

# EFG Code of Ethics

# Chair and CEO message

Peter Fanconi, Chair of EFG's Board of Directors, and Giorgio Pradelli, Chief Executive Officer of EFG International, highlight the importance of ethical business conduct.

---

Dear colleagues,

Our mission is to be a leading Swiss private bank renowned for its unique client centric approach. In order to achieve this mission, we must not only deliver consistently high-quality service tailored to our clients' individual needs but also always act with integrity to effectively build a corporate culture that focuses on fostering trust and being a reliable partner.

We are convinced that the highest standards of ethical business conduct must be applied in order to create value and build long-term relationships with clients, employees and shareholders alike.

Our Code of Ethics defines the moral and ethical framework according to which all of us at EFG are expected to behave. It emphasises the role each of us plays in safeguarding the reputation and performance of EFG, which depends on our conduct as a bank and as individuals.

It is based on two overarching principles: client centricity and accountability, always putting our clients' best interests first and taking a hands-on approach with clear responsibilities and effective collaboration across the organisation to find the best possible solutions and to build long-lasting [client] relationships.

As a leading Swiss private bank operating in around 40 locations worldwide, we are committed to adopting a partnership-oriented approach. As part of the financial industry, we strive to build our reputation and momentum through actions that contribute positively to our clients, the banking industry and society. We bring entrepreneurial thinking to private banking and engage with all our stakeholders – from clients, to colleagues, to regulators and shareholders – openly in a spirit of transparency and trust.



---

EFG Code of Ethics is part of our governance framework and has been defined by our Board of Directors and Executive Committee to explain the main principles and practices that define how we behave and do business at EFG.

A handwritten signature in black ink, appearing to read 'P. Fanconi'.

Peter Fanconi

A handwritten signature in black ink, appearing to read 'Giorgio Pradelli'.

Giorgio Pradelli

# EFG corporate values

Our performance and reputation depend on our conduct as a bank and as individuals. Our five corporate values describe our 'corporate personality' and are intended to guide us in every aspect of our work.

Our five corporate values encapsulate the DNA of our organisation. They say who we are, what we do and how we do it. They help us to understand how we are expected to behave and what we need to do to demonstrate integrity and ethics in our daily working life. They provide a solid framework to encourage sound decision-making and the right behaviour. Our corporate values create a basis to ensure appropriate conduct at work and help us safeguard our reputation vis-à-vis all our stakeholders, including clients, regulators and our colleagues.

For more information on EFG corporate values, including more detailed descriptions of the individual values, please refer to the following documents, which are available on the dedicated corporate values page on EFG's intranet:

EFG corporate values guide

- EFG corporate values factsheet
- EFG corporate values training



## Accountable

Taking ownership for tasks and challenges as well as seeking continuous improvement



## Hands-on

Being proactive to rapidly deliver high quality results



## Passionate

Being committed and striving for excellence



## Solution-driven

Focusing on client outcomes and treating clients fairly with a risk-aware mindset



## Partnership-oriented

Promoting collaboration and teamwork. Working together with an entrepreneurial spirit

# Business conduct

Our behaviour helps us safeguard our reputation vis-à-vis all our stakeholders, including clients, regulators and our colleagues.

---

## Protecting our reputation

Our reputation is founded on trust from our employees, clients, shareholders, investors and regulators. Isolated events can undermine that trust and negatively impact our reputation. It is the responsibility of all of us to protect it.

## Complying with laws and regulations

We abide by all laws, rules and regulations that are applicable in the jurisdictions in which we operate. We expect our Board of Directors and all our employees to comply with these as well as with our own internal regulations, and we endeavour to maintain an exemplary compliance culture in all our doings.

## Being risk aware

We promote a culture of strong risk awareness and ownership. Risk awareness is a foundation of values, knowledge, beliefs, understanding and communication of the risks associated with our business objectives and the assets necessary to achieve the objectives.

We believe the behavioural element is key to ensure sound risk management, and that this is guided by the risk appetite and culture of our organisation. Accordingly, we view risk culture as a core component of effective risk management. This also translates into the way we define our employees' performance awards.

## Promoting leadership and ownership

We encourage all our employees to take ownership for tasks and challenges, as well as seeking continuous improvement. At EFG, taking ownership is about assuming full responsibility for our own actions and decisions and living up to EFG's standards.

We believe in empowerment and leadership to build confidence in our capacity to execute our collective mission and goals and establish essential trust in our bank.

