Helsana

Code of Conduct

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Valid from 01 January 2026

Key points

- The Code of Conduct represents the minimum standard of expected behaviour for employees and codifies Helsana's most important fundamental values. It encompasses an obligation to comply with the law, supervisory requirements, internal regulations and to display impeccable integrity.
- All other company standards and guidelines are subordinate to the Code of Conduct, which is binding for all employees, managers and members of the Executive Board and Board of Directors of Helsana. No exceptions to this are permitted.
- The Code of Conduct not only applies to collaboration within Helsana, but also towards external parties, namely customers, business partners and authorities.

1. Subject matter and scope of application

1.1 The Code of Conduct defines rules derived from general, legal and ethical principles that are binding for all managers, members of the Executive Board and Board of Directors and employees of the Helsana Group. The Code of Conduct serves to enhance trust among and towards our insured persons, business partners and the authorities. Compliance with the Code of Conduct is the foundation of our company's reputation; we are all responsible for this.

1.2 By joining the company, we undertake to comply with Helsana's Code of Conduct. The Code of Conduct is a component of our employment contract. We personally take liability for ensuring we have read and understood the Code of Conduct. We will regularly refresh our commitment to the Code of Conduct as part of the training on this.

2. Commitment to the principles of corporate governance

2.1 We are committed to the principles of corporate governance (pursuant to FINMA circular 2017/2 "Corporate Governance – Insurers" and the "Swiss Code of Best Practice for Corporate Governance" by economiesuisse) and put them into practice consistently across the company. In so doing, we create a stable foundation for modern, values-oriented corporate governance shaped by a ceaseless sense of responsibility.

2.2 We strive to keep a strict separation between operational activities and monitoring. To this end, we allocate tasks, competences and responsibilities clearly.

2.3 We ensure any major decisions are documented and that internal reports are traceable.

2.4 We have an effective company-wide risk management system and an effective internal control system (ICS), including the monitoring bodies of Risk Management, Compliance and Internal Audit. Efficacy and appropriateness are subject to independent review at periodic intervals.

2.5 We determine company standards and guidelines, necessary processes and structures to comply with legal, regulatory and internal requirements.

3. Compliance with laws, internal company standards and guidelines

We comply at all times with the applicable laws and regulatory requirements in Switzerland and in the other countries where we operate. We follow internal company standards and guidelines, especially policies, regulations, instructions, and human resources standards and guidelines.

4. Safeguarding of data protection and information security

4.1 We comply with data protection and information security legislation and requirements at all times.

4.2 We process customer data and particularly sensitive heath data with care and ensure it always remains confidential. Data may only be processed and shared within and outside of the Helsana Group for the purpose of executing specific business transactions and only in accordance with the relevant legal provisions, internal company standards and guidelines. In so doing, we protect the personal rights and private sphere of our insured persons, business partners and employees.

4.3 The protection and secure handling of information and information systems are crucially important to us. We undertake to handle information about Helsana, our business partners and insured persons in confidence at all times, to not disclose it to third parties and uphold business secrecy. This obligation to maintain secrecy shall continue to apply indefinitely even after the end of the employment relationship.

5. Demonstrating integrity and ethically correct behaviour

5.1 Integrity and ethics are core components of our actions. We act with integrity by saying what we do and doing what we say.

5.2 We undertake to behave legally, ethically and morally in our business transactions and when dealing with our insured persons, employees, business partners and the authorities.

5.3 We handle public and social media carefully by treating others with respect and being honest and polite. When using these media, we are always explicit about the fact that we are expressing our personal opinions, not those of Helsana. We do not publish business secrets or other confidential information pertaining to Helsana in the media.

6. Safeguarding proper financial reporting

6.1 We ensure that statutory evaluation and accounting requirements are put into practice. Our accounting depicts the company's economic situation in such a way that third parties can form a reliable judgement on it.

6.2 We ensure the integrity of our financial reporting. All employees have a responsibility to help ensure that business transactions are recorded in a timely, complete and precise manner that reflects the actual facts.

6.3 In our accounting, we only indicate assets or liabilities that are actually owned (assets) or part of the debt (liabilities) of Helsana Group companies, as is proper.

7. Protection of tangible and intangible resources

7.1 We treat the company's finances and its tangible and intangible resources with great care.

7.2 We handle fixed assets, intellectual property and information with care. Helsana's assets and resources may only be used for appropriate, legal, business-related purposes. Limited private use is only permitted to the extent expressly provided for in the applicable company standards and guidelines. Helsana's name, logo, brand and copyrighted content may not be disclosed or used in an impermissible way or without prior consent.

8. Avoidance of the acceptance and granting of unlawful advantages

8.1 We may only accept gifts and other non-cash benefits from insured persons, business partners and third parties that are within a modest, socially acceptable framework and have a low commercial value.

