

radicant bank Industry & Practices Disclosure

B Lab Statement on radicant bank B Corp Certification

B Lab's independent Standards Advisory Council has rendered the following decision and guidance regarding eligibility for B Corp Certification for companies in the banking industry in Switzerland:

"Companies involved in private banking in Switzerland are eligible for B Corp Certification if they are able to demonstrate sufficient management practices in place to screen clients for criminal activities and compliance with relevant local and international regulations.

If approved, a company is required to disclose their management practices regarding the above on their B Corp public profile."

radicant bank is required to disclose a summary of how it complies with these industry requirements as a part of its B Corp Certification. For more information on the specific requirements, please refer to B Lab's position statement on Banking in Switzerland <u>here</u>.

About radicant bank

radicant bank is a digital bank founded in 2022 with a licence from the Swiss Financial Market Supervisory Authority (<u>FINMA</u>), mentioned as among the '<u>Authorised banks and securities firms</u>' in Switzerland. The company employs approximately 100 individuals.

radicant has the objective to align their business with the UN's 17 Sustainable Development goals, associating their banking and investment products to sustainability objectives. Such products include their impact transactions feature, allowing clients (both businesses and individuals) to invest a portion of their funds in highly liquid sustainable investments (eg. Green bonds), investing a part of interchange fee from a debit card business in sustainable projects and their carbon footprint tracker for payments. In addition, the company offers a digital investment management section in their banking platform, permitting clients to invest in various topics of interest using their SDG Impact rating feature.

The company is a member of the Swiss Sustainable Finance (SSF) association, bringing together 200 members of the financial industry, and a member of the Green Fintech Network (GFN), an association to foster the Swiss green digital finance ecosystem.

Information on the company's social and environmental impact can be found in their sustainability report.

radicant bank Management Practices to Prevent Criminal Activities

As a FINMA licensed bank, radicant adheres to all laws and ordinances that apply to them. The company has not received any sanctions or fines for non-compliance of the laws and ordinances that govern the Swiss Financial market:

- <u>The Banking Act</u> for Banks
- <u>The Financial Institutions Act</u> for Financial Institutions
- <u>The Collective Investment Schemes Act</u> for funds
- <u>The Anti-Money Laundering Act</u> for all financial market participants

In addition, radicant bank adheres to laws pertaining to taxes, data privacy, money laundering, FATCA & AIA (Foreign Account Tax Compliance Act and Automated Information Exchange). The company has an International tax policy (FATCA & AIA), Internal Control Systems, Market Conduct Policy and Counterpart Risk Policy. Employees of radicant also receive compliance education.

The company has not received any sanctions or fines for non-compliance of the laws and ordinances that govern the Swiss Financial market:

To comply with the above regulations, radicant has a <u>Code of Conduct</u> within which radicant commits to compliance with applicable laws and regulations applicable to everyone at radicant, including members of the Board of Directors, advisors, agency employees, vendors, independent and temporary contractors and all of their employees. Their Code encourages the responsible reporting of suspected violations of this Code of Conduct, any radicant policy or the law to their respective line manager or to the Compliance department. The company commits to treat the reporting violations or suspected violations confidentially or anonymously without risk of retaliation.

radicant establishes a zero tolerance approach to anti-financial crime within their Code of Conduct, committing to avoid:

- Engagement in any business activities with criminals, terrorists, or entities associated with sanctioned governments.
- Money laundering or terrorist financing in any form.

Moreover, the company includes a zero-tolerance policy to bribery or corruption as well as a commitment to adhere to legislation that promotes responsible investment practices, ensuring that capital transfers comply with the regulations of respective countries and assisting clients in fulfilling their tax obligations both domestically and internationally.

The area responsible for the implementation of the above policies and practices is the Risk Management area; responsible for ensuring compliance with regards to legal, risk management,

cyber security, and finance. The functions are reviewed every two years. Policies and procedures are reviewed on an annual basis by FINMA and internal and external auditors. Risk management conducts internal controls on a regular basis as part of a first and second line of defences. Internal audit functions represent a third line of defence. The operational governance of radicant bank lies with the radicant executive committee and the radicant board of directors. More information available <u>here</u>.

radicant Banks's policies and procedures are reviewed on an annual basis by FINMA and internal and external auditors.

radicant bank's relationship with certain entities, including clients in controversial industries

radicant bank is exclusively for retail clients and does not provide credit, financing or similar to commercial entities. Unwanted client types include gambling and wherever the bank's terms and conditions are not followed. The company's Anti-money laundering procedure that outlines onboard identification for client management, compliance, legal and risk allows them to carry out due diligence on potential new clients.

As a digital bank, radicant has a digital onboarding procedure, supported by processes and digital tools that enable for a know your client (KYC) system.

The company also conducts ongoing monitoring in line with Swiss AML regulations and FATF recommendations.