



Sustainability Delegate of the Board of Directors

"At Leonteq, sustainability remains a cornerstone of our strategy, driving our efforts across environmental, social, and governance dimensions. In 2024, we continued to make significant progress toward our long-term ESG goals with the establishment of our climate action plan and commitment to achieving net zero over the long term."



Our sustainability strategy sets out a clear plan for Leonteg's

continued sustainable growth and international success. We are achieving this by implementing new measures each

## We are implementing ESG best practices to drive the sustainable development of our company.

Leonteq has spent the last five years executing its sustainability strategy.

2020 - 2021

Leonteg launches its Sustainability initiative

Leonteq pronounces its commitment to the UN Global Compact

Leonteq becomes signatory to the UN supported Principles for Responsible Investment

Leonteq becomes a member of Swiss Sustainable Finance









2022 - 2023

Inaugural Sustainability Report 2021 published

Leonteq's Growth Strategy 2026 announced

Leonteq's Sustainability Committee established

Leonteq publishes its Code of Conduct & Ethics

Leonteq becomes a member of Advance

Leonteq becomes Great Place to Work certified

Leonteg receives MSCI ESG rating score of A

Leonteq publishes its second **Sustainability Report 2022** with limited assurance on selected KPIs

Leonteq signs the Advance Diversity Charter

Leonteq receives an ESG Risk Rating of 12.3 (aLow Risko) by **Sustainalytics** 

Leonteq places in top 3 financial services companies in Inrate zRating study 2023

MSCI upgrades Leonteq's ESG rating score to AA







2024

Leonteq prepares inaugural TCFD Report 2024

year to reach our sustainability targets.

Leonteq defines climate action plan including net zero targets

Leonteq becomes **Great Place to Work certified** in Monaco, Germany, Hong Kong, Portugal and Singapore

Leonteq conducts its first double materiality assessment



TASK FORCE ON CLIMATE-RELATED FINANCIAL COLUMN

Leonteq's sustainability efforts are overseen by the Board of Directors and implemented via the Sustainability Committee.

Our sustainability governance is defined as per Leonteq's Sustainability Framework policy. The Board of Directors determines the overall direction of the Group's sustainability strategy, with the Sustainability Committee primarily responsible for the implementation of it, with the aim of improving the integration of ESG practices across all business areas.

### **Board of Directors**

**Audit & Risk Committee** 

**Nomination & Remuneration Committee** 

### **Executive Committee**

### Sustainability Committee

Responsible Investing Workstream Environment Workstream Social Workstream Governance Workstream Corporate Sustainability Reporting Workstream



In 2024 as we further expanded our efforts, we also renewed our material sustainability topics through a <u>double materiality assessment</u>.

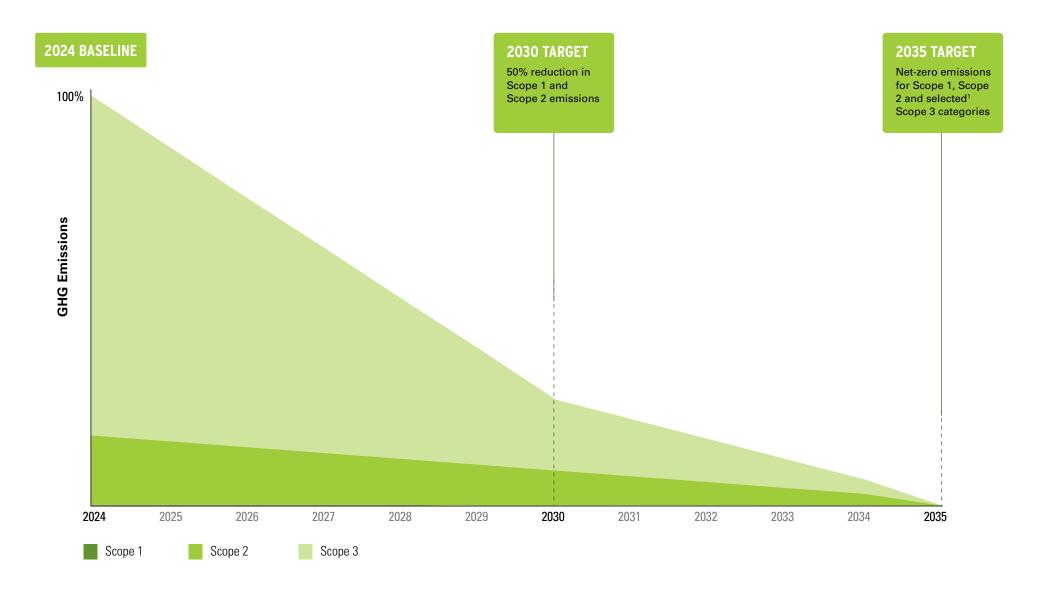


**Impact Materiality** 

We prepared our fourth Sustainability Report in accordance with the GRI Standards, and we developed our first Task Force on Climate-related Financial Disclosures (TCFD) report.



In 2024, we took significant steps to address climate change by defining a comprehensive climate action plan and net zero targets.



<sup>&</sup>lt;sup>1</sup> Business travel and employee commuting.

### Our ESG targets 2026 also remained a focus.

### Nationality of employees



Our diverse workforce of 592 employees included 464 males and 128 females, representing 54 nations. With a gender diversity of 22%, Leonteq aims to improve its overall gender diversity to over 25% by 2026.



<30 Years	19%
30-50 Years	72%
>50 Years	9%

In 2024, Leonteg took part in the Great Place to Work® initiative, including employee survey, for a second time. Based on the results, which included an overall Trust Index Score of 64% (2022: 68%) and additional company analysis, Great Place to Work® certified five of Leonteq's 14 locations as Great Places to Work (2022: 2 certified locations). Leonteg aims to improve its overall Trust Index score to over 72% by 2026.



Great



Great

**Place** 

Work.

Certified

То



Place To Work<sub>®</sub> Certified

2022: 19%

2023: 20%

2024: 22%

2026 Target:

**Gender diversity** >25%

2022: 68%

2023: -

2024: **64%** 

2026 Target:

**Great Place to Work®** >72%

Sustainability Report

TCFD Report

9

### Leonteq continued to implement its strategic ESG measures and targets across its business operations

Employee engagement and development was further fostered through Corporate Culture initiatives and programmes to upgrade employee skills. In 2024, Leonteq employees benefited from:

An average of

20

hours of training per employee

Access to

>100

Soft skills training courses

The availability of

13

Leonteq Clubs across various interest groups

Additionally, in 2024 Leonteq supported six employee-led community engagement initiatives that:

Amounted to

49

days of volunteering

**Supported** 

5

Sustainable Development Goals

Our commitment to upholding high legal, ethical, and moral standards, ensures our strict compliance with local and international laws and regulations. We have robust policies, including our Code of Conduct & Ethics, in place that are aligned with both internal and external sustainability standards. Our mandatory employee trainings are continuously reviewed and enhanced and address specific areas of business integrity. We closely monitor the management of our business conduct, and we are committed to following strict anti-bribery and anti-corruption best practices and regulations. In 2024, Leonteq:

**Implemented** 

6

New mandatory employee training courses

Rolled out a total of

19

Mandatory employee training courses

Identified

0

Significant risks related to corruption

Identified

0

Incidents of corruption

Received

Sustainability Highlights

Substantiated complaints regarding breaches of professional secrecy, data loss, or internal breaches

**Purchased** 

70%

of products and services from local suppliers

We additionally kept advancing Leonteq's strategy for providing transparency about the sustainability characteristics of products and are developing a Sustainability Scorecard in accordance with industry guidelines, enabling investors to make informed decisions based on their individual preferences and priorities.

Leonteg aims to provide high quality investment choices to investors and assist distribution partners in offering products adapted to different market conditions, whilst delivering value when compared to traditional investment opportunities. In 2024, Leonteq:

Served

Clients across Europe, the Middle East, Latin America and Asia

Issued

46,467

Products, of which 62% were processed fully automatically Identified

Incidents of non-compliance concerning product and service information and labelling or marketing communications

By integrating such ESG considerations into the product and service portfolio, enhancing the Group's environmental footprint, maintaining a robust governance system, and addressing social considerations that benefit employees and the wider community, we are driving the sustainable development of our Group.

Our efforts are being recognised by ESG rating agencies and other external parties. We aim to further improve the ratings assigned to Leonteq by ESG rating agencies in the future.



AA

Upgraded from A in 2023



Low Risk (score 13.0)

Maintained Low Risk of experiencing material financial impacts from ESG factors



В

Upgraded from B- in 2023



**Highest Governance Quality Score** 



SPI ESG INDEX

Leonteg represented in the ESG Index by SIX



About this report

### 13

Our company, activities

### 15

Governance

### 20

Strategies, policies and practices

### 24

Stakeholder engagement

### 26

Material topics

### 27

**Business Conduct & Ethics** 

### 31

Quality of Products

### 33

Employee Engagemen & Development

### 46

& Cybersecurit

### 49

Sustainable Offering

### 51

Climate change

### 54

Responsible sourcing

### 56

Community engagement

#### 58

GRI Content Index



Sustainability Report

TCFD Report

12

## **About** this report

GRI 2-2 GRI 2-3 GRI 2-5

Leonteq launched its sustainability initiative in 2020 to foster a more sustainable approach to business in view of the growing importance of environmental, social and governance (ESG) aspects and the increased focus being placed on sustainability practices by clients, investors, employees and the broader public. As part of this initiative, we analysed Leonteq's sustainability efforts as a company and identified how and where we can integrate ESG considerations and sustainability practices into our own operations and management processes. We also determined how we can best support our clients and partners in investing responsibly. Our sustainability strategy therefore aims to drive the sustainable development of our Group.

Leonteq has published an annual Sustainability Report since 2021. The publication date of the Sustainability Report 2024 is 27 February 2025. It covers the reporting period from 1 January 2024 to 31 December 2024 (in alignment with the Annual Report 2024). The scope of Leonteq's sustainability reporting is aligned with the scope of the entities consolidated in the Group financial statements, as set out on page 144 of the Annual Report 2024.

The report describes the current situation and the progress made in the area of sustainability in 2024 and provides a comprehensive overview of Leonteq's approach to sustainability, material topics, and our sustainability strategy and governance. It also provides an account of our sustainability achievements during the year and current sustainability measures and initiatives in place at the Group.

This report has been prepared in accordance with the Global Reporting Initiative (GRI) Standards 2021, as well as the Task Force for Climate-Related Disclosures (TCFD) and Article 964b of the Swiss Code of Obligations. The Sustainability Report was approved by Leonteq's Board of Directors and will be submitted for approval in an advisory vote by shareholders at the Annual General Meeting 2025. Limited assurance has been obtained for specific sustainability indicators from Leonteq's external auditor, Deloitte, and these indicators are listed in the Assurance Report on pages 75 to 76. The point of contact for inquiries regarding the Report can be found in the GRI Content Index on page 59.

For the purposes of this report, unless the context otherwise requires, the terms "Leonteq", the "Group", "we", "us" and "our" mean Leonteq AG and its consolidated subsidiaries. The business of Leonteq Securities AG, the main operating entity of the Group, is substantially similar to the Group, and we use these terms to refer to both when the subject is the same or substantially similar. We use the term "Company" when we are referring only to Leonteq AG.



Our company, activities and people

GRI 2-2 GRI 2-6

GRI 2-7 GRI 2-8

Sustainability Highlights Sustainability Report TCFD Report

### **Our Vision**

We aspire to be the leading marketplace for structured investment solutions

### Our Mission

We deliver quality products and services to our partners and clients

### Our Values

Our core values build the foundation of our corporate culture. We live, respect and protect them

## How we live our values

**Passion** 



We love what we do, take pride in our work, and are excited to be innovators in our field

Quality



We uphold professional excellence in everything that we do, creating sustainable relationships and driving innovation

**Expertise** 



We are a team of experts; we trust our specialists, develop our teams and share our knowledge

**Dedication** 



Our success is driven by committing to and focusing on our clients' needs, professionally and in a solution-oriented manner

**People Together** 



We believe in the power of collaboration between our employees, our clients and our partners, and we respect them for their values, knowledge and experience Leonteg is a Swiss fintech company with a leading marketplace for structured investment solutions. Based on proprietary modern technology, the Group offers derivative investment products and services. Leonteg acts as both a direct issuer of its own products and as a partner to other financial institutions. Leonteg further enables life insurance companies and banks to produce capital-efficient, unit-linked pension products with guarantees.

Leonteq is committed to offering clients and partners excellent service delivered by an international team of experienced industry professionals. We have a strong presence in our home market of Switzerland and in Europe, as well as an established footprint in Asia. including the Middle East. Leonteg's headquarters are located in Zurich, Switzerland. The Group has additional offices in 13 other locations: Amsterdam, Dubai, Geneva, Guernsey, Frankfurt, Hong Kong, Lisbon, London, Milan, Monaco, Paris, Singapore and Tokyo.

Leonteg focuses on building a unique ecosystem for investment solutions with a highly automated marketplace. It offers B2B and B2B4C services to 952 financial intermediaries globally. Leonteg has a strong shareholders' equity of CHF 803.8 million as of 31 December 2024 and investment grade ratings assigned by renowned credit rating agencies. The Company's shares are listed on SIX Swiss Exchange. 39% of its equity capital is held by a shareholder group comprising the Swiss cooperative bank Raiffeisen Switzerland and two of its founding partners, Lukas Ruflin and Sandro Dorigo. The remaining 61% is distributed among institutional investors as well as retail shareholders mainly from Switzerland.

Leonteg's workforce consists of a headcount (HC) of 592 experts from 54 different countries who administer CHF 13.4 billion of assets on the platform and support the continued development of the Group's ecosystem.

Leonteg's 592 employees correspond to a total of 583 full time equivalents (FTEs) as of 31 December 2024. This is a decrease from 591 FTEs, or total headcount of 600, in the prior year. Of the 592 employees, 128 employees are female and 464 employees are male. This corresponds to 122 female FTEs and 461 male FTEs. Out of the global workforce, 327 employees are based in Switzerland, 194 in Europe and 71 in Asia, including the Middle East.

Of the total employees, 564 are permanent employees and 28 hold temporary employment contracts. 558 are full-time employees and 34 work part-time of less than 100%.

Workers who are not employees are contractors and work at Leonteg at a project level. Contractors are not considered employees as they do not have an employment contract with Leonteg and are therefore not included in the company's headcount. As at 31 December 2024, 83 contractors worked at Leonteq (2023: 99).

TCFD Report

HC					2024				2023
		Total	Switzerland	Europe	Asia	Total	Switzerland	Europe	Asia
Employee contract	,								
Permanent	Female	127	59	51	17	117	54	43	20
	Male	437	255	132	50	459	267	140	52
Temporary	Female	1	0	1	0	5	3	2	0
	Male	27	13	10	4	19	12	6	1
Employee type	,								
Full-time	Female	108	43	48	17	100	38	42	20
	Male	450	255	141	54	466	267	146	53
Part-time	Female	20	16	4	0	22	19	3	0
	Male	14	13	1	0	12	12	0	0

### Governance

## Governance structure and composition

**GRI 2-9** 

Leonteq recognises that robust corporate governance and a clear governance framework with defined roles and responsibilities are vital for the long-term success of the Group. They instil the right mindset among Leonteq employees and help to preserve the integrity of the financial sector.

The Group's corporate governance reflects its regulatory obligations as a Swiss securities firm and as a publicly listed Swiss company, respectively. Leonteq provides transparent disclosures about its governance to help stakeholders assess the quality of the Group's corporate governance and to assist investors in their investment decisions.

Leonteq's corporate governance framework comprises its governing bodies and its corporate governance policies, which describe the competencies of the governing bodies and other corporate governance rules and procedures. Leonteq's governing bodies are the General Meeting, the Board of Directors and the external auditors.

Shareholders elect the members of the Board of Directors and the independent external auditors on an annual basis and approve statutory resolutions at the Annual General Meeting. Those statutory resolutions include the approval of the consolidated financial statements, amendments to the Articles of Association (if applicable), and the approval of the total compensation of members of the Board of Directors and the Executive Committee. The Board is responsible for the overall strategic direction, supervision and control of the Group and appoints the members of the Executive Committee. The Executive Committee is responsible for the day-to-day operations and for implementing the overall strategy of the Group.

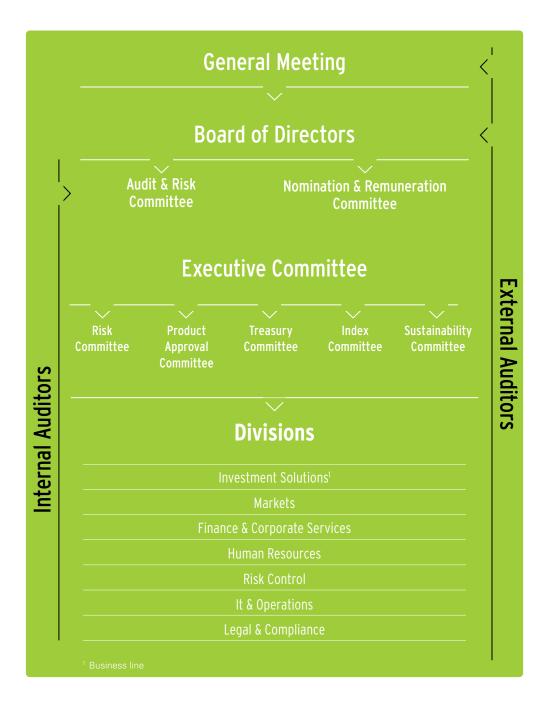
Leonteq's corporate governance is defined through a set of policies that include the Articles of Association, the Organisational Management Regulations and the Code of Conduct & Ethics. The Articles of Association define the purpose of the business, the capital structure and the basic organisational framework.

The Organisational Management Regulations define the organisational structure of the Group, the responsibilities and areas of authority of the Board of Directors and its Committees, the competencies of the Executive Committee and its Committees, and the relevant reporting procedures. The Code of Conduct & Ethics defines the Group's standards of business conduct and the ethical values that the Board of Directors and all employees are required to follow, including adherence with applicable laws and regulations.

Leonteq's shareholder base comprises a total of 5,204 shareholders, who are entered in Leonteq's share register and represent 77% of voting rights. As of 31 December 2024, 4,975 retail shareholders held 34% of total outstanding shares, while 229 legal entities accounted for 43% of the share capital. Legal entities also include shares held by Leonteq. As of 31 December, Leonteq owned 1,041,865, or 5.6%, of its own shares. 23% of voting rights are held by shareholders who are not entered in the share register.

The Board of Directors consists of seven non-executive members. No member of the Board of Directors of Leonteq exercised any operational management functions for the Company or any of its subsidiaries in the year under review. No member of the Board of Directors has held a management position at Leonteq or any of its Group companies in the last three years.

More information about Leonteq's governance structure can be found in the Annual Report 2024.



# Nomination and selection of the Board of Directors

### GRI 2-10 GRI 2-11

According to Leonteg's Articles of Association, the Board of Directors consists of five or more members. Each member of the Board is individually elected by the Annual General Meeting for a term of one year. Members of the Board may be re-elected with no limitation on the number of terms served. The term of office ends upon the completion of the Annual General Meeting following their election. The Annual General Meeting shall elect a member of the Board of Directors to be the Chairman of the Board for a one-year term. The Chairman of the Board of Directors is a non-executive, independent member of the Board of Directors. In the event of the post of Chairman being vacant, the Board of Directors shall appoint a new Chairman for the remaining term until the next Annual General Meeting. The Board shall elect a Vice-Chairman from among its members. The Chairman or the Vice-Chairman must be domiciled in Switzerland. Furthermore, the Board shall appoint a Secretary who does not need to be a member of the Board.

Diversity in terms of experience, views and culture, as well as gender, are important criteria that are considered in the composition of Leonteq's Board of Directors. The backgrounds, skills and experience of Leonteq's current Board members are diverse and include prior experience in senior executive

positions at financial services companies in Switzerland and abroad. The Board is composed of individuals with wide-ranging professional expertise across investment banking, wealth management, speciality finance, and audit and advisory services. The seven-member Board of Directors includes two women, corresponding to female representation of around 30%. Leonteg acknowledges the importance of diversity in fostering innovation and inclusive decision-making. The Board has intensified the process of identifying potential female candidates for election to the Board of Directors, in particular with a view to further enhancing its skill set in the area of technology, digitalisation and innovation. In this context, the Board expects to propose the election of a new member of the Board according to these criteria at the AGM 2025.

The Board of Directors manages its composition through a formal rotation of its members, as well as through background and skill mapping to achieve an optimal structure over time. The Nomination and Remuneration Committee regularly considers the composition of the Board as a whole and the composition of its Committees. The skill matrix is regularly reviewed and adapted taking into account the development of Leonteq's business model and external factors.

The Nomination and Remuneration Committee takes into account skills, management experience, independence and diversity when recruiting and evaluating candidates for Board membership. It also considers the other activities and commitments of potential candidates to ensure that they can devote sufficient time to a Board position at Leonteq. The Nomination and Remuneration Committee aims to maintain a high level of talent and experience and continues to strive for greater diversity in terms of the skills and background of its members through new nominations.

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### Sustainability governance

GRI 2-12 GRI 2-13 GRI 2-14

Efficient and effective sustainability governance is essential to ensure that we continue to embed sustainability considerations into our business practices and product and service offering, as well as achieving steady progress towards our sustainability goals and recognising potential opportunities and challenges at an early stage.

In recent years, Leonteq has strengthened its sustainability approach, defining roles and responsibilities at various levels throughout the organisation. These efforts include the establishment of a Sustainability Framework, which outlines the overarching organisational set-up and governance that are designed to support the execution of the Group's ESG strategy, in line with its commitment to sustainable development.

Leonteq's Sustainability Framework also includes a structured process designed to identify, assess, mitigate, and monitor ESG risks associated with the Group's material sustainability topics. ESG risks are identified as part of the double materiality

assessment that is conducted every three or four years by the Sustainability Committee. The Sustainability Committee defines Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs) specific to objectives related to identified risks and establishes and regularly monitors these metrics and their corresponding targets together with Risk Control to ensure ongoing progress.