8.2 We do not accept gifts or other non-cash benefits from insured persons, business partners or third parties that might impact the independence, objectivity and freedom of our professional decisions or encourage us to act in a particular way. We avoid even the mere appearance of bribery and immediately return any perks of this nature. The acceptance of cash is forbidden. Similarly, it is not permitted to declare gifts or non-cash benefits as alleged remuneration for services that have not actually been rendered.

8.3 We do not offer public and private officials or decision-makers any gifts or non-cash benefits outside the normal framework and with the purpose of using them to gain an illegal or non-chargeable benefit or encouraging the individual in question to take particular action. Any appearance of having an improper influence on the independence and objectivity of decision-makers must be avoided at all costs.

8.4 As part of this, we comply with company standards and guidelines to prevent corruption and bribery.

9. Avoiding conflicts of interests

9.1 We avoid conflicts of interests and the appearance of them through integrity and transparent behaviour. A conflict of interest could arise with us if employees' personal interests, financial interests, interests relating to secondary employment, family connections or other connections are counter to Helsana's interests. If we end up in situations where personal interests or those of people or organisations close to us conflict with the interests of Helsana, we will immediately disclose this to our managers and the Compliance & Regulatory area.

9.2 We will report any secondary employment to our managers and HR for prior approval. Secondary employment that could negatively impact work at Helsana, whether by its nature or performance, is forbidden.

9.3 The assumption or renewal of an executive function (e.g. member of a foundation board, member of the board of directors of a commercial enterprise, an association or another comparable organisation) is to be reported to the managers and the Compliance & Regulatory area for prior approval. Mandates of Executive Board members require the prior approval of the Chair of the Board of Directors. The Compliance & Regulatory department is informed of this. For all other mandates, the corresponding liability and reputational risks that could arise for Helsana must be considered.

10. Ensuring free, fair competition

10.1 We adhere to the fundamental principles of free, fair competition.

10.2 Agreements, concerted practices with other companies, or other actions that serve or intend to unlawfully restrict competition are expressly prohibited.

10.3 We respect the principles defined by Group companies to ensure free and fair competition.

11. Sustainability

11.1 With our products and services, we make a sustainable contribution to our customers' health. To this end, we are committed to the ten principles of the UN Global Compact[1].

11.2 We also expect our suppliers to conduct their business with integrity and in compliance with ethical, social and ecological standards. For this purpose, we require our suppliers to acknowledge and implement the standards set out in the Supplier Code of Conduct (SCoC), or to have at least an equivalent SCoC of their own.

12. Healthy working culture and appreciative dealings with one another

12.1 We do not tolerate discrimination against individual employees or groups of people, namely due to gender, age, disability, mental or chronic illness, sexual orientation, skin colour, cultural background, religion or nationality. We actively promote equal opportunities and diversity.

12.2 We are pleased that our company is home to a diverse array of people and backgrounds, view each other as individuals and work in a straightforward, pragmatic manner.

12.3 Everyone can rightfully expect their personal integrity to be protected in the workplace. Our collaboration at every level of the hierarchy is shaped by respect and mutual appreciation. We do not tolerate sexual or other physical or verbal assault, harassment or any form of discrimination.

[1] https://unglobalcompact.org/what-is-gc/mission/principles

12.4 The consumption of alcohol during working hours, drugs or other narcotics is forbidden.

12.5 To protect the health of employees, we pay attention to safety in the workplace and to ensuring adequate working conditions for the specific activities at hand.

12.6 We maintain professional, respectful communication. We provide each other with the information needed in a timely, accurate, objective and understandable way.

13. Responsibility of managers and employees

13.1 We recognise that one of our personal duties is to comply with the Code of Conduct and corporate standards and guidelines at all times.

13.2 We ensure that all our activities at work contribute to the business operations undertaken by Helsana and refrain from any activities that could negatively impact the value or interests of Helsana or the ability of our employees to perform well.

13.3 Managers, in particular, help to ensure that the Code of Conduct is practised and implemented by us. They ensure that all employees are aware of and comply with the legal provisions, and internal company standards and guidelines. Managers should behave in such a way that they serve as role models and points of contact for our questions. They take their employees' concerns seriously and offer them solution-focused support.

14. Reporting and sanctioning of breaches

14.1 We have an open, transparent approach to handling breaches of legal requirements, internal company standards and guidelines, and the Code of Conduct.

14.2 We are called to deal with breaches openly and report them to management or Human Resources. If it is not possible for an employee to report this to their line manager, or the manager above them, or they did not heed this report, employees can always contact the Speak-Up whistleblowers' hotline via e-mail or a secure website. This ensures reports can be made anonymously then investigated independently and impartially. Employees who report incidents in good faith should not fear reprisals. If it is determined that a breach has occurred, sanctions will be imposed independent of the violator's role or level in the hierarchy. Breaches can have consequences under employment law, civil law and penal law.