



Vendor / Service Provider Code of Conduct

1 Introduction

This Vendor / Service Provider Code of Conduct («Code of Conduct») outlines Habib Bank AG Zurich's («the Group») expectations of third-party vendors / service providers («VSPs») that conduct business with, provide goods and services to or act on behalf of the Group and its branches, subsidiaries and affiliates. The Group expects its staff members and its VSPs to be aware of, understand and comply with the principles of this Code of Conduct.

The Group is committed to conducting its business activities ethically and in accordance with applicable laws and regulations and the highest professional standards. It requires that its VSPs comply with all applicable laws, regulations and standards of the jurisdictions they operate in. VSPs must also require their subcontractors to meet the relevant standards set out in this document.

This Code of Conduct shall be considered in the context, size and nature of the respective VSP businesses, the goods and services provided, and the jurisdictions in which they operate.

2 Key principles

VSPs are expected to have in place written policies, governance and oversight mechanisms to ensure that they and those within their supply chains, operate lawfully and in accordance with the highest standards of ethical business conduct, integrity and the principles set out below.

2.1 Responsible treatment of workers

Principle	Conduct expected from the VSPs and their supply chain partners
Workplace safety, security and health	<ul style="list-style-type: none">adhere to applicable safety laws and regulationsimplement measures to provide a safe working environment with a view to minimizing health and safety risks and supporting accident prevention for all staff members
Employment standards	<ul style="list-style-type: none">comply with applicable employment / labor lawsprovide terms of employment setting out rights and obligations in a manner that can be readily understood by all staff members)
Diversity and inclusion	<ul style="list-style-type: none">observe laws that prohibit discrimination based on gender, race, ethnicity, sexual orientation, age, disability or any other legally protected statusactively define and promote a culture of inclusion throughout the businessmonitor, measure and identify scope for improvement on an ongoing basisprovide genuinely equal of opportunity for employment, skill development and career advancement
Avoidance of discrimination and harassment	<ul style="list-style-type: none">prohibit discrimination, harassment and violence in the workplace or any other form of inappropriate behavior or abuse on any groundspromote diversity, equity, inclusion and accessibility



Principle	Conduct expected from the VSPs and their supply chain partners
Whistleblowing	<ul style="list-style-type: none"> ▪ ensure that concerns with regard to potential breaches of laws, rules and regulations or compliance policy raised in good faith are handled in an appropriate manner and the underlying issues are rectified as necessary ▪ have formal policies and processes in place to protect staff members who report conduct that they reasonably believe amounts to a violation of laws, regulations, codes of ethics or other professional standards ▪ ensure that staff members may express any such concerns without fear of retaliation

2.2 Human rights and fair labor practices

Principle	Conduct expected from the VSPs and their supply chain partners
Human rights	<ul style="list-style-type: none"> ▪ abide by policies that respect human rights in accordance with applicable laws and in the spirit of human rights principles ▪ prohibit the use of any illegal or unethical form of employment, such as slavery, servitude, forced labor, human trafficking and child labor within their operations and supply chains ▪ have appropriate due diligence procedures in place to identify and manage human rights considerations within the supply chain
Fair labor practices	<ul style="list-style-type: none"> ▪ ensure that <ul style="list-style-type: none"> - all workers are entitled to work and be paid for a minimum number of working hours - working hours are not excessive - maximum working hours comply with national laws ▪ pay fair wages commensurate with statutory minimum wages, prevailing industry conditions and without undue or unauthorized deductions ▪ apply clear and consistent disciplinary and grievance procedures that include provisions prohibiting mental, physical or verbal abuse and protect workers against retaliation

2.3 Sustainability and local development

Principle	Conduct expected from the VSPs and their supply chain partners
Sustainable practices and climate change	<ul style="list-style-type: none"> ▪ comply with all environmental protection laws and regulations ▪ commit to environmentally responsible business practices (including responsible use of natural resources, sustainable use of water, and supporting biodiversity) ▪ establish operational practices that minimize the impact on the environment and deploy measures to prevent and reduce harm to the environment ▪ establish improvement programs to address significant environmental impacts ▪ define management procedures to support ongoing improvement of environmental performance and policy implementation
Local development	<ul style="list-style-type: none"> ▪ develop corporate social initiatives designed to improve the social and economic conditions of local / regional economies ▪ avoid activities with negative impacts or detrimental consequences to local communities

