

Gouvernance

Code of Conduct of Groupe Mutuel

 **Business process**

 **Monitor**

 **Audit**

➤ **Through our actions,
we promote a liberal
philosophy based on
the values of caring,
responsibility and
proactivity.**

As a major player in the **Swiss health and pension industry**, we are committed to upholding our ethical, economic and social responsibility. Our strategy is based on healthy growth. We manage our business and carry out our projects in such a way to be able to fulfil our commitments at all times. We are committed to a sound financial position at all levels and to careful and effective risk management.

We strive **to maintain a strong corporate culture and to ensure that all our** employees, regardless of their position or level, enjoy a good working environment and are able to work in a climate of trust. We promote caring, responsibility and proactivity among our employees.

This Code of Conduct clearly sets out the commitments that are derived from the values and standards we uphold in our activities. All members of our governing bodies and all employees of Groupe Mutuel and its subsidiaries, regardless of their role, position or area of activity, shall comply with this Code of Conduct.

We endorse this Code of Conduct and stand by its commitments. We therefore expect that all members of our management bodies and all of our employees comply with these principles when carrying out their activities.

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› **Complying with the Code of Conduct What are the implications for me?**



I must read the document and ask myself the following questions before I act or make a decision:

- › Is my behaviour appropriate and consistent with the Code of Conduct?
- › Is it in line with the commitments of Groupe Mutuel?
- › Can it have negative consequences for Groupe Mutuel or for myself?
- › Am I prepared to take personal responsibility for my decisions and their consequences?
- › Would I be comfortable if these decisions were made public?

➤ **Our commitments**



Integrity

We are committed to upholding ethical behaviour and integrity.

- › We defend the interests of Groupe Mutuel and its subsidiaries and shall refrain from any activity or conduct that could harm them.
- › We act appropriately when doing business and in day-to-day dealings with our employees and business partners.
- › We identify, manage and avoid conflicts of interest. We shall report to our supervisor any situation in which our personal interests could be deemed to conflict with the interests of Groupe Mutuel and its subsidiaries.
- › We shall refuse any gift or benefit from third parties that could influence or give the impression of having an influence on our concrete decisions or lead us to adopt a certain behaviour.
- › We respect the working equipment, facilities, buildings and other assets belonging to Groupe Mutuel and its subsidiaries. The working equipment and resources provided to us shall be used exclusively for professional or other authorised purposes.



Is my behaviour appropriate? Does it comply with the Code of Conduct?

- › In case of doubt, I shall check with my line manager.

Professionalism

We fulfil our obligations in a professional manner and take responsibility for our actions. We honour our commitments to our partners:

- › policyholders,
- › customers,
- › colleagues,
- › service providers,
- › authorities, political bodies and the general public.



**Does my behaviour take into account the interests of the various partners of Groupe Mutuel?
Does it comply with the Code of Conduct?**

- › In case of doubt, I shall check with my line manager or contact the compliance department.

Respect

We treat our employees with respect and fairness.

- › We do not tolerate any form of discrimination or harassment based on ethnicity, nationality, gender, sexual orientation, gender identity, religion, age, political orientation, disability, marital or family status including pregnancy, or any other discriminatory factor.
- › We strive to ensure that all employees, regardless of their position or level, enjoy a quality working environment
- › We strive to develop and maintain a healthy working environment.



Could my attitude harm my colleague? Does it comply with the Code of Conduct?

- › In case of doubt, I shall check with my line manager or contact the compliance department.

Trust

We behave ethically and professionally in a way that reflects positively on Groupe Mutuel and its subsidiaries, both internally and externally.

Trust is earned:

- › By striving to actively promote the image of Groupe Mutuel and its subsidiaries.
- › By refraining from any activity that could have a negative impact on the reputation of Groupe Mutuel and its subsidiaries or otherwise harm them.
- › By taking seriously and dealing with complaints from customers and business partners in a fair and timely manner.



Is my behaviour transparent and trustworthy, both with my colleagues and with customers? Does it comply with the Code of Conduct?

- › In case of doubt, I shall check with my line manager or contact the compliance department.

Confidentiality

- › We handle all data as confidential and shall not disclose any information unless required by law to do so.
- › We strictly adhere to the legal provisions and internal rules on data protection and information security. We shall not share any personal and sensitive data with unauthorised parties.
- › We shall not take personal advantage of the knowledge and opportunities available to us through the use of the company resources and information or because of our position in the company.
- › We shall apply the necessary controls and monitor any access and/or disclosure of confidential or sensitive information.



Do I handle the information I have access to in a compliant manner? Am I complying with the Code of Conduct?

- › In case of doubt, I shall check with my line manager or contact the compliance department.

Compliance

- › We are committed to complying with the applicable laws, regulations and instructions.
- › We act in accordance with internal guidelines and instructions relating to our various responsibilities and shall implement the prescribed measures and approaches with due diligence.
- › We demonstrate integrity in our reporting and shall ensure that any data, information or documents we prepare, or for which we are responsible, are comprehensive and compliant.



**Do my actions comply with the applicable regulations, guidelines and instructions?
Do they comply with the Code of Conduct?**

- › If in doubt, I shall check the applicable regulations, guidelines and instructions. If any doubt remains, I shall refer the matter to my line manager or to the compliance department.

Risk culture

In our all of our activities, we promote a risk-based corporate culture.

- › We act in accordance with the guidelines and regulations related to risk management.
- › We participate in the management of risks inherent to our activities, including risk identification, risk assessment and risk mitigation measures.
- › We shall report all significant negative events that could affect our business.



Do my actions comply with with the company's risk tolerance policy?

Have I taken the necessary steps to reduce a significant risk?

Have I reported any significant negative events?

- › If in doubt, I shall consult the applicable regulations, guidelines and instructions. If the doubt remains, I shall refer to the risk officer of my sector or to the Risk Management department.

➤ **Non-compliance, sanctions
and whistleblowing policy**



Non-compliance with the Code of Conduct

We fully comply with this Code of Conduct.

Any case of non-compliance with the Code of Conduct shall be duly recorded and may result in disciplinary measures and civil or criminal liability. These measures include:

- › Reprimand,
- › Termination of employment contract,
- › Legal proceedings,
- › Filing a criminal charge.

This also applies to:

- › Any person who fails to report an observed breach of the Code of Conduct;
- › Any person who withholds material information concerning a breach when required to disclose information in his or her possession;
- › Any person who knowingly provides false information that may harm a person;
- › Line managers who excuse or minimise a breach of the Code of Conduct or who attempt to retaliate against a member of staff or any other person who has reported an incident or identified parties involved in a breach.

Whistleblowing policy

Employees who are aware of behaviour that they consider to be in breach of this Code of Conduct are strongly advised to contact

- › their line manager(s), or
- › the Human Resources Department, or
- › the Chief Compliance Officer.

We acknowledge that there are situations in which anonymity and confidentiality are prerequisites for being able to report an incident safely and with peace of mind. We provide a dedicated tool for the reporting process, through a secure and independent external platform, which can be used anonymously by means of a telephone call or a secure online form. The platform can be accessed from the homepage of Groupe Mutuel intranet or through a link sent to Groupe Mutuel employees.