

Code of conduct Personal, close, reliable

Edition

1. January 2025

Foreword



“Our integrity serves to create trust, peace of mind and transparency. The values of la Mobilière and the code of conduct provide the cornerstone for our correct and upright behaviour within and outside our company. I expect us all to uphold this and to protect la Mobilière’s good reputation.

Many thanks for your loyalty and hard work for la Mobilière.”

Michèle Rodoni, CEO

Code of conduct

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up to
our values



How we live up to our values

La Mobilière fosters a respectful and progressive work culture based on appreciation. We live up to our values “personal”, “close” and “reliable” internally and externally. We are guided in this by a fundamental attitude of integrity, behave in an ethically correct manner and comply with laws and regulations.

Personal:

We interact at eye level, show respect and are cooperative – within the company, towards our customers and towards other external business partners.

Close:

We cultivate a personal relationship and are trustworthy. Employees, business partners and customers can count on us.

Reliable:

We keep our promises. We respect the privacy of our employees, customers and other external business partners and protect the information and personal data entrusted to us.

To whom the code of conduct applies and what its goals are

The code of conduct applies to all employees of the Mobilière Group including general agencies and subsidiaries – in every area, at every level, in every situation, both in the digital sphere and during physical contact.

The code of conduct

- is intended to raise our awareness of the statutory provisions, requires us to take an ethical approach and act with integrity,
- sets out the framework for our actions but does not cover every conceivable situation,
- supplements our values and forms the basis for a shared understanding of compliance in the Mobilière Group,
- serves as the foundation for any implementing rules on the individual topics listed.

“In the code of conduct we as a company set out the forms of behaviour with which we intend to achieve our business success.”

Andrea Rieger,
Head of Legal & Compliance

“The code of conduct is addressed at the entire Mobilière family, from the apprentice to the Executive Board. We all know: we are one Mobilière.”

Fabian Aebi,
General Agent in Olten

We act ...

in compliance with laws and regulations

It goes without saying that we respect human rights and the international standards recognised by Switzerland and comply with the prevailing laws, regulations and our internal provisions.

We behave as a trustworthy and professional point of contact towards our customers, business partners and competitors.

respectfully, honestly and with integrity

We act with integrity in business transactions and in our day-to-day dealings with our employees, customers and business partners. Integrity means that we gear our actions to our corporate values. Our values serve us as a compass in all situations.

We uphold the interests of la Mobilière and behave in a respectful, reliable and honest manner. If in a specific situation we are uncertain, we consult our responsible manager or the Group Compliance Office.

transparently

We communicate in a credible and transparent manner towards our customers, employees, supervisory authorities, the media and other stakeholders. Only the offices authorised to do so such as Corporate Communications or Regulatory Affairs engage in communication with the media and supervisory authorities.

We refrain from unsubstantiated, misleading or vague statements that could convey an incorrect impression. We avoid greenwashing particularly in descriptions of the sustainability of a product, service, business activity or commitment. This way we protect the good reputation of la Mobilière and foster customer confidence.