2.4 Responsible business practices

Principle	Conduct expected from the VSPs and their supply chain partners
Risk management	<ul style="list-style-type: none"> ▪ establish appropriate measures to identify risks that are aligned with the principles specified in this Code of Conduct ▪ implement appropriate controls to mitigate the identified risks



Principle	Conduct expected from the VSPs and their supply chain partners
Monitoring and enforcement	<ul style="list-style-type: none"> conduct periodical audits to ensure the highest level of business ethics, integrity and honesty ensure prevention and timely correction of non-compliance and implementation of improvements, as required
Downstream monitoring	<ul style="list-style-type: none"> perform effective due diligence for downstream suppliers, subcontractors and other supply chain participants to ensure that their standards are monitored as part of their own supplier code of conduct
Supplier diversity	<ul style="list-style-type: none"> commit to inclusive procurement practices to advance equitable opportunity for diverse businesses encourage supplier / subcontractor diversity within the extended supply chain
Protecting information and assets	<ul style="list-style-type: none"> comply with all applicable privacy and data protection laws and regulations and implement appropriate security policies to protect personal data notify the Group immediately of any unauthorized use, access or disclosure (whether actual or suspected) of the Group's information and data protect and treat confidentially as agreed any Group-related information or data and not be used, shared or disclosed except to the extent necessary to carry out obligations and business activities with the Group or required to be disclosed under applicable laws or regulations use the Group's assets (data, systems, equipment, premises etc.) only for the purpose authorized by the Group. have policies and procedures in place for the proper use, handling and protection of all information and data accessed in the course of business dealings with the Group
Publicity	<p>VSPs shall refrain from commenting publicly about the Group, its business or their business relationship with the Group. This includes specifically:</p> <ul style="list-style-type: none"> publicly disclosing their business relationship with the Group using any Group brand elements in their marketing or publicity without its prior written consent speaking to the media about matters concerning the Group or their business relationship with it (all such media inquiries must be directed to the Group's Senior Management) comment disparagingly in public about the Group

2.5 Business ethics and compliance

Principle	Conduct expected from the VSPs and their supply chain partners
Compliance with laws and regulations	<ul style="list-style-type: none"> comply with applicable laws and regulations respond fully to information, compliance and audit requests
Conflicts of interest	<ul style="list-style-type: none"> do not engage in any outside activities that are inconsistent, incompatible or appear to conflict with the ability to exercise independent / objective judgment promptly disclose to the Group any matters that could pose a potential, perceived or actual conflict of interest
Anti-corruption	<ul style="list-style-type: none"> comply with applicable anti-corruption laws and regulations refrain from any conduct that could associate the Group with a violation of anti-corruption laws
Anti-money laundering and sanctions	<ul style="list-style-type: none"> comply with applicable anti-money laundering laws and regulations refrain from engaging in any activities that may facilitate, result in or be perceived as money laundering do not directly or indirectly deal with restricted parties or sanctioned countries in connection with dealings with the Group
Insider trading	<ul style="list-style-type: none"> ensure that information barriers are in place to prevent buying, selling or tipping information about securities based on inside information



3 Non-compliance

VSPs are expected to continually self-monitor their compliance with this Code of Conduct, adopt management systems to adhere to it, and to immediately inform the Group of any non-compliance. More specifically, VSPs shall immediately inform the Group of any instances, suspicions and grievances related to child labor. Notification to the Group shall be performed using the contact information in Section 5.

In the event of violations of the principles set out in this Code of Conduct, a specific improvement plan must be submitted and implemented promptly. If the Group is of the opinion that a violation cannot be remedied within a reasonable period of time, it reserves the right to draw up and implement a concept with specific measures, responsibilities and milestones in order to minimize potential risks. The Group further reserves the right to suspend the business relationship during the implementation of the concept.

The Group reserves the right to immediately terminate its relationship with business partners who repeatedly and knowingly violate this Code of Conduct or refuse to implement improvement plans.

4 Due diligence & periodic updates

The Group engages to conduct appropriate due diligence before entering into relationships with VSPs and reserves its right to carry out a due diligence assessment to verify compliance with this Code of Conduct. This may include monitoring through self-assessments, questionnaires and other due diligence tools. VSPs identified as high risk may be subject to on-site visits.

The key principles outlined in this Code of Conduct may be periodically updated to reflect changes in laws, regulations and industry standards.

5 Contact information

For questions, concerns or to report violations of this Code of Conduct, please contact Uzma Murshed, Head of GROUP OPERATIONAL RISK (Tel: +971 (04) 3870700 Ext. 3285 – email u.murshed@habibbank.com).