Sustainability Highlights

### **Annual General Meeting**

Following its publication, the Sustainability Report is submitted to the Annual General Meeting for approval in an advisory vote.

### **Board of Directors**

The Board of Directors determines the overall direction of the Group's sustainability strategy, oversees the implementation of the strategy and approves sustainability-related targets and KPIs. The Board of Directors affirms the material topics annually and approves the materiality assessments. In addition, the Board of Directors reviews and endorses the Group's main ESG-related policies, including the Group's governance policies and practices.

Oversight of sustainability and ESG matters is interdisciplinary by nature, and as such, the discussion and monitoring of sustainability topics fall partially within the mandate of the Audit and Risk Committee and partially within the mandate of the Nomination and Remuneration Committee. In specific terms, the Audit and Risk Committee is responsible for reviewing the Group's sustainability reporting. The Nomination and Remuneration Committee is responsible for monitoring and assessing the Group's efforts related to gender diversity and approving programmes that enable the Group to attract and retain employees. It also defines the framework used to determine how the implementation of ESG measures impacts the compensation of the Executive Committee.

The Board of Directors reviews the Sustainability Report that is published annually. This report and related disclosures are prepared by the Sustainability Committee, signed off by the Executive Committee and is submitted to the Audit and Risk Committee for review ahead of the final approval provided by the Board of Directors before publication.

### **Sustainability Committee**

Leonteg's Sustainability Committee is a committee of the Executive Committee. The composition of the Sustainability Committee reflects Leonteg's five sustainability focus areas: Responsible Investing, Environment, Social, Governance and Corporate Sustainability Reporting. The members of the Sustainability Committee represent these focus areas based on their function within the Group. Each focus area is linked to one or more material topics and their respective impacts. Committee members are either a member of the Executive Committee or hold a senior management position, subject to the internal provision that the Sustainability Committee should not include more than three members of the Executive Committee.

The Sustainability Committee is primarily responsible for the implementation of the sustainability strategy defined by the Group's Board of Directors, with the aim of improving the integration of ESG practices across all business areas. In specific terms, the Sustainability Committee is responsible for overseeing the integration of ESG best practices across the Group's business activities and management approaches, as well as overseeing the implementation of Leonteg's sustainability initiatives. The Sustainability Committee defines a sustainability KPI framework with sustainability-related targets and KPIs in cases where it is possible to monitor implementation. The framework is approved by the Group's Board of Directors, which subsequently also monitors the progress of the agreed sustainability initiatives by reviewing the Group's performance against its sustainability KPIs, targets and ambitions.

The Sustainability Committee meets at least four times a year. Following each meeting, the Chairman of the Sustainability Committee provides an update to the Sustainability Delegate of the Board of Directors. Additionally, the Sustainability Committee regularly submits updates and reports to the Board of Directors about the Group's progress against its sustainability strategy, including KPIs, trends, regulatory requirements and recommendations.

### **Board of Directors Audit & Risk Committee Nomination & Remuneration Committee Executive Committee Sustainability Committee Responsible Investing Environment** Social Governance **Corporate Sustainability Workstream** Workstream **Workstream Reporting Workstream Workstream**

### **Conflicts of interest**

### **GRI 2-15**

Members of the Board of Directors and the Executive Committee must avoid conflicts of interest or actions that could appear to conflict with the Company's interests or those of its subsidiaries or the Group. If a conflict arises, the individual must immediately inform the Chairman (or the Vice-Chairman, if the Chairman is involved), abstain from discussions and voting on the matter, and allow the Chairman or Vice-Chairman to determine if a conflict exists. Additionally, Executive Committee members are excluded from Board discussions or decisions regarding their performance, compensation, recruitment, or personal matters and from private sessions where strategic company issues are addressed.

More information is available in the <u>Annual Report 2024</u> on page 72.

## Communication of critical concerns

GRI 2-16 GRI 2-26

Leonteq's global whistleblowing system is based on the Group's global policy on Escalation and Whistleblowing.

The policy complements Leonteq's Code of Conduct & Ethics and requires employees to report any violations of laws, rules, regulations or the Code of Conduct & Ethics. Reports may be made via an internal channel, such as the employee's line manager or other member of senior management, or on a confidential, a nonymous basis if required and where permitted by law. In this case, they may use Leonteq's Integrity Line, which is a third-party escalation platform hosted by EQS that serves as a whistleblowing channel to escalate cases of potential legal, regulatory or ethical misconduct.

When a whistleblowing report is submitted, the EQS platform notifies Leonteq's Global Head of Compliance, who conducts an initial assessment before passing the report to the decision body for further action. The decision body is composed of two persons, depending on which individuals or functions are affected by the potential accusations. This selection is aligned with Leonteq's process to ensure an independent decision: the Chairman of the Board of Directors, the Chairwoman of the Audit and Risk Committee (ARC), the Head of Group Internal Audit, the Chief Executive Officer, the General Counsel, and/ or the Global Head of Compliance.

The decision body then determines the next steps, and an investigation is launched. The investigation is led by the Global Head of Compliance, unless the Legal & Compliance team is the subject of the investigation, in which case it is led by the head of Group Internal Audit or by an external independent investigator. Within 20 days of initiating the investigation, the results are reported to the decision body, along with a recommendation to either take further action or close the case.

The Leonteq Integrity Line can also be accessed via Leonteq's corporate website by individuals outside Leonteq who wish to report violations of Leonteq's Code of Conduct & Ethics or any applicable laws, rules or regulations.

To reinforce the effectiveness of this process, it is supervised by the Audit and Risk Committee of the Board of Directors of Leonteq. The Audit and Risk Committee receives regular updates on significant reports received as well as on measures taken. Leonteq is committed to the timely resolution of grievances and uses these reports to improve its practices and mitigate future risks. These procedures apply across all operations and are an integral part of Leonteq's efforts to foster accountability and trust within its stakeholder network.

In 2024, all reports were investigated and reported to the Executive Committee and Audit and Risk Committee. None of them were determined to be of a critical nature.

TCFD Report

## Strategies, policies and practices

**GRI 2-22** 

"At Leonteq, sustainability remains a cornerstone of our strategy, driving our efforts across environmental, social, and governance dimensions. In 2024, we continued to make significant progress toward our long-term ESG goals with the establishment of our climate action plan and commitment to achieving net zero over the long term."

Sylvie Davidson, Sustainability Delegate of the Board of Directors



### Our sustainability strategy

Leonteg has been intensifying its sustainability efforts since 2020, when it launched a dedicated sustainability initiative. We consider it our duty to act responsibly in order to generate positive impact through our business practices.

Our sustainability strategy - which is based on our business model and value creation capabilities - sets out a clear and comprehensible plan for Leonteg's continued sustainable growth and international success.

To deliver on our sustainability strategy and thus drive the sustainable development of the Group, we are focusing on enhancing the Group's environmental footprint, maintaining a robust governance system, and addressing social considerations that benefit employees and the wider community.

We have defined two external ESG targets that we want to achieve by 2026, alongside additional measures that will support the integration of ESG aspects into our business activities as well as our product and service offering. These external targets focus on the material topic where Leonteg believes it can generate the most significant impact - employee engagement and development - and reflect its commitment to increase gender diversity within the Group to over 25% female representation, as well as to improve the company's Trust Index Score in the "Great Place to Work" employee survey to above 72%.

In 2024, Leonteg additionally defined its sustainability strategy as it relates to the Group's climate action plan to achieve net zero greenhouse gas emissions. Leonteg has set ambitious, time-bound targets aimed at reducing its carbon footprint and managing climate-related risks. These targets support Leonteg's efforts to strengthen its long-term resilience and align its operations with global climate objectives:

- 2030 Target: Achieve a 50% reduction in Scope 1 and Scope 2 emissions compared to the 2024 baseline, reflecting Leonteg's commitment to significant emissions reductions in the near term.
- 2035 Target: Reach net-zero emissions for Scope 1 and Scope 2, as well as for selected Scope 3 categories, namely business travel and employee commuting.

As a result of all these efforts, we also expect to further improve the ratings assigned to Leonteg by ESG rating agencies.

The ESG ratings and external recognitions currently assigned to Leonteg are the following:

MSCI ESG RATINGS CCC B BB BBB A AA AAA	AA	Upgraded from A in 2023
SUSTAINALYTICS  a Morningstar company	Low Risk (score 13.0)	Maintained Low Risk of experiencing material financial impacts from ESG factors
REFINITIV 🔫	В	Upgraded from B- in 2023
ISS QualityScore  GOVERNANCE  Mighast Rating By INSTITUTIONAL SHAREHOLDER SERVICES	1	Highest Governance Quality Score
∕IX	SPI ESG INDEX	Leonteq represented in the ESG Index by SIX

## Our policies and practices

**GRI 2-23** 

GRI 2-24

**GRI 2-25** 

GRI 2-27

Leonteq is committed to upholding high legal, ethical and moral standards as well as fostering a culture of strict compliance with local and international laws and regulations. In order to achieve a common understanding of our conduct and ethics standards across the company, we have summarised them in our global Code of Conduct & Ethics, which is complemented by our Supplier Code of Conduct. These core documents ensure that Leonteq operates with integrity, aligns with international standards, respects human rights, and promotes transparency and accountability in all its activities. By embedding these principles across our operations and business relationships, Leonteq reinforces its commitment to sustainable business practices.

The Code of Conduct & Ethics outlines Leonteq's commitment to ethical business practices, referencing international frameworks such as the International Charter of Human Rights and International Labour Organization (ILO) standards. It mandates due diligence, proactive risk management, and respect for human rights, emphasizing equality and non-discrimination. Approved by the Board of Directors, the Code of Conduct & Ethics applies to all operations and to all Leonteq personnel. It is read and acknowledged by all employees annually and forms part of Leonteq's mandatory compliance training. The Code of Conduct & Ethics is publicly accessible on Leonteq's corporate website and underlines Leonteq's dedication to integrity and to following sustainable practices in its operations and stakeholder engagements.

Leonteq's Code of Conduct & Ethics further references a number of internal Group policies. These and other policies are mentioned in this report where applicable in the discussion of Leonteq's material topics.

Policies are embedded at every organizational level and mandatory training is provided to employees and members of the Board to ensure compliance with them. Leonteq uses robust governance structures, led by the Board of Directors, to monitor adherence with the policies and address any violations. Regular reviews and updates to all policies, including the Code of Conduct & Ethics, ensure Leonteq's alignment with regulatory requirements, evolving international standards and stakeholder expectations.

Additionally, the Group-wide internal control system, whose basic structure reflects the three lines model, ensures effective risk governance and risk management. Overall responsibility for the internal control system lies with the Board of Directors and its Committees. The Board of Directors defines the overall guidelines and performs an assessment of the internal control system on a regular basis. It delegates the implementation and maintenance of the internal control system to the Executive Committee.

The first line delivers services and products to partners and clients while managing associated risks. It consists of managers and "risk owners," who are responsible for identifying, assessing, and addressing inherent risks tied to business activities. Line managers implement controls and measures to mitigate risks and manage activities under their supervision.

The second line supports the first line by providing expertise, independent controls, and oversight. It defines policies, frameworks, tools and techniques that are to be implemented by the first line for risk management. It monitors their implementation, and ensures consistent risk measurement.

The third line, led by Internal Audit, provides independent assurance to the Board of Directors, assessing the effectiveness of governance, risk management, and internal controls using a risk-based approach.

The internal control system is audited on an annual basis in accordance with ISAE 3402. A comprehensive report documenting these controls is produced on an annual basis and is certified by means of an external audit.

To address potential and actual adverse impacts associated with its operations, Leonteq follows structured grievance mechanisms in line with its internal Group policies. Several of these processes relate to Leonteg's material topics. Further

information can be found on the following pages: client complaint processes (page 32), market abuse and insider trading (page 28), corruption (page 29), discrimination (page 45), data breach (pages 46 to 47), cybersecurity incident (page 47).

TCFD Report

In 2024, Leonteq had one significant instance of non-compliance with laws and regulations. On 12 December 2024, FINMA announced its completion of proceedings against Leonteg and decreed a profit disgorgement of CHF 9.3 million relating to transactions with two former distributors in the period from January 2018 to June 2022. The company has already taken comprehensive organisational measures over the past years, as also acknowledged by FINMA. Leonteg regrets the shortcomings identified and will continue to strengthen its internal control system and is implementing the additional measures ordered by FINMA with high priority. FINMA's probe was triggered by a disclosure by the company as well as allegations raised by the media and third parties. Various of these allegations have turned out to be unfounded and in particular there remains no indication that Leonteg intentionally participated in any potential money laundering or tax fraud.

### **Association memberships** and participation in external initiatives

### **GRI 2-28**

Leonteg is a member of various associations, including the Swiss Structured Product Association, Italian Association of Certificates and Investment Products (ACEPI), Swiss Sustainable Finance (SSF), and Advance. The Company is also a signatory to the United Nations Global Compact (UNGC) as well as the UN-supported Principles for Responsible Investment (PRI).

### **United Nations Global Compact** and Sustainable Development Goals

Leonteq became a signatory to the United Nations Global Compact (UNGC) in 2021, committing to its Ten Principles on human rights, labour, environment, and anti-corruption as a core part of its strategy, culture, and daily operations. Its commitment to the UN Sustainable Development Goals (SDGs) is reflected in its sustainability initiatives, with its efforts to align its material topics with the relevant SDGs. Leonteq also focuses its community engagement framework around seven key SDGs while actively contributing to the realization of 14 out of 17 SDGs. Further details on the linkage between material topics and SDGs are available in the GRI Content Index of the 2024 Sustainability Report.

### **Principles for Responsible Investment**

Leonteg became a signatory to the UN-supported Principles for Responsible Investment (PRI) in 2021. As a professional service partner, Leonteg recognises the influence it has over how its clients address ESG issues and acknowledges the relevance of ESG issues for investment management. It is therefore committed to providing, promoting and improving services that support the implementation of the PRI's Six Principles for Responsible Investment, and, in turn, contributing to developing a more sustainable global financial system.

### **Swiss Sustainable Finance**

Leonteg has been a member of Swiss Sustainable Finance (SSF) since 2021. In view of its ability to offer and implement sustainable investment opportunities for its clients and partners, Leonteg's ambition is to create awareness and inform its clients about ESG as well as the trends, risks and opportunities deriving from ESG. With its membership of Swiss Sustainable Finance, Leonteg is committed to driving sustainable investment approaches across this field.

### **Swiss Structured Products Association**

As a leading marketplace for structured investment products, Leonteg actively promotes the image of the structured products sector within the Swiss finance industry and supports efforts to increase transparency and educate investors about this field. Leonteg has been an active member of the Swiss Structured Products Association (SSPA) since 2008. Leonteg representatives have taken part in the expert workgroups "Standards" and "Legal & Regulation" since 2008, in the "Public Distribution" since 2018 and in the "Tax" expert group since 2021. In 2022, Leonteg joined the ESG expert working group as part of its increased involvement with SSPA in the area of ESG. It is actively supporting the establishment of a recognised common minimum standard across the Swiss structured product industry for products with sustainability features.

### Advance

In 2022, as part of our efforts in the area of diversity and inclusion, Leonteg joined Advance, the leading business association for gender equality in Switzerland. Advance works with around 150 Swiss-based companies that are committed to increasing the proportion of women in management. As a member of the association, Leonteg is seeking to improve the gender diversity of its own workforce and to give its leaders additional resources to nurture an inclusive working environment.

### Italian Association of Certificates and Investment **Products**

TCFD Report

Leonted has been a member of the Italian Association of Certificates and Investment Products (ACEPI) since 2022. The Association aims to promote an interest in and knowledge of certificates and investment products among investors, taking the necessary measures to foster the development of efficient and transparent primary and secondary markets for these products. Membership of the Association enables Leonteg and other market operators to stay informed about developments in this area through ACEPI's research, studies, conferences, seminars and training courses. Our role as a member of ACEPI also helps to position Leonteg as a recognised participant in the market.

Sustainability Report

TCFD Report

24

## Stakeholder engagement

**GRI 2-29** 

As a public company listed on SIX Swiss Exchange, Leonteg is committed to the open and transparent communication of information about its performance and business activities to ensure its compliance with the applicable regulations and to enable our stakeholders to make informed decisions and draw conclusions about the performance of the Group. We consider open and transparent communication to be vital to build relationships of trust with all our stakeholders. They include our clients, whose reputation and credibility are directly impacted by Leonteg's degree of transparency, as well as our shareholders, who have invested their capital in the company. Also included are our employees, who depend on Leonteg for paid employment and opportunities for career development. In this context, we also aim to exemplify transparency within the financial sector and to serve as a benchmark for Leonteg's competitors.

In our corporate communications activities, we rely on various online and offline channels in order to share information with Leonteq's stakeholders in the most effective way possible. We are committed to providing timely and adequate information to our stakeholders so that they can make informed decisions about Leonteq as well as the Group's product offering. We use targeted communication methods and various platforms, and we publish all our corporate and product news on our website. We are also active on LinkedIn, X, Facebook and YouTube and reach different target groups through these channels.

We promptly report all relevant information to comply with regulatory requirements. Leonteq aims to share all relevant information with its stakeholders. However, the Group limits some disclosures in cases where, for example, the sharing of (aggregated) data would allow information to be traced back to individuals or would place the Group at a competitive disadvantage.

### Clients and partners

Generating high levels of satisfaction and consistent value for our clients and business partners is of key importance to us because it helps us to strengthen their investment knowledge and security. This in turn strengthens our relationship with our clients, resulting in recurring business flows.

- Ongoing dialogue with Client Relationship Officers and Key Account Managers
- High-quality marketing materials
- Newsletters with product and business updates
- Client events

### **Employees**

It is important that employees receive a consistent and transparent flow of information, which enhances their knowledge of the Group's activities and the understanding of the Group's strategy, business model and priorities. Providing regular platforms where our employees come together as a team fosters cohesion and a healthy corporate culture.

- Regular information provided via the Intranet, on TV screens within Leonteq offices and in email newsletters
- Annual employee survey together with Great Place to Work
- Townhalls, Power Hours, Global Leadership Meeting and other engagement sessions
- Local and global staff events

### Shareholders, investors and analysts

Maintaining regular contact with shareholders, investors and analysts throughout the year increases market transparency and strengthens relationships. Providing up-to-date information about financial and business performance enables investors to make well-informed decisions when investing in Leonteg.

- General Meeting(s)
- Annual and half year reports and results presentations
- Results roadshows and investor conferences and regular dialogue between Investor Relations department and investors as well as analysts
- Press releases

Sustainability Report

TCFD Report

2!

### Credit rating agencies

To ensure the most accurate and up-to-date rating possible, Leonteq maintains regular contact with the rating agencies Fitch Ratings Ltd. and Japan Credit Rating Agency, Ltd. and routinely informs them about business developments.

- Ongoing dialogue with Investor Relations & Communications department
- Annual meetings between our management team and rating analysts

### ESG rating agencies

Providing regular feedback and information to facilitate appropriate ESG ratings by Inrate, ISS, MSCI, Refinitiv, Sustainalytics and S&P Global Ratings.

- Annual evaluation of assigned ESG ratings and reports
- Regular engagement between Investor Relations & Communications department and ESG ratings analysts

### **Proxy advisors**

Leonteq is subject to the recommendations of proxy advisors, which can influence voting results at Leonteq's Annual General Meeting. It is therefore important that proxy advisors receive the information they require to give facts-based voting recommendations.

- Review of proxy voting guidelines
- Regular engagement meetings between Investor Relations department and proxy advisors

### Media and general public

To ensure accurate information about the Group is being communicated and published.

- Annual and half year reports, presentations and brochures
- Press releases and newsletters
- Corporate website and social media channels
- Ongoing dialogue with Investor Relations, Communications & Marketing department
- Interviews

### Suppliers and service providers

Each supplier or service provider is subject to pre-qualification screening to ensure operations are compliant, for advance awareness and sharing of best environmental practices. Throughout the business relationship, correspondence is maintained to review requirements, ensure payments, negotiate contracts where necessary and ensure a sustainable supply chain.

- Pre-qualification screening
- Ongoing correspondence with Procurement department
- Clear and fair Supplier Code of Conduct

### Counterparties and stock exchanges

Through close contact with counterparties and stock exchanges in Switzerland and abroad, (exchange) regulations are monitored and processes to respect them are adopted where applicable. The ongoing evaluation of the counterparty network also ensures that Leonteq is not exposed to single counterparty risk; ensuring market access and business continuity whilst also maintaining cost discipline. Leonteq also enables counterparties to perform their reciprocal assessment of Leonteq.

- Ongoing dialogue between stock exchanges and Leonteg
- Regular review meetings between counterparties and Risk Control, Finance, Compliance and Operations departments

### **Regulators**

To understand regulatory changes, provide updates and comply with its notification and regular reporting obligations.

Ongoing reporting to and dialogue with FINMA (Switzerland), AFM (Netherlands), AMF and ACPR (France), BaFin (Germany), CCAF (Monaco), CMVM (Portugal), Consob (Italy), FCA (UK), GFSC (Guernsey), MAS (Singapore), FSA (Japan), SFC (Hong Kong), and DFSA (Dubai)

### Internal and external auditors

To ensure the adequacy and effectiveness of the internal control system and risk management as well as to obtain independent assurance on the financial statements reporting.

- Regular dialogue between the CFO as well as the Finance department and head of Group Internal Audit and lead external audit partner
- Direct contact and regular meetings between Head of Group Internal Audit and lead external auditor partner and the Audit and Risk Committee
- Regular dialogues between internal and external auditors

Sustainability Report

TCFD Report

26

## **Material topics**

GRI 3-1 GRI 3-2

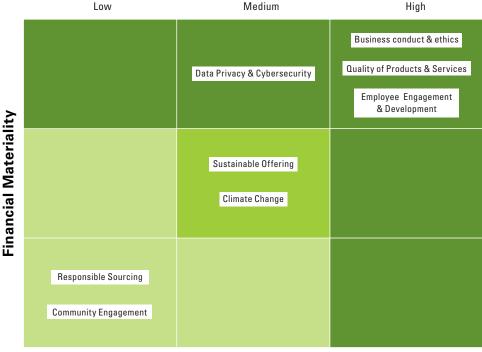
This Sustainability Report covers the topics that are most relevant to our Group and our stakeholders. In 2024, Leonteq conducted a double materiality assessment to re-evaluate the 13 material topics that were defined in 2021. Through this double materiality process, eight new material topics were defined following the consolidation of several of the previous material topics.

