

## **BUSINESS PARTNER CODE OF CONDUCT**

(Status as of 28 February 2022)  
of IDE TREDE SA

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## **A. GENERAL**

Ide Trade SA is committed to respecting the principles of ethics, integrity and legal compliance . In addition to the regulations in force, will apply a series of instructions and rules internal compulsory in all the our organs company and employees.

We expect also that the our Partners commercial act in so ethically, with integrity and in compliance with the law. The following principles of conduct are thus one standard minimum for the conduct of each Business Partner and therefore the basis for any relationship business. Any deviation from these principles of conduct will not be tolerated by Ide Trade SA!

## **B. PRINCIPLES OF CONDUCT**

### **1. Fight against corruption**

The Partners Business oppose actively and consistently any influence criminal or unethical on decisions by Ide Trade or from other third parties and act consistently against activities of corruption, nepotism and conflicts of interest in their company.

### **2. Fight against forbidden 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 the 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 relation to Ide Trade in their country or in third countries and document it accordingly.

### **7. Fight against illegal, forced and undeclared work**

Business Partners comply with the provisions of the law on the employment of workers and effectively combat undeclared 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 comply with legal environmental regulations and minimize environmental impact.

### C. OBLIGATION TO CARE DURING THE BUSINESS RELATIONSHIP

1. Our Business Partners must report their 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 ("Reporting obligation").
  2. The following reporting channels exist for reporting compliance violations:
    - a. **Corporate compliance (internal reporting)**  
  
IDE TRADE SA  
Corso Elvezia, 16  
6900 Lugano  
Telephone: +41 (0) 91 921 02 25  
Mail: [compliance@idetrade.ch](mailto:compliance@idetrade.ch)
  3. In addition, the Business Partners are obliged to actively investigate any suspected cases and to cooperate with Ide Trade without reservations ("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 does not adequately comply with this reporting obligation and / or investigation and cooperation obligation, Ide Trade may terminate the business relationship with the relevant Business Partner with immediate effect on the basis of existing contractual or legal rights. In case of violation of this Code of Conduct for Business Partners, Ide Trade reserves the right to take further legal action, in particular by asserting 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.
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1. Ide Trade SA may appropriately update the Code of Conduct for Business Partners 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 Code of Conduct for Business Partners 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).

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Place, date

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Signature of the Authorized Representative

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Corporate stamp

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Name (Capital letters), function

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<sup>i</sup> If desired, the information can be sent anonymously.