

SUSTAIN- ABILITY REPORT

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Why we are committed to sustainability

The year 2021 is the second year for Swissquote **GRI 102-1** to disclose non-financial information, in addition to financial performance, remuneration and corporate governance. As an annual recommitment to our customers, employees and other stakeholders, we continue to publicly provide comprehensive insights into our sustainability approach and performance by employing the GRI Standards.

We remain convinced of the importance of tracking and reporting environmental, social and governance (ESG) metrics, and we embrace the patience and tenacity to persistently and continually seek improvement in our ESG performance and ratings. In this regard, we performed a gap analysis on selected ESG ratings in 2021 to identify and assess improvement options for our sustainability

management approach. The main outcome of the analysis was communicated to the Executive Management and will be used in the continuous process of developing the Company's sustainability strategy.

This report focuses on Swissquote business activity in Switzerland and Luxembourg.

OUR UNDERSTANDING OF SUSTAINABILITY

We strive to deliver sustainable value to society and choose to be exemplary when it comes to applying ESG criteria in our strategic decisions and day-to-day activities.

For us, this means that we challenge convention on the delivery of innovation and technology, constantly pioneering new and better ways of banking. We build relationships based on trust, conducting our business responsibly and transparently. We champion our customers by delivering exceptional products and services, creating a bespoke user experience that enhances and eases banking and investment decision-making, and we obsessively and relentlessly seek out our clients' opinions to understand their needs, motivations and aspirations. We cherish our employees and work hard to make Swissquote an attractive place to work. Finally, our understanding of sustainability drives us to deliver sustainable growth and create value for all our stakeholders, which includes reducing our environmental footprint.



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MATERIALITY ASSESSMENT

Swissquote has determined which topics to focus on to contribute to sustainable development, whereby the impact of its business activities, stakeholder interests and long-term success in the marketplace are essential dimensions. These three pillars lay the foundation for sustainability management and reporting, and thus serve as the basis for this year's sustainability report 2021.

In 2020, we conducted a materiality assessment to sharpen and prioritise the sustainability topics important to Swissquote and our stakeholders. As a first step, we compiled a list of potentially relevant topics. This was based on the GRI Standards, the Investment Banking and Brokerage Sustainability Accounting Standards of the Sustainability Accounting Standards Board (SASB), topics of importance to our peers, topics observed by ESG rating agencies and our own established sustainability topics. We then clustered the topics through categorising and grouping. In a second step, we evaluated and prioritised the topics in a workshop with

our Chief Financial Officer and representatives from various departments such as Finance, Reporting and Tax, Human Resources, Marketing, Legal and Compliance, and Investor Relations. We assessed the materiality of the topics according to the following criteria: relevance for our long-term business success, relevance for our stakeholders' decision-making and significance of the impact of our business activities. The materiality assessment was facilitated by an external corporate sustainability consultancy and discussed with an institutional investor specialising in sustainable development. The outcome of the materiality analysis was presented to the Board of Directors, the Executive Management and some proxy advisors. **GRI 102-46¹**

The 15 identified topics with high and very high relevance form the basis of our sustainability management and reporting. We are also reporting how we support communities and address our environmental impacts.

Our Materiality Matrix GRI 102-47

RELEVANCE FOR STAKEHOLDERS	VERY HIGH			<ul style="list-style-type: none"> ● Business Continuity, IT Resilience ● Customer Data Security, Privacy and Protection ● Financial Performance 	
	HIGH	<ul style="list-style-type: none"> ● Environmental Responsibility ● Social Impact 	<ul style="list-style-type: none"> ● Customer Experience ● Diversity ● Employee Engagement ● Product Focus ● Talent Development 	<ul style="list-style-type: none"> ● Compliance, Governance and Ethics ● Innovation 	
	MEDIUM		<ul style="list-style-type: none"> ● Compensation and Benefits ● Credibility in the Market ● Prudent Investment Approach 		
	LOW				
		LOW	MEDIUM	HIGH	VERY HIGH
				RELEVANCE FOR LONG-TERM BUSINESS SUCCESS	

¹ Swissquote employs the GRI Standards to report on its sustainability performance. References to selected GRI disclosures can be found throughout the report.

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STAKEHOLDER ENGAGEMENT

We strive to integrate our stakeholders' perspectives at the core of our business strategy. The materiality assessment helps us formalise our engagement with our most important

stakeholders: those who either contribute to the successful business activity of Swissquote or are influenced by our business activity. **GRI 102-42**

Our Approach to Stakeholder Engagement

Stakeholder Group GRI 102-40	Examples of Stakeholder Engagement GRI 102-43	Key Topics and Concerns Raised GRI 102-44
Clients	<ul style="list-style-type: none"> – Annual global satisfaction survey – Biannual Net Promoter Score measurement – Additional targeted surveys – Direct point of contact for business and institutional customers – Focus groups – Personal and email communication – Physical and online events – Social media 	<ul style="list-style-type: none"> – Safeguarding assets – Expertise of their broker/bank – Pricing – Platform usability and reliability – Time to analyse markets – Understanding market trends to trade successfully – Service/support – Ensuring data privacy and client confidentiality – Independence
Investors	<ul style="list-style-type: none"> – Biannual financial results presentation – Investor roadshows – Annual General Meeting – Engagement programme 	<ul style="list-style-type: none"> – Business growth / Financial performance – Transparent and long-term strategy – Anticipation and management of risks – Reliable, timely, high-quality information
Employees	<ul style="list-style-type: none"> – Annual engagement survey – Additional selected surveys – Q&A sessions with Executive Management – Department-level discussions – Full Annual Management Meeting 	<ul style="list-style-type: none"> – Fair remuneration – Enjoyable environment – Career planning – Recognition – Work-life balance – Safe workplace
Regulators	<ul style="list-style-type: none"> – Regulatory reporting – Regular contacts – Engagement in industry associations such as CMTA – Involvement in consultation paper 	<ul style="list-style-type: none"> – Full compliance with applicable laws and regulations – Following best practices – Proactive reporting – Absence of conflict of interests or irreproachable business conduct
Local communities	<ul style="list-style-type: none"> – Sponsoring of local events – Participating in university and association committees – Giving to charitable organisations 	<ul style="list-style-type: none"> – Paying taxes – Philanthropy – Attractive employer

How we respond to the needs and concerns of our stakeholders is outlined in the following sections.

CLIENTS >> **Product Focus, Innovation, Customer Experience, Credibility in the Market, Customer Data Security, Privacy and Protection, Business Continuity / IT Resilience**

INVESTORS >> **Financial Performance, Compliance, Governance and Ethics, Prudent Investment Approach**

EMPLOYEES >> **Employee Engagement, Compensation and Benefits, Talent Development, Diversity**

REGULATORS >> **Compliance, Governance and Ethics**

LOCAL COMMUNITIES >> **Social Impact**



How we focus on customer centricity

In a competitive and crowded industry, we constantly seek to differentiate and think “client first” to keep Swissquote as the bank of choice for our customers. At all times, we are our customers’ champions.

CUSTOMER EXPERIENCE

To hold our position as a leading online bank and keep up our pace of global expansion, we are relentless about understanding our customers’ desires, needs and ambitions. By knowing our customers and delivering outstanding products and customer service, we are building enduring relationships.

The Value of the Customer Experience

One of the Company’s core values is to champion the customer. We strongly believe that by understanding our customers and creating qualitative services and products, lasting partnerships are born. Our ambition is to make information, technology and products accessible to all so every investor can make informed online investments.

Customer retention is key in a competitive market, and customer experience is crucial in the organisation’s value proposition. We are dedicated to perfecting the customer experience to retain business and inspire clients to be fervent Swissquote promoters.



WHERE WE HAVE SET OUR SIGHTS

- » Maintain our Net Promoter Score (NPS®)
- » Grow our global client satisfaction rating
- » Achieve a strong service level within our Customer Care department
- » Be top of mind for trading in customer surveys (IPSOS)

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A Look at 2021

For Swissquote, 2021 was marked by a historical number of requests for new account openings (see table below). The surge of requests affected service quality of various departments such as customer care, central data and compliance. Nevertheless, the Company succeeded in making the required institutional changes (e.g., increased staffing) so that the perceived quality of our services would not be impacted. Our efforts are reflected in the customer satisfaction: we received a positive validation in our 2021 Net Promoter Score SM with the highest level since 2019. Net Promoter Score (NPS®) is a standard indicator providing insights into customer loyalty. It measures the willingness of customers to recommend the brand to a friend or acquaintance, and it is calculated as a difference between brand promoters and detractors.

	2021	2020
Number of new accounts opened during the period	77,599	50,636
Number of new accounts opening request received	151,841	101,098
Average deposit per customer in CHF	114,564	96,948

In early 2021, Swissquote intensified its long-standing collaboration with PostFinance, a leading financial service provider in Switzerland, by entering a joint venture to launch the mobile banking application Yuh. This was a major development in the Swiss mobile banking market, as it was developed from scratch and offers features not previously available on any other Swiss banking app. The app is a unique mobile solution that allows to pay, save and invest. With more than 20,000 new clients in the first three months, the launch was a commercial success and answered the call from customers for smart digital solutions for their financial needs.

In response to growing customer demands, we expanded our offerings for cryptocurrency and services that allow clients to benefit from different market conditions. For example, we have worked to develop a new staking service allowing customers to generate interest return in negative interest market conditions. The staking service was released beginning of 2022. We have introduced new crypto assets to our offering. To improve the customer experience, we started implementing an expanded solution of qualified electronic signatures for clients in the field of electric vehicles leasing as well as a full digital account opening process for European customers. We also rolled out a new eTrading platform that includes a revamped portfolio overview, an enhanced interface and a quick search. To improve communication

between the Company and its customers, a chatbot solution is now available.

We completed a redesign of the multi-asset Advanced Trader Web platform to enhance our Forex/contract for differences (CFD) customer experience. The comprehensive platform provides an integrated charting library and meanwhile offers more than 300 CFD products. The 2021 roadmap for the platform's new features has been built with the help of clients whose feedback is constantly collected directly from the interface. During the rollout, we communicated with our clients by email about the status of the roadmap and upcoming feature launches.

