

Code for Suppliers





As a provider of infrastructure services to the international financial centers and with a large international client base, we are aware of the systemic importance of SIX and therefore assume great responsibility. Thus, the smooth functioning of our services is of the utmost importance.

SIX is committed to ensuring the highest standards in the conduct of its business and expects all its employees to comply with all relevant laws and to demonstrate proper ethical conduct in all matters. SIX expects the same from its suppliers.

In the Code of Conduct, SIX sets forth the fundamental standards of ethical and professional conduct expected of its employees. The present Code for Suppliers sets forth the relevant requirements for SIX suppliers and their sub-suppliers.

All suppliers and their sub-suppliers are subject to the Code for Suppliers and must comply with its terms. This means that SIX suppliers must ensure that the Code for Suppliers is integrated, applied and communicated within their organization and with their sub-suppliers.

The Code for Suppliers serves as a basic guideline to which reference is made in contracts and in the General Terms and Conditions (GTC) between SIX and its suppliers. It includes policies on human rights, labor and environmental standards, as well as anti-corruption principles.

Should you require further information, please contact:

SIX Procurement

procurement@six-group.com www.six-group.com/codeforsuppliers



Reporting of potential misconduct

SIX has an independent and confidential misconduct reporting office.

Suppliers who believe that an employee of SIX or another supplier or service provider of SIX has engaged in illegal or improper conduct should inform SIX. The reporting office is operated by a third-party provider and accepts anonymous reports. However, the third-party provider cannot view the reports.

In addition, all reports are reviewed by SIX Compliance employees. To file a misconduct report, please go to https://six.integrityplatform.org.

Reporting potential misconduct in good faith will not jeopardize a supplier's relationship with SIX.

Business Ethics and Compliance

Legal and compliance

Suppliers must comply with all applicable laws, regulations, policies and local conditions in the countries in which they operate, produce or do business.

Fair competition

Suppliers must not engage in bribery, price fixing, or any other form of corruption or competitive harm to obtain or retain business. In addition, suppliers are prohibited from demanding bribes from SIX if SIX wishes to do business with them. Any supplier that acts in such a way will immediately be excluded from supplying SIX.

Competitive conduct

Laws that protect and promote competition, particularly antitrust laws, must be complied with. Suppliers must abide by the prohibition on collusion between competitors and other actions that may interfere with the proper functioning of the free market.

Conflicts of interest

Suppliers must disclose all potential conflicts of interest, in particular those that may inadvertently arise from business or personal relationships with SIX customers, other suppliers, competitors or SIX employees.

Protecting trade secrets

Suppliers are obligated to protect confidential information about SIX that becomes known to them through a business relationship and to treat it as a trade secret. Suppliers must neither trade in securities on the basis of confidential information provided to them by SIX, nor encourage others to do so.

Data protection

SIX expects its suppliers to comply with high standards of data protection and security. Suppliers are therefore obliged, among other things, to process and protect the personal data of SIX in accordance with the applicable laws. In particular, the personal data of SIX may only be processed in accordance with the respective contractual agreements and directives of SIX and must not be disclosed to third parties without written consent.

Trademark and copyright protection

Suppliers must respect the protection of patents, copyrights, and trademarks. It is mandatory to obtain permission from the authorized persons or otherwise refrain from using them.



Labor and Social Standards

International standards

Suppliers are required to comply with the following internationally recognized labor and human rights standards:

- International Bill of Human Rights,
- United Nations Guiding Principles on Business and Human Rights (UNGP),
- OECD Guidelines for Multinational Enterprises,
- Labor Standards and Principles of the International Labour Organization (ILO).

Respectful work environment

Suppliers shall promote a work environment free from harassment/violence, sexual abuse, physical violence, discrimination, intimidation and bullying.

Health and safety

Suppliers shall ensure a safe workplace, in order to prevent occupational accidents and injuries. The same applies to housing for employees provided by the supplier.