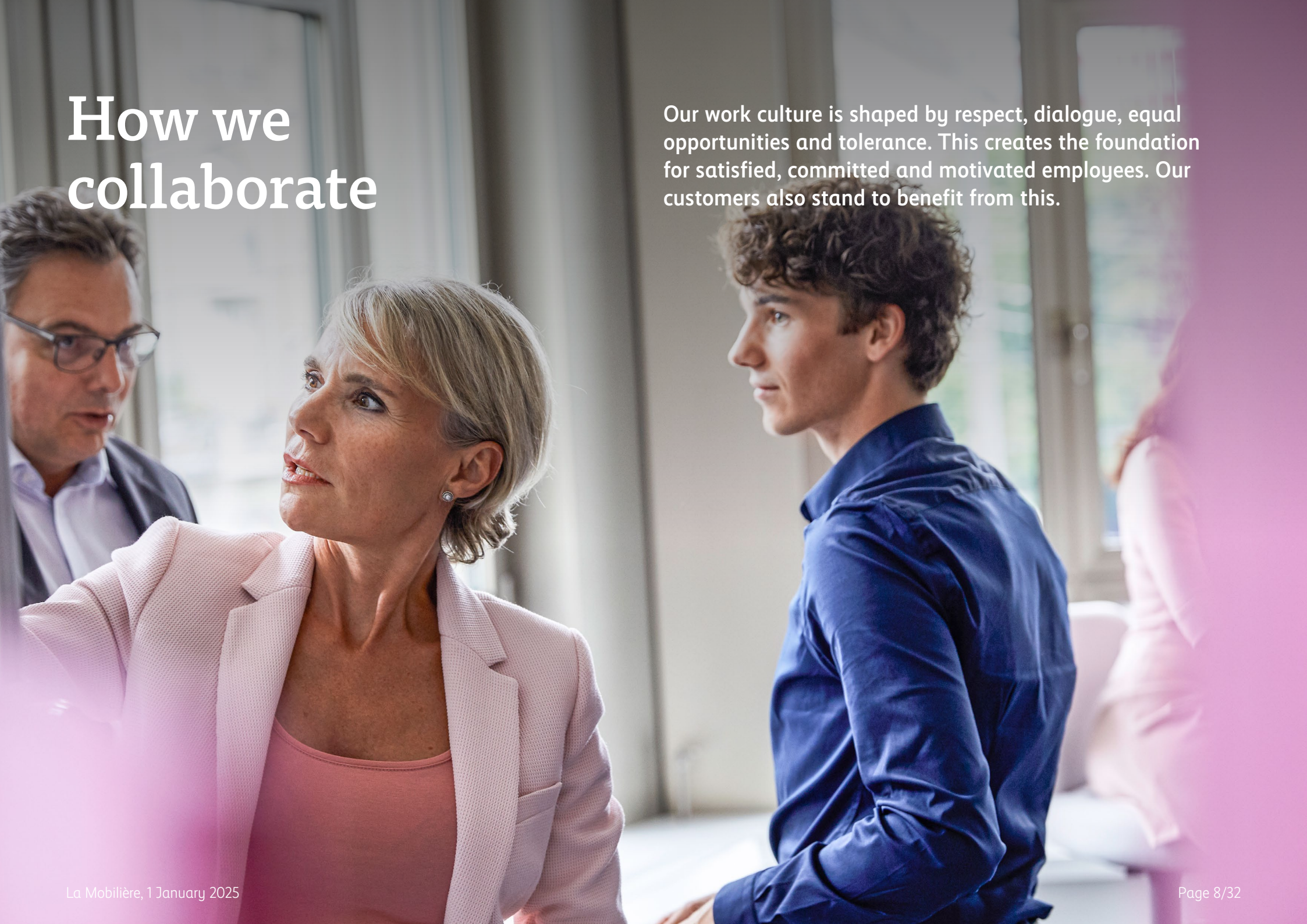
“Respectful conduct is important for me, both towards our staff and towards our customers.”

Rita Meister,
General Agent in Balsthal

“By providing clear, honest and timely information, we strengthen our relationships and create an environment in which trust thrives and successes are possible.”

Irene Fischbach,
Head of Corporate Communications

How we collaborate



Our work culture is shaped by respect, dialogue, equal opportunities and tolerance. This creates the foundation for satisfied, committed and motivated employees. Our customers also stand to benefit from this.

Our common understanding of leadership

Our managers bear responsibility for the employees and act as role models. They address and substantiate the importance of integrity and correct ethical and lawful conduct. They identify and resolve problematic situations. In doing so they are guided by our common understanding of leadership.

What does this mean for me?

- As an **employee in a leadership role** I set an example of personal conduct and social skills within the meaning of the code of conduct. I act as a role model. I actively communicate with my staff in my leadership role and serve as a point of contact in case of questions or uncertainties.
- As an **employee in a leadership role** I promptly address incorrect conduct by my staff with the persons involved. I communicate transparently about misconduct, lessons learned and any sanctions.
- As an **employee** I can count on appropriate conduct by my managers in our daily cooperation and dialogue.

“It is our values and the people who live up to them that set us apart. By each assuming responsibility for them and implementing them in our everyday work, we create the basis for trustful collaboration.”

Barbara Agoba,
Head of Human Resources

La Mobilière as a responsible employer

The individual qualities, knowledge and experience of each person are what count for us. We care strongly about our employees' personal and professional further development. As a mutually structured company, our strength always comes from the community. We protect and respect the privacy and health of our employees. We do not tolerate any kind of discrimination or harassment.

What does this mean for me?

