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Banque Cantonale Vaudoise (BCV) is a full-service bank with strong ties to Vaud Canton. As one of Switzerland’s cantonal banks, our corporate mandate is to foster the development of all sectors of the Vaud economy and to help finance the Canton’s public-sector organizations. We also help to meet demand for mortgage lending in the Canton, and we pay particular attention to the principles of economically, environmentally, and socially sustainable development in everything we do.

1. Introduction

1.1 Objectives
The aim of this code of professional conduct is to ensure that all BCV Group employees are aware of the behavior that is expected of the company as a whole, the governing bodies and each and every staff member. As such, it is a reference document for BCV. The principles it contains are applicable to any action or decision taken in a professional context.

1.2 Scope
The values and principles set out in this code of professional conduct incorporate the ethical rules governing the banking profession, the core values of BCV Group and the other corporate values that BCV Group deems of particular importance.

This entire document applies to all governing bodies and all temporary and permanent staff members of all BCV Group entities.

1.3 Adherence
All members of the governing bodies and all BCV Group employees must adhere to the principles and rules set out in this document. In so doing, they demonstrate that BCV’s corporate culture is rooted in compliance with the rules of conduct, BCV Group’s core values and the other corporate values deemed particularly important to BCV Group.

1.4 Responsibilities and oversight
Each member of a governing body and each employee of BCV Group is personally responsible for familiarizing themselves with the rules set out in this code of professional conduct and for applying these rules when carrying out their tasks and professional responsibilities.

Managers must ensure that employees under their responsibility are aware of and fully understand the code of conduct, and must oversee its application. Managers must pay particular attention to new staff members, making sure that they are fully integrated into the team and that they adhere to BCV Group’s ethical principles and values.

Sanctions and other measures, as provided for in the Staff Regulations, will be taken against employees who violate the principles set out in this code of conduct, whether intentionally or through negligence.

The Compliance Department within BCV Group’s parent company should be consulted on all matters relating to this code of professional conduct. The Compliance Department ensures that this document is distributed, provides assistance regarding its interpretation and implementation, and recommends amendments and additions.

1.5 Commitments of the governing bodies

BCV Group’s Board of Directors and Executive Board unreservedly endorse the principles and rules of conduct set out in this code of professional conduct and undertake to ensure that all members of both boards, as well as all BCV Group employees, act in accordance with the principles and rules contained herein.

BCV Group’s Board of Directors and Executive Board are ultimately responsible for promoting this code of conduct and ensuring it is complied with on a daily basis. Each BCV Group entity has the authority to manage implementation and determine internal responsibilities and oversight procedures.

The Board of Directors and Executive Board of BCV Group
Lausanne, June 2018
2. Professional ethics

Members of the governing bodies and employees must behave in accordance with all rules and duties applicable to the banking profession.

2.1 Compliance
BCV Group constantly analyzes its strategic decisions, internal operating framework and day-to-day business activities to ensure that they comply with the law, external and internal regulations, and the ethical standards set out in this code.

We keep ourselves informed about the laws and regulations that are important to the work we do. If we have any doubts about the procedure to follow or about our understanding of a standard, we refer to our line manager or consult an expert.

2.2 Knowing clients and identifying their needs
Client relationships are built on trust. A business relationship can only be entered into if the client’s identity has been fully determined and if there is no doubt as to the legality of the operations that the client wishes to conduct. Knowledge of the client is monitored throughout the business relationship, especially when changes occur in their personal or financial situation. A client’s needs and goals, financial capacity, risk appetite and knowledge must be taken into account when providing them with advice or opinions and offering services.

We always seek to fully understand our clients’ characteristics and expectations and keep a record of them.

2.3 Due diligence regarding financial crimes
BCV Group works to combat money laundering and the financing of terrorism and applies economic sanctions aimed at individuals or activities linked to certain countries. Particular attention is paid to unusual behavior and behavior that may be indicative of money laundering.

When there are doubts about the legality of a client’s transaction, we clarify the economic background and, where necessary, report the situation to our line manager or consult with Compliance.

