



# Code of Conduct

Effective as of January 1<sup>st</sup>, 2022



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# SIX Code of Conduct

The SIX Code of Conduct sets the values and principles that we as employees follow in our interactions with each other and with our stakeholders such as customers and other business partners, our shareholders and the regulatory authorities. It forms the basis for our behavior and for the public image of SIX.

We expect and foster in our company a culture of openness and mutual trust and the courage to take responsibility. By acting with integrity, all employees throughout the Group help to reduce or avoid risks for SIX. In this way, everybody makes a contribution to the long-term success of SIX.

All SIX employees adhere in their daily work to the values and principles defined here. Our members of management live up to these values and principles and ensure compliance with them. This enables us to protect and strengthen our reputation. The Code of Conduct is binding for all employees and members of the Board of Directors of SIX worldwide.

# Principles

## CONTRIBUTION TO THE STABILITY AND ATTRACTIVENESS OF FINANCIAL CENTERS

SIX provides services in the securities, payments and financial information business. We make a significant contribution to the stability, appeal and competitiveness of the financial centers where SIX provides financial market infrastructure and assume our responsibility accordingly. Our behavior and actions have a direct impact on how the industry is perceived in public. Our employees and managers are aware that they represent the company and therefore act accordingly.

A disruption to our infrastructure could cause massive damage not only to SIX but also to respective financial centers and national economies within a very short time. We therefore make sure that our systems are stable and function without any disruptions, and we continually develop new and innovative services. Through our daily action and planning, we make an active contribution to the long-term competitiveness of financial centers we operate in.

## COMPLIANCE WITH THE LAW

We operate within the laws and regulations of the countries in which we operate and within the framework of our own internal directives and regulations. The purpose is not only to ensure the legality of our actions, but also to do the right thing. We constantly ask ourselves if our actions are in keeping with the principles of behavior of this Code of Conduct. We maintain an open, transparent and cooperative relationship with public authorities and we assume our responsibility as a global player in the financial market.

SIX respects internationally recognized human rights and supports compliance with these rights. In particular, we have no tolerance for forced, slave or child labor or any other form of exploitation. With our transparent way of doing business and our Code for Suppliers, we promote respect for these fundamental rights across our entire value-added chain.

→ *In our daily work, we should constantly ask ourselves whether our actions are morally and ethically correct: "Am I doing what's right?" In our compliance trainings, employees learn more about the most important laws for them and deepen their knowledge of the rules that apply at SIX. If there is any uncertainty, Compliance will be happy to help.*

## REPORTING MISCONDUCT

SIX does not tolerate any violation of applicable laws or internal rules. Employee reports on misconduct are an important tool for exposing wrongdoing in the workplace and protecting SIX from risk. In addition to measures such as controls and trainings, it also requires the courage of our employees to openly address wrongdoing and to report any compliance concerns in order to detect and prevent misconduct. Employees who report compliance concerns in good faith have nothing to fear, as they are acting correctly and in the interests of SIX and of all our employees.

## SANCTIONS FOR VIOLATIONS OF THE CODE OF CONDUCT

Violations of this Code of Conduct could result in sanctions. This may include both disciplinary employment measures (including dismissal) and, depending on the circumstances, criminal proceedings. This applies not only to employees who are accused of having violated mandatory rules, but to all those who know of a specific instance of misconduct and tolerate this (for example, as a member of management) without reporting it. SIX has high standards for members of management particularly in this regard.

→ *Misconduct and wrongdoing can be reported directly to management, Compliance, Human Resources, or on our internal reporting platform. Reports can be submitted anonymously via this platform, which is available to all employees worldwide.*

→ *If you are unsure whether a certain behavior is appropriate, please contact your line manager. Compliance is also available to answer your questions. If an employee would like to ask a question anonymously, this can be done at any time via the SIX internal reporting platform.*



# Integrity

## COMBATING MONEY LAUNDERING AND TERRORIST FINANCING

SIX does not tolerate any form of money laundering or terrorist financing and complies with all relevant economic and financial sanctions. Through their integrity and compliance with due diligence, all employees help prevent illegal activities. In addition, we have systems and processes in place to detect and prevent economic crime. SIX never engages in dubious transactions.

## HANDLING CONFLICTS OF INTEREST

Both SIX and all our employees make potential conflicts of interest transparent or avoid them whenever possible. Such a conflict can arise when personal interests or related third parties are involved in a business situation. An open and proactive approach to conflicts of interest serves the long-term interests of the company.

## CORRUPTION

SIX does not tolerate any form of corruption. We always make our business decisions on the basis of economic facts in order to avoid even the appearance of bribery or corruption. It can happen, however, in everyday business that small gifts, invitations and other benefits are offered, or we may ourselves offer some such benefit. SIX wants to ensure that gifts, invitations and benefits stay within reasonable limits and are in keeping with the law and that our employees who are affected are protected. We have therefore implemented clear rules of conduct for receiving and giving gifts, invitations and other benefits.