As part of the process to define our material topics, we conducted a stakeholder engagement process together with external consultants specialising in the field of sustainability. This process involved two internal workshops with key sustainability stakeholders. It was also based on interviews carried out with external stakeholders to gain the best possible understanding of which topics are most important to them and to identify areas where Leonteq should further focus its sustainability efforts. The main outcome of the stakeholder engagement

process is shown in the materiality matrix. It integrates input from all participating internal and external stakeholders and defines Leonteq's priorities based on the double materiality assessment method.

This method considers the outside-in (financial materiality) perspective, which assesses the risks and opportunities for Leonteq, including the impact of sustainability factors on the company's performance. The inside-out (impact materiality) perspective is also considered. This focuses on how Leonteq's business activities impact people and the environment.

The materiality matrix shows the significance of all topics Leonteq has identified during the abovementioned stakeholder engagement process. Some topics refer to an existing Global Reporting Initiative (GRI) standard, while others have been identified as Leonteq's own material topics that reflect its business as a structured investment product service provider.



**Impact Materiality** 

Sustainability Report

TCFD Report

27

## Business Conduct & Ethics

**GRI 3-3** 

As a financial services company that operates in regulated markets globally, Leonteq is committed to conducting its business honestly and transparently. We have a zero-tolerance approach to all forms of corruption. We strive to operate with integrity and according to a clearly defined set of business ethics to protect our interests as a company and to serve the best interests of our stakeholders.

Leonteq's approach to ethical business conduct, including the prevention of corruption, insider trading, market abuse and fraud, is designed to safeguard our own reputation, but also the reputation and credibility of the financial sector as a whole. Leonteq's approach is also designed to avoid negative impacts on the business and to protect the Group against the financial penalties and regulatory consequences of non-compliance.

Leonteq acknowledges the significant positive and negative impacts of its Business Conduct & Ethics on the economy, environment, and people, including human rights. These impacts have been identified as both actual and potential, covering both short-term and long-term effects.

In terms of positive impact, Leonteq helps to prevent unethical or illegal activities through mechanisms such as whistleblowing for reporting breaches. Additionally, the company makes an actual positive contribution to macroeconomic stability in the jurisdictions where it operates through the payment of taxes and other levies.

A potential direct negative impact is socio-economic harm caused by unethical or illegal activities by stakeholders such as clients, employees, or suppliers. Leonteq addresses potential negative impacts relating to business conduct and ethics through its compliance policies, disciplinary measures and grievance mechanisms processes as well as its third-party risk management process.

If a Leonteq employee or representative is found to have breached any of the company's rules, regulations or internal directives, they are subject to Leonteq's Disciplinary Measures Policy. The policy sets out different measures, depending on the severity of the breach – ranging from informal or formal warnings to discretionary financial penalties and ultimately dismissal.

In the event of a suspected breach of legal or regulatory requirements, internal guidelines or ethical standards, Leonteg

has grievance mechanisms in place, including a global whistleblowing system.

To manage Business Conduct & Ethics, Leonteq is committed to upholding high legal, ethical and moral standards and to fostering a culture of strict compliance with local and international laws and regulations. Leonteq has therefore established robust policies and commitments that are aligned with both internal and external sustainability standards.

Leonteq policies are communicated to all employees to ensure they understand what is expected of them in terms of ethical conduct and integrity as part of their contractual relationship with Leonteq. Leonteq policies are issued and overseen by the Executive Committee or the Board of Directors. Together with members of the Compliance department and other departments, they manage and monitor each policy.

One such policy is Leonteq's <u>Code of Conduct & Ethics</u>, which summarises the Group's business conduct and ethical standards. This policy, which is externally available, is approved and overseen by the Board of Directors. It is read and acknowledged by all employees annually, is part of Leonteq's mandatory compliance training, and guides the company and all our employees in our everyday behaviour, actions and decisions.

Leonteq's Code of Conduct & Ethics also references internal Group policies focusing on business conduct and ethics. These policies include:

- Anti-Bribery and Anti-Corruption: Leonteq has a zero-tolerance approach to bribery and corruption and is committed to detecting and preventing bribery and corruption. Our personnel and associated persons do business in a fair and transparent manner, in compliance with the principles of this policy.
- Client Acceptance and Due Diligence: This Policy outlines Leonteq's risk tolerance and the counterparties that Leonteq deals with and the required due diligence obligations. In addition, the policy defines the extent to which personnel must identify their counterparties and the relevant criteria. This policy defines the global minimum standard that must be upheld throughout the company. Local onboarding requirements may go further than the standard defined in this global policy where required under local regulations.

- SIX Swiss Exchange Reporting and Disclosure Requirements: This policy defines the information requirements and responsibilities regarding disclosures by Leonteq AG (the "Company", and together with its subsidiaries the "Group") and the requirements governing communication with media contacts to ensure that the company informs the public in a fair and transparent manner and at the earliest possible point in time about significant developments and changes in the company. The policy ensures compliance with all applicable disclosure obligations under the Swiss Federal Code of Obligations (CO), the Swiss Federal Stock Exchanges and Securities Trading Act (SESTA) and the Listing Rules of SIX Swiss Exchange (LR, SIX), including implementing provisions thereof.
- FATCA Client Acceptance: The policy sets out Leonteq's guidelines to ensure compliance with FATCA regulations and it is of relevance during Leonteq's client onboarding process.
- Cross Border: This policy protects Leonteq from the legal and reputational risks associated with the performance of cross-border activities and the distribution of financial products abroad.
- Global Tax: This policy sets out the overall approach of Leonteq and its directly or indirectly controlled entities in respect of taxation.
- Conflicts of Interest: This policy addresses actions or transactions at Leonteq that may give rise to actual or potential conflicts of interests and sets forth standards by which the firm will identify and manage such conflicts.
- Market Conduct Rules: This policy defines the global standards for employees, contingent workers and long-term consultants to ensure compliance with market conduct rules.
- Anti-Money Laundering (AML) and Counter-Terrorism
  Financing (CTF): This policy establishes the framework and
  governance for the prevention of money laundering and
  terrorism financing and outlines the respective regulatory
  requirements and obligations that apply to Leonteq and its
  personnel.
- Gifts and Business Entertainment: This policy defines Leonteq's rules on what is or is not allowed in relation to gifts and entertainment.

Handling of Complaints, Claims and Errors: This policy ensures the timely and efficient handling of complaints and minimizes harm to client relationships.

Sustainability Highlights

- Disciplinary Measures: The policy establishes the framework and governance for disciplinary measures and the assessment of the severity of a misconduct.
- Escalation and Whistleblowing: This policy outlines Leonteq's escalation structure, describing the manner in which Leonteq personnel are required to escalate breaches, unusual incidents or genuine concerns that pose, or may pose, significant risks.

To address the impacts of business conduct and ethics, Leonteq has implemented actions aimed at both preventing negative impacts and enhancing positive outcomes.

Actions that Leonteq takes to prevent or mitigate negative impacts include:

• Compliance and risk training: All Leonteg employees must complete annual online training courses based on the Group's policies and guidelines. These courses address specific areas of business integrity and include an annual compliance self-certification and training. Leonteg compliance training courses are completed by all Leonteg employees, including part-time employees, contingent workers and all contractors unless otherwise specified. Mandatory training courses that were rolled out to all employees via Leonteg's e-training platform in 2024 included: Annual Self Certification, Fit & Proper Questionnaire, Personal Account Dealings, Market Abuse, Financial Crime and Anti-Money Laundering, Basic Compliance, Escalation and Whistleblowing, Risk Tolerance Framework, Operational Risk, Internal Control System, and Personal Data Protection Annual Self-Certification and Training, In addition, the following training courses had to be completed by selected employees based on their function and place of employment. SIX Reporting Requirements, Disciplinary Policy, Lisbon Location Protocol, Supervisory Framework and High-Level Protocol, Counterparty Onboarding.

Comprehensive online training courses on anti-corruption also had to be completed by members of the Board of Directors. In 2024, these training courses included Financial Crime and Anti-Money Laundering, Escalation and Whistleblowing, Operational Risk, Internal Control System, and SIX Reporting Requirements.

 Prevention of market abuse and insider trading: Market abuse and insider trading activities are prohibited by law. Leonteq takes the prevention of these offenses very seriously.

Clear rules are in place internally to implement Leontey's policies. A series of measures and controls are used to detect breaches, including but not limited to the pre-approval of personal account dealings. Prior to any personal account dealings, employees must obtain preclearance from Compliance for transactions carried out through employee securities and custody accounts as well as those for which the employee is the beneficial owner or has power of attorney. The relevant transaction must not be carried out until the request has been granted explicit pre-clearance by Compliance. If pre-clearance for a requested transaction is denied, the transaction must not be executed. With this control mechanism, Leonteq strives to ensure that personal account dealings are compliant with Leontey's Code of Conduct for employees.

Compliance also takes measures to detect market abuse in the form of front running or insider trading. It also establishes information barriers to prevent conflicts of interest or the misuse of information, and it reserves the right to access all employees' recorded means to identify any signs of market abuse or insider trading.

Through these and other controls, Leonteq ensures that its employees and the Group itself uphold all relevant laws and regulations.

If a case of market abuse or insider trading is detected, it is reported immediately to the senior management of Leonteq and the competent authorities are notified if required.

The effectiveness of the actions taken to manage business conduct and ethics is closely monitored through established processes and key performance indicators. We assess the impact of our actions using tools such as our internal control system, regular audits, and stakeholder feedback.

### **Operations assessed for** risks related to corruption

### GRI 205-1

Leonteg is committed to following strict antibribery and anti-corruption best practices and regulations and to doing business based solely on the quality of the products and services it offers and purchases.

Based on Leonteg's business model, inherent corruption risks may exist in the areas of gifts and entertainment, fee payments, and the evaluation of products and services of providers. Leonteq has frameworks in place to address the respective potential corruption risks. The assessment of corruption and bribery risks forms part of the annual compliance risk assessment, which is performed at branch and legal entity level and aggregated globally. The global compliance risk assessment is presented to the Group's Executive Committee and Board of Directors on an annual basis and included in the Compliance Report.

In 2024, no significant risks were identified when conducting this assessment.

### **Communication** and training about anti-corruption policies and procedures

### GRI 205-2

Leonted takes steps to actively combat any form of corruption or bribery and it has policies in place, including a policy governing gifts and business entertainment, that outline key requirements for employees and members of its governing bodies to manage the risk of corruption, both internally and externally when engaging with Leonteg's clients. Leonteg's Compliance department regularly informs all employees (including the Executive Committee) and the Board of Directors about Leonteg's anti-corruption policies, and it conducts mandatory annual web-based training globally, as well as continuously monitoring business activities.

In addition to standardised web training, our individual branches have the possibility to implement local training courses on anti-corruption topics. Compliance risk assessments, including risks related to corruption, are performed by Leonteg's team of experts on an annual basis. If adjustments to employee compliance training or communications are necessary, the Compliance department updates the training annually and increases or reduces its internal communication activities as needed. A compliance report, containing a compliance risk assessment, is additionally submitted to the Executive Committee and the Board of Directors once a year.

These and other measures and policies are actively monitored to foster a sustainable, best practice approach to business and to ensure that Leonteg's clients and business partners receive the best possible service. The majority of Leonteg's business partners are distribution partners, and Leonteg's terms of business and distribution agreement stipulate the importance of adhering to applicable anti-corruption laws and standards.

To ensure the Group-wide understanding of our policies, Leonteg continuously enhances its employee training about the implementation of anti-corruption measures.

TCFD Report

### **Confirmed incidents** of corruption and actions taken

### GRI 205-3

In 2024, there were no confirmed incidents of corruption at Leonteg.

30

### Approach to tax

### GRI 207-1

Leonteq strives to have a positive impact on the community and to contribute to a sustainable economy, society and environment. Taxes, social security contributions and other levies form the main component of Leonteq's financial contribution to the macro-economic stability of the different jurisdictions in which it operates. Leonteq is committed to always complying in spirit and practice with the expectations of the relevant tax authority. The Group further applies the following tax risk tolerance levels as guiding principles:

- It has a zero-tolerance approach to the assumption of tax compliance risks and tax risks that could harm Leonteq's reputation.
- It has a low tolerance regarding tax risks related to structuring, transactions and corporate actions that would include actions being taken without appropriate consideration of the potential tax consequences.

Leonteq is committed to preventing any form of tax avoidance and tax fraud by stakeholders, including clients, employees and suppliers, in the context of their interaction with Leonteq. Taxes are calculated, secured, and collected using a comprehensive system that is subject to rapid legislative, regulatory, and technological changes. Leonteq's tax management activities ensure the tax compliance of all Leonteq Group entities with the applicable regulations.

### Tax governance, control, and risk management

### GRI 207-2

Taxes are covered by the overall governance and risk framework. Tax compliance has been adequately assured within the existing organisational setup, reporting lines and responsibilities. Leonteq's Group Taxes department reports directly to the Chief Financial Officer and manages a network of tax advisors locally. It applies the following principles to the management of Leonteq's tax affairs to mitigate risks and comply with tax legislation:

Sustainability Highlights

- We undertake our tax affairs with the aim of generating sustainable value while meeting all applicable legal and regulatory tax requirements.
- We give due consideration to the intent and spirit of tax laws, the social context within which we operate, and our standing and reputation with tax authorities, regulators, and the general public.

The Group Taxes department submits regular updates about tax compliance and tax risks to the Executive Committee and the Audit and Risk Committee. Tax compliance errors of material nature are reported within the context of operational risk reporting, and the corresponding measures are reviewed and approved by the Audit and Risk Committee. Furthermore, the Group has defined certain criteria and thresholds for the immediate reporting of reputational and financial tax risks to the Executive Committee and the Audit and Risk Committee.

To further improve the Group's management of tax risk, tax compliance and tax transparency, Leonteq has a global tax policy in place. This policy defines roles and responsibilities in respect of taxation, sets out the Tax Principles, and describes the Group's tax management approach. The Tax Policy is embedded in the overall governance and risk framework.

## Stakeholder engagement and management of concerns related to tax

TCFD Report

### GRI 207-3

Leonteg follows the recommendations of the good tax practices codes implemented in the countries and territories in which the Group's companies operate, taking into account the specific needs and circumstances of all Group entities. The Group is also committed to complying with the OECD Guidelines for Multinational Enterprises in taxation, Leonteg cooperates with the competent tax authorities in the detection of and search for solutions to address fraudulent tax practices of which the Group is aware and that may be used in the markets in which the Group companies have a presence. The Group provides significant tax-related information and documents that may be requested by the competent tax authorities when exercising their powers, as soon as practicable and with the required scope. Leonteg notifies the appropriate body of the tax authority and discusses with it any relevant facts and issues it has noticed, allowing the authority to commence the appropriate investigative proceedings, if any, and to foster agreement and consent during the inspection proceedings, to the extent that is reasonably possible without undermining good corporate governance.

### **Political contributions**

### GRI 415-1

Leonteq does not engage in any form of lobbying and did not make any financial or in-kind contributions to political parties, politicians or causes in 2024.

**Sustainability Report** 

TCFD Report

31

# Quality of Products & Services

**GRI 3-3** 

Based on our vision to be the leading marketplace for structured investment solutions, our mission is to deliver quality products and services to our partners and clients. We acknowledge the significant impacts that our activities could have on the economy, the environment, and people, including human rights. In terms of the quality of our products and services, we have identified both actual and potential impacts that cover both short-term and long-term effects.

Potential negative impacts include the sophisticated nature of structured investment products, which may indirectly pose challenges for some investors, potentially leading to misunderstandings or misaligned expectations. Additionally, the negative performance of products can potentially decrease client and end-investor activity and result in a financial loss.

On the positive side, Leonteq has the potential to directly enhance financial inclusion by democratising access to structured products and enhancing the ability of financial intermediaries to autonomously price, trade and manage the lifecycle of a large range of structured products. Additionally, the positive performance of products can potentially increase client and end-investor activity and / or result in a financial gain.

Generating high levels of satisfaction and consistent value for our clients and business partners is of key importance to us because it helps to strengthen their investment knowledge and security.

We typically operate through intermediaries to whom, as part of our regulated B2B4C business model, we pay distribution fees and contractually agree the standards we expect of them. including their duties towards their clients. As of end-2024, all of these distribution partners are regulated financial intermediaries which have to comply with the regulations put in place by the respective financial market authority. Our 952 clients are located across Europe, the Middle East. Latin America and Asia. They are served by Leonteg's experienced sales team of industry experts that provides continuous support and is committed to building long-term client relationships. With a digital marketplace offering a vast universe of structured products, Leonteg gives clients access to a variety of issuers, asset classes and pay-offs. Leonteg's distribution capabilities are complemented by a dedicated in-house ideation, structuring and trading team and include a digital and automated pricing engine.

Leonteq additionally offers clients educational opportunities, such as Leonteq's Structured Products Academy, its annual

Trend Talks event, and various representations at panel discussions globally. As part of its Structured Products Academy, Leonteq, in partnership with the Institute for Management Development (IMD), offers an online training course on structured investment products for its clients and partners. The course includes two tailored modules, Foundations and Advanced, providing participants with a comprehensive understanding of various structured product types. Leonteq's Trend Talks event is an in-person event in Zurich that explores key investment trends, with expert speakers providing insights into the latest market trends and topics.

The effectiveness of Leonteg's actions to help enhance financial inclusion is evident through LYNQS, Leonteg's digital marketplace for structured products. Leonteg enables clients to issue and distribute products via their own channels through its digital marketplace LYNQS. LYNQS technology, which was developed in-house, gives Leonteg clients digital access to one of the largest structured product universes available. LYNQS is based on Leonteg's analytical library and financial product engine, providing Leonteg's clients with a completely new investment experience. They benefit from unique lifecycle management and investment ideas, and they can invest in a tailor-made and optimised way. LYNQS consists of several distinct modules, including investment ideas, quote, portfolio. AMC and academy. In 2024, the number of available third-party issuers for LYNQS users was expanded to include several top-rated, internationally renowned banking groups. As a result, LYNQS users have now access to structured products from a total of 15 issuers. Further, the number of products initiated via LYNQS increased by 96% to 10,915 products compared to 5,582 in 2023. As a result, its click 'n' trade ratio improved to 23% in 2024, compared to 15% in 2023. The number of intermediaries connected to LYNQS increased to 1,131 (2023: 1,059 intermediaries).

Leonteq also monitors the performance of products issued by Leonteq as well as its white-labelling partner through a product quality dashboard (PQD). Monitoring includes product performance at expiry and during pre-determined time frames. Through the PQD, Leonteq aims to provide high quality investment choices to investors and assist distribution partners in offering products adapted to different market conditions, whilst delivering value when compared to traditional investment opportunities. In the context of its B2B4C business model,

Sustainability Report

TCFD Report

32

Leonteq is committed to a durable level of satisfaction of investors, which in turn should lead to a healthy and sustainable franchise of distribution partners.

To ensure the high quality of our products and services, Leonteq has robust policies in place and is committed to upholding both internal and external sustainability and regulatory standards. These policies include:

- Documentation & Distribution of Financial Products: This policy ensures compliance with applicable laws, local securities regulations, securities exchanges and self-regulatory organisations in connection with the issuing, distribution and trading of financial instruments and it protects Leonteq from reputational and/or financial damage.
- Handling of Complaints Claims and Errors: This policy ensures the timely and efficient handling of complaints and errors and minimizes damage to client relationships.
- Management of product orders: This Policy outlines the procedures for the confirmation, booking, cancellation, amendment, control, reporting obligation and supervision of trading activity with respect to product orders within all Leonteq entities worldwide.

Leonteq is additionally committed to supporting international industry frameworks and is a member of the Swiss Structured Products Association (SSPA) and the Italian Association of Certificates and Investment Products (ACEPI).

### Client feedback

Engaging with our clients and partners is integral to our approach to managing the quality of products and services, with ongoing feedback directly informing our strategies and actions.

### Client complaint process

Ensuring a high level of client satisfaction is a priority for Leonteq. However, in the case of a client complaint, Leonteq has a comprehensive client complaint process in place that is managed by our Compliance department. The process involves clarifying the legitimacy of a complaint. All complaints and claims are forwarded to the Compliance department, the head of the division that is subject of the complaint or claim

and the General Counsel, if necessary or appropriate. Receipt of claims are acknowledged to the claimant within one week and the client will be informed of an expected date by which the complaint or claim will be answered if feasible. Ongoing coordination and monitoring are performed by the Compliance department, which also consults with the affected organisational units where necessary.

This process ensures that good relationships with clients are maintained and that errors are handled appropriately to avoid any recurrence and any detrimental impact on investors.

### **Marketing and Labelling**

GRI 417-1

GRI 417-2

GRI 417-3

As Leonteq continues to develop its product and service offering, each business area engages in product development, client communications and marketing activities. We have comprehensive processes in place to ensure accuracy and compliance with applicable legal regulations as well as internal consistency, for best practice messaging and communication with clients, partners and other stakeholders.

Leonteq creates product documentation for both its own products and partner products and manages the products throughout the product's lifecycle. This begins with the creation of documents such as a termsheet and Key Information Document (KID) before the product's issue date. Once the product is issued, its relevant data is also published on the Leonteq website, LYNQS and additional third party providers. Over the course of the product's lifecycle, Leonteq issues additional product documents based on various lifecycle events, such as credit events or the rolling of futures and assists when it is time for a product's redemption.

In 2024, Leonteq issued a record total of 46,467 products, which is a 22% increase compared to the previous year. Of the total products issued, 62% were processed on a fully automated basis.