As an employee I can rest assured

- that my employer, la Mobilière, fosters a culture of diversity and fairness and takes resolute action against discrimination and misconduct. This enables it to forestall reputational and liability risks, loyalty problems and lack of commitment.
- that my employer complies with all relevant provisions concerning privacy and health protection and guarantees legally sound employment contracts and conditions.
- that my employer protects the health of its employees in their day-to-day work and contributes to their financial security in old age with strong occupational pension insurance.

We provide security and sustainability

We protect people and the environment and safeguard our business operations in all our activities. This includes both the protection of employees, customers, suppliers and business partners and that of our facilities, buildings and equipment.

We are aware of our responsibility and act in a sustainable manner.

Within the company we seek to continuously reduce the negative impacts of our activities on the environment.

We respect prevailing laws and regulations and the international agreements recognised by Switzerland for the protection of the environment, the minimisation of climate change and handling of its consequences, and the conservation of natural resources.

What does this mean for me?

- I behave in a safety-compliant and risk-conscious manner in both the virtual and physical domain. This way I avoid damage incidents.
- I comply with the house rules and obey instructions in the event of a security-relevant incident.
- I avoid emissions wherever possible and do not waste any resources. I am mindful of my mobility behaviour in my everyday work and choose a sustainable means of transport whenever possible.

Property and working tools of la Mobilière

We respect la Mobilière's ownership of working materials and tools, furniture, buildings and other assets.

Theft, fraud, misuse and wilful damage of working materials are not tolerated.

What does this mean for me?

I treat the working materials and aids provided to me with due care and only use them for business or other approved purposes.

How we behave towards our customers and business partners

La Mobilière is available for its customers in different situations in life. We interact with them and other partners at eye level and with respect and appreciation.

Our customer concept

La Mobilière is a professional and trustworthy point of contact for its customers in different situations in life. We take their concerns seriously and aim to provide timely advice and support. Our customers can choose how they wish to contact us. They can reach us via a wide range of equivalent contact points.

“Whether digitally or physically: we are close to our customers and there when they need us at our 160 locations.”

Philipp Mischler,
Head of Market Management

What does this mean for me?

If I receive a request from a customer, I handle it carefully, swiftly and straightforwardly.
I consult the necessary experts if required.

Business relationships with suppliers and service providers

Our business success also depends on the selection of high-performing and reliable business partners.

We expect our suppliers and service providers to comply with the statutory provisions, human rights and international social and environmental standards recognised by Switzerland and in particular to assume the requisite responsibility for the health and safety of their employees. We do not tolerate corruption.

What does this mean for me?

High-performing and reliable business partners are important for us. I therefore select suppliers and service providers carefully and on the basis of objective selection criteria. I avoid any inappropriate preferential treatment and ensure effective and fair competition.

How we deal with issues

Various channels are available for our customers, business partners and third parties to communicate their concerns to la Mobilière.

Feedback and complaints help us to review and continuously improve our services, products and processes.

What does this mean for me?

I contribute to la Mobilière's good reputation by acting as a reliable and professional point of contact for our customers, business partners and third parties. If they bring concerns to me, I deal with them promptly and provide professional and clear feedback.



How we preserve la Mobilière's good reputation

La Mobilière, 1 January 2025



We at la Mobilière always act with integrity. We behave fairly and in compliance with the law, prevent unlawful and unethical activities and protect our good reputation.

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Data protection and confidentiality

We treat information and personal data of customers, employees, suppliers and business partners carefully and with discretion. We only process data within the scope of the statutory provisions and internal requirements. We may likewise not disclose confidential information about la Mobilière and business secrets to third parties – including when we no longer work for la Mobilière. When we process personal data technically, we do so in compliance with data protection law.

What does this mean for me?

- If I give someone information, I always ask myself if they have a right to such information. This way I protect the personal data entrusted to me and the trust placed in me.
- If I send an e-mail with confidential data, I check the correctness of the recipient before sending it. This way I prevent breaches of data protection.

Data security and integrity

We protect electronic and physical information and data adequately. We safeguard their confidentiality and availability and uphold their integrity. This means that they are correct, complete and consistent and only stored at the storage locations approved by la Mobilière. When transmitting, processing and archiving information and data, we only make use of instruments and channels that guarantee that no unauthorised parties are able to gain access and the data can neither be altered nor lost.