2.4 Transparency towards clients
When offering accounts and services to clients, open, constructive and transparent information must be provided on the potential risks of their transactions and on the terms and conditions of the accounts and services being offered.

We are mindful of our clients’ expectations and make sure they can make fully informed decisions.
2. Professional ethics

2.5 Identifying and managing conflicts of interest
For the purposes of loyalty and integrity, BCV Group watches out for potential conflicts of interest and goes to great efforts to identify and prevent such conflicts. If, despite these efforts, a potential conflict of interest cannot be fully ruled out, all appropriate measures are taken to manage such conflicts effectively and with the necessary transparency.

Using confidential information about BCV Group, our clients or third parties obtained in a professional capacity for personal means or for a third party is prohibited and may constitute a criminal offense.

In addition, BCV Group prohibits any act that could be deemed active corruption (i.e., corrupting) or passive corruption (i.e., allowing oneself to be corrupted) in the context of one's professional activities.

We make sure that privileged information remains confidential and prevent such information from being misused in a way that could lead to insider trading.

BCV Group employees are not allowed to give or receive any gifts or other benefits that are not consistent with BCV Group policy.

2.6 Privacy and personal data protection
By strictly complying with preventive measures, we can stop non-public information about BCV Group and our clients and employees from being disclosed. To earn their trust, both clients and employees must be guaranteed full confidentiality in accordance with the law and established practices. No information about a client’s identity or relationship with BCV Group may be given to third parties without the client’s consent, unless authorized or required by law or by a court order.

When the collection of personal data concerning clients or employees is required by law or by the circumstances, those data must be handled in compliance with data protection requirements.

Appropriate organizational and technical procedures are in place to prevent documents and records from being viewed, used, modified or destroyed by unauthorized persons.

We help to prevent data from being leaked by complying with rules aimed at protecting data that could be used to identify clients. We do not discuss confidential details about our clients with third parties or provide such information to them.

2.7 Fair competition
BCV Group observes fair competition rules with regard to competitors. Our relationships with clients and other partners are conducted in accordance with regulations governing cartels and unfair competition.

We do not disparage our competitors; our commitment to quality and our professionalism are what set us apart.

2.8 Cooperating with the authorities
We cooperate constructively and transparently with the authorities. We provide information that allows them to have a true and fair view of our company.

We remain informed of the major laws and regulations affecting our business. We also ensure that they are properly implemented and that we are always readily available to answer any questions the authorities may have.
2. Professional ethics

2.9 Corporate governance

BCV applies corporate governance standards and best practices, clearly setting out the responsibilities of each governing body and committee, and regularly communicating relevant information to shareholders and other stakeholders.

We are constantly reviewing our organizational structure and the information we provide, in line with the requirements and development of our business.

Our aim is for corporate governance at BCV to become a benchmark for other regional, full-service banks. One of the key missions of our governing bodies is to constantly adjust our organizational structure in order to keep pace with new requirements and manage the Bank in the most effective manner.

2.10 Staff training and development

BCV Group and the external providers with which we work offer many professional, individual and managerial training opportunities.

As employees of a company that puts a premium on training, we are always looking to expand our knowledge and develop our skills. We are committed to taking the specific training courses related to our work in order to meet the evolving needs of our profession and respond to new challenges.

We aim to flawlessly fulfill our function and grasp opportunities to enhance our versatility and our knowledge, thereby helping the Bank to achieve its goals.

We also put our expertise to work for our colleagues’ development.

2.11 Health and safety

BCV Group as a whole and each individual employee seek to create a healthy working environment that complies with safety standards and with laws aimed at preventing accidents and work-related illnesses.

Our working environment is pleasant and adapted to our needs. We are aware of the procedures to follow in the event of a health or safety incident.
3. BCV’s core values

We have defined four values that are central to our strategy and culture: responsibility, performance, professionalism, and close ties with our clients and the broader community. These values are key to our long-term success and to ensuring customer satisfaction.

3.1 Close ties
Our employees use their on-the-ground presence in Vaud Canton and their knowledge of the local community to fully appreciate and understand the needs and expectations of our customers.

We seek to put ourselves in our clients' shoes and view the situation from their perspective.

