

# Business Ethics Appendix

2023

**EgonZehnder**

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# Introductory Statement

Egon Zehnder has an unwavering commitment to fair and responsible business conduct. In all aspects of our business, we ensure that we are aware of our ethical responsibilities and we comply with them consistently. This Business Ethics Appendix, which forms part of the firm's Code of Conduct, consists of three sections

1. The anti-bribery and corruption statement
2. The anti-money laundering and fraud statement
3. The anti-trust and anti-competitive statement

Together, they fully articulate our policy to prevent any form of financial crime in our firm. This appendix applies globally to all Egon Zehnder employees (which term shall also deem to include contractors) and defines the fundamental ethical principles and guidelines we are committed to upholding in all of Egon Zehnder's business activities. The responsibilities of our suppliers are covered in our Ethical Procurement Policy.

# 1. Anti-Bribery and Corruption Statement

Every Egon Zehnder employee has a responsibility to manage risks to the firm proactively, and to build and protect the firm's reputation. We are committed to fair and responsible business, and we have a zero-tolerance approach to all forms of corruption and bribery. Many of the countries in which we operate have laws explicitly prohibiting bribery and corruption, including the [UK Bribery Act](#), the [Comprehensive EU Anti-corruption Policy](#) and the [US Foreign Corrupt Practices Act](#). In addition to complying with applicable laws in the region, we will adopt these principles as best practice for global application. Any instances of suspected misconduct should be immediately reported to the firm's General Counsel or the Whistleblowing hotline.

We are vigilant in preventing instances of financial crime and other forms of ethical misconduct. This includes money laundering, economic and trade sanctions, bribery, and other forms of corruption. Each of us must do our part to understand these issues and remain alert for signs of suspicious behaviour so that we never knowingly work with clients or business partners who engage in these activities. We refuse to do business with anyone on any applicable sanctions list and do not knowingly initiate or become party to any third-party efforts to avoid sanctions.

## 1.1 Conflicts of Interest

We seek to ensure that personal interests do not improperly influence business decisions we make or advice we provide to our clients. In all our business dealings, we are guided by our values and we expect Egon Zehnder colleagues to utilise good judgment and common sense. Please refer to section 7 of our Code of Conduct for our statement on conflict of interest.

## 1.2 Gifts and Entertainment

We do not offer or accept gifts to secure advantages or influence business decisions. We believe our business will prosper in the long term when our success is based solely on the merits of our professionals, our services and the satisfaction of our clients. Please refer to section 11 of our Code of Conduct for our statement on gifts and entertainment.

## 2. Anti-Money Laundering and Fraud Statement

We are committed to maintaining the high standards of prevention in relation to money laundering and fraud. This includes protecting Egon Zehnder's reputation by promoting a sound culture of risk awareness. We are aware of and uphold our responsibilities in alerting the firm's General Counsel and/or CFO or the Whistleblowing hotline in case of any doubts or suspicions related to a business partner or engagement.

It is the obligation of every employee at Egon Zehnder not to commit money laundering offences.

The firm's integrity and reputation can be severely damaged by failing to detect and avoid relationships that place the firm at risk. We will conduct business only with clients who, to the best of our knowledge, are involved in lawful business activities. We know our clients and we are committed to confirm our clients' identities if necessary or appropriate. We will never knowingly accept payments that are derived from unlawful sources or activities.

### 3. Anti-Trust and Anti-Competitive Statement

We are committed to operating within free, fair and competitive markets, and we compete solely on the quality and impact of our work. We believe that our clients, employees and communities are best served through a strong and competitive marketplace. All employees of the firm must comply with relevant laws, regulations and internal policies relating to fair competition, anti-trust and trade controls. We are aware of and uphold our responsibilities in alerting the firm's General Counsel or the Whistleblowing hotline in case of any doubts or suspicions related to the above.

We do not enter into agreements, understandings or coordinated activities with actual or potential competitors that may eliminate or lessen free and fair competition. We do not agree or coordinate with competitors to fix fees or specific elements thereof, neither do we allocate markets geographically, by function, industry, or sector.