

Compliance policy

Introduction

Bellevue Asset Management AG is a FINMA-regulated manager of collective assets pursuant to Art. 24 FinIA. Bellevue strives to comply with all regulatory requirements at all times and to implement them accordingly. Bellevue Asset Management AG lives an exemplary control and compliance culture, with individual employees setting a good example and complying with all applicable laws, regulations and directives at all times. New or existing practices are critically scrutinized, and in the event of non-compliance with standards, action is taken and the matter is reported to the responsible supervisor or the Compliance Office. In addition, the Three Lines of Defence model is consistently adhered to.

1 SCOPE AND PURPOSE

1.1 Scope

This policy applies to all employees of Bellevue Asset Management AG (hereafter "**BAM**") including subsidiaries. It is based on the regulation Risk Policy.

Any additional local peculiarities or regulatory requirements of individual subsidiaries are regulated separately and either apply in addition to this policy or override it as the case may be.

1.2 Purpose

This policy governs the responsibilities of all employees in connection with compliance with all relevant regulations.

It also governs the responsibilities and competencies of the Compliance Office and the maintenance of an appropriate compliance control program.

2 PRINCIPLES

2.1 Personal responsibility

The responsibility for knowing and complying with the applicable rules lies with each individual. If you are not sure which rules apply, contact your supervisor or the Compliance Office.

2.2 Compliance culture

If errors occur or if misconduct by an employee is identified, this is addressed openly, discussed with superiors and/or with the Compliance Officer and subsequently rectified.

If an employee believes that another employee or a supervisor has made a mistake, the employee will contact the Compliance Office.

3 ORGANISATION AND RESPONSIBILITIES

3.1 Executive

The managers at all levels ("1st line of defense") ensure that the employees have the necessary knowledge or acquire it and check compliance with the rules as part of their management activities (management checks). Leadership controls are to be documented in writing.

3.2 Compliance Office

The Compliance Office supports and advises the management and employees as an independent control body ("2nd line of defense") in the enforcement and monitoring of all activities aimed at ensuring compliance with laws, directives, industry standards and codes of conduct as well as the prevention of reputational damage.

The Head of the Compliance Office reports to the Chief Financial Officer ("CFO") or Chief Risk Officer ("CRO").

4 FUNCTION AND MISSION OF COMPLIANCE

4.1 General order

The Compliance Office supports the Executive Board and the Board of Directors in connection with the development and implementation of risk-appropriate strategies, internal directives, work processes and in the selection of the orders and measures to be taken in the wake of the identification of serious compliance violations, through the following activities::

- Advice to management and employees
- Monitoring according to compliance control program
- Training according to training concept
- Monitoring of legal and regulatory requirements
- Compliance with and updating of the instruction system

4.2 Proposals to the Executive Board

The Compliance Office submits a report to the Executive Board for approval by the Board of Directors:

- an annual overview and assessment of all relevant compliance risks (risk assessment), including the effectiveness of the compliance control program and the corresponding methods and systems for risk monitoring
- an annual activity report
- An annual activity plan to manage the identified compliance risks; this contains the findings of the last activity report, the annual objectives and the main risk-oriented activities

4.3 Compliance program

The Compliance Office shall establish and implement a compliance control program based on the control concept (according to section 5) and taking into account the specific risks identified in the risk assessment.

It may carry out or arrange for further controls at its own discretion.

4.4 Anti-Money Laundering Unit

The Anti-Money Laundering Unit is part of the Compliance Office.

In the event of reasonable suspicion of money laundering or suspected terrorism pursuant to Art. 9 AMLA or in the event of a simple suspicion (pursuant to Art. 305ter para. 2 SCC), the Compliance Office, in accordance with the process provided for this purpose and after consultation with the CFO & CEO, submits the suspicious activity report to the Money Laundering Reporting Office Switzerland (MROS).

4.5 Legal cases

The Compliance Office is responsible for handling legal cases and proposes to the Executive Board which external lawyers to work with on its own behalf.

The processing of legal cases shall be deemed to include, in particular, all contacts with domestic and foreign attorneys as well as the processing of proceedings in connection with:

- civil, criminal, administrative and regulatory proceedings
- Debt collection proceedings
- Trademark proceedings
- Customer complaints that go beyond routine inquiries from customers

The Compliance Office ensures that the Group Executive Board of Bellevue Group AG is adequately informed in the event of relevant legal cases.