How We Are Reaching Our Goals

We constantly release new products and services into the market. While we are quick to respond to customer needs, we are committed to keeping our platform simple to use, as we truly believe that trading should be accessible to everyone. Swissquote offers a broad range of training tools to help customers join the trading universe more easily and successfully. We also publish the Swissquote Magazine six times a year to deliver ground-breaking stories that guide investors toward a successful personal investment strategy.

Knowing our customers is how we are perfecting the customer experience, and we invest heavily in user research as a component of product and service design. Our team includes a researcher dedicated to understanding customer needs and a specialist who works on the user journey throughout the design process. We systematically conduct usability testing (including testing by Swissquote employees with differing trading level competencies), organise small group events with customers and regularly survey clients to collect qualitative feedback. Our "mystery trader" practice gives insight into the customer experience regarding the quality of interaction with Swissquote support teams. We have magnified our attention on social media, using this communication tool to collect customer feedback and respond to interests and concerns among potential customers. Additionally, we carefully monitored customer ratings and feedback provided through the Yuh app and the Swissquote mobile trading app to ensure our products are aligned with customer expectation.

We share the findings with all employees and expect them to respond to client needs and feedback. To build a common understanding of clients and their needs we have conducted special data-based research to create so-called "personas" – archetypes of customers that represent key traits of a large segment of our audience. They help us understand our customers' needs, experiences, behaviour and goals.

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To ensure that we meet our customers' expectations, we ask for their opinions in client surveys and observe how our competitors are perceived through benchmarking. Since 2016, we have measured client satisfaction in cooperation with the global market research firm IPSOS. The level of client satisfaction has been relatively stable for the last five years. On a biannual basis, we measure customer experience with the Net Promoter ScoreSM. We combine NPS[®] measurements with our customer experience and customer satisfaction research to continually increase customer delight and loyalty.

Client satisfaction targets are reflected in the dedicated Marketing Scorecard used by the Marketing team to set annual performance objectives.

» Further details can be found in the section on innovation

CREDIBILITY IN THE MARKET

Credibility is everything in banking. Without credibility, there is no bank.

The Value of Market Credibility

Swissquote is not a typical Swiss bank. We are forging our own unique market position based on creativity, software development and investor empowerment. Being known for reliability and flexibility allows us to progressively move from being considered by our customers as their "secondary" bank toward being their first and only bank. Swissquote is becoming a universal digital bank with a broad range of products and services.

Credibility is captured by one of the four founding principles of our value proposition and entails:

- Swiss pedigree/customer service
- Unique offering and multi-asset products
- Trust and security
- Technology leader and proven innovator



WHERE WE HAVE SET OUR SIGHTS

- » Remain a profitable company and trustworthy partner for customers
- » Maintain a strong equity capital ratio well above minimum requirements
- » Propose continuity in the dividend payment
- » Apply best practice standards in financial and non-financial reporting
- » Support meaningful regulation and appreciate being regulated by the most respectful regulators in the world
- » Provide transparency
- » Apply best practice remuneration and corporate governance rules
- » Improve ESG rating scores

A Look at 2021

The Company experienced a record level of growth - astronomical success that also brought special challenges. During the first half of 2021, nearly as many new accounts (49,552) opened than did during the entire year of 2020. This sharp increase initially impacted customer care services and we observed a higher rate of aborted client calls and therewith an increased dissatisfaction among our clients, ultimately posing a risk for our market credibility. We immediately responded by increasing our resources in the customer care team and improving other internal processes wherever possible, helping the Company meet its service level goals. Nevertheless, the record number of new account openings paired with increased market capitalisation and growing investors' interest in our shares are strong indicators of Swissquote's commercial success and market credibility.

	2021	2020
Total number of inbound calls	370,011	307,263
Average percentage of calls answered within 120 seconds	88%	89%

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How We Are Reaching Our Goals

On a fundamental level, we establish customer trust by being a regulated bank under the authority of the Swiss Financial Market Authority (FINMA) in Switzerland and a regulated bank under the authority of the Commission de Surveillance du Secteur Financier (CSSF) in Luxembourg, with all the guarantees and capital requirements that come with the status. On a yearly basis, financial and regulatory audits are performed.

Beyond our status as a regulated bank, we know that transparency is the foundation of enduring and trusted relationships. Relevant aspects of our business activities are openly communicated to our customers, partners and all other stakeholders. Our language is clear and unambiguous.

Our International Client Satisfaction survey that we conduct with international research institute IPSOS since 2016 consistently reveals that our clients highly appreciate our status as a regulated bank accountable to a reliable supervisory authority. Our clients confirm their trust in us and our ability to securely manage their data. In relation to regulatory status, trust and security, our clients give us a satisfaction score of 5.9 out of 7.

We are diligent in respecting all compliance and cross-border policies and fiercely protective of our strong brand reputation at the highest possible level. There were no incidents of non-compliance concerning product and service information and labelling or marketing communications in 2021. **GRI 417-2 & -3**

In addition to being a bank, the Company also operates as a public media vector in the form of an online financial platform accessible by a large audience in Switzerland and abroad. The financial industry in Switzerland sets restrictions and information publication obligations applicable to the advertising of specific groups of products and services, particularly in the field of the investment fund business. Our response to these requirements is the engagement of our Legal and Compliance department, the extensive use of ad hoc disclaimers as well as a cross-border policy. Regulatory audits are performed by external auditors.

Executive Management and the Board of Directors receive a daily briefing covering media attention on Swissquote. This measure allows leadership to evaluate how the Company's credibility is reflected in the media and to immediately react if the Company's reputation is at risk. **GRI 103-1, -2 & -3**

»» Further details can be found in the section on employee engagement

CUSTOMER DATA SECURITY, PRIVACY AND PROTECTION

Protecting personal data, maintaining confidentiality and safeguarding privacy are among our most sacred duties. We protect our clients' data with the highest level of information security available.

The Value of Customer Data Security, Privacy and Protection

Customers expect their banks to keep their financial information safe and secure. Proactive IT management targeted on shielding our clients from financial harm and invasion of privacy is necessary to achieve a high level of trust, ensuring our customers' loyalty and reinforcing our credibility.

WHERE WE HAVE SET OUR SIGHTS

- »» **Achieve zero incident regarding customer data security, privacy and protection**
- »» **Maintain and preserve the strong reputation of the bank**
- »» **Remain a trusted bank and warrant all the discretion and security required by our customers**
- »» **Obtain successful results at the annual penetration test audit performed by a third party**

A Look at 2021

We conducted an internal audit on data protection in 2021. The purpose of the audit was to provide independent assurance as to whether appropriate controls are in place to mitigate the key risks over the treatment of Client Identification Data (CID) within the internal processes of the

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bank. Following the audit, we identified areas of improvement and took adequate correction measures.

When Swissquote and PostFinance launched the online banking application Yuh, the key focus was ensuring that the app met an adequate level of security and privacy requirements to preserve client trust. In light of several data breaches covered by media, we responded to growing public concerns regarding data protection by further increasing our focus on this topic.

We pursued efforts to increase the efficiency of our email filtering and block site policy as well as end-user training to reduce the risk of cyber-attacks. Work-from-home arrangements were extended and improved in 2021, requiring further IT efforts to ensure appropriate data security, privacy and protection. To guarantee that all employees fully comprehend their role regarding data protection, we provided a guidance with “do’s and don’ts” as well as tips to work from home securely.

Thanks to our efforts, we did not experience any major incident regarding customer data security in 2021, and our employees’ appropriate response to phishing emails helped us avoid and anticipate potential scammers targeting our customers. **GRI 418-1**

How We Are Reaching Our Goals

As a bank regulated by the Swiss Financial Market Authority (FINMA) and other regulators around the world, we abide by strict security measures to ensure that our customer data and privacy are safe. Swissquote has established a framework for the management of IT risks, particularly regarding intentional or unintentional threats to its IT systems. Internal guidelines ensure that adequate dedicated controls, procedures and processes are in place, particularly with respect to:

- Confidentiality of data processed by the Company
- Integrity of the Company's IT systems
- Availability of the Company's IT systems
- Compliance with relevant laws and regulations

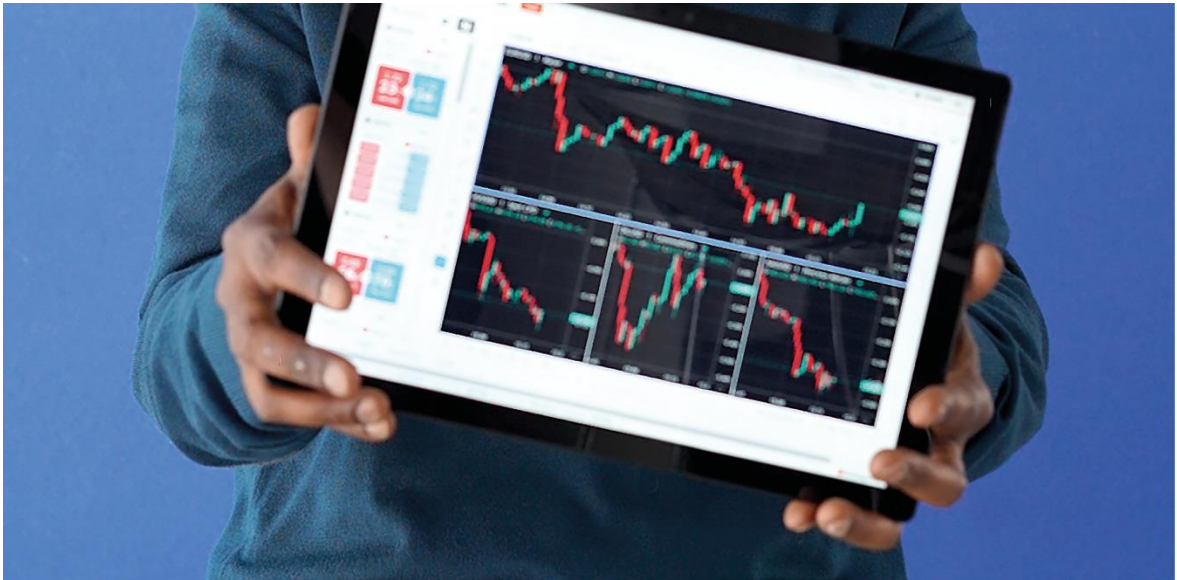
We secure our operating environments and limit access to CID on a need-to-know basis, encrypt sensitive information processed in transactions over our websites and verify customer identity before granting access. In addition, we retain customers' personal data for only as long as it is necessary for the stated purpose, taking into account our

need to answer queries or resolve problems, provide improved and new services and comply with legal requirements under applicable laws. When the collected personal data is no longer required, we destroy or delete it in a secure manner. We maintain a web page where dedicated information related to data protection is available, so that customers can review our policies, procedures and customer rights on data protection at any time. We ensure compliance with the Swiss Federal Act on Data Protection and that the principles of European Union General Data Protection Regulation (GDPR) that apply to Swiss companies are implemented. Customers can use a dedicated email address (privacy@swissquote.com) to discuss any privacy or security concerns. We track the number of received complaints and every potential CID breach is analysed using a matrix that classifies events according to severity and indicates appropriate responses and escalates high-severity cases to the supervisory authorities.

