

## Code of Conduct for Business Partners of Swiss Life Ltd

### Preamble

As a leading provider of life and pensions and financial solutions in Europe, Swiss Life Ltd (hereinafter **Swiss Life**) makes a direct contribution to sustainability in society and the economy through its core business. In addition, Swiss Life acknowledges its responsibility towards its employees and the environment.

As part of its sustainability strategy, Swiss Life considers compliance with ethical, ecological and economic principles when selecting business partners and demands a high degree of responsibility from them with regard to the implementation of sustainability standards.

Swiss Life is committed to responsible and sustainable corporate governance. We also require our employees to observe the principles of ecological, social and ethical conduct and ensure that these principles are integrated into the corporate culture. We strive to optimise our entrepreneurial activities as well as our products and services in the interests of sustainability.

We expect our business partners to follow similar ethical principles in their activities, to abide by applicable law and to pass on these obligations to their subcontractors. This Code of Conduct for Business Partners sets minimum standards for the business relationship between the business partner and Swiss Life.

The Code of Conduct is based on Swiss laws and regulations as well as international conventions and resolutions, such as the United Nations Universal Declaration of Human Rights, UNICEF's Children's Rights and Business Principles, the United Nations Guiding Principles on Business and Human Rights, the core standards and principles of the International Labour Organization (ILO), including the Convention on Discrimination (No. 111), the Convention on Minimum Age for the effective abolition of child labour (No. 138) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (No. 182), the United Nations Global Compact and our own internal standards.

### Compliance with legal requirements and ethical principles

In the course of its entrepreneurial activities, the business partner shall comply with all applicable laws, legal regulations and official requirements and shall observe in particular the aforementioned international agreements and resolutions. This applies in particular with regard to:

## **Human rights and fair working conditions**

### **▪ Child labour**

The business partner does not employ any children below the legal minimum age for employment in the relevant country or legal system. If there is no minimum age for employment, the supplier or business partner does not employ children under 15 years of age.

Employees under 18 years of age only perform work in accordance with legal requirements (e.g. with regard to working hours and conditions) and in compliance with education and training requirements.

### **▪ Forced labour**

The business partner does not use any form of forced labour, serfdom or compulsory labour. The decision to work must always be voluntary. Employees must be allowed to retain control over their identity documents (e.g. passport, work permit or any other personal legal document). The business partner guarantees that employees have access to adequate housing, a water supply and sanitary facilities. It ensures that employees do not pay fees or make any other payments in order to secure their employment, during both the entire recruitment phase and the period of employment.

Punishment and psychological and/or physical coercion are prohibited. Disciplinary policies and procedures must be clearly defined and communicated to employees.

### **▪ Compensation and working hours**

The business partner shall comply with all applicable legal requirements and binding industry standards regarding working hours, overtime, wages and other employer benefits. It respects the work-life balance of employees. It pays employees promptly and informs them clearly and comprehensibly of the basis on which employees are paid.

Deductions from wages and salaries as a disciplinary measure are not allowed unless they are legally permissible.

### **▪ Freedom of association**

The business partner's employees must be free to join or refuse to join a trade union or other representative organisation of their own choosing without threat or intimidation.

### **▪ Diversity**

The business partner promotes an inclusive working environment in which the diversity of its employees is valued. It shall not discriminate against any person on the basis of gender, ethnicity, religion, disability, age, impairment, sexual orientation, origin or other characteristics or accept any such discrimination. Employees receive equal pay for equal work.

### **▪ Occupational health and safety**

Swiss Life expects its business partners to ensure a high level of occupational health and safety by following a health and safety management approach that is appropriate for their organisation.

The business partner must comply with the occupational health and safety regulations applicable to it and ensure a safe and health-promoting work environment in order to maintain the health of employees, protect third parties, and prevent accidents, injuries and work-related illnesses. This includes regular workplace risk assessments and the implementation of appropriate security and precautionary measures. Employees must be adequately trained in occupational health and safety issues.

