



# **Code of Conduct**

**Open Energy Platform AG**

March 2026

## A message from management

Everything we do is guided by the principles of quality, transparency and cost-consciousness. High customer satisfaction is no less important to us than an environment that provides motivation for all employees. Adhering to laws and regulations is just as much a matter of course for us as a sustainable approach to the environment. This present code of conduct applies to OpenEP's employees and bodies in their interactions with each other and with business partners.

Zurich, March 2026



Romeo Deplazes  
President Board of Directors



Rudolf Summermatter  
CEO

### OUR HEALTH AND SAFETY COME FIRST.

- ✓ We protect and respect the identity and health of our employees. In particular, occupational safety and health protection take priority over economic and time-related objectives.
- ✓ We all share responsibility for creating a safe and healthy working environment through strict compliance with labour and health regulations. We provide employees with suitable protective equipment and infrastructure for their work.

### WE RESPECT THE LEGISLATION AND OUR INTERNAL GUIDELINES.

- ✓ We comply with the legal provisions that apply in our areas of activity.
- ✓ We observe the external standards to which we have voluntarily committed ourselves.
- ✓ We are familiar with our internal guidelines and directives and comply with them consistently.

### **WE TREAT EACH OTHER WITH RESPECT AND APPRECIATION.**

- ✓ We work together in partnership as employees at all levels. We treat each other respectfully, fairly and with humanness. We strive to create a motivating and performance-oriented working environment defined by personal responsibility.
- ✓ We stand for gender equality and equal treatment of people regardless of their origin, sexual orientation or background. Harassment or discrimination of any kind is not tolerated.
- ✓ We respect each other's privacy and personal integrity.

### **AS A SUSTAINABLE COMPANY, WE TAKE RESPONSIBILITY FOR THE ENVIRONMENT.**

- ✓ We are conscious of sustainability in actions in all areas and all functions of our company. We seek solutions that are economically viable and environmentally and socially responsible. It's about solutions that last, not quick wins.
- ✓ We use natural resources sparingly. In our cooperation with business partners, we are committed to compliance with environmental and social working and production conditions.

### **WE ARE COMMITTED TO FREE AND FAIR COMPETITION.**

- ✓ Within the market, we behave in a performance-oriented and fair manner towards customers, suppliers and competitors alike.
- ✓ We make our business decisions on an objective basis and free from any discrimination. We reject unlawful agreements that restrict competition in terms of price, quantity, markets, territories or customers.

### **WE NEITHER GIVE NOR TAKE BRIBES.**

- ✓ We run our business on the basis of honesty and the quality of our services, so we reject bribery and other forms of corruption.
- ✓ In particular, we do not grant undue advantages to business partners for the purpose of securing an order or to public officials for the purpose of performing or refraining from performing an official act or for the mere cultivation of relationships, neither do we accept such undue advantages for ourselves. We do not use third parties to engage in corrupt practices.
- ✓ We can accept one-off token or customary courtesy gifts or invitations by way of exception. However, we always adhere to our internal guidelines.

## **WE AVOID CONFLICTS OF INTEREST OR DISCLOSE THEM IN A TIMELY MANNER.**

Our work is based on objectivity, not on personal interests. We therefore always strive to avoid conflicts between our personal interests and the interests of OpenEP. Conflicts of interest arise when the personal, family or business interests of an employee conflict or could conflict with the interests of the company.

We disclose any situations that give rise to actual or potential conflicts of interest internally (to the Managing Director and/or Compliance), immediately and without being asked to do so. If a conflict of interest cannot be avoided in an individual case, we abstain from giving advice or contributing to decisions.

In general, the following connections to partners must be reported if they give rise to conflicts of interest for us:

- Marriage, civil partnership and cohabitation
- Direct relatives or collateral relatives (by blood or marriage) up to the third degree
- Party affiliation, in cases involving highly politically motivated decisions
- Serious bias on the part of the decision-maker for reasons other than those mentioned above

Where necessary, responsibility for deciding on recusal is as follows:

- For employees: the Managing Director
- For the Managing Director: the Board of Directors
- For a member of the Board of Directors: the other members of the Board of Directors.

## **WE RESPECT DATA PROTECTION AND ARE CONSCIENTIOUS IN OUR HANDLING OF CONFIDENTIAL INFORMATION.**

- ✓ We always handle information and business secrets that we receive in the course of our business activities conscientiously and only use them to the extent that is permissible and commercially justified.
- ✓ We ensure that confidential information and business secrets are only accessible to authorised persons internally and externally. We do not misuse such information for the personal or unauthorised benefit of third parties.
- ✓ We treat the personal data of our customers, employees and business partners confidentially and take appropriate measures to protect them. We adhere strictly to the principles of data protection.

## APPLICABILITY OF THE CODE OF CONDUCT AND SANCTIONS

- ✓ The Code of Conduct applies without restriction to all employees and governing bodies of OpenEP and its majority shareholdings. We expect our business partners to also adhere to the principles of the Code of Conduct.
- ✓ It is the responsibility of the management of OpenEP to ensure that all employees know, understand and act in accordance with the Code of Conduct.

We punish violations of the Code of Conduct and of internal directives and guidelines. Line managers and the relevant internal departments are responsible for enforcing this.

## NOTIFICATION OF VIOLATIONS

- ✓ Employees who become aware of possible illegal or unethical acts or violations of the Code should inform their supervisor, the Executive Board or the Compliance Officer. There is a legal obligation to report suspected economic crime, especially fraud and corruption.
- ✓ As an alternative, OpenEP has set up an external [reporting site](#) for its employees and external parties. Reports to this site will always be treated confidentially.
- ✓ Those who report violations in good faith will not have to fear any repercussions. Violations that constitute a criminal offence are excluded. Discrimination or retaliation of any kind against employees who report a violation of the Code of Conduct in good faith or who refuse to participate in a violation will not be tolerated.

## CONTACTS

- ✓ OpenEP values a corporate culture of openness and transparency. With that in mind, the following contact persons are available to answer any questions relating to compliance with or interpretation of the Code of Conduct:
  - CEO
  - Compliance
  - Compliance Partner



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