

We are Bitcoin Suisse

Our Code of Conduct



Dear colleagues,

This Code of Conduct outlines our established and recognized standards that help us meet the requirements of good corporate governance throughout the crypto-financial markets and business environments we operate in. It provides a clear direction of how we expect all members of the Board of Directors, of the Management Committee and all Bitcoin Suisse employees to act - with the utmost professional expertise and integrity. It is a reference to the principles and values that guide the work of all people who represent Bitcoin Suisse, and which are also reflected in our policy framework.

Pioneering the crypto asset industry since 2013, we are one of the oldest and most trusted crypto companies in the world and we have been driving the crypto industry further throughout the many market cycles over the past decade. What guides us are not the short-term opportunities, but our desire to create a world where decentralized finance has a net positive impact on society. Our company culture is a collaborative one, where we innovate together, support and drive each other towards our common goals with a powerful sense of belonging.

The Code of Conduct has the full backing of the Board of Directors, the Management Committee and the founders. It is intended to provide appropriate guidance on how we do business and our ethical standards which should be also applied to unforeseen situations that are not explicitly mentioned in this document. Should you have any questions or concerns, it is your responsibility to raise them with your Team Lead, Human Resources, Compliance, or a representative of the Management Committee.



On behalf of the Board of Directors and
the Management Committee,

Luzius Meisser
Chairman of the
Board of Directors

Dr. Dirk Klee
Chief Executive
Officer

Who we are

We are Bitcoin Suisse

We want to be the most trusted Swiss crypto investment partner and gateway to crypto solutions and are focused on a highly qualitative and secure offering. We do not only contribute to innovative blockchain solutions but also to the long-term establishment of the global crypto market.

Our Heritage

We were the genesis of “Crypto Valley” in 2013 and ever since been the largest force to push crypto adoption in Switzerland.

Our Mission

We support the crypto ecosystem by building the most trusted Swiss-based crypto-native company offering institutional-grade crypto services at the forefront of technical innovation.

Our Vision

A world with an open and transparent financial system, enabled by crypto.

Our Belief

We act from the strong belief that crypto currencies will have a profound net positive impact on society.



Founded in 2013, Bitcoin Suisse is the Swiss crypto-native pioneer and trusted gateway to crypto asset investing, offering institutional-grade crypto services at the forefront of technical innovation. With the strong belief that decentralized finance will have a fundamentally positive impact on society, Bitcoin Suisse has helped to shape the crypto and blockchain ecosystem in Switzerland and has been a driving force in the development of the Swiss “Crypto Valley” and “Crypto Nation Switzerland”.

We are learners and doers who do not shy away from complexity. We challenge the status quo and are creative problem-solvers. We make things happen with teams that trust, respect and count on each other. We work hard and recognize outstanding achievements. We are passionate about our clients as we are about the various aspects of cryptocurrencies and the underlying technology.

Our Employees

Our people are the heart of Bitcoin Suisse and are extremely valued. They are a great mix of highly specialized professionals, experts and generalists with a broad range of experience at different levels and different fields. We value and combine our diverse skills and backgrounds and leverage the best of them for the most optimal outcome.

We aspire to become the #1 employer of choice in the crypto industry in Switzerland. We build on continuous employee feedback, long-term incentives, and true ownership.

Every person at Bitcoin Suisse is important as everybody contributes to the company’s strategic targets, team goals and the overall business success. We are all part of the same journey and believe that collaboration and team spirit are the keys for success. We all feel responsible for our company and our colleagues and feel like we belong.

Our Clients

We feel privileged to have formed such great relationships and earned the trust of the clients that we serve. Without our clients we would not exist.

We work hard to continue earning that trust by understanding our clients’ needs, providing them with best-in-class solutions and creating long-term value. Our clients’ interests are one of our highest priorities, and we always act with the highest integrity.

Our Values

Transparency

With a high degree of transparency, we build trust and keep ourselves accountable in all our relationships.

- We communicate in a target group-oriented, clear, honest, and concise manner. We listen.
- We maintain an open and constructive feedback culture aiming at improving every day.
- We take informed decisions and avoid inefficiencies and negative surprises by considering and having all relevant information at hand.

Trust

Trust and reputation are our most important assets. We give trust to each other and jointly build trust for our clients by focusing on quality, security, and stability.

- We establish and maintain a trustful environment by living an open, honest, and transparent communication culture.
- We maintain a productive workplace where people feel respected, safe, and belong.
- We treat each other with respect and value different points of view.

Security

We protect our clients, employees, and the company.

- We take our decisions by carefully balancing opportunities, risks, and costs.
- We protect our clients and their assets by building secure solutions and processes.
- We maintain a safe, healthy, and productive work environment for everyone.

Empowerment

We are convinced that employee empowerment has a high impact on effectiveness and efficiency. Empowered people drive the firm to success with passion.

- We empower everyone in the company to have a high degree of decision power in their area of expertise and responsibility.
 - We feel responsible for our tasks and projects with a strong focus on thought-through and high-quality results.
 - We consequently analyze our mistakes and share our learnings aiming at collectively improving every day.
- We do not compromise or follow the hype.
 - We are maintaining a constant dialogue with our clients aiming at understanding their needs and improving our offering with a “release early, release often-mindset”.