### **▪ Data protection, data security and confidentiality**

The business partner shall comply with the applicable data protection and security provisions, in particular the provisions on cross-border data transfer and cybersecurity. It undertakes to keep Swiss Life data secret and to process it only for the purposes agreed with Swiss Life. This applies in particular to the personal data of customers, employees, brokers, partners and suppliers.

The business partner takes appropriate technical and organisational measures to protect the Swiss Life data stored by it against unauthorised or unlawful access and accidental loss, destruction or damage. It obliges its employees and business partners to ensure the confidentiality and protection of Swiss Life's trade secrets and to protect them from disclosure to third parties.

▪ **Bribery and corruption**

The business partner ensures that its employees and/or representatives do not engage in bribery and/or corruption or any business conduct of any kind that might give rise to the appearance of undue influence, and complies with all national and international anti-corruption provisions, laws, regulations and standards applicable to it.

▪ **Business continuity planning**

The business partner shall take precautionary measures against disruptions to its business activities (e.g. natural disasters, terrorism, software viruses, illness, pandemics, infectious diseases). The precautionary measures include, in particular, contingency plans to protect employees and the environment as far as possible from the effects of potential disasters in the area of the business activity.

▪ **Subcontractors**

The business partner shall inform Swiss Life in advance and in a timely manner of the involvement of its subcontractors so that Swiss Life has reasonable notice to ensure on that basis that the subcontractor is implementing the standards set out in this Code of Conduct for Business Partners.

The relevant specifications are to be included in the contracts with subcontractors in particular.

▪ **Conflicts of interest**

The business partner shall take the necessary measures to avoid conflicts of interest between itself and Swiss Life or with regard to the employees involved in the business relationship. It shall disclose any actual or potential conflict of interest with any employee of Swiss Life. A conflict of interest arises when a person has a private/personal interest that could influence their decisions. Such conflicts of interest include those arising from relationships by blood or marriage, partnerships, business partnerships and investments.

▪ **Environmental protection and animal welfare**

The business partner shall comply with all applicable environmental laws, regulations and standards and shall operate an efficient system to identify and eliminate potential environmental hazards. Swiss Life expects the business partner to endeavour to support animal welfare and the climate protection goals of Swiss Life through the goods and services to be supplied by it. In this context, Swiss Life also expects the business partner to take appropriate account of climate protection in its own operational activities, e.g. by setting climate protection targets and implementing them accordingly.

Within the scope of these targets, the business partner must strive for low CO2 emissions.

▪ **Prevention of money laundering and the financing of terrorism**

The business partner shall comply with all laws and regulations that apply to it relating to the prevention of money laundering and the financing of terrorism. It ensures a corresponding level of risk awareness and has implemented appropriate measures to avoid any risks.

▪ **Fair competition**

The business partner shall act within the scope of applicable competition and antitrust laws.

▪ **Trade regulations**

The business partner shall comply with all applicable trade and import regulations, including all applicable trade and economic sanctions and embargoes. The business partner also observes all tax requirements.

- **Checks**

Swiss Life reserves the right to check compliance with the requirements of the Code of Conduct for Business Partners after giving reasonable advance notice or to engage a third party to do so. Swiss Life may pass on the information and documents required to carry out these checks to the third parties commissioned by it or to the competent authorities. Upon request, the business partner shall provide the necessary evidence of compliance with this Code of Conduct for itself and its subcontractors. Swiss Life encourages its business partners to introduce their own binding guidelines for ethical conduct.

This Code of Conduct forms the basis for all future goods and services provided by the business partner. This Code of Conduct enters into force upon signature.

Any culpable breach of the obligations set out in this Code of Conduct shall be considered a material breach of contract and shall entitle Swiss Life to extraordinarily terminate the business relationship without notice, including all contracts concluded between companies of the Swiss Life Group and the business partner.