

SELF-DECLARATION OF THE COMMERCIAL PARTNER

(Status of 28 February 2022)
of IDE Trade SA

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A. GENERAL

IDE Trade SA commits itself to respect the principles of ethics, integrity and legal compliance. In addition to current legislation; moreover, in IDE Trade implemented one series of internal mandatory instructions and standards that apply to every Company department and employees.

The following principles of conduct are therefore a minimum standard for the conduct of any Business Partner and thus the basis for any business relationship. Any deviation from these principles of conduct will not be tolerated by IDE Trade SA!

B. PRINCIPLES OF CONDUCT

1. Fight against corruption

Business Partners actively and consistently counter any criminal or unethical influence on decisions by IDE Trade or other third parties and act consistently against corruption, conflicts of interest and nepotism in their company. Fight against forbidden agreements

Business Partners do not participate in illegal anticompetitive agreements and fight illegal cartels. Business Partners comply with current procurement law.

2. Combating Prohibited Agreements

Business Partners do not participate in illegal anticompetitive agreements and fight illegal cartels. Business Partners comply with current procurement law.

3. Money Laundering Prevention

Through adequate and appropriate measures, Business Partners actively work to prevent smuggling of illegally acquired funds into the economic system.

4. Possession of relevant registrations, licenses and permits

Business Partners always possess the necessary registrations, licenses and permits to perform services or their activities under state law or official requirements.

5. Ensure the privacy and security of information

Business Partners comply with the regulations on the protection of sensitive data and, before the conclusion, comply with the provisions for the protection of confidential commercial information.

6. Compliance with fiscal and tax regulations

Business Partners pay the taxes / duties incurred in connection with IDE Trade in their country or third countries and document it accordingly.

7. Fight against illegal, forced and undeclared work

Business Partners respect the provisions of the law on the employment of workers and effectively combat illegal work, forced labor and undeclared work within and through their own "supply chain".

8. Respect the fundamental rights of workers

Business Partners pay attention to the health, safety and personality rights of their employees and are committed to principles of respectful, fair and non-discriminatory conduct. They employ and reward their employees on the basis of fair and legally correct contracts and compliant with international norms and minimum labor standards.

9. Respect for the environment

Business Partners observe legal environmental regulations and minimize environmental impact.

C. OBLIGATION OF CARE DURING THE BUSINESS RELATIONSHIP

1. Our Business Partners must report violations of this Code of Conduct for Business Partners if it affects the business relationship with IDE Trade SA and provide any information on the misconduct of IDE Trade employees at IDE Trade SA ("Reporting Obligation").
2. The following reporting channels exist for reporting compliance violations:¹
 - a. **Corporate compliance (internal reporting):**

IDE Trade SA
Corso Elvezia, 16
6900 Lugano
Telephone. +41 (0) 91 921 02 25
compliance@idetrade.ch

3. In addition, Business Partners are obligated to actively investigate any suspected cases and to cooperate with IDE Trade SA without reservation ("Duty to Investigate and Cooperate").
4. If there is a reasonable suspicion that a Business Partner has violated this Code of Conduct for Business Partners by working with IDE Trade, or if a Business Partner fails to adequately comply with this reporting obligation and / or investigation and cooperation obligation, IDE Trade SA may terminate the business relationship with the relevant Business Partner with immediate effect on the basis of existing contractual rights or legal rights. In the event of a violation of this Code of Conduct for Business Partners, IDE Trade reserves the right to take further legal action, in particular by making claims for damages.
5. We expect our Business Partners to enforce and monitor compliance with these or with comparable minimum standards of their Business Partners.

¹ If desired, the information can be sent anonymously .

6. IDE Trade SA may appropriately update the Business Partners Code of Conduct from time to time and expects its Business Partners to accept such changes.

D. CONFIRMATION

The Business Partner hereby confirms:

1. We have received the " *Business Partner's Code of Conduct* " and we hereby undertake to comply with the rules of conduct and the duties of care contained therein.
2. We agree that this declaration is subject to the substantive law of the Swiss Confederation (excluding the rules of private international law).

Place, date

Signature of the authorized representative of the Business Partner

Corporate stamp

Surname (block letters), function