The Company designs its employee security information strategy around three axes: online training, internal newsletters and security bulletins. We train our employees on data security and privacy-related risks and procedures upon hiring and then on a yearly basis. All employees are required to undergo training on data protection in accordance with the requirement of FINMA (FINMA Circular 2008/21 “Operational Risks – Banks”). All matters of data security and privacy are managed by our IT Security team. Ultimate responsibility lies with top management, in particular our Deputy Chief Executive Officer and Chief Risk Officer.

We have mandated an external third party to perform an ISAE 3402 review on the description of our systems and controls in conjunction with our function as an IT service provider organisation. This helps us communicating about the suitability of our controls to achieve specified control objectives and ultimately enables us to build trust among our partners. Apart from this, an external third party conducts regulatory required annual prudential audits. We also occasionally run internal audits on Data Security, Privacy and Protection. **GRI 103-1, -2 & -3**

»» **Further details can be found in the section on compliance, governance and ethics**



How we innovate to enhance our products

At Swissquote, we are never satisfied with the status quo. We continuously seek new and unexpected ways of delivering value to our customers by developing, refining and evolving our products and services. This dedication to innovation is something our customers have come to expect from us and has become a defining characteristic for the Company.

PRODUCT FOCUS

Swissquote continually develops new products to better serve our customers and provide value to stakeholders. By focusing our efforts on developing the most innovative products possible, we provide our clients with industry-leading value while directly reinforcing the Company's reputation for excellence.

The Value of Focusing on Products

Over the past decade, Swissquote's business has evolved from offering stock trading to retail clients in Switzerland to providing a wide array of products to retail, corporate and institutional clients worldwide. To maintain this growth and improve our agility we have become a product-focused organisation. **GRI 102-2**

To consolidate our unique offering and reinforce our value proposition, we have an ambitious roadmap that puts client wants and needs in the driver's seat. To reach our goal of becoming our clients' primary bank, our products must satisfy their demands.

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WHERE WE HAVE SET OUR SIGHTS

- » Deliver an ambitious project roadmap on a yearly basis
- » Increase agility to speed up the pace of product delivery and keep a high level of stability in our systems
- » Implement client-oriented KPIs

A Look at 2021

We continued to decrease product delivery time and increase efficiency. After rolling out a new approach in 2020 that organised Swissquote around small, cross-functional teams (“squads”), we collected feedback internally and further modified the organisation by separating client needs from internal organisation needs. We created cross-functional hubs (product manager, designer and product analyst) focused on products, to further our client-centric approach and get closer to client need and expectations, which were captured through a collaboration between UX research, data science and marketing insight. We developed an internal evaluation standard chart that allows us to assess the success of each squad. The result of the cross-functional work is improved quality of insight and output and delivering the best offerings and data-driven solutions to our clients.

We continually develop intuitive trading solutions and expand our cryptocurrency product offerings, in line with the demand of our clients. We contribute to expanding mobile capacity and functionality so that customers choose mobile as the first and most common point of access. Our strong product focus materialised in an employee increase of 26% (headcount) within the teams dedicated to product development, including software development and project management.

	2021	2020
Headcounts dedicated to product development	211	168

Swissquote recognises the importance of sustainability when it comes to customer investment decisions and offers six theme trading certificates with a focus on sustainability (vegetarianism, global recycling, sustainable energy, social responsibility, green energy and decarbonisation). The decarbonisation theme certificate was launched following a vote from customers on social media.

Moreover, the Tracker Certificate on Swissquote Rainbow Rights Index, issued in partnership with Leonteq and for which Swissquote Bank Ltd is the Index sponsor, received the [2021 Swiss Derivative Award](#) in the category of Best ESG Product. The Swissquote Rainbow Rights Index invests globally in large-capitalised companies actively supporting the advancement of LGBT rights, gender diversity and human equality as part of their corporate social responsibility strategy.

How We Are Reaching Our Goals

Every product has a product manager in charge of working toward the overall vision and achieving set targets. Product managers lead the squads’ efforts and coordinate with the relevant departments.

The three-pronged mission of the product-oriented hubs is to:

- Define the best products for our clients
- Provide visibility of short/mid/long-term goals
- Provide product “cockpits” to pilot products and measure results

We are employing the squad model for both product improvement and new product development. We have a metric-based approach for product development, in which each squad receives a measurable objective and tracks KPIs relevant to their task, such as lead-time, technical depth, stakeholder satisfaction and team mood.

» Further details can be found in the section on employee engagement

INNOVATION

As a pioneer in the online banking industry, innovation is central to our corporate identity and synonymous with our brand. We strive to generate value in new and unexpected ways that delight our customers and keep them using our services.

The Value of Innovating

Digital banking services and technology have become key elements of the banking industry. More and more customers expect to have a convenient, easy to use, flexible and on-demand method of managing their financial assets. Our competitive advantage and positive brand perception increase if we can provide newer and more desirable products than our competitors. As a bank focused on innovation throughout our 25-year history, we are perceived as a proven innovator, which largely contributes to our brand awareness and is fundamental to our goal of retaining tech talent, which encompasses more than 40% of our people. By focusing on innovation, we can add value to the Swissquote platform and quickly act on changes in the market.



WHERE WE HAVE SET OUR SIGHTS

- **Bring new, disruptive products to the market and differentiate ourselves through innovation**
- **Reinforce reputation as a pioneering organisation**

A Look at 2021

The CFD programme that allows clients to trade major stock indices online in our FX platforms continues to reap benefits. During the year, the Company expanded its CFD offer by launching CFDs on single stock. In 2021, CFDs were 28% of our leveraged Forex revenues (2020: 27%) and 7% of our total operating income (2020: 8%).

A particularly innovative element of the recently launched Yuh mobile banking application is a new crypto token called Swissqoins (SWQ). The value of this token increases each month as Yuh shares a portion of its revenues with the holders of the SWQ. The more customers use the app, the more tokens they receive, driving more revenue for Yuh and more value for the customers. This innovation creates a win-win, goal-aligning mechanism whereby a portion of the Company's revenues is redistributed to the most active users. Since October 2021, the Yuh customers are able to trade fractions of selected shares. Despite challenges concerning technical and legal aspects of the application, the efforts are rewarding as the app supports our mission of making trading accessible to a broader audience, especially smaller investors with limited financial capacity.

To reinforce its pioneer position in the market, Swissquote has increased the number of cryptocurrencies available for trading on its platform and now covers 26 assets.

	31 December 2021	31 December 2020
Total number of cryptocurrencies available for trading	26	12
Total number of online tradable securities	3,178,448	2,992,919



Cryptocurrencies available for trading as of 31.12.2021

How We Are Reaching Our Goals

Swissquote develops innovative solutions by continually scouting the market for new technologies and by understanding the needs and behaviours of our customers to anticipate what could improve their experience and increase their trade volumes with us. Our innovations are focused on making wealth building easier, less time consuming and more accessible.

For more and more investors, ESG criteria are becoming an increasingly important aspect of stock selection. While Swissquote already offers a broad range of trading options focused on sectors that fight climate change in their regular operations, we are also evaluating how we can provide better ESG-related information to our customers in the future.

Our product management division is responsible for driving innovation. Ideas are discussed in think tanks, and our squads are created around each innovation project once a budget is allocated.

Tech talent is crucial to company success, and we understand that the retention of this talent is closely related to innovation. We are committed to retaining employees who are looking for professional challenges and with that in mind, we pursue a company strategy of constant innovation.

Objectives and KPIs are established to track the development of new products and innovations. We also collect feedback from our customers through qualitative and quantitative surveys.

»» Further details can be found in the sections on customer experience and talent development



How we create value and conduct business responsibly

We are committed to conducting our business responsibly and transparently. Mutual respect is foundational to our identity and defines everything we do. At Swissquote, we consider this both a moral obligation and a differentiator; by building relationships based on trust and understanding, we are better positioned to serve our customers, now and into the future.

PRUDENT INVESTMENT APPROACH

We work hard to safeguard our clients' financial interests. By including environmental, social and governance criteria into our investment decisions, we are limiting risk exposure while making a positive impact on the world in both the short and long term.

The Value of Prudent Investing

For us, prudent investment means doing our best to ensure long-term returns by investing in responsibly operated companies and ventures. We aim to invest in high-quality issuers to mitigate yield deterioration while maintaining an appropriate risk level. Responsible and prudent investing is important to achieve a target yield and maintain a strong liquidity ratio.

In line with its mission of democratising finance and empowering investors, Swissquote does not provide investment advice or asset management services other than Robo-Advisory services, and our core business does typically

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not involve granting direct loans to corporations. However, as a publicly traded company with a Swiss banking license and more than 480,000 accounts, we must strictly follow rules and guidelines to safeguard our customers' assets and shareholders' equity. Swissquote fully complies with the Basel III framework.



WHERE WE HAVE SET OUR SIGHTS

- » Adequately and vigilantly manage the various risks affecting our assets
- » Remain in compliance with regulations and our own rules
- » Apply best practice risk management policies

A Look at 2021

The COVID-19 pandemic continued to dominate investment decisions in 2021. So far, our prudent investment approach has proven effective as we have no defaults to report, and less than 0.1% of our investment portfolio has a witnessed significant degradation of its credit metrics. The full scale of the pandemic's consequences is not yet known, and as such, we have adopted a selective approach for credit risk appetite.

