

GROUP – CODE OF ETHICS POLICY



Scope

SixCube Group (all affiliates of the SixCube Holding AG) in all locations.

Overview and Purpose

The Company is committed to honesty and integrity with respect to its entire business conduct towards employees, customers, suppliers, competitors and other stakeholders.

The Company recognizes that legal and cultural requirements vary in the global market. The Company expects from all its employees to act with the same fairness, honesty and responsibility in all aspects of their business.

This Code of Ethics Policy (hereinafter referred to as “Code of Ethics”) highlights important standards that are consistent with the Company’s values and to which each employee of the Company must strictly adhere. This Policy also sets the regulations and procedures in accordance with the vision and philosophy of the Company in regard to any potential discriminating act in the Company’s operations. Furthermore, it intends to assist personnel in implementing and maintaining an appropriate strategy and to serve as a guideline for the performance of all activities.

Definitions

Definitions are defined in “Group – Policy Definitions”.

Principles

This Code of Ethics applies to every employee, worker, contractor, subcontractor, dealer, agent and other person, who is performing services in the name and on behalf of the Company, no matter if the contract on which the cooperation is based is an employment contract, a service contract, if it is temporary or open-ended/unlimited contract, an agency-contract etc. (hereinafter referred to as “Employee”). The Employee acknowledges and agrees to comply with the standards of the Code of Ethics and that he/she will act in accordance with any and all applicable laws, rules and legal regulations in the country he/she is working in, for the Company.

Respect for Human Rights

The Company is leaning on the “UN Guiding Principles on Business and Human Rights”. The Employee will treat all individuals with respect and fairness and will observe basic human rights set forth, for example, in the Universal Declaration of Human Rights of the United Nations and the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy of the UN International Labor Organization (ILO), including, but not limited to, the prohibition of forced or child labor, human trafficking and the provision of reasonable wages, social benefits, working hours, freedom of association and other fair working conditions in compliance with applicable laws.

We especially highlight real living wage, as something we want to point out to our employees and to show them that we really care about employees feel valued and that their earnings are enough to support them with real costs of living. Furthermore, the Company will keep his working environment free of retaliation, free of discrimination and harassment on the basis of gender, age, race, skin color, ethnicity or national origin, citizenship, religion or religious beliefs, physical or mental disability, veteran status, sexual orientation or any other characteristics protected by applicable law. These activities include, but are not limited to, hiring and firing of staff, selection of volunteers and vendors, and provision of services. We will not discriminate and will take affirmative action measures to ensure against discrimination in employment, recruitment, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the basis of the above listed characteristics.

In accordance with the Guidelines established for Small & Medium-Sized Businesses (“My Business and Human Rights – A Guide to Human Rights for Small & Medium-Sized Enterprises”), published by the European Commission, we have installed the following compliance procedure.

The Company’s Steps to Human Rights Compliance:

- Step 1: Commit to respect human rights and imbed the commitment in our business.
- Step 2: Identify our human rights risks.
- Step 3: Take action to avoid and address the risks we identify.
- Step 4: Enable remedy for those affected, if we are directly involved in a negative impact.

- Step 5: Track our progress.
- Step 6: Communicate about what we are doing.

Antitrust and Competition Law Compliance

The Employee will strictly act in accordance with all applicable anti-trust laws, trade practice laws and any other laws, rules and regulations dealing for example with monopolies, unfair competition, restraints of trade and competition, and relationships with competitors and customers. The Employee will not enter into agreements with competitors and other acts, which may unfairly impact competition, including, but not limited to, price fixing or market allocations.

Anti-Corruption

The Employee will act in accordance with applicable laws and regulations concerning anti-corruption, including those concerning foreign corrupt practices.

The Employee will not engage in, nor tolerate, any form of corruption, bribery, theft, embezzlement, or extortion or the use of illegal payments, including without limitation, any payment or other benefit conferred on any individual, company or government official for the purpose of influencing the decision-making process whether or not in violation of applicable laws.

The Employee will never offer, grant, demand or accept bribes, illegal payments, payoffs, kickbacks, incentives, gifts, entertainment, favors or other benefit of a value in exchange for business opportunities with or in any way related to the business operations of the Company.

Anti-Money Laundering (AML)

The Company is committed to create and maintain procedures aimed at preventing any involvement in unlawful financial activities.

The Company upholds strict due diligence measures in order to identify and mitigate the risks of money laundering within Company's operations, ensuring compliance with all relevant regulatory requirements.

Since the main clients/customers of the Company are from the financial sector, the Company has established an "Anti-Money Laundering Policy" in September 2024.

The Employee is required to report any transactions or activities that appear suspicious, actively promoting integrity in Company's efforts of preventing money laundering.

Product Safety, Health, and Environment

The Employee will be committed to manufacture/produce/develop and deliver safe products and provide a safe working environment that supports accident prevention and minimizes exposure to health risks to the other employees.

The Employee will act in accordance with applicable laws and regulations on environmental protection and will preserve resources and protect the environment as much as possible.

Data Protection, Confidential Information and Intellectual Property

The Employee will act in accordance with all applicable laws and standards concerning data protection and information security.

It is the Employee's responsibility to ensure that any confidential business information or trade secrets gained by virtue of the business activities with the Company (hereinafter referred to as "Confidential Information") are held in strict confidence and not improperly used or disclosed to third parties. Furthermore, the Employee will protect and secure the Company's intellectual property as Confidential Information.

Export and Import Regulations

The Employee will act in accordance with all applicable import and export control laws, including, without limitation, sanctions, embargoes and other laws, regulations, government orders and policies controlling the transmission or shipment of goods and technology.

Responsibility

The Executive Management may decide on changes, updates, concrete activities, which all shall be binding for the Company. The Executive Management can assign this task to a certain person within the Company. In case a local law or legal provision changes and reflects or could have impact on the Policy or the subject regulated by the Policy, it shall be implemented.

Implementation and Handling

The implementation and compliance of this Policy has to be permanently monitored by the Executive Management. If a potential risk for a breach of the Policy is identified, it needs to be reported and analysed in order to decide whether to change the activity or the Policy, depending on what shall be the better solution for the potential risk.

Policy Compliance

Responsibilities

Executive Management:

- Sign-off of the Policy

Risk and Compliance:

- As the representative of the Executive Management, the Risk and Compliance Team (R&C) is responsible for the maintenance and gives the sign-off in the name of the Executive Management.

Exceptions

Any exception to the Policy must be approved by the Risk and Compliance Team in advance.

Non-Compliance

Every employee is asked to report immediately any breach or potential breach to the following email address: risk@sixsentix.com.

An employee found to have violated this Policy may be subject to disciplinary action, up to and including termination of employment.

Related Documents

- Group – Environmental Policy
- Group – Policy Definitions

Revision History

Date of Change	Responsible	Summary of Change	Version	Sign-off
31 October 2017	Head Legal	Gen. Review	1.0	Head Legal
31 March 2018	Legal and Compliance	Update	1.1	CRO
25 May 2018	CRO	Group Update	1.2	CRO
15 October 2020	CRO	Group Update	2.0	CRO
16 August 2023	Risk and Compliance	Update	2.1	R&C
01 st January 2025	Risk and Compliance	Update	2.2	R&C