Our products and services meet the applicable legal and regulatory requirements with regard to labelling product types/structures and transparency, including the disclosure of fees.

Specifically, the documentation and issuance of structured products is created and designed in accordance with the Swiss Financial Services Act (FinSA) and other applicable rules. Leonteq provides investors with a product documentation in accordance with relevant laws and regulations, such as Base Prospectuses, Final Terms / Pricing Supplements and Key Information Documents (PRIIPs and FINSA KIDs) as well as MiFID II documents.

The quality of products and services is monitored as part of Leonteq's Internal Control System, which comprises controls relating to its business, operational and IT processes, as well as information security controls and controls carried out by Leonteg's partners.

Leonteq is not aware of any incidents of non-compliance concerning product and service information and labelling or marketing communications for the 2024 reporting year.

### Brand study

In 2024, Leonteq conducted its first brand study in collaboration with YouGov, a leading market research institute, to assess brand awareness and image. The survey was completed by 1,319 participants from all regions of Switzerland, with a subset of wealthy owners of investment products (i.e. individuals with securities accounts and at least CHF 100 thousand of free investible assets). The results showed that 9% of respondents recognised the Leonteq brand, with that figure more than doubling to 20% among wealthy individuals. Leonteq performed well in an assessment of spontaneous recognition compared to major players, with particularly strong recognition among the same group of wealthy individuals.

The study also confirmed Leonteq's strong positioning as a fintech leader, with high marks for innovation and competitive pricing. While trust and likability were rated lower, this is common for newer or less visible brands. Notably, 17% of respondents associated Leonteq with structured products and fintech expertise, with wealthy clients showing stronger recognition of its innovative investment solutions. These insights highlight the need to build on our strengths, boost visibility, and refine messaging to enhance trust and strengthen market perception.

**Sustainability Report** 

TCFD Report

33

## Employee Engagement & Development

**GRI 3-3** 

At Leonteq, we recognise that employees are our most valuable asset and are key to our success in all areas of our business. Satisfied and motivated employees engage more effectively with their colleagues, perform better in their day-to-day work and show greater loyalty to the Group. Leonteq is committed to being an attractive employer that fosters the well-being, satisfaction and development of its employees and is mindful of the need for them to strike a good personal and work life balance. Offering positions and functions that provide opportunities for development and give employees a sense of purpose, satisfaction and inspiration are important to promote employee motivation and wellbeing and thus also contribute to the long-term success of the business.

Leonteq acknowledges the significant impacts that its material topic "Employee Engagement & Development" could have on the economy, the environment, and people, including human rights. These impacts have been identified as both actual and potential, covering both short-term and long-term effects.

Leonteq has identified several positive impacts on people and the environment, including the actual direct benefit of having highly qualified and well-trained employees who continue to advance in their careers. Employees may also experience improved physical and mental health in both the short and long term. Further, through specific developmental initiatives aimed at female employees, the company can potentially increase gender diversity within its workforce. Ensuring good working conditions can further enhance employee satisfaction and motivation. Additionally, employee engagement and development have a direct impact on the quality of the services provided by the company's employees to clients and partners.

Leonteq has not identified any negative impacts resulting from its material topic "Employee Engagement & Development".

To manage the engagement and development of its employees Leonteq has policies and commitments in place that are aligned with both internal and external sustainability standards. One example is the Corporate Values & Ethics Guidelines, which are designed to guide employee behaviour and actions in order to maintain a positive and ethical workplace environment. All employees are required to complete online training related to the Corporate Values & Ethics Guidelines as part of the Group's mandatory training programme. New joiners receive this training as part of their onboarding programme.

Additional policies in place relating to employee engagement and development include:

- Code of Conduct & Ethics: Leonteq's Code of Conduct & Ethics summarises the Group's position on human rights and social responsibility. It further references Leonteq's commitment to upholding the International Charter of Human Rights and the International Labour Organization's core labour principles.
- Employment Manual: The Employment Manual forms an integral part of the individual contract of employment at Leonteq.
- Education and External Training: This policy covers access
  to the financing of external education and training and it determines the respective categories of external education and
  training. It is designed to ensure uniform handling of the financing of external education and training.
- Employment Rights & Obligations: This policy aims to ensure compliance with federal, state or local laws and all applicable regulations, and to help identify potential sources of any kind of criminal act, any kind of harassment and any kind of discrimination (gender, race, age, appearance, homophobia, religion, political affiliation, etc.) as well as to provide practical solutions to the problem of workplace discrimination.
- Flex Work and Leave Policy: This policy sets out the guidelines that apply to the hybrid working model, including working from anywhere, as well as the purchasing of additional days of vacation and mandatory leave.
- Internal Mandatory Training Directive: This policy defines Leonteq's mandatory internal training requirements and concept, and determines which individuals within the Leonteq Group are supposed to be trained in which topics and frequency.
- Length of Service Awards: This policy provides information about the principles that apply in connection with length-ofservice awards (including sabbaticals) at Leonteq and contains guidelines on implementation.
- On-Call Duty Policy: This policy defines the rules and regulations regarding on-call duties, provides a framework to compensate employees for on-call duties and offers incentives for employees undertaking on-call duties.

TCFD Report

- Remuneration Policy: This policy governs the fundamental aspects of Leonteq's approach to remuneration with an emphasis on variable compensation. It is based on the principles set out in the FINMA Circular 2010/1 "Remuneration schemes". Further, the policy provides management and employees with a comprehensive overview of structures and instruments and defines standards and processes in the context of governance of compensation.
- Working Hours: This policy sets out legal and regulatory provisions on the topic of working hours that apply to all personnel of Leonteq Securities AG who are employed in Switzerland and are protected by Swiss labour law.

Leonteq is also committed to ensuring compliance with sustainability goals and human rights standards and is a member of Advance, the leading business association for gender equality in Switzerland.

Leonteq's Human Resources department, led by the Chief People Officer, is the point of contact for employees and line managers throughout their employment relationship, and it fosters an open-door policy. Employees are assigned a designated HR Business Partner and receive appropriate support in all employee-related matters.

The Human Resources department is also responsible for positioning Leonteq as an employer of choice. To achieve this, the company has several initiatives in place to enhance the effects of the positive impacts that were identified. These include initiatives to promote employee engagement and feedback, health and safety offerings, comprehensive training opportunities for further learning and development, and programmes to promote and foster diversity and inclusion in the workplace. For each of these topics, Leonteq has set internal and/or external targets by which to measure the effectiveness of the actions taken to manage the engagement and development of employees.

### Great Place to Work®

As part of the Group's employee engagement efforts, Leonteq took part in the Great Place to Work® initiative for the second time in 2024. Employees globally were asked to participate in an employee survey as the first step in this process. Based on the survey results, which included an overall Trust Index Score of 64% (2022: 68%), as well as additional analyses of the company, Great Place to Work® certified five of Leonteq's 14 locations as Great Places to Work: Monaco, Germany, Hong Kong, Portugal and Singapore. This is an increase from two certified locations in 2022.

To address the areas for improvement identified in the survey results, Leonteq has taken appropriate actions and has conducted "train the trainer" sessions for line managers, who then together with their teams have identified proposal within their sphere of influence for bottom-up actions. In parallel, the Group's management team has conducted top-down assessments.

Leonteq aims to improve its overall Trust Index score to over 72% by 2026.

### Corporate culture

Leonteq continues to foster employee engagement and instil a positive culture across the company through its corporate culture initiatives driven by the Corporate Culture Committees, and specifically through Leonteq Clubs. Through this initiative, employees are encouraged to form interest groups. These groups, or clubs, aim to support the development of Leonteq's corporate culture as well as giving employees with similar interests their own platform and space to engage with each other. Leonteq Clubs is an international initiative spanning Switzerland, Europe, the Middle East and Asia. Further global initiatives aimed at strengthening Leonteq's corporate culture include fostering positive communication through "mottos of the month" and hosting virtual "meet and greets" to welcome new joiners and celebrate jubilees.

### **New employee** hires and employee turnover

### **GRI 401-1**

Leonteg offers full-time and part-time positions for employees in recognition of the need for flexible working models. We employ a unique pool of experts as well as young professionals at the beginning of their careers. Leonteg's seasoned experts have extensive experience in our fields of business and many have been hired from major investment banks, leading law firms, "Big Four" audit and management consulting companies, as well as from FINMA and SIX Swiss Exchange. Leonteg's referral reward programme also encourages current employees to refer candidates from within their network who could in their view positively contribute to the culture and success of the Group.

In 2024, Leonteg hired a total of 84 employees. This corresponds to a total of 83 FTEs.

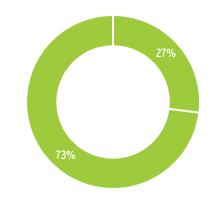
### New hires by region



Switzerland	42%
Europe	46%
Asia	12%

### New hires by gender

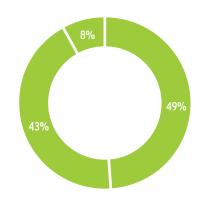
Sustainability Highlights



Female	27%
Male	73%

### New hires by age group

TCFD Report



<30 Years	49%
30-50 Years	43%
>50 Years	8%

		2024		2023
	НС	New Hire Rate (%)	нс	New Hire Rate (%)
Total New Hires	84	14%	108	18%
Gender				
Female	23	27%	27	25%
Male	61	73%	81	75%
Age				
<30	41	49%	53	49%
30-50	36	43%	49	45%
>50	7	8%	6	6%
Region				
Switzerland	35	42%	40	37%
Europe	39	46%	53	49%
Asia	10	12%	15	14%

In 2024, we experienced a total voluntary employee turnover rate (defined as the total number of employee-initiated resignations in relation to the average headcount of the respective period) of 8% (2023: 8%). This compares to the overall total employee turnover rate of 16% (2023: 16%), or 14% excluding interns with fixed employment contracts. While we report fully on Leonteq's total 2024 turnover in the following tables, Leonteq considers voluntary turnover metrics when assessing its performance against benchmarks.

	Leavers		2024		2023
			Turnover		Turnover
		HC	rate <sup>1</sup>	HC	rate <sup>1</sup>
Total leavers		94		98	
Gender					
Female		19	15%	26	21%
Voluntary		14		15	
Involuntary		5		6	
External Influence <sup>2</sup>		0		5	
Male		75	16%	72	15%
Voluntary		36		35	
Involuntary		21		19	
External Influence <sup>2</sup>		18		18	
Age					
<30		24	21%	44	37%
Voluntary		9		17	
Involuntary		0		4	
External Influence <sup>2</sup>		15		23	
30-50		60	14%	48	11 %
Voluntary		38		31	
Involuntary		21		17	
External Influence <sup>2</sup>		1		0	
>50		10	19%	6	12%
Voluntary		3		2	
Involuntary		5		4	
External Influence <sup>2</sup>		2		0	
Region	'	'		'	
Switzerland		47	14%	45	13%
Voluntary		23		25	
Involuntary		15		10	
External Influence <sup>2</sup>		9		10	
Europe		32	16%	39	20%
Voluntary		18		20	
Involuntary		6		8	
External Influence <sup>2</sup>		8		11	
Asia		15	21%	14	19%
Voluntary		9		5	
Involuntary		5		7	
External Influence <sup>2</sup>		1		2	
Rate of employee turnover		16%		16%	

<sup>&</sup>lt;sup>1</sup> Total number of leavers irrespective of reason in relation to the average headcount of the respective period.

Leonteq has a core group of employees who have been with the Group for multiple years – meaning that we continue to benefit from their expertise and long experience. At the same time, Leonteq continues to welcome new talents. In total, 292 employees (49%) have worked at Leonteq for four or more years (2023: 284 employees, or 47%), and 300 employees (51%) have worked at Leonteq for less than four years (2023: 316 employees, or 53%).

<sup>&</sup>lt;sup>2</sup> Including employees with limited contracts, those who retired or who are deceased.

TCFD Report

# **Employee benefits**

GRI 401-2 GRI 401-3

Leonteq offers its employees a range of non-financial benefits. Leonteg's benefit programme is available to employees both on a global and regional level. Whilst benefits such as length of service award, work from anywhere allowance and corporate travel insurance are offered globally, local offerings such as car and public transportation discounts, fitness offerings and food and drink discounts are organised locally and differ from region to region.

The majority of benefits offered in each office location are available to all employees working there. The work from anywhere allowance is also dependent on an individual's function within the Group. The only benefits provided to full-time employees that are not offered to temporary and/or part-time employees are subsidised public transportation. Lunch allowances are provided in Switzerland, Portugal and Italy to all employees including part-time and temporary employees, but not interns.

	BENEFITS COVERING >50% OF WORKFORCE (IN FTE)	BENEFITS COVERING >75% OF WORKFORCE (IN FTE)	BENEFITS COVERING 100% OF WORKFORCE (IN FTE)
Insurance coverage (travel, accident, sickness, life, and/or health)			•
Retirement plan			•
Public health services / counselling		•	
Fitness		•	
Public transportation support	•		
Fleet discount	•		
Lunch allowance	•		
Coffee & tea in the office			•
External education support			•
Length of service award			•
Parental leave beyond required minimum	•		
Flexible working			•

## Pension and insurance benefits

Leonteg employees in Switzerland benefit from generous pension provisions and are covered by Leonteg's accident insurance policy, which exceeds statutory requirements. In terms of accident insurance, Leonteg employees are insured against occupational and non-occupational accidents, in accordance with the Federal Accident Insurance Act, and Leonteg pays the employer and employee premiums for both occupational and non-occupational accidents. This insurance not only covers wage loss and the costs of hospital treatment in a private ward but includes additional capital insurance benefits in the event of disability or death. Further, in the event of illness, Leontea employees are covered by daily sickness insurance covering 90% of their salary for up to 730 days.

Leonteg employees in Switzerland also benefit from an occupational benefit plan governed by separate regulations, which insures them against the financial consequences of retirement, disability and death in accordance with the established pension fund plan. As part of this offering, Leonteg also contributes to each employee's pension fund, paving the highest level of savings regardless of the employee's chosen contribution level. Equivalent benefits for Leonteg employees outside Switzerland vary depending on local legal requirements and arrangements.

# Additional vacation days and length of service awards

Leonteg grants employees additional vacation days when they reach various service milestones. Employees who have worked for the company for 5, 15, 25 or 35 years are awarded five additional days of vacation on reaching these service anniversaries. On reaching 10, 20, 30 or 40 years of service, they are awarded a sabbatical of up to two months, including four weeks of paid leave.

In addition to these gifted vacation days, employees have the option to buy additional vacation days at any point during their employment at Leonteg.

# Flexible working model

Leonteg's hybrid model allows employees to work from home for up to two days per week, depending on their function and department. Additionally, they have the possibility to "work from anywhere", subject to regulatory restrictions on working abroad, for up to one week every six months, depending on their function and department. Leonteg's flexible working model is designed to foster a healthy day-to-day work/life balance.

### Parental leave

Mothers and fathers are granted parental leave following the birth or adoption of a child. The amount of parental leave granted is in line with the legal requirements in each country where Leonteg operates. Additionally, in Zurich, Geneva and Hong Kong, new parents are paid 100% of their salary while on parental leave, rather than the 80% prescribed by local law. In London, Leonted offers 14 weeks of maternity leave at 100% salary, instead of the statutory six weeks.

TCFD Report

Parental leave								
(HC)				2024				2023
				<b>Employees</b>				Employees
	Employees entitled to parental leave in 2024		Employees who returned to work from parental leave in 2024	Leonteq 12 months after returning from	Employees entitled to parental leave in 2023	Employees who took parental	Employees who returned to work from parental leave in 2023	who were still working at Leonteq 12 months after returning from parental leave
Male	20	20	19	21	25	25	21	23
Female	11	11	8	4	4	4	3	7
Total	31	31	27	25	29	29	24	30

		2024		
	Return to work rate	Retention rate	Return to work rate	Retention rate
Male	95%	84%	84%	82%
Female	73%	100%	75%	70%
Total	87%	86%	83%	79%

39

# Health and safety

GRI 403-3

GRI 403-5

GRI 403-6

GRI 403-7

## Health services

Protecting the health and safety of employees is assigned the highest level of importance at Leonteg. As an employer of a diverse workforce in a world that is changing rapidly and in which new risks are constantly emerging, we consider it our duty as an employer to protect the health, safety, and wellbeing of our employees. We examine environmental factors, economic impacts and social issues in this context through our HR and Business Continuity Management (BCM) processes, and we have measures and programmes in place to ensure that employees know that Leonteg has their best interests at heart. It is important to Leonteg that its employees feel safe and comfortable at work and know that we prioritise their health and safety above all else.

Many factors can influence the working environment and thus impact on an employee's mental and physical health: Internal company politics, economic circumstances, an employee's personal or family situation, and of course, exceptional circumstances such as a pandemic or war. Leonteg's Human Resources department, led by the Chief People Officer, is always available to support all employees or their line managers in clarifying any issues that arise in the workplace.

For topics that extend beyond the remit and expertise of our Human Resources department, Leonteg has an employee assistance program in place in cooperation with the external firms MOVIS and Enjoy Benefits. As part of this program, employees have 24/7 access to immediate support from experts on topics relating to the workplace, their personal life, mental and physical health, financial guidance and integration. Consultations are strictly confidential, conducted by experienced counsellors with advanced degrees and training. Appointments can be obtained quickly in person, over the phone or online.

# Worker training on occupational health and safety

Sustainability Highlights

Leonteg has a Health and Safety Officer, who works in close coordination with the Business Continuity Manager (BCM Manager), who is part of the evacuation and first aid team. The BCM Manager is also the IT Risk Delegate. The Health and Safety Officer leads a Health & Safety team consisting of evacuation officers (fire marshals) and first aiders; they complete refresher training courses on a biennial basis. Health and safety courses on emergency procedures, building evacuation plans and first aid assistance are provided to all employees upon joining the Group. Fire and evacuation drills are conducted annually for all employees. Hazard identification, risk assessments, and incident investigations are also conducted when required.

Leonteg employees additionally receive training on mental health at work. In 2024, MOVIS joined Leonteg for a one-hour training workshop as part of Leonteg's Power Hour programme. This impactful session provided essential insights into mental health in the workplace and equipped attendees with practical tools to effectively support colleagues and themselves. This training session was available for all employees globally.

## Promotion of worker health

Leonteg promotes worker health both through benefits offered. such as accident insurance and seasonal flu shots, as well as through corporate initiatives, such as fitness clubs. In 2024, the following Leonteg clubs were active: Running, football, paddle, surfing, table tennis, golf and cold-water swimming.

# Prevention and mitigation of occupational health and safety impacts

Leonteg acknowledges the impact that a desk job has on a person's physical health, and the stress and strain placed on the body due to a lack of exercise. Leonteg therefore offers standing desks, ergonomically designed chairs and adjusted lighting to provide optimal comfort and posture support in the workplace.

Leonteg also assigns a high level of attention to ensuring that employees maintain a healthy work-life balance. All employees are required to take a two-week block leave every year and to use their allotted vacation days before year-end.

# Training and education

GRI 404-1 GRI 404-2 GRI 404-3

Leonteg is committed to offering attractive training and development opportunities for employees based on its belief that this gives them a sense of purpose and satisfaction, thus also strengthening their motivation and wellbeing. We recognise that as a firm, we have a responsibility to support both the personal and professional development of our people, and we acknowledge the positive impact that continuous learning has on their professional lives. Through these efforts, we aim to enhance the employability of our people and the skills, innovative strength and attractiveness of the local workforce. Further, maintaining a highly-skilled workforce and ensuring high levels of employee satisfaction is an important factor driving the long-term success of the business.

#### **Employee training hours**

Employee training hours	2024	2023
Average hours of training per employee (headcount)	20	18
Gender		
Female	17	20
Male	21	18
Employee rank		
Senior Management	11	15
Professionals	23	19
Division		
Executive Committee members	8	9
Finance & Corporate Services	24	18
Human Resources	13	22
Investment Solutions	22	17
Legal & Compliance	15	17
Markets	13	18
Operations & IT	18	18
Risk Control	42	25

# Average hours of training per year per employee

Leonteg's training and development programmes are available to all employees globally, including part-time and temporary workers, unless otherwise stated. Employee training hours are determined by considering both mandatory internal training courses and the Graduate Programme, as well as optional educational programmes offered in-house by Leonteg professionals or external partners. The following optional educational programmes have additionally been considered in the calculation of the average hours of training per year per employee: GoodHabitz soft skills training courses, IMD online course "Investing in Structured Products", leadership and professional development workshops, external degree programmes, language courses and Power Hours.

# **Programs for upgrading employee** skills and transition assistance programmes

We invest in the development of our employees throughout their career at Leonteg and offer them regular opportunities to grow their skills and knowledge, both as part of their professional role within the financial industry and in areas that are partly unrelated to their core field of work. Our Education & Talent Development programme is overseen by the Human Resources department and the Chief People Officer. As part of this programme, employees are provided with a variety of professional development opportunities as well as career planning and succession planning.

Leonteg has various individual programmes in place to enhance employee skills, including:

- Onboarding Programme: This programme is designed to enhance productivity and engagement among new joiners through a globally standardised onboarding process that accelerates integration and ensures an effective, informative experience. All new employees, whether permanent or fixed term, must complete the course. It is also open to consultants.
- Internship Programme: Lasting between 6 and 12 months, this programme gives university students and new graduates their first professional experience within the industry.

- Graduate Programme: This programme offers long-term career development opportunities for new graduates in the form of tailored, business-specific professional training. The 12-month programme includes an off-campus, twoweek intensive training course.
- Mentoring Programme: Personalized guidance is offered to employees by experienced colleagues to support their growth. The programme is designed to accelerate the participants' professional development by providing valuable insights. It also aims to expand their network by fostering meaningful connections within the organization, as well as shaping their career with advice tailored to their unique goals and aspirations.

