





Dear employees

As a company that is predominantly working for the public sector and thus serving the general public at large, we bear a special responsibility to the contracting authorities as well as our customers and con-tract partners. We must behave ethically and in compliance with the law at all times, using the funds allocated to us conscientiously, sustainably and in a way that is commercially sound.

Through your work, you make a direct contribution to our ability to meet the many demands we face from various stakeholders. With your decisions, you remould BLS each day, and with that reshape its future and public image, too.

The BLS code of conduct is the foundation of our day-to-day activities. It helps you to behave appro-priately in all situations, particularly in those situations where there are multiple interests at play. The code of conduct is binding for all employees, irrespective of function or position. By adhering to it, we are staying true to our corporate culture and laying the foundations for long-lasting success.

The compliance officer or company management will be happy to answer any questions you may have about the code of conduct or its use.

Thank you very much for your contribution.

Best regards,

Kurt Bobst
Chairman of the Board

Chairman of the Board of Directors BLS Ltd

/ Daniel Schafer CEO BLS Ltd



1 Introduction

We adhere to the forms of conduct outlined below. They provide the foundation for our activities.

- I consistently apply the code of conduct when dealing with colleagues, customers, suppliers and other stakeholders.
- I am aware of how my conduct as an employee is perceived and that I am jointly responsible for BLS' public image.

2 Health and safety

Health and safety are our top priority when working.

- I plan my work carefully and am familiar with the relevant safety regulations. When performing my work,
 I consistently adhere to the guidelines in order to optimally protect myself and colleagues.
- I discuss risks and errors openly with my line manager and with specialists. If I notice any safety risk during my own work or that of others, I take immediate action. In the event of immediate danger, I stop work.
- I am responsible for myself and my colleagues and play my part to ensure a safe working environment.

Conduct in the workplace

We show each other appreciation and respect in our interactions at work. We offer equal opportunities to every colleague. We do not tolerate any form of discrimination, sexual harassment or bullying.

- I am guided by the BLS values and, through my actions, contribute to an appreciative and respectful working environment. This is the foundation that allows us to successfully achieve our goals together.
- I regard the diverse backgrounds and experiences of my colleagues as an opportunity to develop balanced solutions and to learn from one another. I communicate my decisions clearly and take responsibility for implementing them.
- I am authentic in my daily work and am respectful in the way I deal with opinions and lifestyles that are different to my own.

4. Use of resources

We make sparing use of the resources and funding provided to us.

- I make sparing and prudent use of the available resources. This applies equally to financial resources and BLS property. When making purchases, I act with foresight and take account of the overall costs.
- 5. Adherence to regulations
 We are familiar with the legally applicable and internal regulations and contracts, and adhere
 - I ensure that I am familiar with the latest applicable laws, standards, internal regulations and contracts relevant to my work, and that I adhere to these.

6 Conflicts of interest

to these.

We identify conflicts of interest and ensure that they do not influence the integrity of BLS.

- I stay alert to potential conflicts of interest and bring these to the attention of my line manager in good time.
 In this way, I prevent BLS from suffering negative economic consequences and reputational risks.
- In the event of a conflict of interest, I do not participate in any voting procedure within the affected company.

Dealing with business partners, authorities and buyers

We do not accept any gifts or donations that might influence us in our business decisions, and do not dispense any such gifts or donations ourselves.

 I do not accept any gifts, invitations or similar if these might influence my professional decisions and if they exceed the value of 200 Swiss francs. The same applies to gifts and invitations that I provide.



8 Confidentiality and data protection

We handle internal BLS information confidentially.

- I handle confidential information with care and take all the necessary precautions to protect internal, confidential and secret information, especially business secrets, against third-party access.
- I protect personal data and adhere to the data protection policy.
- I leave the press office to deal with the media.

Whistle-blowing

We openly address any misconduct within the company.

- In the event of any breaches of the code of conduct or other regulations, I confront the person committing the breach directly. If this has no effect, I turn to my line manager. If this proves unsuccessful or if this approach is unreasonable, I contact the compliance officer or reporting office.
- I am aware that I can report such situations in confidence and, where required, anonymously to the reporting office responsible for dealing with misconduct. All reports will be investigated.

Genfergasse 11 3001 Bern Switzerland Telephone + 41 58 327 27 27 bls.ch