How We Are Reaching Our Goals

In addition to the Swiss regulations for licensed banks that ensure proper capital and liquidity buffers as well as risk diversification, our Board of Directors has set internal risk management guidelines that pertain to our investment approach. These guidelines cover approved investment products that Swissquote can purchase on its balance sheet, maxima and minima by credit rating and type of investment product, diversification rules by country and industry, liquidity buffers as well as rules to ensure an appropriate duration of our assets and liabilities. Our diversification rules ensure we are minimising investments into less sustainable companies.

Our Asset and Liability Management and Treasury department, which oversees the balance sheet, is responsible for adherence to our risk management guidelines. Our Controlling and Risk department monitors compliance to these rules daily. In addition, adherence is audited by external auditors to prevent conflicts of interest.

» Further details can be found in the section on product focus

COMPLIANCE, GOVERNANCE AND ETHICS

Since our founding, Swissquote has built a reputation based on transparency and respect for our stakeholders. Integrity is in our DNA, and our partners have come to expect this in everything we do.

The Value of Compliance, Good Governance and Strong Ethics

Conducting our business with integrity is vital to avoid regulatory risks and preserve our reputation. As a financial services group comprising a regulated bank in Switzerland and a regulated bank in Luxembourg, compliance with all relevant laws and regulations, including corresponding best practices, is important from both a regulatory and a business perspective, as reputation and trust are key elements to successful banking relationships. We take great care in conducting our business in a responsible and ethical manner. We are fair, honest and respectful in every interaction with our customers, partners and colleagues. Everything we do is done according to the highest ethical and corporate governance standards. Employees are contractually required to comply with those standards, and breaches can result in disciplinary actions. As an international financial services group based in Switzerland, we are in full compliance with the SIX Swiss Exchange Directive on Information Relating to Corporate Governance as well as all national and regional requirements where we do business. We inform our shareholders, prospective investors and the public on our corporate governance policies through our Corporate Governance Report. Our [Code of Conduct](#) is available on our website.



WHERE WE HAVE SET OUR SIGHTS

- » Aim for zero incidents that could harm our reputation and set corresponding objectives for people in management positions

Sustainability Report

A Look at 2021

Our core values are **GRI 102-16**:

- Champion the customer
- Unite as one
- Dare to be different
- Do the right thing
- In pursuit of excellence
- Always say it how it is

In 2021, Swissquote did not identify any material non-compliance with applicable laws or regulations in the economic, social or environmental area and was not subject to any significant fine or non-monetary sanction, more specifically, was not subject to any legal action for anti-competitive behaviour, anti-trust or monopoly practices in 2021 **GRI 206-1 GRI 307-1 GRI 419-1**.

In 2021, we performed an in-depth review of our corporate governance and remuneration framework. As a result, Swissquote improved the disclosure on a number of aspects, including with respect to the short-term and long-term incentives plans of the Executive Management. Moreover, the Board of Directors made a series of proposals to amend Swissquote's Articles of Incorporation with the purpose of improving our governance and strengthening shareholders' rights, which were all approved by the General Meeting.

In the context of a shareholder engagement programme launched in the second half of 2021, a delegation of Swissquote led by our Chairman met with certain key investors. The objective was to intensify the dialogue with them in order to better understand their position and provide adequate answers to their expectations. The key subjects discussed on this occasion included succession planning at the level of the Board of Directors, gender diversity, independence and the Executive Management's remuneration. The answers to the investors' key expectations are summarised in the letter from the Chairman of the Nomination & Remuneration Committee, which is included in the Remuneration Report.

In 2021, the Company worked on drafting a Whistleblowing Policy as well as a Suppliers Code of Conduct. Both documents were implemented early 2022.

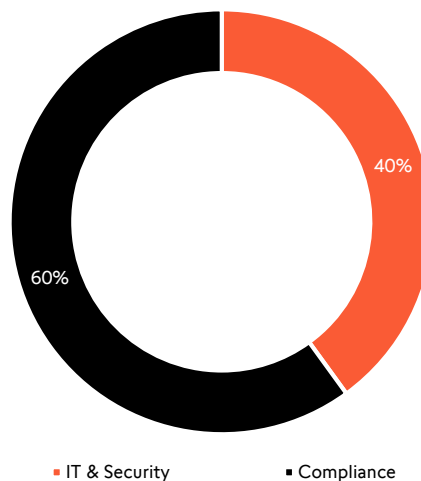
How We Are Reaching Our Goals

Our stakeholders expect accountability from us – and our procedures and organisational structure are set up to respond to their reasonable concerns and anticipate any issues that may arise.

As a matter of course, we comply with both the letter and spirit of the laws and regulations and identify and adopt best practices to ensure compliance throughout our operations. We have policies and rules in place to identify, mitigate, manage and prevent, inter alia, conflicts of interest, money laundering, terrorism financing, corruption and market abuse. For example, for digital account openings, we follow the procedure for video and online identification that respects anti-money laundering and "know-your-customer" requirements issued by FINMA.

We run an e-learning training programme to ensure our employees are well versed in all relevant laws and regulations and internal policies. Swissquote's training schedule defines the mandatory training courses and frequencies for each employee. In 2021, all employees were required to follow trainings on cross-border compliance, client identification data, General Data Protection Regulation (GDPR), password security and the new Swiss Financial Service Act. For selected employees, additional training in specified fields of expertise is applicable. All our employees are trained in anti-money laundering procedures, insider trading and anti-corruption. Compliance-related trainings are a high priority for Swissquote and make up 60% of all mandatory trainings. New employees must follow a dedicated training. Our employees are required to annually sign-off their understanding and acceptance of the regulation relating to own-account transactions and insider trading **GRI 205-2**.

MANDATORY TRAINING BY CATEGORY (2021)



We foster a culture of ethics and expect employees to abide by our Code of Conduct. The Code of Conduct is presented during our induction programme for new employees, which includes a series of training modules aimed at onboarding and familiarising newcomers with our operations and company principles. Swissquote requires all new employees to review, understand and acknowledge they received and read our policies on banking secrecy, money laundering, insider trading and corruption. All employees accept the "Anti-Bribery and Corruption Policy" which is part of the employment contract **GRI 205-2**. Behavioural expectations are outlined in our full coercive set of applicable internal regulations and Standard Terms and Conditions that are part of the working contract.

If an employee suspects unethical or illegal behaviour, we have reporting procedures that guide a discussion of the suspicious activity with the manager and escalate any issues to the Human Resources, Legal or Compliance departments **GRI 102-17**. Every alleged breach of ethics is fully investigated, and appropriate corrective actions are taken. We employ external legal counsel and undergo external audits to confirm that we manage our regulatory and compliance risks effectively.

Our Board of Directors takes responsibility for ESG and sustainability decision-making by supervising the achievement of objectives in terms of sustainability, gender diversity and wage fairness **GRI 103-1, -2 & -3**.

»» **Further details can be found in the section on customer data security, privacy and protection**

BUSINESS CONTINUITY AND IT RESILIENCE

Our Business Continuity and IT Resilience plans ensure that critical business processes can continue in the event of a major internal or external incident. It solidifies our reputation as a reliable bank that can maintain complete operations even during times of crisis.

The Value of Business Continuity and IT Resilience

As an online bank offering eTrading and eForex services every single day, around the clock and across the globe, business continuity and IT resilience are key expectations of our customers and core elements of our value proposition. Any interruption of our operations could lead to litigation and reputational damage. It is therefore of paramount importance to have abundant risk-mitigation measures in place to prepare for and prevent such events.



WHERE WE HAVE SET OUR SIGHTS

- »» **Always remain resilient and operational**
- »» **Apply Business Continuity Management best practices**
- »» **Comply with applicable regulation from FINMA, Swiss Banking Association and other authorities**
- »» **Keep operating and limit losses in the event of an operational disruption, IT disaster or national emergency**

A Look at 2021

As the pandemic continued, we extended the work-from-home solution without noticeable incident, allowing operations to continue running smoothly. Despite the rapid personnel growth, we ensured that our employees have timely access to needed IT material, software and further tools.

Sustainability Report

We transferred part of our processing capacity to a private cloud, hosted by the Company, to meet customer demand in a more flexible and dynamic way.

We conducted a holistic review of the organisation's business impact analyses (BIAs) and continuity of operations plans (COOPs) in partnership with an external advisor to ensure greater efficiency of business continuity at the entity, department and service level. The review was carried out in collaboration with all departments of Swissquote to ensure the accurate identification of primary respondents in each department, the detection of critical business processes and the definition of available fallback procedures.

Moreover, Swissquote started migrating its system toward a self-contained System SCS architecture, which represents a significant technical challenge. The SCS is a new software architecture approach focusing on the separation of functionalities into independent systems hence reducing the risk associated with having a system disproportionate in size. The organisation's increased activity implies a growth in the load on the servers and the new architecture allows the organisation to improve the servers' resilience.

How We Are Reaching Our Goals

Business continuity management is an integral component of our entire corporate strategy. Our business continuity strategy addresses a comprehensive range scenario, with corresponding responses to events that threaten our operations with total or partial failure. The objective of the strategy is to ensure that essential functions in each department are maintained and that the impact on our activities is minimised in the event of an incident, crisis or disaster. As disruptive events can have multiple causes, our strategy focuses on consequences and impacts rather than the causes themselves.

Our strategy and related plans enable us to cope with the following consequences and impacts of disastrous events:

- Total or partial inaccessibility or loss of one of our buildings
- Loss or unavailability of IT infrastructure, applications and/or communication system
- Loss of key skills or staff members

Swissquote's continuity plan includes a back-up website that allows customers to connect and trade, should the primary website be compromised.

Our strategy incorporates best practices and regulated mandates as they relate to business disruption. Swissquote business continuity plans are reviewed every year and certified by third party audits and specialised external consultants to continuously improve our business continuity processes. We also incorporate stakeholder feedback through existing feedback channels.