The Group also offers workshops and training courses to upgrade employee skills and knowledge, including:

- GoodHabitz: Through the external provider, GoodHabitz, Leonteg employees have unlimited access to over 100 soft skills training courses and self assessments on a range of topics, including Personal Strength, Inspirational Leadership, Communication, Health, Safety & Wellbeing, Productivity, and Digital Skills.
- IMD online course "Investing in Structured Products": Together with the Institute for Management Development (IMD), Leonteg offers an online course in structured investment products to clients and employees. This course combines the excellence and academic rigour of IMD's executive education offerings with Leonteg's expertise and innovation in the structured products business. The jointly developed online course is a custom offering comprising two modules: The first, called "Foundations", instructs participants on the fundamentals of structured products, while the second course, "Advanced", provides a deeper understanding of more complex topics and product features. By completing these modules, participants gain a thorough understanding of structured products across all the different product types. Participants who successfully complete the course receive a customised IMD-Leonteg certificate.
- Speexx business language courses: Leonteg employees with a permanent contract have access to the digital language training service provided by Speexx. This external partner uses AI to create a completely personalised learning environment based on a growing library of more than 30,000 business language activities and exercises to improve business language skills.

- Leadership and professional development: A strong leadership team is crucial for the achievement of our business objectives. Our Leadership Programme encompasses various workshops and seminars that inform managers about various topics that are important to successfully lead a team, including identifying employee potential, workplace diversity, and individual and professional growth. Leonteg employees who progress in their careers have the option to take on senior management positions. Leonteg therefore offers further training measures, including external coaching services, to ensure the talent and professional potential of individual employees are identified and leveraged.
- Advance events: Leonteg encourages its female managers to attend events and workshops hosted by Advance, a business network promoting gender equality in Switzerland. Leonteg also takes part in Advance's cross-company mentoring programme, both as a mentor and mentee.
- External degree programmes and certifications: Leonteg encourages and financially supports its permanent employees, including part-time workers, in completing external degree programmes and certifications.
- Power Hours: "Power Hour" events feature both internal speakers from across different divisions and external speakers who provide employees with information on key topics relating to the development of Leonteg's business, as well as a wide range of external topics. Power Hours are held on a monthly basis.
- Sustainability Townhalls: Occurring twice annually, Sustainability Townhalls serve as an educational platform to expand employees' knowledge of environmental, social and governance topics and the initiatives in place.

Leonteg additionally works with MOVIS, the specialised employee assistance service in Switzerland, to provide transition assistance programmes for employees to increase their employability and to help them navigate a change of direction due to retirement or the termination of employment.

Furthermore, Leonteg values and recognises the importance of young talent within the workforce. As part of its goal to develop the next generation of leaders, Leonteq has a talent pipeline in place to bring young professionals to the Group. Leonteq is actively involved in university education and recruiting activities,

and it offers IT apprenticeships, internships and graduate positions to young employees on an ongoing basis. These different posts take the form of temporary contracts for students and young professionals at the start of their career. As part of its efforts to connect with universities and young talent globally, Leonteg engaged with 22 universities across Switzerland, Europe and Asia in 2024.

# Performance and career development reviews

Every year between September and March, Leonteg conducts an annual year-end process, which includes annual performance reviews, determination of variable compensation, and the promotion process.

Discretionary variable compensation is determined at Leonteg's discretion and is subject to a broad range of assessment criteria. These include the performance of the Group as a whole, the division and the individual employee, as well as the individual's disciplined risk management and compliance-centred behaviour. Leonteq has a comprehensive performance management system in place based on three ratings: Job function, tasks and culture. An employee's overall rating is determined based on the calculated result of all performance indicators combined with their respective assigned

weighting. Noncompliant or unethical conduct and unreasonable risk-taking can lead to a manual downward adjustment of the overall rating.

Permanent employees who join the company before 1 July are required to complete a performance review with their managers for that year. Employees who are on long-term leave, such as parental leave or a sabbatical, during the performance review period, or who have a set employment end-date near the beginning or end of the calendar year, are exempt from the need to complete an annual review. Consequently, the percentage of employees who received an annual performance review is based on the total number of employees (in terms of headcount) who are eligible for a performance review, as outlined above.

Each employee's rank is evaluated during the annual year-end process and promotions are awarded based on various criteria. To be considered for promotion, an employee's line manager must complete a promotion request form. Depending on their rank, employees must present their case to the Executive Committee or another designated committee, they must have held their previous rank for a certain period of time, and they must have succeeded in achieving defined KPIs as part of their performance review, among other factors. Six different ranks exist at Leonteg: Employees, Analysts, Associates and Directors (collectively defined as "Professionals") and Executive Directors and Managing Directors (collectively defined "Senior Management").

Year-End Performance Reviews			2024			2023
	Completed	Not completed	Total	Completed	Not completed	Total
Gender					'	
Female	99.07%	0.93%	100.00%	100.00%	0.00%	100.00%
Male	99.30%	0.70%	100.00%	100.00%	0.00%	100.00%
Employee rank			'			
Senior Management	98.04%	1.96%	100.00%	100.00%	0.00%	100.00%
Professionals	99.74%	0.26%	100.00%	100.00%	0.00%	100.00%
Division						
Executive Committee members	100.00%	0.00%	100.00%	100.00%	0.00%	100.00%
Finance & Corporate Services	100.00%	0.00%	100.00%	100.00%	0.00%	100.00%
Human Resources	100.00%	0.00%	100.00%	100.00%	0.00%	100.00%
Investment Solutions	97.69%	2.31%	100.00%	100.00%	0.00%	100.00%
Legal & Compliance	100.00%	0.00%	100.00%	100.00%	0.00%	100.00%
Markets	100.00%	0.00%	100.00%	100.00%	0.00%	100.00%
Operations & IT	100.00%	0.00%	100.00%	100.00%	0.00%	100.00%
Risk Control	96.55%	3.45%	100.00%	100.00%	0.00%	100.00%

# **Employee compensation**

Appropriate compensation is an important factor determining employee satisfaction and loyalty. Leonteq is committed to offering employees fair and competitive compensation and benefits that exceed all country-specific minimum living wage requirements where the Group operates and that are in line with market standards and the Group's remuneration principles.

Based on its remuneration system, Leonteq has a global remuneration policy in place, which has been approved by the Board of Directors. The policy governs the fundamental aspects of Leonteq's approach to remuneration and outlines the Group's key remuneration principles.

Leonteg's key remuneration principles include:

- Leonteq offers a competitive and merit-based compensation, which rewards consistent high performance and the successful, sustainable implementation of business objectives in the interest of the stakeholders:
- The remuneration procedures and practices are compatible with, and supportive of, effective and prudent risk management and compliance with legal and regulatory requirements;
- Remuneration is based on the function's responsibility and latitude as well as the incumbent's capabilities, experience, and knowledge. The level and future progression of a salary are aligned with market practice in the respective labour market:
- Employees are rewarded on a total rewards basis, which includes fixed and short-/ long-term variable compensation, as well as tangible and intangible benefits (in line with market practice). The proportions of the variable compensation shall incentivise appropriate conduct and actions; and
- Leonteq encourages a safe and healthy work environment, free from any kind of discrimination. In terms of compensation, we promote equal pay for work of equal value.

Total employee compensation consists of both fixed and variable compensation, with each compensation category broken down further into specific remuneration types and subject to various determinants.

Fixed employee compensation comprises an employee's base salary and allowances. It varies according to the responsibility, requirements, rank and labour market associated with the role as well as the individual employee's qualifications or expertise, experience and other attributes that influence performance.

Variable compensation is awarded annually based on contractual agreements and/ or at the discretion of the Group. It varies, depending on the overall performance of the Group, as well as divisional and individual performance, measured on the basis of predefined, strategy-oriented quantitative and qualitative KPIs, including non-financial factors such as ESG aspects, cultural values, compliance and risk-taking. The payment of any variable compensation is subject to employees having always acted appropriately and in line with any law, regulatory requirements or Group policies.

Sales employees mainly receive variable compensation based on a sales formula, which is linked to sales productions. Adjustments are made to reflect the Group's trading result, the Group's net profit and the sales organisation's direct and indirect costs of production. Additional adjustments are made for negative performance contributions, including among others material client complaints and non-observance of internal policies and failure to meet appropriate standards of fit & proper.

More information about compensation plans for employees can be found in the Compensation Report of the <u>Annual Report 2024</u> on page 112 and in article 13 of the Financial Report on page 160.

Executive Committee members are remunerated based on their specific compensation model, which is based on clearly defined performance metrics with the aim of ensuring maximum transparency. Further information about the Executive Committee compensation model can be found on pages 107 to 110 of the <u>Annual Report 2024</u> and information about the remuneration of members of the Board of Directors can be found on page 111 of the <u>Annual Report 2024</u>.

**Sustainability Report** 

# **Diversity and inclusion**

GRI 405-1 GRI 406-1

# Diversity of employees

Leonteg is a global company and employs people from many different backgrounds. The diversity of our workforce enriches the Group as well as the local labour market, as each individual brings specific expertise to their employer. The different cultural backgrounds of our employees help to create a diverse environment with mixed teams whose varied profiles and experience have a positive impact on the business by introducing a range of perspectives – resulting in more diverse outcomes. In 2024, Leonteg employed people from 54 different nations, demonstrating the diversity of our workforce.

As a fintech company with a large portion of its employees in sales and IT roles, Leonteg is aware of the challenges faced when seeking to increase gender diversity. As is characteristic of these two disciplines across the industry, Leonteg's IT and front office staff (IT & Operations and Investment Solutions) have some of the lowest ratios of female employees. Leonteg nevertheless considers diversity across ranks and functions to be a very important factor to help it remain competitive and to position the Group as an employer of choice. It is therefore working to improve its diversity ratios and has defined the goal of increasing gender diversity across the Group to over 25% by 2026 as one of its key ESG targets.

To achieve its diversity target by 2026, Leonteg has implemented several measures to support the inclusion of female workers and to help close the gender gap among Leonteg employees.

- . Recruiting: As part of our efforts to attract female talent, Leonted took part in over 30 university events, including the Women in Finance round table at the EDHEC Business School Nice.
- Professional Women Network: Leonteg's Professional Women Network (PWN) was founded in 2024. The PWN is a platform for Leonteg's female employees to build relationships across the firm. It connects women with mutual interests, creates a space for them to develop professional connections, and to shape their careers, and it gives them a space to exchange best practices and to share career and life experiences. In 2024, three global roundtable events were held for female employees.
- Advance: Female employees in Switzerland with the rank of Director and above have access to Advance-led workshops and diversity initiatives.

In 2024, 22% of Leonteg's workforce was female (2022: 19%; 2023: 20%), and the percentage of new female hires rose by two percentage points to 27% in 2024 (2022: 23%; 2023: 25%). The percentage of female employees in Leonteq's senior management rose by one percentage point to 12%. The percentage of leavers who were female also decreased to 15% in 2024 from 21% in 2023.

While Leonteg is moving in the right direction with a 22% female ratio in 2024, the fact remains that Leonteg operates in a niche market between finance and technology where finding suitable talent, and specifically suitable female talent, is generally more challenging.

#### **Gender distribution**

					2024					2023
Diversity of employees by gender (HC)	Male	Male %	Female	Female %	Total HC	Male	Male %	Female	Female %	Total HC
Employee level										
Senior Management	146	88%	20	12%	166	148	89%	18	11%	166
Professionals	318	75%	108	25%	426	330	76%	104	24%	434
Division										
Executive Committee members	6	86%	1	14%	7	5	83%	1	17%	6
Finance & Corporate Services	32	57%	24	43%	56	29	59%	20	41%	49
Human Resources	2	22%	7	78%	9	2	20%	8	80%	10
Investment Solutions	127	88%	17	12%	144	136	88%	18	12%	154
Legal & Compliance	39	60%	26	40%	65	43	64%	24	36%	67
Markets	47	96%	2	4%	49	54	95%	3	5%	57
Operations & IT	189	83%	39	17%	228	189	84%	36	16%	225
Risk Control	22	65%	12	35%	34	20	63%	12	38%	32

### Age distribution

2024							2024							2023
Diversity of employees by age (HC)	<30	<30 %	30-50	30-50 %	>50	>50 %	Total	<30	<30 %	30-50	30-50 %	>50	>50 %	Total
Gender														
Female	25	20%	90	70%	13	10%	128	29	24%	82	67%	11	9%	122
Male	89	19%	335	72%	40	9%	464	89	19%	350	73%	39	8%	478
Employee level														
Senior Management	0	0%	137	83%	29	17%	166	0	0%	135	81%	31	19%	166
Professionals	114	27%	288	68%	24	6%	426	118	27%	297	68%	19	4%	434
Division														
Executive Committee members	0	0%	3	43%	4	57%	7	0	0%	4	67%	2	33%	6
Finance & Corporate Services	11	20%	42	75%	3	5%	56	6	12%	40	82%	3	6%	49
Human Resources	2	22%	7	78%	0	0%	9	2	20%	7	70%	1	10%	10
Investment Solutions	42	29%	96	67%	6	4%	144	43	28%	104	68%	7	5%	154
Legal & Compliance	7	11%	45	69%	13	20%	65	9	13%	46	69%	12	18%	67
Markets	10	20%	35	71%	4	8%	49	11	19%	42	74%	4	7%	57
Operations & IT	32	14%	175	77%	21	9%	228	37	16%	169	75%	19	8%	225
Risk Control	10	29%	22	65%	2	6%	34	10	31%	20	63%	2	6%	32

45

# Diversity of Leonteq's Board of Directors

In 2024, Leonteg's Board of Directors was composed of two, or 29%, female members and five, or 71%, male members. All Leonteg Board members are over 50 years of age, with 14% between 51-55 years, 43% between 56-60 years, and 43% between 61-65 years.

Leonteg acknowledges the importance of diversity in fostering innovation and inclusive decision-making. The Board has intensified the process of identifying potential female candidates for election to the Board of Directors, in particular with a view to further enhancing its skill set in the area of technology, digitalisation and innovation. In this context, the Board expects to propose the election of a new member of the Board according to these criteria at the AGM 2025.

Further information about the composition of Leonteg's Board of Director's and the diversity of its members can be found in the Annual Report 2024, pages 65 to 66.

## Non-discrimination

Ensuring the equal treatment of employees, clients and other stakeholders at all times - regardless of race or ethnicity, gender, nationality, age, disability, sexual orientation, religion or any other status protected by law – is of the utmost importance at Leonteg. The Group has a zero-tolerance policy on harassment and discrimination, as defined in the Code of Conduct & Ethics. It has a defined escalation, whistleblowing and grievance process in place to manage any instances of harassment and discrimination.

Any form of discrimination or other violation of personal rights - such as sexual harassment, mobbing, xenophobia, curtailments of the freedom of religion or belief, etc. - is thoroughly investigated in an interview process. Any person committing acts of harassment and/or discrimination is subject to individual sanctions that include written warnings, personal interviews, transfer to another department or termination. Additionally, employees who have been subject to any discrimination and/ or harassment at Leonteg receive support from the Group and they have the right to submit complaints without facing the risk of any negative consequences.

We strive to protect our employees' personal integrity in the workplace at all times, including throughout the hiring process, during their employment with the Group and in the event of the termination of the employment relationship.

There were no incidents of discrimination and no corrective actions taken in 2024.

Leonteg is additionally committed to the principle of offering existing and prospective employees equal opportunities in accordance with the laws and regulations of the jurisdictions in which it operates. It additionally has several rules in place to ensure equal treatment of its employees, including guaranteeing equal professional opportunities for its employees and equal pay for equal work.

Sustainability Report

TCFD Report

46

# **Data Protection** & Cybersecurity

**GRI 3-3** 

The data protection and cybersecurity measures implemented at Leonteq are designed to protect the confidentiality of important data, the integrity of our assets and the information they contain, and the availability of all systems, services and information when needed by employees, partners and clients.

Leonteq acknowledges the positive and negative impacts that its material topic, "Data Protection & Cybersecurity", could have on the economy, environment, and people, including human rights. These impacts have been identified as potential and encompass both short-term and long-term effects.

On the negative side, personal data breaches could directly and adversely affect individuals' rights and freedoms. Additionally, the loss of personal data or a severe security incident could have negative consequences for the company's stakeholders. Misuse of personal data could lead to privacy violations, exposing personal data without consent and potentially resulting in identity theft and financial fraud.

On the positive side, Leonteq recognizes the potential benefits of sharing innovations in data protection and cybersecurity with others, contributing to enhanced security practices and broader societal improvements.

Leonteq's approach to data protection and cybersecurity is defined in Leonteq's official Group policies, instructions and guidelines. The Data Protection Advisory (DPA) team consist of representatives from Legal, Compliance, Information Security and Business Continuity, and Third-Party Risk Management.

To manage data protection and cybersecurity, Leonteq has the following policies and commitments in place that are aligned with regulatory and sustainability standards:

- Personal Data Protection: This policy helps to protect Leonteq from tangible data security risks related to personal
  data, as defined in the applicable laws. This includes breaches of confidentiality, such as information being shared inappropriately, and failing to offer choice to data subjects on
  how their data may be used.
- Clear Desk: The purpose of this policy is to reduce the risk of unauthorised access, loss of and damage to sensitive data during and especially outside normal working hours or when areas are unattended.

- Securities Firm Secrecy: This policy is based on Article 69 of the Federal Act on Financial Institutions (FinIA). Client confidentiality is embedded in contract law (duties of fiduciary care and due diligence within the contractual relationship between client and securities firm), the right to personal privacy (the financial sphere is part of the protected privacy) and securities firm law (protection under criminal and supervisory law).
- ICT Risk Management: This policy's objective is to proactively manage and reduce the potential impact and likelihood of information and communication technology (ICT) risks. The policy defines how Leonteq identifies, assesses, and mitigates ICT risks.
- Privacy Notice for Employees: This notice explains how the companies of the Leonteq Group process employee personal data, in particular the types of data we process, the purpose of processing and who may share employee data with others.

Leonteq has a dedicated Information Security team led by Leonteq's Chief Information Security Officer (CISO) and a dedicated Data Protection Advisory team lead by Leonteq's Group Data Protection Advisor and Officer.

Both teams are also supported by external cybersecurity and legal data protection specialists. Their aim is to prevent, mitigate and reduce the impact of cybersecurity-related events (including data breaches) by identifying threats and risks, implementing appropriate safeguards, monitoring those safeguards and the assets required to manage security breaches, and responding to cybersecurity issues if and when they occur to ensure the reliability of information systems and communication technology used in Leonteq's critical operations. These areas are tested by means of ongoing internal checks and automated vulnerability scans as well as through a broad range of security tests conducted by external cybersecurity specialists on an annual basis and when new critical services are launched.

In the event of a personal data breach, Leonteq has a comprehensive incident response plan in place: Leonteq informs the relevant supervisory authorities within 72 hours of the issue being detected in accordance with applicable data protection laws and regulatory requirements. In addition,

where there is a significant risk that the personal data breach could adversely affect the impacted individuals' rights and freedoms, Leonteg informs those individuals without undue delay.

· In the event of a cybersecurity incident, the Information Security team is responsible for mitigating that incident and for ensuring the recovery of services while working with external parties, where necessary, to document the incident and gather evidence.

In the event of an incident, Leonteg has a comprehensive Business Continuity Management (BCM) response plan in place. Key elements of the Group's BCM plan are: The establishment of a crisis management team, including the Group Chief Operating Officer (COO), regional senior managers and business critical department heads; the definition of communication plans for internal and external stakeholders; IT and infrastructure redundancies; and a flexible IT set-up that allows Leonteg employees to work from home or other locations without their ability to perform essential tasks being affected.

To ensure preparedness for any event requiring a BCM plan, Leonteg's BCM manager regularly conducts business impact analyses, interested parties analyses and risk assessments for departments across the Group. Employees are also informed about BCM as part of the induction day for new joiners and Cyber incident training is provided for employees within key departments involved in business continuity and crisis management. The Group conducts annual reviews of its BCM plan and strategy with the Board of Directors and Executive Committee and holds biweekly BCM management reporting meetings. BCM tests are held several times per year (2-3 major BCM tests and 3-4 minor BCM tests per year) and Leonteg works with an external partner in the cloud space to build safe, secure, and stable business continuity as well as security platforms. Leonteg maintains a dedicated disaster recovery site.

Leonteg is continuously developing and refining its data protection and cybersecurity strategies to reflect current areas of focus and ensure their ongoing implementation.

Leonteg's Data Protection Advisory and Information Security functions work to ensure the Group's compliance with regulatory requirements in all the jurisdictions in which we operate. The measures used to ensure IT security and the protection of personal data of counterparties, employees, business partners and other stakeholders include the following key areas: Employee awareness and training, technical defences, data access and control, standardisation and certification, and operational resilience.

The effectiveness of these measures is tracked through Leonteg's risk management procedures, its Global Control Forum, which comprises the CISO, CFO and regional office managers, as well as through several reporting and dashboarding methods, including Key Risk Indicators, the maturity matrix, third-party risk management, business impact analyses, interested parties analyses, and our Operational Risk Assessment Process. In addition, the Data Protection Advisory team continues to enhance the Group's data sharing framework. The Data Protection Advisor and Officer also advises the Executive Committee on data protection and privacy topics to enable the Executive Committee to take appropriate steps relating to these topics.

#### **Employee awareness**

To ensure that Leonteg conducts its business in a safe and secure manner, and to share insights about best data protection and cybersecurity practices, Leonteg runs several employee awareness programmes. They cover tips, precautionary practices, and general and specific information around identifying, understanding, and remaining vigilant about cybercrime.

Awareness programmes include onboarding sessions for new employees, monthly newsletters and communications delivered to all employees via email, and notices on the company intranet and TV screens within Leonteg offices globally. Mandatory cybersecurity and data protection training is also reguired of all employees, including part-time and temporary employees. In 2025, Leonteg will expand its training programme to include dedicated classroom training sessions for various departments on specific data protection topics.

#### Technical defences

Leonteg follows state-of-the-art cybersecurity practices and uses a range of cybersecurity tools to monitor its environment in real time and to produce alerts if any risk indicators emerge. Any such indicators are followed up and investigated.