For more information on business conduct, please refer in particular to the following documents, which are available on the Group Corporate Governance intranet page:

- EFG corporate values guide
- Group Business Code of Conduct
- Group Risk Appetite Framework
- Group Risk Management Framework

See also the Group training programme / online courses and related mandatory requirements for the various roles at EFG, which are available on the Group Training & Development intranet page.

# Our clients first

At EFG, we put our clients first. Our business model is client-centric and focuses on providing our clients with the best possible service.

---

## Acting in our clients' best interest

For us, the client – both internal and external – is at the centre of our business philosophy, operations and ideas. In this context, we are always looking for the best solutions for our clients, taking their individual needs into consideration. Our services and products are tailored to each individual client. We do not believe in taking the path of least resistance but rather the one that is most appropriate for our client and are aware that we must not be influenced by any other external considerations.

## Knowing and understanding our clients

To build a long-term client relationship, we must know and understand our clients. This means we need information on all our clients, to understand them, understand their needs and their business activities, including how and why they want to do business with us.

As a bank, we need to comply with many laws and regulations, and this includes obtaining in-depth knowledge about our clients (Know Your Client requirements).

This also means gaining insight into the financial situation of our clients from a suitability perspective, understanding their investment knowledge and experience as well as their investment wishes and objectives in order to provide them with the most appropriate service and product.

## Cross-border services

We offer comprehensive investment, wealth and credit solutions to our clients on a global scale and, as such, we strive to maintain the highest standards in our cross-border business activities as reflected in our internal rules and guidelines.

## Tax compliance

We are committed to complying with all relevant tax laws and not assisting our clients in dealing with or undertaking activities intended to breach their tax obligations.

## Handling complaints

We always strive to improve and to deliver better services to our clients. When we receive client complaints, we handle them promptly and professionally.

## Preserving confidentiality

We have always made it a priority to protect information concerning our clients, our bank or any of our employees. Our commitment to privacy is an integral part of our Code of Conduct, to which we all must strictly adhere. We do not disclose non-public information unless required to do so by law. We apply due care when processing and storing the information entrusted to us.

For more information, please refer in particular to the following documents, which are available on the Group Corporate Governance intranet page:

- EFG corporate values guide
- Group Business Code of Conduct
- Group General Directive: Know your Client and Anti Money Laundering
- Group General Directive: Advisory Services
- Group General Directive: Discretionary Management Services
- Group General Directive: Cross Border Activities
- Group Country Manuals
- Group General Directive: Doing Business in the United States
- Group General Directive: Common Reporting Standards
- Group General Directive: Tax Transparency
- Group General Directive: Handling of Client Complaints
- Group General Directive: Data Protection
- Group Policy: Information Security Policy

See also the Group training programme / online courses and related mandatory requirements for the various roles at EFG, which are available on the Group Training & Development intranet page.

# Combating financial crime

As part of the financial system, we are committed to preventing, detecting and reporting financial crime such as money laundering, terrorism financing, fraud, bribery and corruption as well as insider trading and market manipulation.

---

## **Money laundering and terrorism financing**

We are committed to assisting in combatting money laundering and terrorism financing to help preserve the integrity of the financial system and our operations. We are continuously updating and enhancing our internal rules and processes to achieve this objective.

## **Market abuse / insider trading**

We strictly prohibit any abuse of inside information (market manipulation) and have measures in place to ensure that our employees and members of our Board of Directors adhere to appropriate standards when handling inside information.

## **Fraud and cybercrime**

We consider cybercrime (and fraud more generally) as one of the greatest threats to our operations and therefore maintain our information and cyber security environments at the highest standards and constantly improve them. We also believe that training our employees is key to raising awareness of and helping prevent the risks of fraud and the associated consequences.

## **Strictly prohibiting bribery and corruption**

Bribery and corruption are not only against EFG values; they are illegal and can expose both the employee and the bank to fines and penalties, including imprisonment and reputational damage.

At EFG, bribery is never permitted. We will not seek to influence others, either directly or indirectly, by offering, paying or receiving bribes or kickbacks, or by any other means considered unethical, illegal or harmful to our reputation for honesty and integrity. Employees and representatives of the bank are expected to decline any opportunity which would place our ethical principles or reputation at risk.

For more information, please refer in particular to the following documents, which are available on the Group Corporate Governance intranet page:

- Group General Directive: Know your Client and Anti Money Laundering
- Group General Directive: Economic Sanctions and Embargoes
- Group Business Code of Conduct
- Group General Directive: Market abuse
- Group General Directive: Conflicts of interest
- Group General Directive: Fraud risk management
- Group General Directive: Anti-bribery and corruption

See also the Group training programme / online courses and related mandatory requirements for the various roles at EFG, which are available on the Group Training & Development intranet page.