FINANCIAL PERFORMANCE

Swissquote aspires to grow as a company and provide exceptional value to investors by pioneering new markets in the online banking industry. By reinvesting part of our profits into improving and innovating our operations and services, we are positioned to lead the Swiss online banking industry as one of the best capitalised banks.

The Value of Monitoring and Developing Cash Flow

Swissquote structures its business strategy around the long-term growth, profitability and capital efficiency of its operations through innovative products, enhancing client experience and expanding to new markets. To achieve this, our strategy balances profitability and capital efficiency with a long-term view to create value by investing in our technology and services, improving cost-efficiency and generating sustainable growth.

As a high qualitative small-capitalised company, our investors expect significant upside growth potential. Therefore, we plan carefully and thoughtfully to ensure these expectations are met.



WHERE WE HAVE SET OUR SIGHTS

2021

- » Acquire net new money in the amount of CHF 6 billion
- » Raise net revenues by 15%
- » Increase pre-tax profit by 23 %

MEDIUM-TERM

- » Increase client assets
- » Keep our margin on assets between 85 and 90 basis points
- » Increase net revenues and pre-tax profit
- » Achieve a pre-tax margin above 45%

A Look at 2021

Swissquote realised a strong financial performance while maintaining a robust capital ratio situation. Due to the acceleration in the adoption of digital banking services stimulated by the COVID-19 pandemic, Swissquote continued to capitalise on this behaviour trend, with more than 77,000 new accounts opening in 2021. These new customers drove organic growth, generating CHF 9.6 billion of net new money, leading to revenue increasing by nearly 49% since last year. Net profit more than doubled at CHF 193 million, with a net profit margin of 41%. This success has led to us holding a record number of client assets valued at CHF 55.9 billion, with a strong Basel III core capital ratio of 26.2% **GRI 102-7**.

In early 2021, Swissquote released a guidance regarding the 2021 financial objectives that were further reviewed during the year. In addition, Swissquote provided a medium-term outlook for its financial objectives.

Strong growth of financial performance was achieved without being prejudicial to the strength of the organisation in terms of capital ratio and operations.

How We Are Reaching Our Goals

We adopt a holistic approach to financial performance, with the objective of sharing the value we create among our different stakeholder groups. While we share profits with our shareholders in the form of dividends and other pay-outs, we also retain some revenue to reinvest in innovative services and products that disrupt markets and make financial trading accessible to everyone. We also incentivise our employees with short-term and long-term equity-based compensation plans to improve operations and profitability.

Our financial performance is audited by an external party on a semi-annual basis. We compare our financial results against the goals we set and take corrective measures to stay on track. Remaining a strongly capitalised bank according to Basel III is key to our success. Hence, the distribution of value created takes into account regulatory capital constraints by considering the reference capital **GRI 103-1, -2 & -3**.

» Further details can be found in the **Remuneration Report, in the Financial Report and in the section on customer data security, privacy and protection**



What matters to us regarding social responsibility

Our people are our most important investment, and they are why we succeed. We challenge them, trust them, support them, compensate them and protect them. And as a result, they deliver an exceptional and refreshing banking experience to our customers. Similarly, we recognise the value of supporting the communities in which we do business and partnering with people and organisations in those communities to ensure that our presence is beneficial

EMPLOYEE ENGAGEMENT

Our employees are driven by a common goal: making trading opportunities accessible to everyone. We are a bank that makes employees feel like home, where we value personality, initiative and above all, team spirit. Our team members reflect a diversity of

backgrounds, cultures, nationalities and skills, and it's these differences that make us powerful innovators.

Sustainability Report

Composition of the workforce

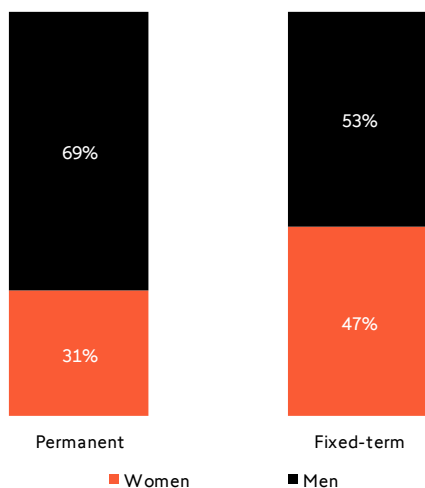
Data covers locations in Switzerland and Luxembourg

GRI 102-8

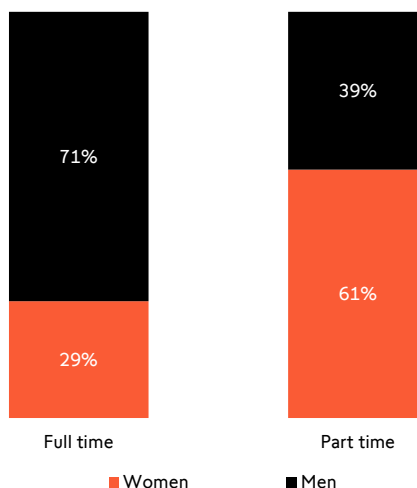
in FTE	2021	share	2020	share
Employees*	840		700	
Apprentices, interns, trainees, externals	23		20	
Employees by employment contract*				
Permanent	808	96%	672	98%
Fixed-term	32	4%	28	2%
Employees by employment type*				
Full time	755	90%	619	88%
Part time	85	10%	81	12%
Employees in locations not in scope of the sustainability report	89		85	
Total employees at Group level	952		805	

* excluding apprentices, interns, trainees, externals

BY EMPLOYMENT CONTRACT



BY EMPLOYMENT TYPE



Sustainability Report

The Value of Employee Engagement

Swissquote is a bank that has intentionally created an environment that appeals to employees who would not otherwise choose the banking sector, and we take care of our people in ways that encourage them to stay. Employees are encouraged to challenge themselves and each other, so that together we are stronger, faster and smarter.



WHERE WE HAVE SET OUR SIGHTS

- »» **Attract and retain talent to increase overall performance and capacity for innovation**
- »» **Decrease turnover to maximise institutional knowledge and reduce talent acquisition costs**
- »» **Emphasise well-being for the health, happiness and productivity of employees**
- »» **Increase engagement and commitment to maximise job satisfaction**
- »» **Improve reputation as a best place to work**
- »» **Create an Employee Value Proposition (EVP) that invites and encourages all employees in identifying strengths, weaknesses and priorities for 2022**
- »» **Improve our online reputation as an attractive employer**

A Look at 2021

In our “2021 COVID-19” employee survey, more than 81% of participants reported a high level of motivation in 2021, despite the social upheaval caused by the pandemic (participation rate of 45%). In our employee survey, we also included questions regarding satisfaction with our pandemic response. Given the situation, Swissquote has established a COVID-19 task force to monitor the evolution of the pandemic within the organisation, implement new measures to ensure employees’ safety and legal compliance and issue a weekly update on all COVID-19 related topics.

Swissquote improved its ranking in [Universum’s World’s Most Attractive Employers](#) survey, with a rank of #26 for Tech Talents and “best climber of the year” designee. Swissquote thus advanced 17 spots in only one year.

At the same time, we were recognised as a “Best Employer in Switzerland” by a survey from *Le Temps*, *Handelszeitung* and *Statista*. We reached #2 in the private/international banking category and #4 in the technology category, which placed Swissquote ahead of Microsoft, Swisscom and Logitech. The survey was open to more than 1,500 Swiss companies with at least 200 employees, and more than 200,000 responses were collected.

We concentrated on improving our online reputation as an attractive employer, including monitoring our position on the employer rating website *Glassdoor*. We experienced a significant increase in our global ranking, moving from 3.1 in early 2021 to 4 out of 5 stars in October, our highest ranking on *Glassdoor* yet.

We organised a week-long 25-year birthday celebration to strengthen team cohesion and express appreciation to our people, who all have helped us reach this milestone. The week included both online and in-person events, at which pandemic safety measures were implemented. Online components included a special collaborative web platform, an invitation to submit a personal video and an online live trivia. The participation rate during the celebration week was high, having 633 registrations for the collaborative web platform, 150 personal video submissions and 150 registrations for the online event.

We continued to offer flexible work arrangements between work-from-home and work-on-site as much as possible while accommodating business demands. Globally our workforce exhibits a ratio of approximately 40:60 work-from-home to work-on-site.

We launched an account on the Instagram platform in June, named “Humans of Swissquote”, to showcase the successes and diverse backgrounds of our employees. This effort contributes to celebrate the strength behind Swissquote online solutions: the humans. We published 52 posts in 2021, with an engagement rate of 8.2%.

Sustainability Report

In 2021, we issued an employee engagement survey as the first step in defining our new Employee Value Proposition (EVP). This survey, which was sent to all Swissquote employees, showed a satisfactory participation score of 67.5%, and the results were analysed with the support of an external consultant agency specialised in employer branding. The survey showed a good Employee Net Promoter Score at 23%. Employees were required to associate and rank 40 attributes in four categories (corporate reputation, people & culture, remuneration & advancement, job characteristics) with Swissquote, which resulted in the following five: friendly work environment, fast growing/entrepreneurial, flexible working conditions, market success and innovation. We were also pleased to see that Swissquote's employer experience is mostly aligned with employees' expectations. Additionally, the survey showed that our employees perceive the core value "Dare to be different" as fully aligned with the current culture of Swissquote. The survey helps us to define our strengths and weaknesses and to set the priorities to work on in 2022.

How We Are Reaching Our Goals

We are a highly motivated, agile, youthful and spirited organisation. Unlike every other bank, we prioritise work-life balance, a start-up approach to work and a relaxed environment. Our values as a company are what make Swissquote unique in the industry and keep our focus on our team members: Unite as one, Dare to be different, Do the right thing, In pursuit of excellence, Always say it how it is, Champion the customer.

We celebrate curiosity and debate, which has strengthened our reputation as an employer of choice. We cannot be competitive on all employer aspects, but we can create an inspiring working environment where norms are challenged and ideas are brought to life.

Among the perks that differentiate us are: no dress code, an exceptional work-life balance that even before the pandemic accommodated part-time and remote working, and a highly deliberate social atmosphere and active social calendar that has returned with revised pandemic precautions.