Free choice of work

Suppliers must not use any form of bonded, prison, slave, or involuntary labor. Employees must have the right to terminate their employment, subject to a reasonable notice period.

Prevention of child labor

Suppliers are not permitted to employ any children who are below the minimum age as defined by the International Labour Organization.

Prohibition of discrimination

In making personnel decisions, suppliers are required to apply the principles of equal opportunity. No person is to be discriminated against on the basis of race, ethnicity, gender, nationality, age, physical ability, sexual orientation or religion.

Freedom of association and right to collective bargaining

Suppliers shall uphold and respect the rights of their employees to freedom of association and collective bargaining. The right of employees to join a trade union must be respected.

Salary and ancillary benefits

Suppliers must pay wages and ancillary benefits that comply with all applicable laws and are consistent with local practices. Any form of illegal employment is prohibited.

Working hours and rest periods

Suppliers must ensure that their employees' working hours do not exceed local limits on regular hours and overtime. Rest periods required by law must be observed.



Environment

Suppliers are required to comply with all applicable national and international legal obligations and existing industry standards or guidelines regarding environmental protection, but as an absolute minimum standard (i.e., where less extensive or no mandatory regulations or industry standards exist), the following principles shall apply:



Resource and emissions reduction

Suppliers use raw materials and natural resources in a responsible manner and take all reasonable measures to reduce the consumption of energy and fuels, as well as related emissions, as much as possible. Suppliers are required to provide SIX with the relevant information and to actively support SIX in achieving its own reduction targets as part of the net zero strategy of SIX.



Substances hazardous to health and the environment

Wherever possible, suppliers shall not use chemicals and other substances that pose an environmental or health hazard if released. If this is not possible, their use must be clearly identified and safe and environmentally sound handling, storage, use, recycling and disposal must be ensured.



Continuous optimization

Suppliers have appropriate internal processes for systematic planning, training, implementation, monitoring and evaluation of the company's environmental performance (environmental aspects) with the goal of continuously reducing the environmental impact of their operations. Suppliers take all reasonable steps to implement new advanced environmental technologies that result in measurable improvements in their own environmental impact (e.g., climate change and biodiversity).



Corporate Governance

Compliance with regulatory requirements and industry standards

Suppliers continuously monitor and ensure that they comply with applicable laws, regulations, and common industry standards.

Risk assessment and management

Suppliers are required to have an appropriate risk management system in place to identify and manage risks associated with the supplier's activities in all areas defined in this Code for Suppliers.

Communication and training

Suppliers have appropriate communication tools and training programs to ensure that their employees achieve the highest possible level of knowledge, awareness and skills to meet the objectives and principles set out in this Code for Suppliers.

Documentation

Suppliers must at all times be able to demonstrate through documentation that they comply with all applicable laws and the objectives and principles set out in this Code for Suppliers.

Audit right of SIX

SIX has the right at any time to request information on compliance with this Code for Suppliers or to conduct on-site audits. SIX must notify the supplier at least ten days in advance of an on-site audit, which will be conducted during normal business hours and no more than once per year. If there are clear indications that the supplier does not comply with this Code for Suppliers, SIX may also conduct more than one audit per year.

Incident reporting

Suppliers are required to report to SIX any incidents, misconduct or other circumstances that constitute an imminent or actual violation of this Code for Suppliers or applicable laws or regulations in these areas.

Incident remediation and right of termination

Suppliers are required to promptly remedy any violations of this Code for Suppliers. In the event of intentional or grossly negligent violations of this Code for Suppliers, SIX has the right to terminate all contracts with the supplier in accordance with the contractual provisions on termination for good cause.

Sub-suppliers

Suppliers are required to ensure that their sub-suppliers also comply with the goals and principles set out in this Code for Suppliers. In particular, contracts with sub-suppliers must be drafted accordingly and a right of audit must be agreed upon.



SIX Group Ltd Hardturmstrasse 201 P. O. Box CH–8021 Zurich

www.six-group.com