3.2 Professionalism
Every employee is committed to delivering the best possible service to customers. To achieve this, they draw on the best practices in their respective fields of expertise and constantly seek to expand their skills and knowledge.

Our staff are committed to providing excellent customer service and delivering the right solutions.

3.3 Performance
At BCV, we set ourselves ambitious goals across the board. Our employees are results-oriented. They systematically seek pragmatic and effective solutions to the challenges that arise every day.

We are always looking to surpass ourselves and stay one step ahead of our competitors.

3.4 Responsibility
BCV employees demonstrate responsible professional behavior. This includes taking responsibility for their actions, being conscientious in their work and being loyal to the company.

We are aware of and mitigate the risks relating to our activities and our function.
Our activities are guided by our corporate values. Those of particular importance to BCV Group are sustainable economic development, protecting the environment, social responsibility, mutual respect, and equal opportunities.

4.1 Helping to ensure sustainable economic development

BCV Group contributes to the development of all sectors of the economy of our home region, the Canton of Vaud, and to the financing of public-sector entities, and helps to meet demand for mortgage lending in the Canton. Our commitment to sustainable economic development implies a commitment to the community in which we operate. As such, we have adopted a long-term business development strategy and aim to play a key role on the Swiss banking scene and to be a leading player in the local economy.

We offer our clients sustainable financing and investment products that meet their financial planning needs.

4.2 Protecting the environment

We make business decisions and manage resources based on their environmental impact. We support employees who wish to get involved in protecting the environment.

We are economical in our use of paper, and we recycle waste. We try to use public or shared transport.

4.3 Social responsibility

Members of the governing bodies and all our employees act in a socially responsible manner and are committed to contributing to the well-being of the local community we serve.

Within BCV Group, the working environment reflects our status as a benchmark employer. We encourage employees to enhance their skills through appropriate professional training, foster integrated knowledge management, promote a performance-based culture in the workplace, and recognize the contribution made by each and every employee.

More broadly, BCV’s mission as a cantonal bank means that our employees’ actions should have an impact on all aspects of life in Vaud. We are involved in numerous organizations and support multiple initiatives, making us an integral part of the economic, social, sporting and cultural fabric of the Canton.

We serve our community by volunteering for local causes, typically carried out in association with charities and NGOs.

Our social responsibility is reflected in our support for humanitarian initiatives, our involvement in cultural, sporting and outreach projects, and the reports we draw up on various sectors of the local economy with a view to enhancing understanding of the local market.
4. Other corporate values

4.4 Trust and mutual respect
BCV Group works to ensure that work relations are built around trust and mutual respect. We work together and share information between business units in order to achieve our common goals.
In the event of a conflict, we seek to find a solution that takes account of the interests of both parties.
All forms of psychological or sexual harassment are prohibited and punishable.

We are open to dialogue and seek to create a real team spirit that allows each member to have their say and get involved in any ongoing projects.

4.5 Non-discrimination and equal opportunities
We respect each other’s differences, and any discrimination on the grounds of a person’s gender, origin, beliefs, age or disability is prohibited.
All of our employees, regardless of gender, have equal opportunities in terms of job prospects, compensation and promotions.

We help to create a working environment in which differences are respected, and qualifications, skills and achievements are valued.

5. Complaints and whistleblowing

Any behavior, event or incident deemed in good faith to be sufficiently serious to constitute a violation of the law, external or internal regulations, or the rules set out in this code of professional conduct must be reported immediately.
Such behavior, events or incidents should, as a general rule, be reported to the line manager, who is required to monitor the situation and inform their superiors where necessary. In exceptional circumstances in which the usual reporting channel (i.e., the line manager) cannot be used – e.g., if the person reporting the incident is concerned about the threat of reprisals or other retaliatory action – they may inform the Compliance Department of any violations that he or she believes in good faith are sufficiently serious.
Reports of such violations cannot be filed anonymously. However, the identity of the reporting person can be kept confidential to prevent any harm from being caused to them as a result of them filing a report.

BCV Group encourages its employees to report potential violations and prohibits any form of retaliation against them. Whistleblowing is also encouraged.