On hold in 2020 due to the COVID-19 outbreak, we re-established our food and beverage service with updated sanitary measures such as more frequent disinfecting and individual portions. To compensate for the social hardship of remote working and to improve morale while working onsite, we have upgraded the quality of food offered.

We have been inspired by the high-level hospitality industry through the hiring of an experienced employee with a background in luxury hospitality, thereby improving the quality of hospitality services offered to our employees.

We place a high value on open and continual communication, and we have continued our practice of holding at least two staff meetings a year to present the Company's status and offer a Q&A session with our Chief Executive Officer.

We routinely ask for feedback through engagement surveys to monitor employee satisfaction. These include regular management surveys to understand how we can better support employees and surveys to check on employees' overall welfare (e.g. "2021 COVID-19" survey or employee engagement survey). Our employees can also provide feedback on food and events via special surveys. In our European Division, we established an annual benchmarking process to compare our initiatives with those of local banks using the Luxembourg Bankers Association (ABBL) survey.

To prioritise health and security in the workplace for all employees, each employee is required to follow an e-learning training module on health and safety measures at work that covers topics such as preventing accidents, behaviour in case of emergency, appropriate workstation ergonomics, burnout awareness, work-life balance, pandemic precautions and emergency contacts. Our various health and safety measures aim to prevent professional risk, promote and implement a healthy environment and reduce workplace accidents and injuries.

To maintain a safe workplace in case of emergency, selected employees are trained as volunteer fire fighters and emergency first responders. Every year, all employees take part in an evacuation drill. In each open office space of the building, an employee is in charge of ensuring a safe and quick evacuation without incident. Those employees receive appropriate training for this role. The drill evacuation is always followed by feedback on the success of the operation to ensure that the organisation learns and grows from it.

A software system recording each employee's working hours is designed to ensure that work time rules and regulations are respected and that overtime is monitored and compensated when appropriate. In addition, the system closely monitors absenteeism. These elements are part of a broader set of measures adopted to preserve employees' well-being and work-life balance **GRI 103-1, -2 & -3**.

» **Further details can be found in the section on compensation and benefit**

COMPENSATION AND BENEFITS

We expect our employees to work hard, and we strive to make working hard easy. This includes fair and competitive compensation, generous benefits, an enjoyable work environment, a priority on work-life balance and a focus on health and well-being.

The Value of Thoughtful Compensation and Benefits

An attractive compensation, rewards and benefits package is a critical competitive tool, especially in the financial industry. We have intentionally designed our remuneration policy to attract talent, retain valuable employees and knowledge, and maximise employee engagement.



WHERE WE HAVE SET OUR SIGHTS

- » Confirm fair and competitive compensation with regular benchmarks
- » Reduce the gap between average male and female salaries
- » Foster non-monetary compensation
- » Align pay with performance
- » Encourage a healthy work-life balance
- » Support remote working

A Look at 2021

We continued to review all salaries, pay “Profit Award” and distribute shares and options. We conduct regular salary benchmark reviews to verify that our salaries are appropriate for our industry and our recruitment strategy. Our most current review shows that our salaries are fair and correspond to market average. More precisely, we benchmarked a number of selected positions throughout the organisation in 2021. This resulted in the increase of remunerations of some positions to align with other market participants.

Our variable remuneration package offered to employees reached an all-time high (+30% compared to the average of the previous years), to express gratitude to our employees for their commitment and hard work during this demanding and disruptive period.

Middle management was especially rewarded for maintaining motivation and satisfaction among the bulk of our workforce.

We remodelled the Executive Management remuneration system to achieve a variable remuneration package that was aligned with proxy advisors’ expectations.

How We Are Reaching Our Goals

Our Pay for Performance policy unambiguously communicates the relationship between compensation and work. Remuneration is linked to the achievement of our strategic business objectives, our overall performance and individual performance. Our policy is aligned with best practices and designed not to create incentives for risk-taking outside Swissquote’s risk appetite. We apply salary grids to guarantee equal and fair treatment and prevent compensation disparity.

In addition to fair and competitive compensation, every employee receives a yearly bonus (“Profit Award”), the amount of which varies according to their hierarchical position within the Company. All employees with at least one year of service are entitled to participate in our Employee Share and Option Plan, which awards free shares and options based on position. Our seniority recognition programme includes additional days of vacation and cash bonuses.

Employees are more productive and satisfied when they do not have to choose between family and career. This is why we are serious about work-life balance: flexible working hours, part-time positions (also at senior levels of management) and sabbatical leave options. Even before the pandemic, our normal workweek permitted working remotely at least one day a week.

We regularly monitor compensation trends to ensure that our employees are fairly, equitably and competitively paid. Each year, we benchmark the compensation of several positions to remain competitive for those positions. In our European Division, we conduct a biannual compensation and benefit review (ABBL survey) where we compare our approach to that of the local market.

With the exception of the “Profit Award” and “Employee Share and Option Plan”, we provide all benefits to full-time, part-time and temporary employees **GRI 401-2**. While in Luxembourg 72% of our employees were part of a collective bargaining agreement in 2021, there is no such

Sustainability Report

agreement in place that could apply to our employees in Switzerland **GRI 102-41**.

Swissquote goes beyond minimum legal requirements for pensions. We pay 60% of the total contributions to the occupational pension fund. Our contributions also exceed the recommended saving rates by age group. We provide complementary plans to cover salaries above the legal maximum, and we offer additional savings opportunities. Employee representatives are involved in the decision-making process **GRI 201-3**.

Beyond financial compensation, we offer all our employees numerous programmes and benefits, making Swissquote an attractive employer. They include subscriptions to fitness, sport activities and bike-sharing, vouchers for goods and services ("Swibeco"), cooking facilities and food services (including daily fresh fruit and a GreenTime fridge with food offerings 24/7), an area designated for employees of any faith for praying, charging stations for electric cars, an internal pub, and annual social events.

» **Further details can be found in the section on employee engagement**

TALENT DEVELOPMENT

Developing the talent we want to keep is the foundation of our talent management efforts. Compensation and benefits are important, but they are only the first step toward cultivating team members who are skilled and inspired to do their best work.

The Value of Talent Development

Helping employees on all career levels develop their talents and become masters of their craft is key to a fully engaged and productive workforce. We aim to ignite employees' curiosity, ensure continuous learning and secure the skill sets needed for long-term business success. By funding skill development and ongoing education, we help our employees grow their careers while staying at Swissquote. When employees stay, we reduce talent acquisition costs for new employees, and we experience higher morale. A healthy internal promotion programme strengthens company culture, institutional knowledge and long-term leadership.



WHERE WE HAVE SET OUR SIGHTS

- » **Attract and retain talented employees**
- » **Promote internally**
- » **Encourage current employees to recruit candidates from their network**
- » **Support professional growth**

A Look at 2021

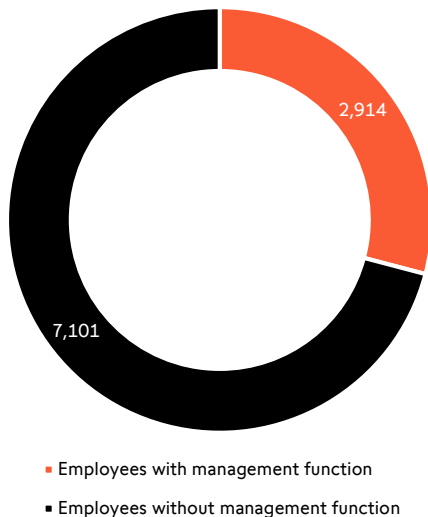
In 2021, we continued to map career paths within the Company to highlight the possibilities of horizontal mobility and create awareness around its benefits among managers. We improved internal mobility with better internal advertising of open positions and a more confidential internal transfer process. The Company observed an increase in the absolute number of internal transfers in 2021 (57) compared to 2020 (45). Nevertheless, to meet its unprecedented growth, the Company had to diversify its sourcing channels and recruited externally, resulting in a decrease in the relative internal transfer rate from 24% in 2020 to 18% in 2021. Indeed, in order to face its unprecedented growth, the Company had to recruit externally as well.

With referrals as a key indicator of employee satisfaction, we recruited 66 people in 2021 through referrals. Referrals are our second largest recruitment channel next to direct applications and represent 16% of our new hires.

The turnover rate remained relatively stable at 11% in 2021 (2020: 10%) **GRI 401-1**. The organisation did not undergo any large-scale redundancies or significant job cuts in 2021.

For skill improvement, Swissquote funded 30 certified training programmes such as university degrees or industry specific professional training courses, 41 language courses and 47 conference registrations held throughout Europe. Regardless of the seniority level of the employee, Swissquote provides up to 100% of financial support for training, depending on the degree of alignment with company priorities.

TOTAL HOURS OF TRAINING IN 2021



Our Software Engineering department collaborated with the Human Resource department to develop a new career path for software engineers that offers interesting opportunities and a clear promotional path. The path is structured along the impact that employees have at each level (personal development, development as part of the squad team and product team, development within the Company, development within the industry). The framework encourages our people to drive initiatives, find solutions, help their teammates and coach less experienced co-workers, while simultaneously promoting collaboration, continuous improvement, knowledge sharing and customer centricity.

With the goal of attracting and retaining talent, Swissquote prepared a Tech Talent Academy that was launched in 2021. The Academy is dedicated for people in junior positions who are interested in expanding their career in tech and allows them to rotate between tech teams for one year. At the end of the programme, they will most likely be offered a position.

We acquired a Human Resource Information System (HRIS), which will help us improve our abilities to provide employee feedback, help people grow and offer greater career opportunity. This major investment will provide a better employee experience and improve engagement and retention.

How We Are Reaching Our Goals

Excessive turnover happens when there is not a good company/employee fit or when an employee feels that there is no place to grow in the Company. We reduce turnover in two ways: first, through more thoughtful hiring informed by exit interviews conducted to understand why people leave. We also analyse turnover according to grade and tenure within the Company. Second, we offer a variety of options for growth, both vertically and horizontally. This includes competence building, formal appraisal and feedback, and providing employees with career development opportunities across different functions and different locations.

