



# Code of Conduct



January 2019

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Responsibility in Wealth

We, Kaiser Partner Privatbank AG (the “Bank”), aim to meet the highest requirements in all business matters. We will conduct our business for the benefit of all our stakeholders in a careful, honest, and sustainable manner.

This Code of Conduct sets out our ethical key principles and professional minimal standards, which are the benchmarks for our Board of Directors, Executive Board, and employees in the performance of their activities. We expect any individual acting for the Bank, regardless of their position, to be familiar with and adhere to this Code of Conduct.

By adhering to the requirements set forth herein, we maintain and improve our reputation as a reliable Bank and a Bank of integrity that always acts in the interest of all our stakeholders, in particular our clients, shareholders, employees, and business partners. Our reputation is our most important asset.

## **Principles of behavior**

### **1. Integrity**

We adhere to all legal and regulatory provisions, internal regulations, and relevant business standards, and comply with the requirements of supervisory authorities when doing business, both in purely domestic and cross-border matters.

We act to combat any potential form of money laundering effectively. All due diligence and anti-money-laundering provisions are strictly adhered to, all due diligence tests executed, and all suspicious activities treated in accordance with the relevant internal and external provisions.

We have zero tolerance for corruption or any kind of bribery. We neither offer nor accept inappropriate gifts.

We act in a tax-compliant manner and also require such behavior from our clients. Consequently, we do not provide assistance to clients in not complying with their tax obligations or evading taxes inadmissibly.

We act honestly and inform transparently and appropriately. In particular, we strive to always inform our clients in comprehensible language.

### **2. Fairness**

We interact with any client, business partner, authority, or colleague, or any other person, in a fair, just, and professional manner. We communicate with everyone in a polite manner and treat everyone with respect.

### **3. Conflicts of Interest**

We put our clients’ best interests before our own and our Bank’s interests before our personal interests. We aim to provide our clients with the best service.

We strive to avoid conflicts of interest. Should this not be possible, we will manage, resolve, and transparently disclose them.

We do not accept any retrocessions or other inappropriate inducements.

### **4. Confidentiality**

We protect our clients’ privacy and adhere strictly to all applicable confidentiality and data protection provisions. Client data will only be disclosed with their consent or where legal or regulatory provisions oblige us to do so.

We ensure that client data is treated confidentially. In this regard, we implement all necessary technical, organizational, and administrative measures. Accordingly, we adopt the highest security standards and ensure that data cannot be manipulated, stolen, or lost.

### **5. Prevention of Market Abuse**

We verify whether information is inside information. If it is, we use the information only for the purposes for which it was provided to us in the first place. We will only provide access to such inside information when doing so is in line with all applicable internal and external provisions.

We strive to recognize and prevent market abuse in a targeted manner, and comply with applicable reporting obligations and obligations to act.

### **6. Company Culture**

We respect each individual’s dignity, personality, and privacy. We refrain from taking any action that might endanger or harm clients, employees, business partners, or other persons.

We support our employees’ vocational training, whether within the Bank or external, if such training is appropriate and in both parties’ mutual interest. We pay our employees fair remuneration and make a contribution in the area of health promotion.

We do not tolerate harassment or bullying. No one will be discriminated against – regardless of their age, gender, ethnic origin, race, religion, political views, or physical disabilities. Every individual has the same chance to pursue a successful career at the Bank.

We strive to create added value for our clients and shareholders by acting with care, professionalism, and commitment. This is reflected in our compensation scheme.

We respect and protect all material and immaterial property of the Bank. Therefore, we handle systems, technical devices, and other devices carefully and use information only in favor of the Bank, and not in order to gain a personal benefit.

We endeavor to optimize our services and conduct in consideration of our ecological and social responsibility.

## **Implementation**

### **1. Knowledge**

We are all familiar with the provisions of this Code of Conduct and act in accordance with the key values and principles of conduct in the performance of our daily business. During the annual confirmation process, everyone has to confirm that they have read and understood the provisions set forth herein and will act in accordance with them.

The Board of Directors, the Executive Board, and employees must meet the requirements of this Code of Conduct at all times and without exception.

### **2. Violations**

Anyone who breaks the rules of this Code of Conduct or any other internal or external regulations will bear serious consequences. These consequences may range from warnings to reprimands or dismissals, with each sanction potentially including claims for damages. The same applies to persons who know about such violations but do not report them accordingly.

### **3. Reporting Obligation**

We report potential or actual violations to the line manager, the Head Risk & Compliance, or the whistle-blowing office of the Bank. The Bank will not impose any sanctions against persons reporting such violations in good faith.

### **4. Review**

This Code of Conduct will be reviewed at regular intervals. The purpose of such reviews is to ensure that our principles of conduct comply with the currently applicable framework conditions.