Quality

We value delivering the highest quality products and services for our customers.

- We empower our employees to take ownership of their work and make decisions that increase the quality of our products and services.

Our Culture

Our Leadership Principles

We believe in our purpose and create a shared vision and common values. Our management models the way, enables our employees to act and to thrive. The management team leads by example and builds a trustful and productive environment while recognizing outstanding achievements and hard work.

In the spirit of our values, our leaders communicate transparently and openly and listen to innovative ideas, concerns, and well-founded proposals as we value each other's opinions and experiences.

In our company, leadership is not exclusively reserved to the management team and team heads. We truly believe that leadership should be demonstrated and lived by all employees by taking on ownership, supporting and inspiring others and getting things done in a team. Together we thrive.

Our Principles of Professionalism

We always act in a professional manner whether in person, through electronic communication channels, or any other form of communication.

We embrace diversity in all its forms, as it allows us to bring a wide range of perspectives and experiences to the table, resulting in a stronger and more innovative organization.

We are committed to fostering a workplace culture where all individuals are valued. We are a place for open minded and curious people, who like to build bridges and learn from each other.



"Our great Bitcoin Suisse culture was the key component in making us successful in the first decade of our journey, especially when the waters were stormy!

We promise to keep fighting for our Bitcoin Suisse culture on our continued adventures!"

*Fabian Hediger & Andrej Majcen
Co-Founders*

Our Principles of Safety

We are committed to providing and maintaining a safe, healthy, and productive work environment for everyone and expect everybody to contribute to a positive and appreciative working atmosphere.

Threatening, aggressive, or abusive behavior, discrimination, verbal or physical harassment or abuse, or offensive behavior towards colleagues, clients, or any other stakeholder will not be tolerated and will be subject to appropriate measures and consequences.

The Way we do Business

Upholding our Reputation

We are true entrepreneurs who carefully balance opportunities, risks, and costs. We perform our business based on sound conduct, risk management and risk culture practices with the highest integrity standards aiming at protecting our clients, our employees, the firm, and its reputation.

Adhering to Laws, Rules, and Regulations

We are fully committed to always complying with applicable laws and regulations in our home market as well as in all countries and markets where we do business. Our comprehensive internal governance and policy framework is setting the standards we adhere to daily. We diligently fulfill our tax duties in line with all applicable laws, rules and regulations and report all necessary information to the relevant authorities.

Conflict of Interests

We are committed to sustaining the highest levels of professional and personal integrity to avoid situations in which an individual's personal interest may conflict or appear to conflict with their duties to Bitcoin Suisse, its clients or relevant third parties. We actively address and manage those situations and any such potential conflict of interest.

Combating Crime

We are committed to an anti-money laundering framework, and do not support any terrorist financing, corruption or circumvention of sanctions and apply all possible measure to combat financial crime.

Fair Dealing

We deal fairly, honestly and in good faith in our relationships with clients and other counterparties. We are committed to not taking advantage of anyone, especially not by means of fraud, manipulation, concealment, abuse of privileged information, or any other unfair or harmful practice.

The Way we deal with Information – Confidentiality & Privacy

We are committed to protecting all client-related information as well as any other kind of data and information, by applying appropriate ethical practices and technical solutions in full adherence to applicable laws.

Applying the Code

This Code of Conduct applies to all employees of Bitcoin Suisse as well as third parties engaged by Bitcoin Suisse, including the Board of Directors. We are aware of our responsibility to know, understand, and abide by the principles outlined in this Code.

This Code is neither intended to be an exhaustive document nor a detailed policy. The following questions shall guide Bitcoin Suisse employees in assessing whether a behavior or decision is in line with the principles outlined in the Code:

- Am I personally comfortable with the behavior and/or decision made?
- Am I being fair, honest, and truthful?
- Do I have enough understanding of the reasons and consequences of my actions?
- Are my behavior and actions in line with Bitcoin Suisse's business purpose, values, and culture?
- Are my actions and behavior in line with all applicable laws and regulations?

- Would the reputation of Bitcoin Suisse be impacted if information regarding my behavior and/or decision would be shared within the public?
- Could someone's reputation, well-being, health, and safety be endangered by my behavior and/or decision?
- Could the intended action appear inappropriate to Bitcoin Suisse clients or any other third party?

We speak up

To identify and avoid potential risks at the earliest possible stage, we are committed to reporting immediately to our supervisor, Finance & Risk, Compliance or Legal divisions any events that could potentially affect Bitcoin Suisse, its clients or other relevant third parties in a negative way.

All escalations will be taken seriously and investigated appropriately – strictly confidential if indicated – by Bitcoin Suisse. Bitcoin Suisse does not tolerate any form of reprisals against anyone who, in good faith, reports a concern or suspected violation of this Code.

We speak up if we see things which seem to be not in line with our principles and behaviors. Speaking up might not always be an easy thing to do. Hence, there are many different channels for reporting any concern. To whom the matter can or

should be addressed may depend on the circumstances. In most cases, a breach of this Code should be raised directly with the respective supervisors or with Risk & Compliance, Legal, and/or Human Resources

In case of a breach of this Code, it is the responsibility of Bitcoin Suisse's Management Committee together with Human Resources to decide appropriate and proportionate measures and consequences.



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