, personnel managers and compliance managers will answer your questions in the case of doubt or in uncertain situations and help you to make a decision if you find yourself in a dilemma.

Wherever necessary, Helvetia issues work instructions to put the Code into concrete terms for daily work in keeping with the principles and main ideas named.

Helvetia makes the pertinent rules known to employees and ensures suitable training.

Each individual business unit and all the employees from top management to newly hired staff are responsible for behaving in accordance with the regulations. It is primarily the given business area that ensures compliance with the pertinent regulations.

Violations and sanctions

Helvetia strives to avoid illegal and unethical behaviours. Critical situations should be revealed as early as possible to avoid serious damage to the company.

An important factor in effective prevention is a well-functioning and timely exchange of information between operational business and the control and support functions such as Compliance Management, Internal Auditing, Risk Management, Legal Services and Human Resources.

Violations

Helvetia counts on support from employees and their representatives if they observe serious violations of the rules. Helvetia explicitly encourages employees to approach their superiors, personnel or compliance managers if they observe wrongful conduct. This provision applies particularly to cases of fraud, embezzlement, corruption, cartel agreements and other violations of competition law, falsification of the books or other conduct with possible consequences under criminal or civil law. Reporting matters of this kind is in the interest of Helvetia. The reporting employee need not fear repercussions of a negative kind as long as he reports to the best of his knowledge and in good faith.

Sanctions

Helvetia imposes sanctions against rule violations. In addition to consequences under labour law, these violations can also have consequences under civil and criminal law. In concrete terms, the consequences can range from a formal letter of warning, a reprimand or disciplinary action to dismissal, payment of damages, and the bringing of criminal charges.

Contact information

If you are in doubt or faced with a dilemma, you can contact the local Compliance Office or the Compliance Office of the Group:

- compliance@helvetia.ch or compliance@helvetia.com
- Phone +41 (0)58 280 50 12 or +41 (0)58 280 50 11

Helvetia Group
Dufourstrasse 40
P.O. Box
CH-9001 St.Gallen