→ *We always question our actions and our own motives in our day-to-day business. If you find yourself in a conflict of interest, you must disclose it immediately. If necessary, decisions must be delegated to a colleague who is not involved in the issue. Compliance can offer support in these often difficult situations.*

→ *Any gifts, invitations and other benefits that are received or offered are to be disclosed in accordance with the directives of SIX. In internal training sessions, employees also learn how to behave in these situations and how to make the right decisions. In case of doubt, we refrain from accepting or giving gifts, invitations or other benefits.*



## HANDLING OF INSIDER INFORMATION

In our daily business, we process confidential, price-sensitive information in many areas. SIX requires all employees and members of management to handle this data carefully and responsibly. This information is used for business purposes only and we do not tolerate any improper own-account trading. We have put in place strict measures to prevent and detect insider transactions.

## DONATIONS

As a company that operates globally, we believe we have a responsibility towards society as a whole and to the communities in which we are located. We make donations for the environment and social issues, supporting organizations that, based on their stated purpose, supplement our own corporate responsibility. SIX makes donations on a voluntary basis, without expecting any consideration in return. In doing so, we always comply with the framework of the respective legal system and act in accordance with the applicable internal regulations.

→ *There are reporting obligations, transaction limits and even transaction bans for some employees. Our internal directive definitively states who is subject to these provisions. If there are any questions nevertheless, Compliance will be glad to help.*

→ *For additional questions on our corporate responsibility, please contact Marketing & Communications.*



# Competition

## PROPER COMPETITIVE BEHAVIOR

We are aware of our system-relevant function as infrastructure provider, and therefore avoid any suspicion of discriminating against customers, competitors or business partners. Price-fixing, restrictions on services offered, discrimination and all other forms of unfair competitive behavior will not be tolerated by us. SIX is committed to competition and the free play of market forces as the fundamental principles of the legal and economic systems found in all countries where we operate.

→ *It is not always easy to recognize anticompetitive behavior. If you need any help or advice, please contact the Legal department.*

## COOPERATION WITH BUSINESS PARTNERS

SIX is very closely linked organizationally and technically with the financial centers it operates in. We provide many services jointly with financial institutions or with specialized business partners, which leads to complex exchanges of processes and demanding legal relationships. We treat all customers, business partners, competitors and suppliers fairly, and we cultivate honest and transparent business relationships with them.

The selection of our business partners takes place in a regulated process, ensuring transparency and fair treatment of all potential partners. We expect that our business partners maintain the same standards that apply for all SIX employees and that they comply with all laws and regulations. We refrain from working with partners who do not meet these strict standards. Our suppliers undertake to comply with fundamental social rights and principles on the basis of the SIX Code for Suppliers.

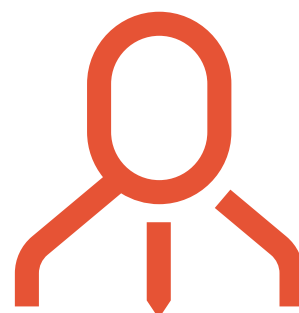
## PROTECTION OF INTELLECTUAL PROPERTY

SIX respects the property rights of others for products, publications and software, such as patents, copyrights and brand rights. If we want to use the intellectual property of others, we always obtain a licence from the rights holders. We treat our own intellectual property with care and protect it from misuse by third parties.

## INNOVATION

Success in today's competitive environment requires initiating developments on the market and actively help shape them. SIX therefore encourages new ideas and innovations in the company. In order to offer our customers efficient solutions and services, we closely collaborate with start-ups, universities and other strategic partners. To remain internationally competitive as well, SIX must stay one step ahead of the global competition. Innovation is the engine that keeps us alive and constantly evolves our business.

→ *The Legal department will be glad to help you with any questions regarding intellectual property and licences.*



# Information Security

## DATA PROTECTION

Our activity as an infrastructure provider for securities, payments and financial information requires us to obtain and process a large amount of data. Thus, data protection is a central issue for us. The basic principle is that wherever data is processed, a high level of data protection and security must be guaranteed. This applies to data from customers and business partners as well as to employee data. Because privacy is above all protection of the person. That's why we attribute such a high priority to compliance with the applicable laws and to protecting privacy and the private sphere of affected persons in order to adhere to national and international legal requirements. For us, this is the basis of a trusting business relationship and the prerequisite for an excellent reputation.

## CYBER SECURITY

The threat of cyberattacks is a major risk and one that SIX takes very seriously. In particular, this has to do with the ongoing functioning of our systems, maintaining our reputation as a reliable service provider. With strict security guidelines and a strong cyber-defense, we protect assets such as data centers, confidential information and our property as well as that of third parties.

→ *In our directive on data protection, we have defined clear guidelines for processing personal data. With this directive, we set a Group-wide data protection and data security standard in our company and regulate the exchange of data between our Group companies.*





# Corporate Culture

## SIX SPIRIT

The SIX Spirit is the expression of our corporate culture. Four values shape our image and guide our actions: Customer Focus, Collaboration, Ownership and Trust. We expect and foster a client-oriented way of thinking and working in all areas. We encourage our employees to take the initiative, to try something new and take responsibility. Every day, we stand for a culture of openness and mutual trust.

