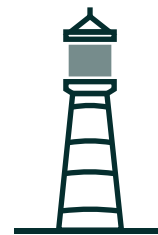


# Our Code of Conduct

---

**radicant bank ag**



**Our vision is to co-create and enable a movement for a sustainable world.**

We are on a journey to empower people to live their lives and to use and grow their wealth in ways which benefit our planet and society.



## **Why do we have a Code of Conduct?**

radicant was founded as Switzerland's first digital sustainability bank aligned with the UN Sustainable Development Goals (SDGs). We believe, that to achieve operational sustainability excellence, we need to live our culture and values in a sustainable manner. Simply said: **We want everything we do to be in line with our mission and vision.** Our Code of Conduct is one of the ways we put our values into practice.

## **Who does this apply to?**

Everyone. Everyone at radicant, from members of the Board of Directors, advisors, agency employees, vendors, independent and temporarily contractors, to all our employees.

## What happens if we do not follow our Code of Conduct?

We act with integrity. This protects us from misconduct. Even a seemingly minor failure of this Code of Conduct could expose radicant or individual employees to serious consequences – from fines to reputational harm or even imprisonment.

Depending on the failure, employees could face consequences, from disciplinary action up to dismissal. A failure by a member of our extended workforce may result in termination of their relationship with radicant.

## Principles



**Our mission is to enable sustainable living and mobilise capital for a sustainable world, by guiding personal actions and financial decisions.**

### **We live our mission and purpose**

The SDGs are our core values: We practice them every day by empowerment, inspiration, trust, collaboration and impact. We collaborate with you, our clients and community to create tech and data-driven processes and build a strong company culture. Every step is grounded in a sustainable culture and values. We are committed to identifying and promoting financial opportunities contributing to sustainability objectives aligned with the 17 UN SDGs.



## **We uphold the law**

Trust, integrity and compliance with applicable laws and regulations are integral to the success of radicant. We are aware of our responsibilities as a member of the financial market. We follow all the rules and conduct our business in a sustainable, honest, respectful and transparent manner to maintain a positive reputation amongst our stakeholders, including our clients, shareholders, community, colleagues, regulators and business partners.



## **We speak up**

We are encouraged to speak up. If we have questions, ideas, problems: We talk and listen to each other. Each of us has a responsibility to maintain trust and protect radicant's reputation. We all help to protect radicant by reporting suspected violations of this Code of Conduct, any radicant policy or the law to our respective line manager or Compliance. We do not have to be certain that a violation has occurred. Having a good-faith concern or even a question about compliance is enough. We can also submit a question or raise a concern through the radicant Observer, confidentially and anonymously.

Reporting violations or suspected violations will never result in retaliation. On the other hand, intentionally reporting false information is contrary to radicant's values and this Code of Conduct and may be subject to disciplinary action. We do not tolerate retaliation in any form against employees who in good faith report concerns or participate in investigations.



## **We follow the Code of Conduct**

We embrace and live our Code of Conduct. It is the responsibility of every employee, regardless of their title, to follow it. Breaches may result in sanctions. We also consider a breach of this Code of Conduct when an employee is aware of a specific instance of misconduct and tolerates the misconduct without reporting it. This is also the case if an employee withholds material information when asked to disclose the details of a breach.

## **We manage our risks**

We believe that professional and prudent risk management and compliance processes are key factors: They retain our reputation and the trust of our stakeholders and society and help to achieve long-term success as a sustainability bank aligned with the SDGs. All employees are responsible to base business decisions and operations on disciplined and intelligent risk taking, as well as on data.

## **We strive to make a positive impact**

Our products and services have a positive contribution to environment, society and the achievement of the SDGs. To ensure a sustainable future for our company, stakeholders, and the world, we apply a holistic approach and consider sustainability in everything we do. Including investments, operations, product development, products and services.

# **Integrity**



## **We do the right thing**

We act with integrity because it's the right thing to do. If we face a difficult decision, we ask ourselves these three questions:

1. Is it legal?
2. Is it consistent with our Code of Conduct, radicant's policies and expectations?
3. Is it in radicant's best interests?

If any of the questions leads us towards a "no", it might not be the right thing to do. If we are still uncertain, we contact Compliance for guidance. Furthermore, we are aware of and comply with radicant's framework of policies, regulations and guidelines.

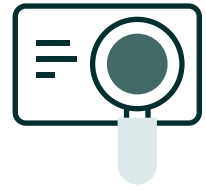
## **We take corporate governance seriously**

We strive to comply with the principles of proper corporate governance consisting of accountability, transparency, fairness, responsibility and risk management on a daily basis.



## **We strive for excellence in our customer experience**

We offer high quality services, products and transparent prices.



