

# Code of Conduct

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for Employees  
Version May 2019

# Code of Conduct

This code describes the conduct expected of all employees (“employees”) of PSP Swiss Property (“PSP”) with regard to their business activities, as set out in the employment contracts, as well as in internal regulations and directives.

## **1. Integrity and loyalty**

### Conduct expected

Proper conduct, based on integrity and loyalty, towards all employees, business partners, shareholders and other business contacts is expected and required.

### Compliance with laws

All laws as well as provisions of the individual employment contract, internal regulations and directives are to be observed.

### Proper business conduct

Improper business conduct as well as bribery and corruption will not be tolerated. In particular, within the context of commercial or administrative activities, no unjust advantages, specifically cash amounts, may be offered, handed over or accepted. Common and reasonable occasional gifts as well as admissible representation expenditures remain excepted hereto.

### Protection of confidentiality

Business secrets and confidential information and data must be protected by taking adequate measures to prevent unauthorized use. The processing of third party data is to be carried out within the scope of business activities and in line with the applicable data privacy laws.

### Avoidance of conflicts of interest

All employees safeguard justified business interests of PSP in good faith and act towards PSP in a fair and correct manner. They avoid conflicts of interest by not allowing themselves to be unduly influenced by personal interests and relationships. It is prohibited to use or pass on insider knowledge.

## **2. Responsible action**

### Regard and respect

All employees, business partners, shareholders and other business contacts are to be treated with respect. Communications should be as open and transparent as possible. Employees are to foster an open and respectful conversation culture with one another. Ecological and social responsibility towards the environment and the public in general should be duly observed.

### Non-discrimination

The unlawful discrimination or harassment of employees in any form whatsoever is not tolerated and their personal integrity and dignity is to be maintained at all times.

### Equality

PSP values the principle of equality in the work environment. Employment, task assignments, working conditions, promotions, etc. are to be based exclusively on the abilities, skills and performance of the individual employee.

### Occupational safety and health protection.

Ensuring occupational safety and health protection are primary objectives. Therefore, the respective regulations are to be observed by all employees. Within their area of responsibility, they are to ensure that these regulations are also observed by mandated workers of third party service providers.

### Ecological sustainability

PSP aims at keeping its footprint as small as possible in all phases of business activities – from the construction of new buildings, to renovations and refurbishments, to operation and maintenance. Environmental regulations are to be observed consistently.

## **3. Final provisions**

The rules set out in this code of conduct are based on the specific provisions of the employment contracts, internal regulations, guidelines and/or instructions, which refer to the applicable laws and either further specify the requirements of this code and/or go beyond its scope. The latter take precedence over this code.

In the event of questions or uncertainties and with regard to notifications of violations, those channels listed in the applicable internal employment documents are to be consulted. Employees who inform of known or assumed infringements in good faith will be protected from any negative consequences.

In case of doubts or uncertainties, all employees can, at any time, contact a member of the Executive Management or the heads of Legal or HR.

This code of conduct is published on the PSP website as well as on the PSP intranet site. The version of the PSP intranet site lists – for reference purposes – the respective provisions of the employment contract, internal regulations and instructions on which this code is based.

Executive Management, May 2019

*English translation of the prevailing German text.*



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