What does this mean for me?

- The trust of our customers is important to us. By handling the data entrusted to me responsibly and protecting it, I preserve the trust placed in us.
- I have a wary eye for attempted hacker or phishing attacks. I do not open attachments or links in suspicious e-mails but report them to IT Security.

Insider information

We do not use or disseminate confidential information about a company or transaction that could influence the price of securities traded on the stock exchange.

What does this mean for me?

If I have insider information at my disposal, I protect it and do not use or misuse it either for my own investments or those of third parties. I do not offer any tips or recommendations on securities if this does not belong to my area of responsibility.

Competition and anti-trust law

We are committed to a free market and fair competition. We do not tolerate either agreements or collusion with other companies that are aimed at or result in illegal restrictions on competition. We also expect the same from our business partners and other market players.

What does this mean for me?

- I prevent antitrust misconduct by always interacting and communicating cautiously with our competitors – including during informal or confidential discussions.
- I keep a watchful eye out for competition and antitrust misconduct such as price agreements or the allocation of markets. Should I detect such misconduct, I withdraw by leaving the meeting or immediately breaking off inappropriate communication.
- I report inappropriate conduct to Group Legal Services or the Group Compliance Office.

Bribery and corruption

We do not tolerate any bribery or corruption. We do not offer undue favours to public or private decision-makers such as expensive invitations or gifts. If gifts or favours are offered at a critical point of time (such as during contractual negotiations) or if they are inappropriately generous, we decline them.

“Integrity for me means doing the right thing even when no-one is looking.”

Nadine Probst,
Head of Compliance

What does this mean for me?

- Our products and services impress with their quality. We neither make payments nor offer valuable gifts in order to influence the staff of authorities or companies.
- I avoid bribery and corruption by distancing myself from all kinds of corrupt behaviour. I detect inappropriate behaviour by always questioning the purpose of payments or gifts and considering how the general public, colleagues or my family would respond to my accepting them.
- I firmly reject calls for bribery and report such incidents immediately to the Group Compliance Office.

Conflicts of interest

We avoid situations in which personal interests conflict with our tasks at la Mobilière. We may not use our position to gain special advantages for ourselves or for people close to us.

We are alert and help to detect and prevent potential conflicts of interest at an early stage. We welcome the assumption by employees of political and public offices and executive functions at associations and comparable organisations as long as they do not compromise the interests of la Mobilière.

What does this mean for me?

- Unfortunately, conflicts of interest cannot always be prevented. Should a conflict of interest arise, I disclose it, immediately notify my responsible manager, the Group Compliance Office or the Board of Directors without prompting and if necessary abstain accordingly.
- I am transparent about other mandates and secondary occupations in addition to my work at la Mobilière and report these.

Donations and sponsorships

We transparently document all donations and gifts. If they are addressed at politicians or political parties, they fall under the responsibility of the Board of Directors of the Mobilière Cooperative and must comply with the corresponding internal requirements. Donations and gifts to associations, societies or other organisations are paid out by the offices responsible in accordance with the internal requirements. The general agents are free within the scope of the internal requirements to bestow donations and gifts upon associations, societies and other organisations.

What does this mean for me?

- Commitments in the area of sponsorship and to projects for the benefit of society as a whole should underline la Mobilière's brand values and not contradict them.
- Specifically as a general agent I have the opportunity to get involved locally and underline our regional presence with local and regional sponsorships.

Money laundering

We do not tolerate any unlawful transactions for the acceptance of funds and do not allow ourselves to be misused for illegal purposes. We only enter into business relationships with trustworthy customers, suppliers and business partners pursuing business activities complying with the provisions of law and possessing financial resources of legitimate origin.

What does this mean for me?

- As an insurance advisor I meet all applicable duties of care for combating money laundering and the financing of terrorism. For example, I identify customers, controllers, beneficial owners and beneficiaries and clarify the background of transactions where applicable.
- Should a customer exert pressure on me in order to obtain a product relevant for money laundering purposes, this is unusual and I analyse such transactions particularly critically. I address any questions to the decentralised compliance officers or the Group Compliance Office.

Accounting

Our accounting is based on recognised principles.

All bookings adhere to the accounting standards chosen by us and are based on the requisite documentation.

What does this mean for me?

- I only record and approve correctly prepared invoices.
- We issue all invoices correctly and in accordance with legally recognised principles.