Leonteg also has multiple layers of technical defences in place to protect against unauthorised access by internal or external parties. This includes the use of next-generation firewalls, intrusion detection systems, and distributed denial of service protection at the network perimeter, together with internal countermeasures. This configuration is designed to ensure that no part of Leonteg's network is exposed to cybersecurity risks due to the failure of any single component and that data cannot be accessed without users passing through multiple checks. In cases where Leonteg is dependent on third-party services and service providers, any failure of or interruption or damage to the services of such third-party service providers could affect Leonteg's business.

TCFD Report

Critical third-party services and service providers undergo data protection impact analysis prior to initiation of the contract. Cloud service providers are additionally assessed based on internal policies to ensure appropriate safeguards are in place.

Additional information about Leonteg's cybersecurity lines of defence and defence governance can be found in the Risk Management & Control section of the Annual Report 2024 on pages 140 to 141.

Leonteg also ensures that its security configurations are reviewed and engages external security specialists to test, check and advise on how it can improve its operational security. It takes all the necessary technical and organisational measures - as set out in the applicable data protection laws - to protect the data of its employees, clients, partners and other stakeholders against loss and unauthorised collection, processing, alteration and disclosure.

#### Data access and control

In line with the laws applicable to Leonteg, such as the European General Data Protection Regulation, the Swiss Federal Act on Data Protection and the DIFC Data Protection Law, as well as the Group's risk management framework, Leonteg also assigns the utmost importance to preventing data loss and leaks, as a loss of personal data or a breach of IT security could potentially have negative economic consequences as well as negatively affect Leonteg's stakeholders.

Leonteg only ever processes the personal data of its employees, clients, partners, service providers, shareholders or other counterparties where this is required in order to comply with legal obligations, where this is necessary to enter into or perform a contract, where a third party has given its consent for Leonteg to process the data for a specific purpose, or where the processing of data is in the legitimate interests of Leonteg or third parties. Further information about Leonteg's privacy statement and the collection and processing of the data of service providers, shareholders, partners, clients, distributors and counterparties is available on Leonteg's corporate website.

Leonteg is also responsible for all the information and personal data where it is the designated data controller and data processor and defines the use and management of that personal data. The majority of its data is held in its Swiss-based data centres, but it is also the controller of data that is hosted by external providers, such as cloud services. Additionally, Leonteg produces reports and management information and provides data uploads to partner organisations where required.

Data protection and professional secrecy at Leonteq are managed by members of the Data Protection Advisory and Information Security teams. These functions report either to the General Counsel or the COO. The General Counsel and the COO are members of the Executive Committee. The DPA team is responsible for making recommendations to the Executive Committee or creating policies to support the safe and secure processing of personal data, for assessing new critical systems using the dual-control principle, and, in the event of an incident, for advising the Group on the appropriate response. Leonteg also retains the services of external providers such as external legal experts specialising in data protection and professional secrecy and a security forensic service provider that specialises in cybersecurity and responses to cyberattacks.

To ensure proper data management, Leonteg strictly controls access to information using its identity access management tool. This role creation and modelling tool enables us to manage user account provisioning, permissions and deprovisioning. All individual and group employee permissions are managed using this tool.

#### Standardisation and certification

The Group's BCM programme, which covers disaster recovery and crisis management procedures, is aligned with all regulatory requirements and internationally recognised standards and is audited in accordance with ISO 22301.2019. This audit is conducted annually and covers the planning, implementation and operation of the Group's plan to protect against, reduce the likelihood of, prepare for, respond to, and recover from disruptive incidents, if and when they arise.

Audits of Leonteg's data and information systems are included in the annual audit of Leonteg's IT systems. This is performed by Leonteg's external auditor as part of the annual regulatory audit. In addition to these external audits, the IT department and its systems are audited annually by our internal audit team. Furthermore, penetration tests are performed annually by external companies specialising in IT and cybersecurity.

Information security is an important element in the protection of the Group's data and information systems and is standardised and audited. Leonteg's IT and security policies are reviewed and updated annually. The compliance of the internal Leonted system is additionally measured through the Group's internal control process, on either a monthly, quarterly or annual basis depending on the control parameters. Leonteg's internal control system, which comprises controls relating to its business, operational and IT processes as well as controls of information security, is validated on an annual basis in accordance with the International Standard on Assurance Engagements (ISAE) 3402. A comprehensive report documenting these controls is produced on an annual basis and is certified by means of an external audit.

#### **Operational resilience**

Recognising the increased potential for significant disruptions to companies' operations from cybersecurity-related events or technology failures among other internal or external events, Leonteq has a comprehensive operational resilience framework in place.

TCFD Report

Further information about operational resilience can be found in the Annual Report 2024 on page 123.

# **Customer Privacy**

## GRI 418-1

In 2024, Leonteg did not receive any substantiated complaints concerning breaches of professional secrecy or losses of client or employee related data and there were no substantial internal breaches.

**Sustainability Report** 

TCFD Report

49

# Sustainable Offering

**GRI 3-3** 

Sustainable finance in general – and the sustainability credentials of financial products such as structured products – have become increasingly important to institutional and private investors. These offerings are also attracting growing attention from the general public, government bodies and the media. In recent years, demand for structured products that incorporate ESG aspects has grown, driven by the increasing desire of clients to access sustainability information and make informed choices based on clear sustainability criteria. As a provider of investment solutions, Leonteq is committed to ensuring the quality, integrity and transparency of all its products and services, and it strives to offer exposure to ESG indices, as well as giving clients access to a wide range of investment solutions with ESG aspects.

Leonteq recognizes the positive and negative impacts that its material topic, "Sustainable Offering" could have on the economy, environment, and people, including human rights. These impacts have been identified as both actual and potential, encompassing short-term and long-term effects.

Negative impacts include the risk of promoting unsustainable businesses, technologies, or developments by investing in them or failing to provide clients with adequate transparency regarding their sustainability status. Additionally, the exaggeration of sustainability commitments, commonly referred to as greenwashing, could mislead investors and clients, potentially contributing to negative outcomes.

On the positive side, Leonteq can directly impact sustainable investing opportunities by offering transparency about the sustainability of the underlying assets that structured products reference. By integrating ESG factors into its offerings Leonteq has the potential to promote sustainable investing, aligning clients' financial goals with environmental and social objectives. Through the transparency provided by Leonteq, investors may prioritize companies with socially and environmentally friendly practices.

To address these impacts, Leonteq is actively working with industry peers to develop recognised sustainability standards and guidelines for structured products in Switzerland and Europe. The Group is also continuing to develop a responsible investing framework that prioritizes transparency and is aligning its product offering with the changing regulatory landscape and investor interest.

To this end, Leonteq has robust policies and commitments in place that are aligned with both internal and external sustainability and regulatory standards. Leonteq's commitments and policies include:

- Swiss Sustainable Finance: Leonteq has been a member of Swiss Sustainable Finance (SSF) since 2021. In view of its ability to offer and implement sustainable investing opportunities for its clients and partners, Leonteq's ambition is to create awareness and inform its clients about ESG as well as the trends, risks and opportunities deriving from ESG. With its membership of Swiss Sustainable Finance, Leonteq is committed to driving sustainable investment approaches across this field.
- Principles for Responsible Investment: Leonteq became a signatory to the UN-supported Principles for Responsible Investment (PRI) in 2021. As a professional service partner, Leonteq recognises the influence it has over how its clients address ESG issues and acknowledges the relevance of ESG issues for investment management. It is therefore committed to providing, promoting and improving services that support the implementation of the PRI's Six Principles for Responsible Investment, and, in turn, contributing to developing a more sustainable global financial system.
- Investment Portfolio Policy: This policy sets out clear principles, rules, processes and limits for the management and monitoring of the resulting risk exposure with the aim of defining the universe of eligible financial instruments for investment, a framework for determining the targeted characteristics of the investment portfolio, a risk framework addressing the resulting risk exposures, and the responsibilities of all bodies involved in the management and supervision of the inherent risk profile.

# Responsible investing framework

Due to the changing regulatory landscape and uncertainty when it comes to determining sustainability features in structured products, Leonteq does not classify its structured products as sustainable under any applicable sustainability-related law, regulation or industry guideline.

Nonetheless, in the context of its responsible investing framework, Leonteq intends to provide enhanced transparency to enable investors to make informed decisions based on their individual values and priorities when it comes to sustainability-related topics.

In 2023, Leonteq developed a basic framework to assess investments with sustainability features. In line with guidelines from industry associations in Germany, Italy, and Switzerland, the framework considers three key aspects: the issuer of the investment product, the product payoff and the underlying(s).

In analysing the sustainability features of its own investments, Leonteq identified the need for a different provider of sustainability-related data that would better fit the Group's investment portfolio and account for the relevant exclusion criteria. Accordingly, in 2024, Leonteq began collaborating with Clarity AI, a leading provider of sustainability analytics.

Clarity Al's robust data and methodologies also form the backbone of Leonteq's new Sustainability Scorecard, which is planned to be introduced in the course of 2025, beginning in Switzerland.

The Sustainability Scorecard provides fact-based insights into the sustainability characteristics of Leonteq's offerings, presenting a detailed overview of key environmental, social, and governance metrics.

This approach reflects the complexity of sustainability by highlighting the diverse impacts across ESG dimensions. By emphasizing transparency, the Sustainability Scorecard enables investors to define what matters most to them and to make informed decisions based on their sustainability preferences, objectives or expectations.

The Sustainability Scorecard is developed in accordance with industry guidelines (such as the Sustainable Finance Code of Conduct developed by the German Structured Securities Association - BSW) and provides information on three different dimensions:

- Issuer: Sustainability performance of the institution issuing the Product.
- Underlying: ESG attributes of the assets (e.g. companies) linked to the Product.
- Product: Specific sustainability characteristics of the Product itself

# **Donation products**

#### **Fondo Forestale Italiano**

As part of its product-related donations, Leonteq launched a product initiative in support of environmental projects in December 2023. The aim of the initiative was to pay a charitable donation on the issuance of two standard yield enhancement products on the Euro Stoxx 50°, FTSE MIB, Nasdaq 100 and Nikkei 225® indices. In mid-2024, six months after the issuance date of each product, Leonteq made a charitable donation equal to 0.50% of the invested amount to the Fondo Forestale Italiano Onlus foundation, whose aim is to preserve existing forests and to create new woodlands. The total amount donated for the two products (CH1300965071 and CH1300958894) was EUR 8,900.

Sustainability Report

TCFD Report

51

# Climate change

GRI 3-3 GRI 302-1 GRI 305-1

GRI 305-2 GRI 305-3 GRI 305-4 GRI 305-5

Leonteg is a globally active company with offices in 14 locations in Switzerland, Europe, Asia and the Middle East. It also has two data centres in Switzerland that use significant amounts of electricity to power the Group's operations. Additionally, some Leonteg employees have to travel internationally as part of their role, and all members of staff commute to their local office locations. The release of greenhouse gas (GHG) emissions and the use of energy from non-renewable sources are a growing concern among investors and the general public in view of their impact on the climate and environment. Leonteg recognizes that measures to reduce GHG emissions can contribute positively to climate change mitigation efforts. It also acknowledges the positive and negative impacts that its material topic, "Climate Change", could have on the economy, the environment, and people, including human rights. These impacts have been identified as both actual and potential, encompassing short-term and long-term effects.

The company has identified several actual negative impacts on people and the environment. GHG emissions from business operations and potentially high energy use in data centres could have direct negative impacts. Additionally, GHG emissions resulting from investments or client investment activities in energy-intensive industries may indirectly contribute to negative outcomes.

On the positive side, Leonteq sees opportunities to create indirect impacts by providing transparency and educating employees on how their behaviors around commuting and business travel can help reduce Leonteg's environmental impact.

To manage its environmental impact and to address the impacts caused, Leonteq has developed a Group-wide environmental reporting framework, that it has used since 2022 to collect data on its Global energy usage and GHG emissions.

Based on the findings of our data collection and analysis of energy consumption and GHG emissions generation for 2022 and 2023, Leonteq defined a framework in 2024, setting out how the Group aims to achieve net zero over the next 5 to 10 years.

With this framework in place, and using 2024 as the baseline year, Leonteq has committed to the following climate action plan and targets:

- 2030 target: Achieve a 50% reduction in Scope 1 and Scope 2 emissions compared to the 2024 baseline, reflecting Leonteq's commitment to significant emissions reductions in the near term.
- 2035 target: Reach net-zero emissions for Scope 1 and Scope 2, as well as for selected Scope 3 categories, namely business travel and employee commuting.

Over the long term, we have the ambition by 2040 to extend the net zero goal for additional Scope 3 categories that are relevant to Leonteq's business model.

As part of its broader efforts to reduce the Group's environmental footprint, Leonteq has implemented a number of initiatives to support the reduction of its GHG emissions. These include the replacement of the company car, which had a diesel combustion engine, with an electric vehicle in 2024.

Since 2022, Leonteq has also implemented an initiative at its Zurich headquarters to support the reduction of its Scope 2 electricity consumption. Measures include lowering the ambient temperature in its office, reducing indoor lighting and screen running times, and switching off illuminated external signage on buildings.

In recent years, Leonteq has additionally moved several of its offices to buildings that are powered by renewable energy and/ or hold or are owned by companies that hold sustainability certifications, including BREEAM, LEED, EPC and SBTi. As of end-2024, Leonteq operates in three office buildings that are powered by 100% renewable energy and two that are powered by more than 85% renewable energy. Additionally, eight out of 14 office buildings have sustainability certificates.

In Zurich, Leonteg is continuing to optimise its energy consumption as part of its commitment under the cantonal target agreement ("Kantonale Zielvereinbarung") to lower energy usage by 2029. Leonteg made this commitment in 2019 with the ambition to reduce its power consumption by 11.3% over 10 years compared to a 2029 extrapolation. Since 2023, our offices and data centres in Switzerland have been powered 100% using renewable energy sourced exclusively from Switzerland. The electricity primarily comes from hydro energy. This switch has resulted in a 0.002 kg CO2-eg decrease per kilowatt hour (kWh). Leonteg's headquarters are additionally located in a Minergie standard building.

With the support of local energy providers, including EWZ (Elektrizitätswerk der Stadt Zürich) in Switzerland, EDP in Lisbon, Tuas Power Supply in Singapore and a2a energia in Italy, Leonteg is taking steps to improve its energy efficiency and reduce its energy consumption.

In 2024, Leonteg's total energy consumption amounted to 3,712.20 MWh. This includes 1,067.50 MWh from electricity, 602.80 MWh from heating and cooling (in Leonteg's Zurich, Amsterdam, Guernsey and Singapore offices), and 2,041.90 MWh generated at our data centres. Of the energy consumed, 295.84 MWh was renewable and 3,416,36 MWh was non-renewable.

Energy Consumption (in M	IWh)	
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		-
Location	2024	2023
Switzerland	1,158.12	930.51
Europe	358.1	308.78
Asia	154.07	118.00
Data Centre	2,041.90	2,057.68
Total	3,712.20	3,414.97

#### Climate counterbalancing strategy

To aid the achievement of our net zero targets going forward, Leonteg has implemented a climate counterbalancing strategy. As part of this, Leonteg is implementing a comprehensive plan to reduce its carbon footprint related to heating and electricity consumption. This will be achieved through the purchase of green electricity from our local energy suppliers, with the objective of significantly reducing our Scope 2 market-based emissions until 2030.

Sustainability Highlights

Furthermore, we have identified air travel as the largest contributor to Leonteg's CO2 emissions. While travel between the Group's global office locations is necessary, we are committed to reducing our environmental impact. To help achieve this, Leonteg is implementing an internal carbon levy for all business travel starting in 2025. This levy is designed to offset the CO2 emissions generated by our business-related air travel and fees collected as part of this initiative will be invested in a carbon removal portfolio that Leonteg has defined together with the Swiss company, Climeworks, as part of the Group's climate counterbalancing strategy.

Climeworks is a leading high-quality carbon removal provider, combining decades of expertise in Direct Air Capture (DAC) technology with a holistic approach to carbon removal solutions. The carbon removal portfolio purchased by Leonteg consists of Direct Air Capture, Enhanced Rock Weathering, Biochar, and Reforestation and targets the removal of 3,600 tons of CO2 until 2030.

**Sustainability Report** 

TCFD Report

53

# 2024 GHG emissions

In 2024, Leonteq's operations globally generated a total of 142 tons of CO2e emissions (2023: 189 tCO2e) and 762 tons of CO2e from air travel and employee commuting (2023: 621 tCO2e for air travel only). Leonteq will use 2024 as its baseline year going forward. The data collected accounts for 100% of Leonteq's FTEs.

# Scope 1 and 2

Leonteq's Scope 1 emissions include one company car in use at its headquarters in Zurich as well as fugitive emissions from refrigerants and other gases. The company car, which has a diesel combustion engine, was replaced with an electric vehicle in mid-2024.

Leonteq's Scope 2 emissions include the use of electricity, heating and cooling energy. The electricity used at Leonteq's offices in Zurich, Lisbon and Milan as well as at Leonteq's two data centres, comes from 100% renewable energy sources. The heating system in Leonteq's headquarters is connected to the local

district heating system. The portion of renewable energy used by the district heating is currently 42%, according to the municipal provider ERZ Entsorgung + Recycling Zürich. Leonteq leases all the buildings in which it operates and is therefore not always able to influence the mix of electricity used in its premises. Where possible, it has and will continue to improve the electricity mix so to reduce the Group's use of energy from non-renewable sources.

# Scope 3

Leonteq's Scope 3 emissions currently encompass data from employee business travel by air and employee commuting and remains relatively stable compared to the previous year. Since Leonteq is a global company, a certain amount of travel by employees between its different office locations is necessary in the course of its operations. At the same time, we recognise the negative impact that air travel has on the environment and we are therefore implementing a carbon levy model to compensate for the CO2 emissions generated by our business-related air travel.

When travelling to the office, employees are encouraged to follow the sustainable commuting practices that have been in place at Leonteq for several years. As part of these efforts, Leonteq subsidises Swiss public transport pass costs for employees working in Switzerland with a contribution of 15% of the cost and offers only a limited number of parking spaces.

#### Greenhouse gas emissions

				2024			2023	
	Total emissions Leonteq offices tCO2e	Total emissions Leonteq data centres tCO2e	Total emissions Leonteq Group tCO2e	CO2 intensity (in kg CO2e/FTE)	Total emissions Leonteq offices tCO2e	Total emissions Leonteq data centres tCO2e	Total emissions Leonteq Group tCO2e	CO2 intensity (in kg CO2e/FTE)
Scope 1 <sup>1</sup>	1.72		1.72	2.96	1.06	_	1.06	1.79
Scope 2 (market-based) <sup>2</sup>	140.35	1.82	142.17	243.96	156.45	32.43	188.88	319.75
Scope 2 (location-based) <sup>3</sup>	175.17	5.21	180.38	309.53	160.59	5.25	165.83	280.74
Scope 3 (limited to business travel by air and employee commuting) <sup>4</sup>	761.68		761.68	1,307.04	620.50	_	620.50	1,050.45
Total net carbon emissions (market-based) <sup>5</sup>	903.75	1.82	905.57	1,533.05	778.01	32.43	810.44	1,371.99

Fugitive emissions are first time included in 2024 for all Leonteq offices where the measure of volume and type of gas from air conditioning and refrigerators is calculated and applied a 2% leakage rate. We use the emission factor from the Swiss Mobitool (www.mobitool.ch) for direct use for an average car fleet (Diesell): 132 g CO2e/pkm until September 2024.

<sup>&</sup>lt;sup>2</sup> For district heating we rely on the conversion factors provided by our energy supplier in Zurich for market-based figures: 108 g CO2e/kWh (2024) and location-based in Amsterdam, Guernsey and Singapore. For electricity we rely on emission factors provided by our power suppliers: EDP in Portugal and A2A in Italy (0 g CO2e/kWh, hydropower) and EWZ in Switzerland (0.89g CO2e/kWh for different renewable power products). For all other offices we used the location-based factor (see below).

<sup>3</sup> District heating: see fn 2; for electricity we rely on emission factors from www.carbonfootprint.com the international country level grid electricity factors for France (70.55 g CO2e/kWh), Germany (379.94 g CO2e/kWh), Hong Kong (692.94 g CO2e/kWh), Italy (314.32 g CO2e/kWh, Japan (457.73 g CO2e/kWh), Netherlands (309.02 g CO2e/kWh), Fortugal (166.39 g CO2e/kWh), Swiss (23.68 g CO2e/kWh), United Arab Emirates (421.61 g CO2e/kWh) and United Kingdom (207.41 g CO2e/kWh).

Scope 3 data includes Business travel by air and 2024 Group Employee commuting. For business travel by air we use data from two travel agencies Egencia and Finass. Egencia uses conversion factors from DEFRA/BEIS of the UK Government. Finass has a cooperation with the Swiss Foundation myclimate, who uses state-of-the-art emission factors based on more of a dozen specific parameters; For Group employee commuting as first exercise performed, we use the Distance-based method, which involves collecting data from employees on commuting patterns (e.g., distance travelled and mode used for commuting and applying appropriate emission factors for the modes used.

<sup>&</sup>lt;sup>5</sup> Scope 1, 2 and 3 are in line with the Greenhouse Gas Protocol (www.ghgprotocol.org).

**Sustainability Report** 

TCFD Report

54

# Responsible sourcing

**GRI 3-3** 

Leonteq is active in 13 countries and works with a variety of suppliers around the globe. As our business grows, our environmental and social footprint is also increasing due to our own activities as well as the operations of our suppliers and service providers.

Led by our Procurement team, Leonteq endeavours to work with suppliers that provide high-quality products and services at fair prices while maintaining sustainable practices. In doing so, Leonteq aims to promote sustainable behaviour on the part of its suppliers, with a focus on their environmental impact, as well as efforts around employee welfare and human rights.

Leonteq recognizes the positive and negative impacts that it has on the environment and people, including human rights, through its sourcing practices. At the same time, it acknowledges the challenges suppliers may face due to more complex organizational structures. These impacts have been identified as both actual and potential, encompassing short-term and long-term effects.

Negative impacts include environmental issues along the supply chain or related to product use and end-of-life, which may have an actual direct impact. Additionally, human rights violations in the supply chain of purchased goods and services represent a potential direct impact.