# Managing conflicts of interest

We strongly believe that managing real and apparent conflicts of interest is important to protect our clients and the integrity of our operations.

---

We promote a culture at all levels of our organisation in which conflicts of interest are properly identified and resolved or managed. This includes prohibiting unacceptable forms of private interest, raising awareness of the circumstances in which conflicts can arise, building capacities to prevent conflicts of interest through training and ensuring effective procedures to resolve conflict-of-interest situations.

For more information on conflict-of-interest management, please refer in particular to the following documents, which are available on the Group Corporate Governance intranet page:

- Group Business Code of Conduct
- Group General Directive: Conflict of interest

See also the Group training programme / online courses and related mandatory requirements for the various roles at EFG, which are available on the Group Training & Development intranet page.

# Our employees

We recognise that private banking is a people business. We build our business around people, not products or services. Our employees represent EFG's most valuable asset in crafting our distinct competitive profile and achieving results.

---

At EFG, we promote collaboration and teamwork within and across various functions and teams. We all work towards a joint purpose and support each other in achieving the best possible outcomes. We treat each other with respect and have a sense of belonging to one firm, regardless of location, department or function.

We expect our employees to maintain high ethical standards, both in their work for the bank and in their personal affairs. Integrity and honesty are at the heart of our business.

Our corporate values clearly promote a safe working environment based on mutual respect for all our employees, free from any kind of harassment or discrimination, and where each employee's personal integrity is protected.

We strive to ensure that there is no discrimination on the basis of race, colour, gender, religion, age, national origin, disability, sexual orientation, or any other impermissible criterion or circumstance.

## **Equal opportunity employer**

EFG is a fair employer and adheres to high ethical standards. We strive to develop a workforce which reflects the diversity in our client base and the locations in which we operate. Professional development, advancement and compensation depend solely on ability, performance, behaviour and contribution to our success.

For more information, please refer in particular to the following documents, which are available on the Group Corporate Governance intranet page:

- EFG corporate values guide
- Group Business Code of Conduct
- Group Policy: Human Resources Policy
- General Directive: Psychological and Physical Harassment

## **Alert mechanisms (whistleblowing)**

By creating an environment of trust and maximum protection for our employees we want to encourage them to report in good faith irregularities they may come across; we believe this is important to help protect the integrity and reputation of our bank. We have put in place arrangements that ensure that any employees who wish to report irregularities in good faith are afforded the utmost confidentiality and greatest degree of protection possible against any retaliation or reprisals, whether actual or threatened, as a result of their action.

For more information on internal alert mechanisms, please refer in particular to the following document, which is available on EFG's intranet:

- Group General Directive: Whistleblowing

as well as to the reporting mechanisms established at the level of your local entity.

# Sustainability and responsible citizenship

We see ourselves as a member of the global community and strive to act as a responsible corporate citizen in various dimensions.

---

## **Sustainable and responsible investing**

At EFG, we believe that an economically efficient, sustainable global financial system is a necessity for long-term value creation, and we are therefore committed to integrating multiple sustainability dimensions into our financial activities and investments as a way to pair the financial return with environmental and social considerations. These approaches are not conflicting but mutually reinforcing and will eventually pay off in terms of our long-term, responsible investment approach and the clients for whom this is implemented, as well as being beneficial for the environment and society as a whole. To reach this goal, we assess the impact of the sustainability risk consideration in relation to the return generated by financial products and apply a Sustainable and Responsible Investment Policy that is published in the section of our website dedicated to Responsible Investing.

In addition, in our investment decision-making process we pay particular attention to environmental protection, the management of greenhouse gases and resources, and the prevention of other forms of pollution.

## **Social commitment**

Within our commitment to promoting human rights and fostering the development of an intellectually rich and diverse society, we support a variety of partners with whom we share the same interests and values: music, art, sport and social engagement. We consider many facets of life and society to be both fascinating and important. In particular, we provide financial support for projects run by Right To Play.

This international organisation is active in 15 countries and uses different forms of play to promote the holistic development of children facing adversity. Right To Play has pioneered a unique play-based approach to learning and development, focusing on quality education, gender equality, child protection, peaceful communities and health and well-being.

For more information on EFG's approach to sustainability and responsible citizenship, please refer to the following documents, which are available on EFG's intranet or its website

- Group policy: Sustainable and Responsible Investment Policy
- EFG's social commitment website

**EFG International AG**  
Bleicherweg 8  
8001 Zurich  
Switzerland  
Phone + 41 44 226 18 50  
Fax + 41 44 226 18 55  
efginternational.com  
© EFG International 2021