Tax law

We comply with the prevailing tax provisions and expressly reject tax evasion.

What does this mean for me?

- We do not provide any active assistance with tax evasion for our customers, employees, suppliers, business partners or third parties.
- I do not offer customers any solution if there are grounds to suspect that the assets to be invested are not taxed.
- I refuse payments both from and to customers if I suspect that this money is or will not be correctly taxed.
- I detect inappropriate customer wishes concerning tax issues and reject these or consult my manager or the Group Compliance Office

Intellectual property rights

We respect the intellectual property and the copyrights, names and patent rights of third parties.

What does this mean for me?

Our brand is our symbol of recognition. It is very important to us to protect it. We therefore respect the property, copyrights, names and patent rights of third parties just as we expect the same from third parties towards ourselves.



How we engage in society

La Mobilière is mutually structured. Solidarity and a sense of responsibility determine our actions – towards customers, employees, partners and society as a whole. We make an active contribution in the areas of prevention, society, research and culture. This way we assume our social responsibility.

Committed to business, society and the environment

Our social commitment is another important component of our sustainability strategy. With our innovation workshop Mobiliar Forum, we support SMEs and organisations in shaping their future and in doing so contribute to the success of Switzerland's economic backbone. In order to safeguard Switzerland's resilience, we engage in projects for the prevention of natural hazards and those with a social and cultural character. We also cultivate various research partnerships.

What does this mean for me?

- We offer staff the opportunity to become involved in corporate volunteering and in society.
- Our customers can choose insurance products that offer a resource-saving alternative in the event of damage – such as repairing rather than replacing.

“The code of conduct supports us in being commercially successful and a good employer. It also forms the framework within which we act with our cooperative commitment.”

Belinda Walther Weger,
Head of Public Affairs & Sustainability

Who I can turn to with questions

By addressing concerns and misconduct, we help ourselves and la Mobilière to improve continuously and thereby safeguard our good reputation. We approach the correct point of contact with questions.



Reporting for employees and protection for whistleblowers

We report activities that are potentially illegal, lacking in integrity or unethical and infringements of this code of conduct and internal requirements to our managers or the Compliance Whistleblower Tool. It is also possible to submit tips anonymously.

There is a duty to report any suspected white-collar crime, particularly fraud and corruption, as well as other behaviour that could be regarded as criminal to the Group Compliance Office (compliance@mobi.ch).

The Group Compliance Office processes all reports and takes the necessary measures where required. All documents are treated in confidence and stored with appropriate protection.

The Compliance Whistleblower Tool is also available for our customers, suppliers and business partners to report infringements of our code of conduct.

What does this mean for me?

If as an employee I report in good faith real or suspected cases of wrongdoing, I can rest assured that I do not have to fear any negative consequences. “In good faith” means that I am convinced that I am telling the truth, irrespective of whether or not a subsequent review confirms this. I am aware that I am able to submit tips to the Compliance Whistleblower Tool– including anonymously if I wish.

Consequences and sanctions

We take action against infringements of statutory provisions, the code of conduct and internal requirements. The applicable managers, supported by the Group Compliance Office, Group Legal Services and Human Resources, are responsible for this. Infringements can result in disciplinary action and entail consequences under civil and criminal law. This includes a reprimand, dismissal, compensation claims or criminal charges.

“Rules are part of the game – not just in sport, but also in day-to-day business. The rules apply equally to everyone.”

Christoph Leemann,
Head of Legal Services

Further information and point of contact

Our code of conduct is intended to help us to understand our culture and way of working at la Mobilière. Nevertheless, employees may be confronted with complex situations to which the code of conduct does not provide a clear answer. Employees can find further information and training material on the intranet. If you are unsure about the correct form of behaviour, you may contact your direct or superior managers, the decentralised legal and compliance officers or the Group Compliance Office at any time. Details of the Compliance points of contact can be found on the intranet under “Compliance”.

Approved by the Board of Directors of la Mobilière Holding Ltd on 26 November 2024, in force since 1 January 2025. This code of conduct replaces the version dated 1 December 2023.

For additional information,
please contact Nadine Probst,
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T 031 389 60 28, compliance@mobi.ch

Compliance Whistleblower Tool
mobiliar.ch/compliance-meldestelle

**Thank you very much
for your cooperation.**