On the positive side, Leonteq generates actual indirect impacts by working with suppliers that provide high-quality products and services at fair prices while adhering to sustainable practices. Furthermore, by promoting sustainable behaviour among suppliers, particularly regarding environmental impacts, employee welfare, and human rights, the company can make a positive contribution in these areas. It also fosters sustainability in the local job market and economic development, amplifying its actual indirect impact on people and the environment.

Leonteqhaspolicies and commitments in place that are aligned with both internal and external sustainability standards. These include:

- Supply Management and Invoice Processing: This policy implements and defines the operational execution of the tasks and functions as defined in the Group's Organizational and Management Regulations (OMR).
- Third-Party Risk Management (TPRM): The objective of this
  policy is to define a Group-wide minimum standard for TPRM
  and to provide an overarching framework for managing risks
  related to the use of third-party services (external and internal services).
- Supplier Code of Conduct: This policy highlights the Group's environmental, social, economic and ethical expectations vis-a-vis its suppliers.

Since 2023, new suppliers have been required to acknowledge the Supplier Code of Conduct as part of their onboarding process. Existing suppliers have additionally been asked to acknowledge the Supplier Code of Conduct before contracts are renewed. Leonteq measures the effectiveness of the actions taken by monitoring the total number of suppliers that have acknowledged the Supplier Code of Conduct compared to the entire universe of suppliers. As of end-2024, the majority of suppliers have acknowledged Leonteg's Supplier Code of Conduct.

As part of our efforts to prevent potential negative impacts and as part of our ongoing commitment to operational excellence and security, we operate a robust TPRM process. We use a comprehensive TPRM framework to identify, assess, monitor and mitigate potential risks associated with third-party relationships. These relationships can include service providers, vendors, suppliers, contractors, and other business partners, as well as regional offices or entities. Third-party relationships can be internal or external.

By rigorously evaluating third-party adherence to security and compliance standards, we can reinforce our defences against potential vulnerabilities that may arise from the extended enterprise. Effective TPRM is critical to protect a company's reputation, financial stability, and long-term success.

**Sustainability Report** 

TCFD Report

**55** 

# **Procurement practices**

## GRI 204-1

Leonteq does not earmark a specific portion of its procurement budget for local suppliers, but it recognises the impact of its business on the local job market and economic development. Leonteq therefore strives to purchase local products and services from suppliers that create positive social and environmental impacts through their work, if both quality and pricing requirements are met.

Leonteq defines "local" as products or services that are purchased from suppliers located within the country where it operates. We base our analysis on invoices paid in the financial year; the evaluation does not take into account payments directly recorded in revenues, such as trading-related fees and interest expenses that are not paid as invoices. Leonteq defines its headquarters in Zurich, Switzerland, as its sole significant location of operations. In 2024, the head office of Leonteq Securities AG, and the head office of Leonteq AG, spent a total of CHF 78.3 million on products and services, of which 70% (2023: 71%) was purchased from a total of 360 (2023: 363) local suppliers. While we aim to support Swiss businesses, we are aware that more complex supply chains may exist behind the products that we source from our Swiss suppliers.

**Sustainability Report** 

TCFD Report

56

# Community engagement

**GRI 3-3** 

Leonteg aims to actively get involved in and connect with the communities in which we operate through meaningful interactions and initiatives. In alignment with the United Nations Sustainable Development Goals (UN SDGs), our company's community engagement objective is to contribute positively to local and global communities. By fostering inclusive partnerships and active involvement with communities, our aim is to address UN SDGs that are relevant to our industry and operations. Our engagement with the communities in which we operate has a positive impact on people and the environment, while also creating benefits for our employees and the Group. This approach fosters a sense of belonging and strengthens our ties to the community. Specifically, we have identified several positive impacts of our community engagement efforts. By providing educational opportunities and sharing knowledge at universities and other academic institutions worldwide, Leonteg can generate a tangible and direct impact. Additionally, by supporting community events through employee volunteering, donations, and sponsorships, Leonteg can create indirect but meaningful contributions to the communities we serve.

To manage its community engagement efforts, Leonteq has a community engagement framework in place, which defines the scope and focus of Leonteq's engagement with the community. Driven by the Corporate Culture Committee that is overseen by the Sustainability Committee, community engagement activities are defined and carried out in alignment with seven of the 17 SDGs and include volunteering efforts and monetary or nonmonetary donations. Sponsoring activities fall outside the scope of the community engagement framework and are led by the business in collaboration with Leonteq's Marketing department.

Leonteq has additionally set internal targets by which to measure the effectiveness of the actions taken to manage Community Engagement and its related impacts. These include targets and indicators relating to community engagement activities, volunteering days, and Leonteq offices engaged, as well as the SDGs addressed as part of the community engagement activities.

In 2024, Leonteq took part in the following community engagement activities.

# **Volunteering**

In 2024, Leonteq funded a total of 49 days during which employees participated in volunteering initiatives.

#### **Schweizer Tafel**

With its mission to distribute food and alleviate poverty, the Swiss food bank collects perfectly good, surplus food from producers and retailers and distributes it free of charge to social institutions that care for people affected by poverty. As part of Schweizer Tafel's corporate volunteering programme, Leonteq employees were able to help in the distribution of food by accompanying an experienced helper for a day.

#### **Banco Alimentar**

Through the Banco Alimentar food bank and the Portuguese Federation of Food Banks Against Hunger, Leonteq employees helped to collect goods at the local Lidl supermarket. These goods were distributed to those in need as part of an annual campaign.

#### Universities

We consider it our duty to give something back to the institutions at which our highly skilled professionals completed their education. We are committed to supporting and collaborating with numerous European universities, engaging with both academic faculties and student organisations. Through guest lectures and knowledge-sharing initiatives, we volunteer our time and expertise to inspire and educate the next generation.

**Sustainability Report** 

TCFD Report

**57** 

# **Donations**

#### Save the Children

Leonteq participated in the global "Save the Children Christmas Jumper Day" fundraising campaign. Employees were encouraged to wear a festive sweater and to make a personal donation to Save the Children. Leonteq further supported the cause by matching the total amount donated by employees. Together, Leonteq and its employees raised a total amount of approximately CHF 3,000 in 2024.

#### **Deutschlandstipendium Goethe University**

Leonteq donates to the Deutschlandstipendium scholarship programme, which supports outstanding students from all disciplines who are committed to achieving academic and professional success. Scholarship recipients receive a monthly stipend of EUR 300 - half of which is provided by the German government, with the other half supplied by private donors such as Leonteq.

Sustainability Report

# **GRI Content Index**

GRI Standard	Disclosure	Reference / Response	SDGs Supported	Article 964b	Assured
GRI 1: 2021	Foundation				
GRI 2: 2021	General Disclosures				
The organization a	nd its reporting practices				
	2-1 Organizational details	Leonteq AG is a public limited company, incorporated and head- quartered in Zurich, Switzerland. It is listed on the SIX Swiss Exchange under the ticker symbol LEON.			
		As a publicly traded company, Leonteq's ownership is divided into shares, which are held by institutional and private investors. The company operates under Swiss law with a legal form that provides limited liability to its shareholders.			
		Leonteq operates in the following countries: Switzerland, Germany, Italy, Monaco, Portugal, the Netherlands, United Kingdom, Guernsey, France, Singapore, Hong Kong, Japan, and the United Arab Emirates.			
	2-2 Entities included in the organization's sustainability reporting	Page 12			
	2-3 Reporting period, frequency and contact point	The Sustainability Report is published on 27 February 2025. The reporting period is 1 January 2024 to 31 December 2024.			
		Questions about the Sustainability Report may be addressed to:			
		Investor Relations +41 58 800 18 55 investorrelations@leonteq.com			
	2-4 Restatements of information	Leonteq has not made any restatements of information in the reporting period.			√
	2-5 External assurance	Selected indicators published in the Sustainability Report have been reviewed as part of the Limited Assurance engagement by Deloitte.			
		Pages 75-76			

GRI Standard	Disclosure	Reference / Response	SDGs Supported	Article 964b	Assured
Activities and workers					
	2-6 Activities, value chain and other business relationships	Pages 13-14		General	√
	2-7 Employees	Pages 13-14	8, 10		√
	2-8 Workers who are not employees	Page 14	8		√
Governance					
	2-9 Governance structure and composition	Page 15	5, 16	General	√
	2-10 Nomination and selection of the highest governance body	Page 16	5, 16	General	√
	2-11 Chair of the highest governance body	The Chairman of the Board of Directors is a non-executive, independent member of the Board of Directors.			√
	2-12 Role of the highest governance body in overseeing the management of impacts	Pages 17-18	16	General	√
	2-13 Delegation of responsibility for managing impacts	Pages 17-18		General	√
	2-14 Role of the highest governance body in sustainability reporting	Pages 17-18		General	√
	2-15 Conflicts of interest	Page 19	16		
		Annual Report 2024, page 72			
	2-16 Communication of critical concerns	Page 19			
	2-17 Collective knowledge of the highest governance body	The Board of Directors and Audit and Risk Committee receive regular updates on latest developments around sustainability regulations, trends and best practices from external experts.			
	2-18 Evaluation of the performance of the highest governance body	The Board of Directors performs a self-assessment once a year, when it reviews its own performance against the responsibilities listed in the Organisational Management Regulations, including the adequate execution of its monitoring and control function, and the further development of the Group's strategy. Furthermore, it assesses interaction with the Executive Committee as well as with the external auditors and Group Internal Audit.			
	2-19 Remuneration policies	Annual Report 2024, pages 96 to 101			√

TCFD Report

_	LEONTEQ AG
	<b>SUSTAINABILITY REPORT 2024</b>

GRI Standard	Disclosure	Reference / Response	SDGs Supported	Article 964b	Assured
	2-20 Process to determine remuneration	Annual Report 2024, pages 96 to 101			√
	2-21 Annual total compensation ratio	The annual total compensation ratio is confidential business information and thus not disclosed.			√
Strategy, policies and p	ractices				
	2-22 Statement on sustainable development strategy	Pages 20-21		General	√
	2-23 Policy commitments	Page 22			√
		Code of Conduct & Ethics			
	2-24 Embedding policy commitments	Page 22		General	√
	2-25 Processes to remediate negative impacts	Page 22		General	√
	2-26 Mechanisms for seeking advice and raising concerns	Page 19	16		
	2-27 Compliance with laws and regulations	Page 22		General	√
	2-28 Membership associations	Page 23			
Stakeholder engagemen	nt		,	,	
	2-29 Approach to stakeholder engagement	Pages 24-25			
	2-30 Collective bargaining agreements	In our Swiss home market, the agreement on the recording of working hours (VAZ) issued by the Employers' Association of Banks in Switzerland (AVG) is applicable to employees who meet the requirements stipulated in the VAZ. Leonteq is also subject to the convention collective des Marchés Financiers in France and to the Contratto Collettivo Nazionale del Lavoro del Credito (CCNL) in Italy.	8		
Materiality assessment	and list of material topics				
GRI 3: Material Topics 2021	3-1 Process to determine material topics	Page 26		General	√
GRI 3: Material Topics 2021	3-2 List of material topics	Page 26		General	<b></b>

TCFD Report

GRI Standard	Disclosure	Reference / Response	SDGs Supported	Article 964b	Assured
GRI 403: Occupational	403-3 Occupational health services	Page 39		Employees	√
Health and Safety 2018	403-5 Worker training on occupational health and safety	Page 39		Employees	√
	403-6 Promotion of worker health	Page 39		Employees	√
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Page 39		Employees	√
GRI 404: Training and	404-1 Average hours of training per year per employee	Page 40		Employees	√
Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	Pages 40-41		Employees	√
	404-3 Percentage of employees receiving regular performance and career development reviews	Page 41		Employees	√
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	Pages 43-45		Human Rights	√
GRI 406: Non-discrimination 2016	406-1 Incidents of discrimination and corrective actions taken	Page 45			√
Data Protection & Cybe	rsecurity				
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 46-48		General	
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Page 48		Social Issues	√
Sustainable Offering					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 49-50	5, 7, 13, 15	General	
Climate Change					
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 51-52	3, 7, 8, 12, 13, 14, 15	General	
GRI 302: Energy 2016	302-1 Energy consumption within the organization	Pages 51-52		Environment	√
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	Page 53		Environment	
	305-2 Energy indirect (Scope 2) GHG emissions	Page 53		Environment	√
	305-3 Other indirect (Scope 3) GHG emissions	Page 53		Environment	√
	305-4 GHG emissions intensity	Page 53		Environment	√
	305-5 Reduction of GHG emissions	Pages 51-53		Environment	√

Sustainability Report

TCFD Report

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GRI Standard	Disclosure	Reference / Response	SDGs Supported	Article 964b	Assured
Responsible Sourcing					
GRI 3: Material Topics 2021	3-3 Management of material topics	Page 54	8	General	
GRI 204: Procurement Practices 2016	204-1 Proportion of spending on local suppliers	Page 55		Environment	√
Community Engageme	ent				
GRI 3: Material Topics 2021	3-3 Management of material topics	Pages 56-57	1, 3, 4, 5, 13, 14, 15	General	

Sustainability Report

TCFD Report

64

65

Executive summary

65

Introduction

65

Governance

66

Strategy

70

Risk Managemen

72

Metrics and Targets

74

Source



# **Executive summary**

This Report marks Leonteg's first formal alignment with the Task Force on Climate-related Financial Disclosures (TCFD) framework, underscoring our commitment to understanding and managing the financial and operational impacts of climate-related risks and opportunities. As part of our approach, we outline how our governance, strategic planning, and risk management practices are being adapted to address both physical risks, such as extreme weather events, and transition risks related to evolving climate regulations. In this way, we aim to support a transparent and resilient business strategy that can adapt to the challenges and opportunities posed by climate change.

# Introduction

Climate change represents an urgent global challenge that has an impact on ecosystems, economies, and communities worldwide. For the financial sector, climate-related risks translate into complex financial, operational and regulatory challenges that call for robust, transparent management practices. In Switzerland, with its commitments to the Paris Agreement, there is an increased expectation for financial institutions to play a proactive role in supporting the achievement of national climate goals. Recognizing this responsibility, Leonteg has adopted the TCFD framework to provide it with a structured approach for assessing and managing climate-related risks and opportunities.

Climate-related risks fall broadly into two categories: physical risks, such as the impact of extreme weather events, and transition risks, which are related to regulatory, technological and market shifts toward low-carbon economies. In response, this report details our governance structures, strategic approach, risk management practices, and metrics and targets that help us to navigate and adapt to these challenges. By following the TCFD framework, we aim to meet the expectations of our stakeholders - including clients, investors, regulators and employees - through consistent and transparent climate-related disclosures.

Covering the period from January 1 to December 31, 2024, this report forms the foundation of our future climate-related reporting. It establishes a baseline to allow us to track progress and it invites our stakeholders to engage with us on our approach to managing the impacts of climate change on our business and the wider financial system.



# Governance

Leonteq's governance structure for managing climate-related risks and opportunities ensures that each level of the organization is involved in addressing climate-related issues. This framework provides clear oversight and accountability, with distinct roles and responsibilities for the Board of Directors, various committees, and executive functions.

TCFD Report

# **Board-level oversight** on climate-related risks and opportunities

Board oversight: The Board of Directors sets the overall direction of the Group's sustainability strategy and delegates its implementation, including the management of climate-related risks and opportunities to management. The Sustainability Committee of the Executive Committee ensures that climate-related risks are evaluated and that strategies, including the Group's net zero targets to manage climate-related risks and opportunities, are in place. In addition, the Board of Directors provides oversights of the Group's ESG governance framework by reviewing and endorsing the Group's main ESG related policies, including the Group's governance-related policies and practices.

Sustainability Delegate: A Sustainability Delegate, appointed by the Board from its members, acts as a liaison between the Board and the operational management, particularly the Sustainability Committee. This Delegate, together with the Chairman of the Sustainability Committee as well as the Sustainability Committee member responsible for Corporate Sustainability Reporting, is responsible for providing regular progress updates to the Board, ensuring continuous oversight and alignment of ESG initiatives with the strategic priorities of the Group.

Sustainability Report

TCFD Report

66

Audit and Risk Committee: The Audit and Risk Committee of the Board plays a key role in overseeing Leonteq's overall risk processes. Integrating climate-related risks into Leonteq's overall risk management framework is an ongoing priority that is currently being managed by the Sustainability Committee and will be conducted jointly by the Sustainability Committee and Risk Control in the course of 2025.

Nomination and Remuneration Committee: This committee of the Board ensures that climate-related objectives are integrated into Leonteq's executive compensation framework. By aligning compensation structures with ESG targets, the Nomination and Remuneration Committee reinforces accountability at leadership level. This integration creates a direct link between executive performance and the achievement of sustainability objectives, fostering a culture of responsibility and commitment to climate action within the Group. Such alignment incentivizes executives to prioritize climate-related goals, supporting the Group's overall sustainability strategy.

# Management's role in addressing climate-related risks and opportunities

Sustainability Committee: The Sustainability Committee, which is a committee of the Executive Committee and is chaired by a member of the Executive Committee, is responsible for identifying and analysing climate-related risks and opportunities, including conducting scenario analyses that explore potential climate outcomes. This committee sets Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs) related to climate objectives and monitors these metrics regularly to ensure ongoing progress. As this process develops, the Sustainability Committee will provide regular updates on climate-related risks and opportunities to the Board of Directors, reporting at least once a year. In doing so, the Committee ensures that the Board remains informed of climate-related developments and that the Group's strategies can adapt to these evolving risks and opportunities.



This governance structure enables Leonteq to address climate-related risks and opportunities with a cohesive, multi-level approach through the combined efforts of the Board, the Audit and Risk Committee, the Nomination and Remuneration Committee, and the Sustainability Committee.

# Strategy

In 2024, Leonteq undertook a comprehensive process, which included extensive engagement with external ESG consultants and internal workshops, to identify specific climate-related risks and opportunities over the short and medium term (2030), and the long term (2040 and beyond), as well as across two distinct climate scenarios. In line with the TCFD risk classification framework, these risks were categorized into transition risks (e.g. regulatory, market, technological, and reputational risks) and physical risks (e.g., acute risks such as extreme weather events and chronic risks like sustained temperature changes). This exercise enabled a thorough assessment of key climate-related

factors that are relevant for Leonteq. This assessment informs our strategy and enhances our ability to adapt to the dynamic regulatory and market environment shaped by climate change. By incorporating scenario analysis, we test the resilience of our strategy under different climate conditions to ensure preparedness and adaptability in a rapidly evolving landscape. In the coming years, we will be able to assess the effectiveness of the measures implemented.

# Strategy resilience

To assess the resilience of our strategy, Leonteq uses scenario analysis to evaluate the potential impacts of climate-related risks and opportunities under different climate pathways, including a 1.5-2°C and a 3-4°C scenario These scenarios are aligned with international climate models and based on the Intergovernmental Panel on Climate Change (IPCC) pathways, such as SSP1-1.9 (limiting global warming to 1.5°C) and SSP2-4.5 or SSP5-8.5 (representing higher warming levels). The 1.5-2°C scenario reflects a future where strong mitigation efforts

TCFD Report

significantly limit global warming, while the 3-4°C scenario illustrates a less coordinated global response, leading to substantial physical and transition risks. By analysing these pathways, we gain insights into how key risks – such as extreme weather events, regulatory changes, and market transitions – may impact our operations, financial stability, and strategic growth, ensuring that our strategy remains adaptable and resilient under varying global warming trajectories.

Our two scenarios and what they mean for us are set out below:

#### 1.5-2°C scenario:

In this scenario, global efforts to limit warming to 1.5-2°C are largely successful, driven by stringent policy measures, technological innovation, and a shift in consumer behaviour toward sustainability. In the short to medium term (by 2030), Leonteq faces significant transition risks, including stricter regulations on emissions and mandatory sustainability reporting standards. These challenges could lead to increased operational costs related to compliance, reporting, and the adaptation of financial products to align with new market expectations. However, these efforts also present opportunities for Leonteq to innovate and expand its offerings, including sustainable product offerings.

In the longer term (2040 and beyond), Leonteq could benefit as it strengthens its reputation and expands into new markets tied to the global decarbonisation process. The relatively stable climate in this scenario reduces the direct physical risks to Leonteq's operations, though occasional disruptions from extreme weather events may still occur. Overall, by embracing the transition, Leonteq may leverage its fintech capabilities to support the shift to a low-carbon economy, enhancing its competitive edge and market position.

#### 3-4°C scenario:

In this scenario, global efforts to reduce emissions are insufficient, leading to a rise in global temperatures of 3°C or more by the end of the century. In the short to medium term (by 2030), transition efforts are fragmented and inconsistent, resulting in a volatile regulatory environment with unpredictable carbon taxes and other measures. Leonteq faces physical risks as extreme weather events become more frequent and intense,

especially in offices in locations such as Singapore or Portugal, potentially disrupting its operations indirectly through impacts on client portfolios and financial markets. The volatility of regulations also makes strategic planning more complex and risk prone.

Over the long term (2040 and beyond), Leonteq is likely to face rising operational costs and increased pressure to innovate as demand for resilient, adaptive financial products grows. Leonteq may need to develop solutions that cater to investors facing severe climate impacts, such as financing technologies and infrastructure that help investors to adapt to the impact of climate change. The market for Leonteq's services could become more fragmented, with regional differences in regulatory and physical impacts making strategic decision-making increasingly challenging. While this scenario presents significant challenges, it also offers opportunities for Leonteq to lead the way in developing financial solutions that support climate adaptation and resilience.

Adaptation measures: Under the 1.5-2°C scenario, we anticipate greater regulatory pressures, which will require further investment in compliance systems and possibly lead to increased operational costs. Adaptation measures under this scenario include more aggressive investments in energy efficiency and increased engagement with stakeholders to align expectations and mitigate reputational risks. For the 3-4°C scenario, our focus is on mitigating acute physical risks by enhancing office resilience and establishing emergency protocols.