## **We adhere to anti-financial crime laws**

We strictly adhere to ethical business practices and maintain a zero-tolerance approach towards engaging in any business activities with criminals, terrorists, or entities associated with sanctioned governments. Furthermore, we are fully committed to preventing money laundering or terrorist financing in any form. We are all responsible for identifying and reporting any suspicious activity to Compliance.

In case we prevent and detect financial crime, we are not only protecting the integrity of radicant but of the whole financial system.

## **We have a zero-tolerance policy towards bribery or corruption**

We always make our business decisions based on economic facts to avoid even the slightest perception of bribery or corruption. We ensure that gifts and entertainment remain within reasonable limits and are kept within the law and according to our rules. In case of doubt, we refrain from accepting or giving gifts and entertainment. Exchanging gifts with public officials or exchange gifts that involve cash or cash equivalents is not allowed. Any donations made by radicant are done on a voluntary basis, without expecting any consideration in return.

## **We comply with tax laws**

We actively support adherence to legislation that promotes responsible investment practices, ensuring that capital transfers comply with the regulations of respective countries.

Furthermore, we are committed to assisting our clients in fulfilling their tax obligations both domestically and internationally, fostering a culture of transparency and compliance.

## **We place radicant's interest above our own**

We avoid actions and transactions that could potentially lead to conflicts of interest. We are transparent about potential conflicts. Should such conflicts nonetheless occur, they are identified, communicated and mitigated as part of our structured compliance risk management process.



## **We compete fairly**

We are aware of our responsibilities as a financial service provider. We win clients and business partners based on our service, quality and reputation – no on shortcuts. We abstain from price-fixing, restrictions on services offered by us, discrimination and all other forms of unfair, anti-competitive behaviour.

We deal fairly, honestly, transparently and in good faith with all stakeholders. We do not take unfair advantage of anyone through manipulation, by misleading them, concealment, abuse of privileged information or misrepresentation of material facts. The selection of our business partners takes place in a transparent and fair process, and sustainability aspects are always considered. We expect that our business partners maintain the same standards and that they comply with all laws and regulations. We refrain from working with partners who do not meet these strict standards.



# Information & Assets

---



## **We safeguard confidential information**

We are security-conscious and safeguard our sensitive information entrusted to us by our clients and other third parties. We never pass on any confidential information to gain unfair advantages for ourselves or any third party.

## **We protect data privacy**

We handle personal information with appropriate care and respect. This is essential to build trust.

We safeguard and manage personal data responsibly and ethically. We apply the highest standards and care when receiving, handling and storing personal data. We collect and use data only for authorised purposes. If we want to use it for a new purpose, we get new permission. We ensure, that personal information is never disclosed or sold to unauthorised internal or external parties.

## **We are committed to cyber security**

The threat of cyber attackers is a major risk and one that our company takes very seriously. Cyber security is integral for us maintaining the functioning of our systems, our reputation as a reliable company and the protection of our assets, as well as the assets of our clients and other stakeholders. To maximize cyber security, we use state of the art technologies and tools. We are all responsible to ensure cyber security.



## **We guarantee our information security**

As a digital service provider for sustainable investments, some of our most valuable assets are intangible. Information drives our business. Our information systems are extremely vulnerable to security risks.

While using our information systems and technology, we all must protect them from breaches, viruses and other risks. Therefore, we:

- Only use and install company-provided software, applications or hardware.
- Only use authorised devices to access our network.
- Never access unauthorised websites.
- Never share passwords or access codes.
- Do not open suspicious or unsolicited emails.

## **We safeguard intellectual property**

We treat our own intellectual property with care and protect it from misuse by third parties.

And we respect and safeguard other's proprietary information and intellectual property rights. We always obtain a license from the rights holders if we want to use their intellectual property.

## **We protect our property**

We treat our assets with care and protect it. In addition, we provide us with company property, such as laptops, that enables us to perform our jobs. We all have a duty to guard this property against misuse, loss, damage or theft and to return company-owned property once we are finished with it.

# **Our Culture**

---



## **We support diversity, inclusion and equality**

We are an ambitious and mission-driven team that values respect, open communication and equal opportunities. We are committed to foster diversity, equality and inclusion in which everyone feels valued and respected, regardless of their ethnic background, gender, age, sexual orientation, physical abilities, religion or identity.

## **We believe**

in our higher purpose of creating positive impact and that those are essential components of achieving our mission.

## **We treat everyone with fairness and respect**

We provide feedback to colleagues at all levels and support team members who may require resources or assistance.

## **We care**

We prioritise mental health and well-being during stressful situations. We encourage our team members to take time to care for themselves and each other, while fostering an environment that prioritises mental health.



## **We listen actively**

We believe in the power of empathy and compassion to promote an inclusive work environment. Our culture of active listening encourages team members to share their thoughts and ideas openly, knowing that they will be heard and valued.

**We're all part of the  
solution, we're all radicants.**

Co-CEO

Co-CEO

Chairman