4.6 Requests from authorities

The Compliance Office is responsible for processing inquiries from other regulatory authorities at home and abroad.

The direct transmission of non-public information to foreign authorities is only permitted within the framework of the conditions set out in Art. 42c FINMASA and specified in FINMA RS 2017/6.

The Compliance Office decides on the admissibility of the transfer of information abroad in consultation with the Executive Board and, if necessary, with the assistance of external legal specialists. If the information is transferred, the foreign authority or body must be informed of the confidentiality and special nature of the information. In addition, the rights of customers and third parties must be strictly preserved and thus, in particular, business secrecy, the provisions on data protection and the rights arising from the employment relationship must be observed.

The Compliance Office shall report any intended direct transmission of information to FINMA if the information itself is of such material importance that it would trigger a reporting obligation to the Swiss supervisory authority even independently of any transmission (Art. 29 para. 2 FINMASA), or if the transmission as such is of material importance. The transmission of information prior to FINMA's re-registration is not permitted.

5 CONTROL CONCEPT

The Compliance Office focuses on the following risks in particular as part of the risk assessment and activity plan:

- Anti-money laundering and counterterrorism

- Investment Regulations and Investment Suitability & Appropriateness
- Tax liabilities (zB. FATCA, AIA)
- Cross Border Activities
- Fiduciary duty and duties of care and confidentiality
- Market conduct rules, including handling of confidential, price-sensitive information
- Trading and settlement: business conflicts of interest, information barriers and insider information
- Personal conflicts of interest, including gifts, travel, entertainment, personal account dealing and outside business interests
- External asset managers and service/product providers, including compensation rules
- New products and services
- ESG risks (e.g. BAM exclusion list, carbon footprint)

6 TRAINING

6.1 Training and training responsibility

Employees are trained on the main compliance risks and regulatory changes. The Compliance Office is responsible for training.

6.2 Trainees and periodicity

The Compliance Office determines the topics, the group of persons to be trained and the frequency of the training courses. New employees are to be briefed on the compliance obligations relevant to them and on their implementation in day-to-day operations.

Employees are informed in good time about new rules and their consequences.

6.3 Documentation

The Compliance Office is responsible for maintaining the training documentation. It consists of a list that provides information about the training topic, the date of the training, and the training participants. Alternatively, proof of attendance can be documented in the "ComplySci" tool. The Compliance Office may require additional documentation to be provided, such as certificates of attendance.

7 REPORTING

7.1 Reporting to the management

The Compliance Office reports to management as follows:

- Ad hoc: without delay about significant events and developments
- Annual: Risk Assessment and activity report
 - Significant changes in the assessment of compliance risk (unless there is a change during the year).
- As a rule, monthly in written form on the following topics:
 - Adherence to the Compliance Action Plan, projects

- Results of internal and external audits with an impact on compliance areas; measures to be taken incl. deadlines
- Development of new products and/or services with the involvement of Compliance
- Overview of new or revised laws and other regulations that have a significant impact on the organization and business activities of the Group companies, as well as their implementation (procedures and timetable)
- Directions/Guidelines
- Compliance relevant incidents

7.2 Reporting to the Board of Directors

Compliance reports to the Board of Directors as follows:

- Ad hoc: Events of particular significance are to be brought to the attention of the Board of Directors without delay, insofar as this has not already been done by the Executive Board
- Annual: Risk situation and activity report including the annual Compliance Risk Assessment

The Executive Committee reports to the Board of Directors, usually on the occasion of the ordinary meetings of the Board of Directors, as follows::

- Ad hoc: Events of particular significance must be brought to the attention of the Board of Directors without delay
- Key elements of compliance reporting

7.3 Reporting to the Audit & Risk Committee and Internal Audit of Bellevue Group AG

The Compliance Office may send the following reports to the Audit Committee and the Internal Audit of Bellevue Group AG the following reports at their request:

- Ad hoc: Events of particular significance and the proposed measures
- Annual: Activity report, including the annual compliance risk assessment
- Annual: Activity plan

The Compliance Office supports Bellevue Group AG's Internal Audit at the latter's request in control activities relating to BAM.

8 DISCIPLINARY MEASURES AND SANCTIONS

Violation of this directive will be punished in accordance with the provisions of the Regulations of Employment.