Swissquote maintains five training areas for employees: general, compliance, IT security, IT development and management. In 2021, the average annual training hours per FTE for employees without management function was 9.12 hours while the average annual training hours per FTE for employees with management function was 47.46 hours **GRI 404-1**. Every new manager receives Management Toolbox Training that introduces our expectations to managers and includes courses on setting smart objectives, giving constructive feedback, labour law and recruitment.

All newcomers experience our induction programme that includes four modules: learning about the Company, our internal tools, the world of finance and Forex. Every year, specific themes are addressed in addition to the annual mandatory training. For example, we included campaigns related to password security and LSFIn regulations in the training in 2021. **GRI 404-2**

Every employee has a performance appraisal at least once every year to discuss performance, career perspectives and objectives **GRI 404-3**. Human resource specialists analyse employee records to identify opportunities for improvement or advancement in every department. In our European Division, the appraisal process is a year-round continuous process that culminates in a year-end review for all employees.

Individual and team objectives are set every year through discussions with the employee and their immediate manager. Objectives are consistent with the employee's job description and level and take into account the organisational strategy and priorities for the period to be reviewed. Objectives are reviewed informally along the year. A formal yearly review is conducted by the manager who assesses employees on their performance against their responsibilities and objectives.

Sustainability Report

DIVERSITY

We embrace diversity along every line: gender, age, (social) origin, culture, race, language, sexual orientation, religion, marital status, thinking and working style, experience, skills and disabilities. The more perspectives we have, the better decisions we make for our diverse base of customers around the globe.

The Value of Diversity

The 992 employees (952 FTEs) of Swissquote Group work in nine cities, represent approximately 57 nationalities and speak 35 different languages.

Our unique identity is defined by our diversity of backgrounds, cultures, nationalities and skills. Greater diversity makes it easier for people to fit in. Without a Swissquote employee stereotype, people can more quickly become active contributors. Inclusivity is the foundation of our close-knit community.

We value inclusion and diversity at Swissquote because it helps us evolve, innovate, problem-solve and be more efficient. More perspectives mean fewer missed opportunities, and we are keenly aware of the value of a diverse workforce as we expand into other areas of the world.



WHERE WE HAVE SET OUR SIGHTS

- » Offer equal opportunities to all our employees
- » Achieve Fair-ON-Pay re-certification
- » Promote diversity in the organisation
- » Support people with disabilities via intentional outreach and workplace modifications

A Look at 2021

In 2021, we were re-certified for Fair-ON-Pay, a voluntary certification that demonstrates conformity with the requirements of the Swiss Federal Office for Gender Equality and ensures that women and men in similar jobs are compensated equally. Managed by an auditor, the re-certification process confirmed that we are continuing to ensure equal pay. Since 2020, the residual gap observed is below 5%. We aim to improve diversity awareness at every level of the organisation by holding presentations on topics such as the benefits of a more balanced organisation, cognitive biases and recruitment practices. **GRI 405-2**

Toward our goal of expanding the pipeline of women applying for tech positions, we are working on our recruitment approach to make it more inclusive (diversify our recruiters pool, change our tech sourcing approach, adapt our recruitment process and qualification, reduce unconscious bias using artificial intelligence in recruitment and create inspiring tech women role). We are also recruiting women tech profiles through the Tech Talent Academy, and to further improve the attraction and the integration of women in the organisation, we are planning to create a Women in Tech Community in 2022.

On the Group Board of Directors, 17% of our members are women while, among the Group Executive Management, 100% are men. At other management levels, 22% are women and, of our workforce, 32% are women. Regarding age diversity, 58% of our employees are between the ages of 30 and 50, with 36% younger than 30 and 6% older than 50. Among executive managers and board directors, 62% and 0% respectively are younger than 50. Regarding other management levels, 85% are younger than 50.

The Company's Nomination and Remuneration Committee adopted in 2021 a timeline regarding the Board's composition and succession planning which includes diversity requirements (see Section 3.6 of the Corporate Governance Report for further details).



Sustainability Report

How We Are Reaching Our Goals

We commit to having an unbiased recruiting process that does not discriminate and promotes diversity throughout the Company. For example, our recruiting is conducted fully in English to welcome candidates of any nationality, and we advertise our job openings on European and global platforms.

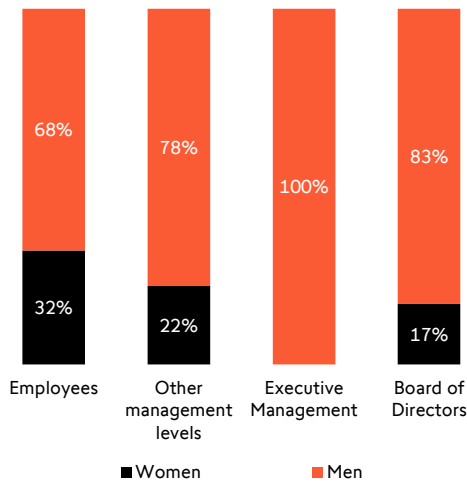
The Swissquote culture ensures a respectful workplace free from discrimination and harassment and supports equal opportunities, compensation and treatment. We have included corresponding rules in our terms and conditions and established a reporting and escalation process to immediately address instances of intolerance, discrimination and harassment.

Salaries are audited by an external party to ensure we abide by the Fair-ON-Pay certification and have no gender discrimination. We support remote working and offer part-time working contracts for men and women, even in management. The Swissquote culture is inclusive, non-discriminatory and makes room for all perspectives. **GRI 103-1, -2 & -3/ GRI 102-8**

» **Further details can be found in the section on employee engagement and compensation and benefits**

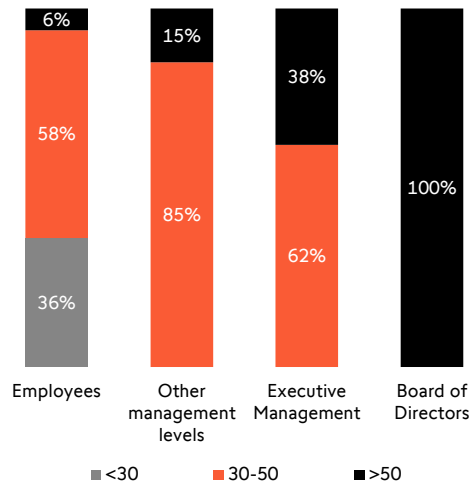
DIVERSITY BY GENDER, 2021

GRI 405-1



DIVERSITY BY AGE GROUP, 2021

GRI 405-1



Sustainability Report

SOCIAL IMPACT

Positive social impact continues to grow as a hallmark of businesses with long-term purpose and sustainability. We are committed to contributing and supporting the local and regional communities in which we do business.

The Value of Supporting Communities

Being a good corporate citizen creates a positive feedback loop that starts with sharing success with others and comes back to the Company in the form of positive reputation, supportive neighbours, loyal customers and motivated employees.



WHERE WE HAVE SET OUR SIGHTS

- » Foster education and innovation
- » Improve livelihood of citizens in our communities

A Look at 2021

As a Swiss tech leader, we accept the responsibility to train young professionals and maintain a healthy ratio of apprentice positions. In 2021, we offered 21 trainee positions to young graduates. We also offered five new apprentice positions in 2021, just like in 2020.

	2021
Number of positions opened during the year	495
Number of candidates applications received during the year	31,552

Swissquote renewed its Trade for Good initiative as part of the Fair Friday initiative, developed by the non-profit organisation Caritas Switzerland, to reduce poverty in Switzerland and care for people in vulnerable situations. The Company donated CHF 1 for each trade executed between the 22nd and 26th of November, resulting in the raising of CHF 100,000 to Caritas Switzerland. Moreover, we donated CHF 3,000 to the non-for-profit organisation "J'aime ma planète" and CHF 4,000 to the G4 foundation. Via the

application Yuh, we conducted a similar initiative called "Yuh care, Yuh share", which resulted in a donation of CHF 41,400. Building a new office tower in Gland was one of our key challenges throughout 2021. Despite standing in a constant dialogue with the concerned parties, we failed to reach a mutual agreement. The amendment of the local urban plan will thus be voted on in a popular referendum in May 2022.

How We Are Reaching Our Goals

Our corporate citizenship initiatives focus on fostering education and innovation, but also include local cultural enrichment, ecologically responsible transportation and poverty alleviation.

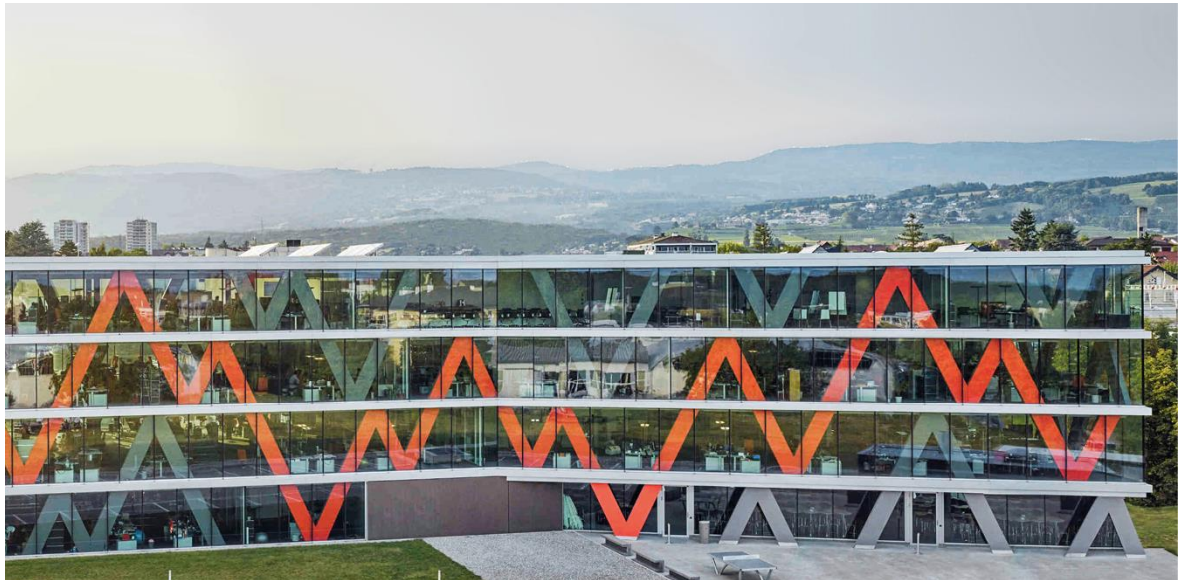
The engagement of Swissquote towards education and innovation initiated in 2009 materialised with the donation of CHF 400,000 per year to the Swissquote Chair in Quantitative Finance at EPFL in Lausanne and to the Center for Digital Trust (C4DT). Moreover, we supported the Fondation pour l'Innovation Technologique (FIT), which provides grants to start-ups that are creating breakthrough innovations. For the 10th consecutive and final year, we donated CHF 100,000.

