

# Human Rights Policy

## Einleitung

Bellevue Asset Management AG is a FINMA-regulated manager of collective assets pursuant to Art. 24 FINIG. The policy sets out Bellevue's commitment to respecting internationally recognized human rights across the firm globally.

## 1 REQUIREMENTS

As a responsible corporate citizen, Bellevue respects internationally recognized human rights and aims to not infringe on human rights, be complicit or contribute to human rights abuses. Bellevue is responsible towards its employees, its investment, clients and society at large.

Bellevue adheres to the principles of the industry association Asset Management Association Switzerland ("AMAS"). The AMAS Code of Conduct confirms its commitment to preserving high legal, ethical and moral standards, and aims to foster compliance with local and international laws and regulations. Bellevue aims to:

- Assess, identify, and monitor material human rights risk across its corporate and investment activities
- Address (identified) potential and actual human rights violations appropriately.
- Fosters a culture of compliance and ethically sound business conduct
- Encourage employees, clients, and external stakeholders to raise concerns about human rights violations or other legal and regulatory breaches

The Whistleblowing Policy has been established internally to prevent and address misconduct within the organisation, including remedies for actual negative human rights impacts.

## 2 OUR COMMITMENT TOWARDS OUR BELLEVUE EMPLOYEES

Bellevue respects human rights in all employment policies and practices and is committed to diversity and inclusion. This commitment extends regardless of individual characteristics including, but not limited to, age, color, national origin or ancestry, sex (including pregnancy, childbirth or related medical condition), breastfeeding, religion or belief, creed, citizenship, marital status, family care status, physical or mental disability, genetic information, sexual orientation, gender, gender identity or expression, trans or transitioning status, political belief, gender, nationality, ability and religion.

Bellevue also respects freedom of association and collective bargaining. Bellevue has a strict zero-tolerance of any form of discrimination.

**3 OUR COMMITMENT THROUGH THE INVESTMENT DECISION-MAKING PROCESS AND DURING OWNERSHIP**

Bellevue does not invest in entities responsible for serious environmental damage or human rights violations, or in those subject to targeted sanctions. Due diligence is conducted before making any investment decisions. Investments undergo systematic assessment for sustainability risks and human rights violations, with MSCI's ESG data and ratings used for reference. In the event of issues, discussions are initiated with portfolio companies, and investments may be subject to review.

**4 COMMUNICATIONS AND TRANSPARENCY**

Bellevue reports on its human rights commitments and any significant incidents within its annual Corporate Sustainability Report on its website.