



# Code of Conduct of Graubündner Kantonalbank.

This Code of Conduct was adopted by the Executive Board of Graubündner Kantonalbank (GKB) on 30 April 2024. It will be reviewed regularly and amended if necessary.



**Graubündner  
Kantonalbank**

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# General principles.

This Code of Conduct sets out principles and ethical standards that guide all our business activities. The Code sets out how we, as employees and members of governing bodies, conduct ourselves towards each other and in our dealings with clients, investors and the public. It describes the correct behaviour in certain situations. Important provisions can be found in the relevant directives and regulations of GKB, which also include appropriate control systems. The Code of Conduct is binding on all employees. Violation of the Code of Conduct may result in measures under labour law in accordance with the general terms of employment.

# Corporate culture.

Our three company values – competent, straightforward and committed – express what is important to us. We foster a performance-oriented, ethical culture based on personal responsibility, in which different ideas are openly shared, and ensure a non-discriminatory working environment.

## **Competent, cooperative and fair.**

We offer standard banking services, take into account the needs of all sections of the population, the private sector and the public sector, and in this context contribute to the balanced performance of the Graubünden economy. This purpose, which is laid down in the Graubündner Kantonalbank Act, governs the business activities of GKB. Our strategic focus is geared towards all stakeholder groups (owners, clients, employees, investors and the general public). Our clients, suppliers and employees are treated professionally, respectfully and fairly.

## **Conflicts of interest.**

We structure our business activities in such a way that potential conflicts with the interests of our clients are identified as early as possible and avoid conflicts of interest. If by way of exception a conflict is unavoidable, we will disclose it to our affected clients. We adhere to the rules of recusal.

We provide our clients with transparent information about distribution commission that we receive from third parties in connection with the distribution of collective investment schemes and other financial instruments.

## **Fair competition.**

Directives and processes have been defined to ensure fair competitive conduct in business dealings with competitors and to prevent illegal competition agreements in accordance with the Federal Act on Cartels and Other Restraints of Competition. We ensure compliance with these directives and processes at all times. We place the same demands on partners and suppliers as we do on our own conduct.

# Equal opportunities, diversity and health.

GKB respects the personal rights of its employees. This includes in particular gender or sexual orientation, origin, descent and skin colour, religion or political opinion, mental or physical abilities and appearance, as well as social origin, language and age. Diversity initiatives are promoted by the Executive Board and HR. Equal pay analyses ensure a non-discriminatory wage system. We promote occupational health management, and ensure that work, family and other areas of life are compatible and that equality is anchored in our strategy, structure and culture. GKB ensures that employees are protected against abuse of power, bullying and discrimination.

# Laws, directives and regulations.

We are committed to upholding human rights and comply with legal requirements, professional and market standards as well as internal regulations. We feel responsible for being familiar with these and implementing them (compliance).

## **Combating money laundering and terrorist financing.**

Measures to prevent money laundering and terrorist financing are a top priority at GKB, especially also financial and economic sanctions issued by the Federal Council that are relevant for the Swiss financial centre. We use industry-standard IT systems, tools and processes to prevent money laundering, crime and the financing of terrorism and to implement financial and economic sanctions.

## **Bribery and corruption.**

We do not tolerate active or passive bribery. Gifts and invitations may be accepted and given within the scale of what is socially customary.

## **Tax issues.**

GKB fulfils its tax obligations in full and pursues a white money strategy. It provides information about its own tax situation and reports the required tax data of its clients and employees in accordance with the applicable laws, directives and regulations.

## **Information security, data protection, banking and business confidentiality.**

We attach great importance to data protection and data security at GKB and take appropriate technical and organisational measures to protect data at GKB. GKB processes personal data and critical data strictly in accordance with the applicable laws, directives and regulations and only for the intended purpose. We only pass on client data to third parties if the data subject has given their consent or we are legally obliged to provide information to the competent authorities. This also applies to information about our employees and business partners. Further information can be found in the data privacy policy.

## **Market conduct rules and inside information.**

GKB does not accept any conduct which constitutes market abuse. The exploitation of inside information (important non-public information) and market manipulation are prohibited. As a member of industry associations (SBA, AMAS), we adhere to their recommendations.

# Sustainability.

We have a holistic understanding of sustainability, i.e. we take economic, ecological and social aspects into account. We conduct ourselves in a responsible manner and fulfil our duty of care towards the environment and society. As we strive to be a model company when it comes to sustainability, we are committed to developing our region accordingly and take into account the sustainability needs of our owners, clients, employees, investors and the general public.

# Reporting misconduct (whistleblowing).

We do not tolerate breaches of imperative rules. Violation of the Code of Conduct may lead to sanctions under labour law and, depending on the case, may have consequences under criminal and supervisory law. Suspected misconduct can be reported to the line manager, the HR department or the whistleblowing point of contact. Employees who make a report will not have to fear any disadvantages.