

2022

LEONTEQ CODE OF CONDUCT & ETHICS



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1. INTRODUCTION

1.1 OBJECTIVE

Leonteq is committed to preserving its high legal, ethical and moral standards as well as a culture of strict compliance with local and international laws and regulations. In order to achieve a common understanding, we have summarized these standards in this Code of Conduct & Ethics (in short “Code”), which guides our everyday behavior, actions and decisions.

1.2 WHO DOES THE LEONTEQ CODE OF CONDUCT & ETHICS APPLY TO?

This Code applies to Leonteq AG and all its subsidiaries (all together “Leonteq”), all employees (all employees, consultants and temporary staff working for Leonteq, together “Employees”) of Leonteq and to the members of the Board of Directors.

2. CORPORATE VALUES

We are our culture. We shape and we develop it as it defines, guides and inspires us.

Leonteq’s corporate culture framework, including its vision, mission statement and values, has been collectively created and defined by Leonteq employees from across the company.

2.1 VISION & MISSION STATEMENT

With the vision to be the leading marketplace for structured investment solutions, it is our mission to deliver quality products and services to our partners and clients.

We achieve our vision and mission statement by living our core values, which shape the essence of our corporate culture. Our people come together every day with great passion and dedication to combine their expertise and deliver quality services for our company, our clients and our partners.

2.2 VALUES

Passion | We love what we do, take pride in our work, and are excited to be innovators in our field

Quality | We uphold professional excellence in everything that we do, creating sustainable relationships and driving innovation

Expertise | We are a team of experts; we trust our specialists, develop our teams and share our knowledge

Dedication | Our success is driven by committing to and focusing on our clients’ needs, professionally and in a solution-oriented manner

People Together | We believe in the power of collaboration between our employees, our clients and our partners, and we respect them for their values, knowledge and experience

3. BUSINESS ETHICS & LEGAL AND REGULATORY STANDARDS

3.1 COMPLIANCE WITH LEGAL PROVISIONS AND REGULATIONS

Employees shall comply with all applicable laws and regulations, including those applicable to a securities firm, which, inter alia, prohibit the misuse of inside information, inappropriate trading and market abuse activities and violation of the principle of best execution. They must also comply with organizational measures implemented in order to e.g., prevent the misuse of confidential and/or price-sensitive information and conflicts of interest and to ensure that such conflicts of interest are not to the detriment of the client’s interests.

3.2 CONFLICTS OF INTEREST

Leonteq has adopted a range of measures to prevent and manage conflicts of interest including, organisational and administrative procedures, training of Employees on an ongoing basis, implementation of appropriate escalation processes when identifying a conflict of interest.

3.3 INSIDER TRADING

Criminal and securities laws, financial services regulations and guidelines prohibit trading while in possession of non-public price sensitive information (including information with respect to initial or secondary public offerings) or enabling or encouraging or supporting others to trade based on such information. Such transactions and activities are strictly prohibited.

3.4 MONEY LAUNDERING & TERRORIST FINANCING

Leonteq is committed to the prevention of money laundering and terrorist financing, has implemented appropriate measures to prevent money laundering, terrorist financing or other criminal offences and has Money Laundering Reporting Officers (MLROs) in place.

3.5 GIFTS & ENTERTAINMENT

In order to reduce risks of bribery and corruption, Leonteq is committed to following strict rules and to doing business based solely on the quality of the products and services it offers and purchases, not on gifts or offers extended or accepted. Hence, Leonteq is committed to following strict rules governing gifts and entertainment.

3.6 DATA PROTECTION & PRIVACY

Leonteq is committed to protecting the confidentiality, integrity and availability of the information it uses to conduct business and takes all necessary technical and organizational measures according to applicable data protection and secrecy laws, to protect personal data against loss, alteration and against unauthorized collection, processing and disclosure.

4. HUMAN RIGHTS & SOCIAL RESPONSIBILITY

Leonteq is committed to upholding the international charter of human rights and the ILO core labor principles, and in doing so is especially committed to no child labor, no forced or compulsory labor, freedom of association and the right to collective bargaining, as well as equal remuneration and non-discrimination.

4.1 REMUNERATION AND CAREER

Appropriate remuneration is essential for employee satisfaction and loyalty, and Leonteq is committed to offering its Employees competitive compensation packages, challenging work, and an attractive opportunity for personal growth and career development.

4.2 HEALTH AND SAFETY

Employee health and safety is crucial at Leonteq. As an employer of a diverse group of individuals in a world that is constantly changing and posing new risks, Leonteq considers it its duty to look after the health and safety of its Employees.

4.3 DIVERSITY AND INCLUSION

Leonteq is committed to supporting its Employees and acts consciously about their individual needs and personal circumstances. Leonteq is committed to ensuring equality of human beings at all time regardless of race/ethnicity, gender, national origin, age, disability, sexual orientation or religion.

4.4 HARASSMENT AND DISCRIMINATION

Leonteq has a zero-tolerance policy on harassment and discrimination and is committed to the principle of offering its Employees and applicants equal opportunities in accordance with the laws and regulations applicable in the relevant jurisdictions, and to protect their personal integrity at the workplace.

5. ENVIRONMENTAL RESPONSIBILITY

Leonteq is committed to using processes that comply with the environmental laws and regulations in force in the countries in which it operates as well as to reduce the environmental impacts of its activities and help to protect the earth and our climate. With the growth of its business, Leonteq is making efforts to reduce its environmental footprint by controlling and minimizing the impacts of its activities on the planet.

6. RESPONSIBLE INVESTMENT

Leonteq is committed to integrating environmental, social and governance factors into its product and service offering. Particularly, offering innovative solutions for different clients' needs, creating awareness of ESG, remaining on top of trends and risks and offering opportunities deriving from ESG as well as transparently reporting about ESG aspects in its products.

7. UPHOLDING OUR CODE

Leonteq is committed to upholding its legal, ethical and moral standards in all its activities. At the same time, the company recognizes that shortcomings can occur, and it has tools and sanction procedures in place to report and manage any such breaches.

Included in these efforts is Leonteq's whistleblowing system, which is available for Employees to anonymously report any issues, organizational shortfalls, misbehaviors of fellow workers, breaches of internal or external regulations, indications for other criminal offences in- and outside the company and the like.

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