We also make substantial financial contributions to innovation and higher education in finance, aiming to adequately prepare the next generation of financial professionals to manage and anticipate risk in the financial industry and reduce the impact of economic crises on communities. We continue to sponsor CLIC, the computer science student association at École polytechnique fédérale de Lausanne (EPFL). In 2021, for instance, we supported them with CHF 3,000 to organise social events throughout the year and provide prizes for their online contests.

In 2021, we financially supported local cultural institutions and sports clubs with more than CHF 400,000 (e.g. Servette Football and Hockey club and Montreux Comedy Festival). We also donated CHF 17,500 to fund a Publibike electric bike station in Gland and an additional CHF 4,950 for ten Publibike Business subscriptions to offer a subscription to all interested employees in our headquarters.

We continue to partner with Caritas Switzerland, a charitable foundation that assists Switzerland's most vulnerable and disadvantaged people. **GRI 103-1, -2 & -3 / GRI 203-1**

» Further details can be found in the section on employee engagement and compensation and benefits



Why Environmental Responsibility is important to us

Every business can take actions to reduce greenhouse gas emissions and cut back on waste. The year 2021 has made clear that environmental responsibility needs to be a high priority of every business and organisation – for and with our stakeholders. By committing to environmental responsibility, we are doing our part to fight climate change.

The Value of Environmental Responsibility

As a corporate world citizen, Swissquote has a responsibility to respect the environment and counteract the effect our business has on the ecosystem. We strive to minimise our environmental impact and prioritise a strong environmental performance, which strengthens our relationships with stakeholders.

Sustainability Report



WHERE WE HAVE SET OUR SIGHTS

- » Increase the energy efficiency of our headquarters buildings by 10% over 10 years
- » Increase our CO₂ savings by approximately 7 tons per year over 10 years
- » Reduce paper consumption by promoting digital initiatives
- » Promote recycling within the organisation

A Look at 2021

We continued to focus on decreasing waste related to the account opening process, and we are extending the digitalisation effort to other processes in various company departments. This effort materialises in the reduction of paper consumption (from 19 pages per new account opened in 2020 to 14 pages per new account opened in 2021 representing a decrease of 27%). Similarly, the new Yuh application, launched by Swissquote and PostFinance, integrates a paying, saving and investing solution in one easy-

to-use package and includes an account opening process that is entirely digital.

Noticing the significant waste created by used COVID-19 face masks, we began partnering with recycling innovator Transvoirie to collect, treat and recycle face masks. To make it easy for our employees to recycle used masks, Transvoirie distributed collection bins throughout our buildings.

In our food service area, we collaborate with suppliers who support short supply chains and seasonal products. Our local caterer offers numerous vegan and vegetarian options. In 2021, we replaced the traditional vending machine with a machine offering more local products.

Our organic growth also creates environmental challenges. For example, our data centre will have to be expanded to create additional capacity to meet the growing demand for our services. Such expansion will unquestionably result in an absolute and relative increase in energy consumption.

Environmental indicators

Overall consumption of energy in 2021 was approximately 4% more than 2020 consumption, despite a 20% increase in FTEs. Taking the increase in FTEs into account, our 2021 consumption was a stark 13% decrease in kWh of energy consumed per FTE. Greenhouse gas emissions were up 4% overall but decreased by 14% per FTE compared with 2020.

GRI 302-1 / GRI 305-1 & -2

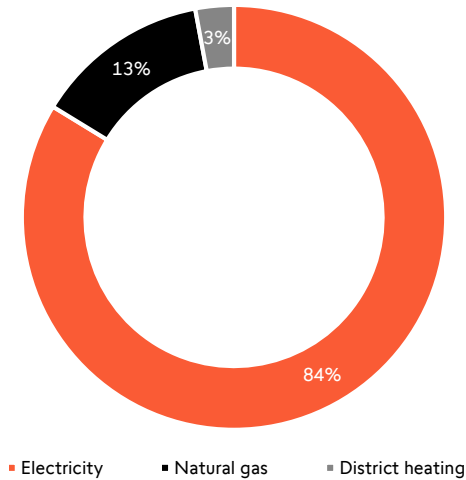
	2021	2020	Delta
Total energy consumption in MWh	3,133	3,018	4%
Electricity	2,623	2,517	4%
Natural gas	418	417	-
District heating	92	84	10%
Energy consumption in kWh per FTE	3,630	4,192	-13%
Greenhouse gas emissions in tCO₂ e	361	349	4%
Scope 1: Natural gas	77	77	-
Scope 2: Electricity & District heating	285	272	5%
Greenhouse gas emissions in kgCO₂ e per FTE	419	478	-14%

Data in the above table is based on locations in Gland and Luxembourg.

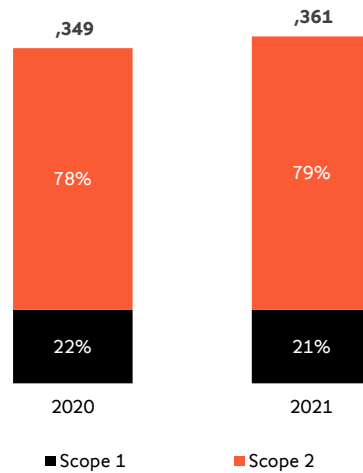
Greenhouse gas inventory calculated in accordance with the Greenhouse Gas Protocol. Emission factors from DEFRA and IEA.

Sustainability Report

SHARE OF ENERGY CARRIERS 2021



GREENHOUSE GAS EMISSIONS BY SCOPE
t CO₂e



How We Are Reaching Our Goals

We track our energy consumption and constantly seek ways to increase energy efficiency. We officially agreed on energy efficiency objectives for our headquarters buildings with the canton of Vaud in Switzerland in 2016. In the first three years following this agreement, we improved by 9% and are close to meeting our objective well ahead of the set target of 2026. We were able to reduce our energy consumption and our CO₂ consumption by 7 tons per year compared to 2016 despite employing more people and growing our IT infrastructure.

In 2021, the solar thermal collectors installed in 2013 produced nearly 14 MWh of energy that was used to heat up domestic water. We also optimised our server locations to reduce cooling needs and are updating our lighting system to reduce electricity use.

We are replacing all conventional lighting with LED lighting, which is more sustainable and uses less energy. Currently, over 20% of our overall lightning is provided by LED.

Our recycling guidelines promote recycling within the organisation. Moreover, our Swiss offices are located no further than a five-minute walk from a railway station to

promote the use of public transportation. One of the Company's short-term objectives is to update its mobility plan and include ambitious measures in order to optimise access to the Gland site for employees by promoting soft mobility. Our electric vehicle parking lots provide charging stations at our offices, offering electricity to employees at discounted rates.

To confirm that we are making regular progress on shrinking our environmental footprint, our facilities are audited by an external party annually according to our agreement with the canton of Vaud on building energy efficiency. As with previous periods, an external third party will audit our progress toward our environmental goals. **GRI 103-1, -2 & -3**

About this Report

The Global Reporting Initiative (GRI) provides the world's most widely used standards for sustainability reporting, offering a structured format to coherently and comprehensively share information about material issues and related performance metrics.

We use the GRI Standards to transparently disclose our sustainability efforts. Our last report was published on 18.03.2021 **GRI 102-51**. There are no significant changes from previous reportings in the list of material topics and topic boundaries **GRI 102-48**. The reporting scope comprises headquarters in Gland in Switzerland and our office in Luxembourg **GRI 102-3 & -4**. We will gradually include our offices in Zurich, Bern, London, Dubai, Hong Kong, Malta, Singapore and Bucharest in the reporting scope over the coming years. Reference is made to page 33 regarding the list of consolidated subsidiaries in the consolidated financial statements **GRI 102-45 GRI 102-9**. Swissquote engages with a variety of business partners to successfully create value. Among others these include: financial counterparties such as banks, stock exchanges, brokers, prime brokers and liquidity providers; datafeed providers; software engineering firms, software and IT infrastructure providers; and other professional service providers such as advertising, sponsoring, consulting and legal firms. In the reporting period, there were neither significant changes to the organisation and its supply chain nor to the list of material topics **GRI 102-49 GRI 102-10**.

The report has been prepared in accordance with the GRI Standards: Core option **GRI 102-54**. The reporting period comprises the calendar year 2021 **GRI 102-50**. Swissquote commits to an annual reporting process **GRI 102-52**. The reporting principles for defining report content and quality have been applied throughout the information collection and report development process **GRI 102-11**. The contents of the sustainability report have not been externally assured **GRI 102-56**.

The contact point for questions regarding the report is Nadja Keller, CEO Assistant / Media Relations, Swissquote, Email: nadja.keller@swissquote.ch **GRI 102-53**.

Memberships and Associations and Commitments to External Initiatives **GRI 102-12 & -13**

- Swiss Bankers Association (SBA)
- Association des Banques et Banquiers Luxembourg (ABBL)
- Swiss Funds and Asset Management Association (SFAMA)
- Capital Markets and Technology Association (CMTA)
- Foundation for Technological Innovation (FIT)
- Commission vaudoise pour la formation bancaire (CVFB)

We are committed to the standards, self-regulations or code of conduct of those associations.

GRI Content Index

For the Materiality Disclosures Service, the GRI Services team reviewed that the GRI content index is clearly presented and the references for Disclosures 102-40 to 102-49 align with appropriate sections in the body of the report. The GRI Materiality Disclosures Service was performed on the English version of the report.



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