## COMMUNICATION AND OUR IMAGE

Our relationships and our communication are characterized by appreciation and authenticity. We promote an open and constructive dialogue with our employees, customers and partners as well as with the media, associations and public officials. We provide information on a timely and transparent basis. Our uniform corporate design enables the SIX brand and our values to be consistently presented and perceived. This creates trust and is an important prerequisite for our reputation.

→ *As employees of SIX, we represent the company. We are therefore careful in our communication in public and on social media. If you are unsure whether and how something can be communicated externally, Marketing & Communications can provide answers and support.*

## CONTINUOUS LEARNING AND DEVELOPMENT

The knowledge and potential of every employee forms the basis for the success of SIX. We create an attractive working environment that encourages in our employees new ways of thinking, personal growth and continuous learning. Everyone takes responsibility for their own personal development. Our members of management are encouraged in particular to create an environment that opens up perspectives for development. We promote a culture that rewards courage, appreciates experimentation and enables constructive feedback. We want our employees to identify with SIX.

→ *SIX offers a platform for customized, flexible and continuous learning. The emphasis is on on-the-job development possibilities, supplemented by specific training sessions as well as external courses and further education.*



## HEALTH AND SAFETY

SIX attaches great importance to protecting and promoting the health and well-being of our employees. Health promotion in the company and safety on the job are therefore crucial issues for us. We provide ongoing training courses, prevention services and information campaigns to draw attention to these topics and motivate all employees to actively participate. Risks and dangers to health and well-being should be identified, minimized or eliminated as soon as possible.

## SUSTAINABILITY

Our business and our company are geared towards sustainability and longevity. This means that we are committed to a clear ESG strategy on corporate and business level, and we comply with applicable laws and standards.

## DIVERSITY AND EQUAL OPPORTUNITY

SIX stands for equal opportunity. We create an environment in which people are appreciated for their contribution, regardless of hierarchy, country of origin, ethnic background, gender, nationality, age, sexual orientation, physical abilities or religion. Fair and respectful interaction – free from discrimination, harassment or reprisals – is anchored in our values and forms the basis for a healthy and inspiring work environment. We actively promote diversity as part of our ESG strategy in our teams, as it is our firm conviction that diversity will generate new ideas, innovative approaches and growth in general. Together we can achieve more.

→ Together with third parties, SIX makes available various offers for promoting health, preventing illness and counseling for employees. You can find out more on our intranet.

→ You can find out more about our commitment in the SIX Corporate Responsibility Report. If you would like to get more involved, please take part in the numerous social engagements of SIX.







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# Rules of BME regarding SIX Code of Conduct

SIX Code of Conduct is binding for all employees of BME with the following amendments and reservations:

## 1. Principles – Compliance with the Law

The following is applicable at BME:

“BME expressly declares that it will never benefit from the unlawful conduct of a director, legal representative, officer or employee, even if the latter believes that he/she may benefit the Group.”

## 2. Accounting and tax obligations and internal controls

The following is applicable at BME:

“The financial and fiscal information of the BME Group will be prepared with reliability and rigour, respecting the applicable rules and standards in this area. All internal control procedures established by the Group to ensure proper accounting for transactions and their proper reflection in the financial information published by the Group shall be complied with.

In particular, in its tax action, the BME Group will be governed by the following principles:

- (i) Respect and compliance with the regulations in force, satisfying the taxes that are required by law.
- (ii) The adoption of decisions on tax matters, which are enforceable in accordance with the law, relating to the business, operations and activity of the Group, as well as the situation and state of its assets, functions and risks.
- (iii) Full clarity, consistency and transparency with regard to the criteria adopted in tax matters and the reasons for them.
- (iv) Transparency, mutual trust, good faith and loyalty in the relations that the Group maintains with the competent tax authorities.

Finally, those subject to the Code will avoid any conduct aimed at defrauding amounts owed to the Tax Administration, Social Security or any other public body, as well as obtaining any type of advantage, tax or social benefit or subsidy in a fraudulent manner.”

### **3. Rules for the use of BME assets**

The following is applicable at BME:

“The Subjects to the Code shall ensure that the assets of the BME Group are not impaired. To this end, they shall respect the following rules in their use (i) they shall protect and safeguard the assets in their possession or to which they have access by complying, where appropriate, with the internal control procedures established by the BME Group to protect such assets; (ii) they shall not make any disposal of or encumber such assets without appropriate authorization; and (iii) they shall ensure that expenditure is incurred strictly in accordance with the requirements of their business.”

### **4. Property management**

The following is applicable at BME:

“The Subjects to the Code who perform functions, have responsibilities or hold powers within the BME Group for the management of property may not undertake any construction, demolition or remodeling work, etc., without having obtained the relevant licenses and authorizations.”



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