

BKW Group Code of Conduct



Together, we care for
our company and act
responsibly and
sustainably.

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Foreword

We are shaping the future of energy – straightforward, reliable and integrated.

We are value-oriented as a matter of course.

Value-oriented conduct is a key success factor in the contribution we make to business and society. With responsible and sustainable actions, we set new standards to reinforce the trust placed in us by our customers, shareholders, business partners and employees.

This Code of Conduct sets out our business principles and expectations when interacting with governing bodies and institutions, employees and business partners of the BKW Group. This Code provides guidance for responsible behaviour and supports us in making the right decisions. We are compliant with all laws and regulations, and consistently align our corporate actions and decisions with our company principles. This ensures our contribution to our corporate success and that we act as a socially responsible corporation.

Everyone is held personally accountable for ensuring that BKW complies with the principles set out in this Code of Conduct. Talk to your colleagues about our values and principles, and point out any instances when these are not observed. The Compliance Team and your manager are there to advise you.

Urs Gasche
Chairman of the Board

Suzanne Thoma
CEO

Our responsibility

This Code of Conduct sets out the basic guidelines for the successful implementation of our strategy and realisation of our vision. The Code of Conduct guides us in our decision making.

By adhering to it, we act as ambassadors for the BKW Group and make a significant contribution to further enhancing its positive reputation. We take responsibility, remain alert and help one another to consistently put the Code of Conduct into practice.

Compliance with laws and regulations

We adhere to all national and international statutory provisions relevant to our activities, and align our corporate actions and decisions with them.

Sustainable thought and action

We take responsibility for our actions towards society and our employees, and contribute to their development. With our business activities, we contribute to the future of energy and infrastructure. Sustainability is part of everything we do and how we do it.

Our interaction with customers, business partners and employees

Appreciation for our customers, business partners and employees

As an international group with a wide network, BKW is familiar with great cultural diversity. We always treat our customers, business partners and employees with appreciation and respect. Our communication with all groups of stakeholders is characterised by openness and cooperation.

We reject any form of harassment in the workplace and treat all people with respect. We do not discriminate on the basis of gender, sexual identity, origin, language, religion, age or other personal characteristics.

Health and safety

Health and safety at work is very important to us. Employees should be able to work in conditions that provide optimum health and safety.

We take the necessary measures to prevent accidents at work and occupational diseases.

All employees take care to ensure they are capable of work, as well as the safety of

persons and property in the course of their work.

Fair interaction with our competitors

As a success and performance-orientated company, we are committed to free competition. We support an open, fair and non-discriminatory market.

We treat our competitors with respect and make our decisions objectively and without discrimination. We reject anti-competitive behaviour or collusion.

We foster a relationship with our trading partners based on respect, integrity and fairness. We refrain from any kind of insider trading or market manipulation.

Responsibilities of our advisers, suppliers and sub-contractors

We expect our agents, advisers and suppliers to comply with all applicable laws and regulations, and to adhere to our Code of Conduct and agreements.

Honest and transparent business relationships

We foster an honest and sincere relationship with our business partners and impress with the quality of our products and services. We do not tolerate bribery or any other form of corrupt business conduct.

We provide open and transparent support with improving the social framework conditions in BKW's environment, e.g. through training and the promotion of young talent.

Our sponsorship programme aims to boost awareness of our company, as well as position it in the market.

We are open and transparent about any financial contributions we make to political activities that affect BKW's overall situation. We refrain from making donations to parties, politicians or staff of public authorities.

We apply the four-eyes principle to decisions relating to contributions, donations and sponsorship.

Protecting our company

Assets, business secrets and data protection

Our company's assets form the basis of our business activities. We handle our assets and information carefully and responsibly, and protect them from loss, damage and unauthorised access. We do not tolerate fraudulent or other illegal activities or use assets or information for personal gain.

We collect business, customer and personal data transparently and in accordance with the law. We handle this data with the utmost care and protect it from unauthorised access by taking the appropriate technical and organisational measures.

We do not trade in securities of the BKW Group or other companies if we have inside information. We do not pass inside information on to unauthorised third parties; this also includes employees of the BKW Group who have no official knowledge of the information, as well as relatives, partners, etc. We do not make recommendations based on inside information and we do not use this information for personal gain.

We reveal any conflicts of interest

It is of great importance to us to avoid conflict between our personal interests and those of BKW. We reveal any situations internally in which business actions are influenced by personal interests or relationships. We mitigate conflicts of interest in individual cases through appropriate organisational and personnel measures.

Implementation

Support by the Compliance Team

The Compliance Team at BKW answers any questions on this Code of Conduct and is on hand to provide employees and business partners with assistance and advice related to legal and ethical decisions.

The individual principles in this Code of Conduct are set out in concrete terms in directives, guidelines and manuals.

Communication and training

This Code of Conduct applies to all governing bodies, institutions and employees of the BKW Group. Through appropriate measures and training, we familiarise ourselves with our values and principles and incorporate these into our daily thoughts and actions.

Together with management, we ensure compliance with the Code of Conduct and the statutory and regulatory requirements within our area of responsibility.

Identification of misconduct

We do not tolerate infringements of the law or of this Code of Conduct. We take disciplinary action, which may also include dismissal, if governing bodies, institutions or employees fail to comply with the law or with this Code of Conduct. We report observations or possible

infringements to management or the Compliance Team.

Employees who report an infringement of this Code of Conduct in good faith can be confident that they will not incur any personal disadvantage as a result.

Final provision

This Code of Conduct has been approved by the Board of Directors and enters into force on 1 January 2017 in place of the Code of Conduct of 7 December 2012.

Bern, 1 December 2016

BKW

Viktoriaplatz 2

3013 Bern

Telephone +41 58 477 51 11

www.bkw.ch