The resilience of Leonteq's strategy lies in its ability to adapt to various climate pathways. By proactively evaluating and refining our approach to climate-related risks and opportunities, we aim to mitigate potential impacts while positioning ourselves for growth and enhancing our reputation in the sustainability space. To ensure this, the scenarios used will be reviewed annually and adapted as necessary to incorporate possible new developments into the climate pathways, e.g. political events or new technologies.

Sustainability Report

TCFD Report

68

Risk description	Туре	Impact	Indicator	Geographies	Likelihood	Velocity	1.5-2°	3-4°	1.5-2°	3-4°	Mitigation actions (current and potential)
Increased frequency and intensity of extreme weather events	Physical	Extreme weather events such as heatwaves and storms are anticipated to negatively affect employee productivity, disrupt operations, and lead to increased absenteeism	We monitor productivity metrics across Leonteq offices during extreme weather events to gauge the impact and identify areas of vulnerability.		high	mid-term	low	low	low	low	Strengthen Infrastructure: We are enhancing our cooling systems in office locations to reduce the impact of heatwaves on employee productivity. Additionally, flexible working arrangements have been established to allow employees to work from home during extreme weather events.  Emergency Response Plan: A comprehensive emergency response strategy is being developed to minimize disruptions during extreme weather. This plan will cover communication protocols, safety procedures, and alternative work arrangements to maintain operational stability.
Regulatory changes impacting business operations and reputation	Transition	Emerging regulations related to climate change may increase compliance costs and carry potential reputational risks if non-compliance occurs	We monitor regulatory developments and our alignment with them to evaluate that the Group meets its regulatory requirements	Global	medium	long-term	high	low	high	medium	Regulatory Compliance: Leonteq is investing in robust compliance systems and maintaining active dialogue with regulators to anticipate policy changes and stay ahead of compliance.  Enhanced Reporting: We are committed to continuously improving our ESG reporting standards to meet investor expectations and strengthen our corporate image. Enhanced disclosures will provide transparency around our climate-related activities and performance.
Regulatory changes creating opportunities for enhanced business operations and reputation	Transition (Opportunity)	Proactively addressing regulatory changes can generate revenue opportunities and enhance Leonteq's reputation as an industry leader in sustainability	We maintain strict compliance practices and regulatory integrity while enhancing brand recognition and reputation through the Group's ESG reporting efforts	Global	high	short- to long-term		-	-	-	Proactive Engagement: By maintaining proactive engagement with regulators, we aim to ensure ongoing compliance without additional costs and to anticipate regulatory changes.  Reporting: We are continuously refining our ESG reporting standards to meet stakeholder expectations, which will improve our corporate reputation while maintaining cost efficiency.

Likelihood	low	medium	high	
Velocity	long-	mid-	short	term

2030 Value at stake
2040 Value at stake

low	medium	high
low	medium	high

Sustainability Report

TCFD Report

69

# Climate-related risks and opportunities

Leonteq's approach to managing climate-related risks and opportunities focuses on addressing specific challenges identified through our internal assessment processes. By understanding both the risks and the opportunities presented by climate change, we can create a resilient strategy that aligns with our sustainability objectives and enhances long-term business stability.

#### Identified climate-related risks:

- Increased frequency and intensity of extreme weather events (Physical Risk):
  - Impact: Extreme weather events such as heatwaves and storms are anticipated to negatively affect employee productivity, disrupt operations, and lead to increased absenteeism.
  - Indicator: We monitor productivity metrics across Leonteq offices during extreme weather events to gauge the impact and identify areas of vulnerability.
  - Likelihood and time horizon: This risk is considered high in likelihood and is expected to manifest in the mid term.
  - Mitigation actions:
    - Strengthen infrastructure: We are enhancing our cooling systems in office locations to reduce the impact of heatwaves on employee productivity. Additionally, flexible working arrangements have been established to allow employees to work from home during extreme weather events.
    - Emergency response plan: A comprehensive emergency response strategy is being developed to minimize disruptions during extreme weather. This plan will cover communication protocols, safety procedures, and alternative work arrangements to maintain operational stability.
- 2. Regulatory changes impacting business operations and reputation (Transition Risk):
  - Impact: Emerging regulations related to climate change may increase compliance costs and carry potential reputational risks if non-compliance occurs.

- Indicator: We monitor regulatory developments and our alignment with them to evaluate that the Group meets its regulatory requirements.
- Likelihood and time horizon: The likelihood of this risk is medium, with short term implications building up to significant impacts expected in the long term.
- Mitigation actions:
  - Regulatory compliance: Leonteq is investing in robust compliance systems and maintaining active dialogue with regulators to anticipate policy changes and stay ahead of compliance requirements.
  - Enhanced reporting: We are committed to continuously improving our ESG reporting standards to meet investor expectations and strengthen our corporate image. Enhanced disclosures will provide transparency around our climate-related activities and performance.

## Identified climate-related opportunities:

- Regulatory changes creating opportunities for enhanced business operations and reputation (Transition Opportunity):
  - Impact: Proactively addressing regulatory changes can generate revenue opportunities and enhance Leonteq's reputation as an industry leader in sustainability.
  - Indicator: We maintain strict compliance practices and regulatory integrity while investing in developing relevant new products and enhancing brand recognition and reputation through the Group's ESG reporting efforts.
  - Likelihood and time horizon: This opportunity is considered high in likelihood, with potential benefits spanning from the short to long term.
  - Opportunity actions:
  - Proactive engagement: By maintaining proactive engagement with regulators, we aim to ensure ongoing compliance without additional costs and to anticipate regulatory changes.

Reporting: We are continuously refining our ESG reporting standards to meet stakeholder expectations, which will improve our corporate reputation while maintaining cost efficiency.

# Impact of climate-related risks and opportunities on Leonteq's business strategy and financial planning

Leonteq integrates the identified climate-related risks and opportunities into its business strategy and financial planning to ensure resilience.

## Integration into business strategy:

- Extreme weather events: The increased frequency of extreme
  weather has influenced our business strategy by prompting
  us to prioritise infrastructure resilience and implement flexible working arrangements. This ensures that our operations
  can continue with minimal disruption, thereby safeguarding
  our productivity, ability to serve clients, and our employee
  well-being.
- Regulatory changes: The potential for new climate-related regulations has encouraged Leonteq to allocate resources toward compliance system enhancements and advanced reporting capabilities. This allows us to maintain compliance, mitigate risks, and demonstrate leadership in addressing climate change.

## Impact on financial planning:

- Capital allocation: Resources are being allocated for infrastructure improvements (e.g., cooling systems), employee safety measures, and the development of an emergency response plan. Additionally, investments are being made to enhance our compliance systems, allowing us to stay ahead of emerging regulatory requirements.
- Operational strategy: Opportunities presented by regulatory changes have driven us to enhance our ESG reporting and explore new product offerings that align with sustainability goals.

Leonteg's overarching risk management and control framework covers both financial and non-financial risks, with the goal of protecting our earnings, capital, liquidity, and reputation, especially under severe stress scenarios. The Board of Directors defines and approves the Risk Tolerance Framework, setting objectives that align with Leonteq's focus on long-term profitability and shareholder value.

Leonteq is currently developing a framework to manage climate-related risks and, with the Sustainability Committee in the lead, has initiated processes to identify, assess, and manage these risks. This framework will be integrated into the Group's overall risk management and control framework under the oversight of the Audit and Risk Committee in the course of 2025.

### Risk Tolerance Framework

### Category

#### Risk tolerance objectives defined by the Board of Directors:

- Capital
- Profit and loss
- Liquidity
- Market risk
- Credit and country risk
- Other financial risks
- Reputational risk
- Strategic risk
- Operational risk

## Risk capacity & exposure

#### **RISK CAPACITY**

Sustainability Highlights

- Capital
- Profit and loss

#### **RISK EXPOSURE**

#### Financial risks:

- Liquidity risk
- Market risk
- Credit and country risk
- Other financial risks

#### Non-financial risks:

- Reputational risk
- Strategic risk
- Operational risk
- Legal and compliance risk
- Tax risk
- Information security risk
- Cybersecurity risk
- Other operational risks

### **Key processes & tools**

- Business model / strategy
- Budget process / strategic business plan
- Cost management / financial reporting and monitoring
- Risk and stress testing framework
- Risk limit framework
- Capital planning / capital management
- Profit and loss reporting and analysis / valuation framework / model validation
- Liquidity planning, monitoring and management framework
- Operational risk framework
- Internal Control System (ICS) / external and independent assessment of controls
- Risk and compliance policy framework
- Incentive system and internal management communication
- Internal rating by Leonteg
- External rating by major rating agencies

# Identifying and assessing climate related risks

The identification and assessment of climate-related risks at Leonteq are currently coordinated by the Sustainability Committee. The Committee, together with Risk Control, focuses on analysing both physical risks, such as the impacts of extreme weather events, and transition risks, including potential regulatory changes related to climate policies. Scenario analysis is a key tool used by the committee to understand how different climate pathways might impact the Group's operations and financial stability. This approach enables the Sustainability Committee to evaluate the likelihood and potential severity of climate-related risks, providing insights that inform risk mitigation efforts. Beginning in 2025, regular monitoring of KRIs related to climate impacts will allow the committee to track these risks over time and update the Board on emerging trends and vulnerabilities via the Sustainability Delegate.

# Managing climate-related risks

Though climate-related risks are not yet fully embedded within Leonteq's comprehensive risk framework, Leonteq has begun to implement specific measures to manage these risks (see mitigation measures in chapter climate-related risks and opportunities). The Sustainability Committee leads the efforts to address identified risks, focusing on both physical and transition risk management.

# Climate risk integration

While currently managed by the Sustainability Committee, integrating climate-related risks into Leonteq's overall risk management framework is an ongoing priority that will be conducted jointly by the Sustainability Committee and Risk Control in the course of 2025. The Board of Directors, in collaboration with the Audit and Risk Committee, oversees this development process, with the goal of embedding climate considerations into Leonteq's established risk management and control framework.

As part of this integration process, the insights gained from scenario analysis are being applied to enhance Leonteq's risk management policies, risk measurement methodologies, and reporting processes. The Board and Audit and Risk Committee will review and define risk tolerance for climate-related risks as Leonteq progresses towards full integration within the Risk Tolerance Framework. This approach ensures that climate-related risks are systematically identified, monitored, and managed alongside other financial and operational risks, reinforcing Leonteq's commitment to resilience and sustainable growth.

Sustainability Report

# **Metrics and Targets**

To effectively manage climate-related risks and leverage opportunities, Leonteg has established a set of metrics and targets that guide its progress in reducing greenhouse gas (GHG) emissions, enhancing operational efficiency, and building climate resilience. These metrics and targets align with Leonteg's commitment to sustainability and transparency, providing a structured approach to track and report on the Group's climate impact over time. Detailed facts, figures, and specific emissions data can be found in Leonteg's Sustainability Report, which includes the GHG inventory and key performance indicators on energy efficiency and resource usage.

# Metrics used to assess climate-related risks and opportunities

Leonteg utilizes various key metrics, including GHG emissions across the three scopes, energy consumption, and efficiency improvements, to evaluate its exposure to climate-related risks and to capture potential opportunities that align with its sustainability objectives. These metrics support the identification and monitoring of both physical risks and transition risks. Tracking these metrics enables Leonteg to assess its resilience and to make informed decisions that align with its strategic goals for long-term sustainability. For specific data and progress on these metrics, please refer to the detailed GHG inventory in the Sustainability Report.

Sustainability Highlights

#### Greenhouse gas emissions

				2024				2023
	Total emissions Leonteq offices tCO2e	Total emissions Leonteq data centres tCO2e	Total emissions Leonteq Group tCO2e	CO2 intensity (in kg CO2e/FTE)	Total emissions Leonteq offices tCO2e	Total emissions Leonteq data centres tCO2e	Total emissions Leonteq Group tCO2e	CO2 intensity (in kg CO2e/FTE)
Scope 1 <sup>1</sup>	1.72		1.72	2.96	1.06	_	1.06	1.79
Scope 2 (market-based) <sup>2</sup>	140.35	1.82	142.17	243.96	156.45	32.43	188.88	319.75
Scope 2 (location-based) <sup>3</sup>	175.17	5.21	180.38	309.53	160.59	5.25	165.83	280.74
Scope 3 (limited to business travel by air and employee commuting) <sup>4</sup>	761.68		761.68	1,307.04	620.50	_	620.50	1,050.45
Total net carbon emissions (market-based) <sup>5</sup>	903.75	1.82	905.57	1,533.05	778.01	32.43	810.44	1,371.99

Fugitive emissions are first time included in 2024 for all Leonteg offices where the measure of volume and type of gas from air conditioning and refrigerators is calculated and applied a 2% leakage rate. We use the emission factor from the Swiss Mobitool (www.mobitool.ch) for direct use for an average car fleet (Diesel): 132 g CO2e/pkm until September 2024.

For district heating we rely on the conversion factors provided by our energy supplier in Zurich for market-based figures: 108 g CO2e/kWh (2024) and location-based in Amsterdam, Guernsey and Singapore. For electricity we rely on emission factors provided by our power suppliers: EDP in Portugal and A2A in Italy (0 g CO2e/kWh, hydropower) and EWZ in Switzerland (0.89g CO2e/kWh for different renewable power products). For all other offices we used the location-based factor (see below).

<sup>3</sup> District heating: see fn 2; for electricity we rely on emission factors from www.carbonfootprint.com the international country level grid electricity factors for France (70.55 g CO2e/kWh), Germany (379.94 g CO2e/kWh), Hong Kong (692.94 g CO2e/kWh), Italy (314.32 g CO2e/kWh, Japan (457.73 g CO2e/kWh), Netherlands (309.02 g CO2e/kWh), Portugal (166.39 g CO2e/kWh), Singapore (502.49 g CO2e/kWh), Swiss (23.68 g CO2e/kWh), United Arab Emirates (421.61 g CO2e/kWh) and United Kingdom (207.41 g CO2e/kWh).

Scope 3 data includes Business travel by air and 2024 Group Employee commuting. For business travel by air we use data from two travel agencies Egencia and Finass. Egencia uses conversion factors from DEFRA/BEIS of the UK Government. Finass has a cooperation with the Swiss Foundation myclimate, who uses state-of-the-art emission factors based on more of a dozen specific parameters; For Group employee commuting as first exercise performed, we use the Distance-based method, which involves collecting data from employees on commuting patterns (e.g., distance travelled and mode used for commuting and applying appropriate emission factors for the modes used.

<sup>&</sup>lt;sup>5</sup> Scope 1, 2 and 3 are in line with the Greenhouse Gas Protocol (www.ghgprotocol.org)

Sustainability Report

TCFD Report

73

# Scope 1, 2, and 3 GHG emissions and related risks

Leonteq's climate impact is measured in accordance with the GHG Protocol across Scope 1, Scope 2, and selected Scope 3 emission categories, providing a comprehensive view of its carbon footprint:

Scope 1 emissions: Direct emissions from Leonteq's controlled operations, including any emissions from facilities directly owned or operated by the Group as well as fugitive emissions.

**Scope 2 emissions:** Indirect emissions resulting from the purchase of electricity, steam, heating, and cooling used in Leonteg's operations, including data centres.

Scope 3 emissions: Indirect emissions from the selected emission categories resulting from up- and downstream business activities. Currently, this includes emissions resulting from business travel and employee commuting. Further emission categories like purchased products and investments are more difficult to account for and will be included into the GHG balance when possible/in the coming years.

Understanding these emissions is essential for evaluating Leonteq's vulnerability to regulatory and reputational risks associated with its carbon footprint. Detailed information on Scope 1, Scope 2, and Scope 3 emissions, along with a breakdown of emissions sources, can be found in the <a href="Sustainability Report">Sustainability Report</a>.

# Targets to manage climate-related risks and opportunities

Leonteq has set ambitious, time-bound targets aimed at reducing its carbon footprint and managing climate-related risks. These targets support Leonteq's goals of achieving long-term resilience and of aligning with global climate objectives. Leonteq, in consultation with external ESG specialists, has established a roadmap to achieve these targets, and is continuing to refine its plan to ensure at least a linear reduction, if possible:

- 2030 target: Achieve a 50% reduction in Scope 1 and Scope 2 emissions compared to the 2024 baseline, reflecting Leonteq's commitment to significant emissions reductions in the near term.
- 2035 target: Reach net-zero emissions for Scope 1 and Scope 2, as well as for selected Scope 3 categories, namely business travel and employee commuting.

Over the long term, we have the ambition by 2040 to extend the net zero goal for additional Scope 3 categories that are relevant to Leonteg's business model.

These targets are monitored through Key Performance Indicators (KPIs) that align with Leonteq's climate and sustainability strategy, allowing for regular assessments and adjustments if needed. The compensation framework (see chapter Governance - Board-level oversight on climate-related issues, under Nomination and Remuneration Committee) incentivises Leonteq's Executive Management to reach the set targets that were defined. Progress towards these targets and further details on KPIs are available in the sustainability report, providing transparency for stakeholders and accountability in Leonteq's climate action efforts.

#### Measures taken to reduce emissions

**Scope 1 emissions:** In 2024, Leonteq replaced its company car, which had a diesel combustion engine, with an electric vehicle.

Scope 2 emissions: In 2022, Leonteq implemented an initiative at its Zurich headquarters to support the reduction of its Scope 2 electricity consumption. Measures included lowering the ambient temperature in its office, reducing indoor lighting and screen running times, and switching off illuminated external signage on buildings.

In recent years, Leonteq has additionally moved several of its offices to buildings that are powered by renewable energy and/ or hold or are owned by companies who hold sustainability certifications, including BREEAM, LEED, EPC and SBTi. As of end-2024, Leonteq operates in three office buildings that are powered by 100% renewable energy and two that are powered by more than 85% renewable energy. Additionally, eight out of 14 office buildings hold sustainability certificates.

Going forward, Leonteq is implementing a comprehensive plan to reduce its carbon footprint related to heating and electricity consumption. This will be achieved through the purchase of green electricity from our local energy suppliers, with the objective of significantly reducing our Scope 2 market-based emissions until 2030.

Scope 3 emissions: Beginning in 2025, Leonteq will implement an internal carbon levy for all business travel. This levy is designed to offset the CO2 emissions generated by Leonteq's business-related air travel and fees collected as part of this initiative will be invested in a carbon removal portfolio that Leonteq has defined together with the Swiss company, Climeworks, as part of the Group's climate counterbalancing strategy. The carbon removal portfolio purchased by Leonteq consists of Direct Air Capture, Enhanced Rock Weathering, Biochar, and Reforestation and targets the removal of 3,600 tons of CO2 until 2030.

Sustainability Report

# **Sources**

#### **General Recommendations:**

https://assets.bbhub.io/company/sites/60/2020/10/FINAL-2017-TCFD-Report-11052018.pdf

#### TCFD\_Workshop\_Governance:

https://assets.bbhub.io/company/sites/60/2022/02/TCFD-Governance-Workshop.pdf

#### TCFD\_Workshop\_Strategy:

https://assets.bbhub.io/company/sites/60/2022/02/TCFD-Strategy-Workshop.pdf

#### TCFD\_Workshop\_Risk Management:

https://assets.bbhub.io/company/sites/60/2022/02/TCFD-Risk-Management-Workshop.pdf

#### TCFD\_Workshop\_Metrics and Targets:

https://assets.bbhub.io/company/sites/60/2022/02/Metrics-and-Targets-Workshop.pdf

## Deloitte.

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#### Report of the Independent Practitioner

To the Board of Directors of Leonteg AG, Zurich

#### Report for a Limited Assurance Engagement on selected Sustainability Information of Leonteq AG

We have performed a limited assurance engagement on selected information included in Leonteq AG (hereinafter "Leonteq") Sustainability Report and Governance Report for the year ended 31 December 2024. Our limited assurance engagement focused on the information as required by Art. 964b (1) and (2) CO and Ordinance on Climate Disclosures as well as additional selected information marked with the symbol √ (hereinafter "Sustainability Information").

Our assurance engagement does not extend to information relating to prior periods and to information disclosed outside of the Sustainability Report and Governance Report unless otherwise indicated, including any images, audio files, or embedded videos.

#### Applicable Criteria for the Preparation of the Selected Information by Leonteg

The reporting criteria ("Applicable Criteria") used by Leonteg are the Standards of the Global Reporting Initiative (GRI) and Greenhouse Gas Protocol (GHG Protocol)

#### **Our Limited Assurance Conclusion**

Based on the procedures performed as described under the 'Summary of procedures performed' and the evidence obtained, nothing has come to our attention that causes us to believe that the selected Sustainability Information of Leonteq have not been prepared, in all material respects, in accordance with the applicable criteria and as required by required by Art. 964b (1) and (2) CO and Ordinance on Climate Disclosures.

We do not express an assurance conclusion on information in respect of earlier periods or any other information included in the Report and outside of it, including any images, audio files or embedded videos.

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Sustainability Report

#### Inherent limitations in Preparing the Sustainability Information

Due to the inherent limitations of any internal control structure, it is possible that fraud, errors, or irregularities may occur and remain undetected. Our engagement is not designed to detect all internal control weaknesses in preparing the Sustainability Information, as it involves selective testing rather than continuous examination throughout the period. Consequently, we cannot guarantee that all errors or irregularities, if present, will be identified.

The nature of such information, the absence of significant body of established practices on which to draw, and varying methods of precision allow for different, yet acceptable, evaluation and measurement techniques which can result in materially different measurement, affecting comparability between entities and over time and causing inherent limitations on the accuracy and completeness of the information.

#### Responsibility of the Board of Directors

The Board of Directors are responsible for the selection of the applicable criteria and for the preparation and presentation, in all material respects, of the Sustainability Information in accordance with the applicable criteria and as required by Art. 964b (1) and (2) CO and Ordinance on Climate Disclosures. This responsibility includes the design, implementation, and maintenance of the internal control relevant for the preparation of the Sustainability Information that is free from material misstatement, whether due to fraud or error. The Board of Directors are also responsible for providing sufficient access and making available all necessary records, correspondence, information and explanations to us.

#### Responsibility of the assurance practitioner

Our responsibility is to express a conclusion on the above-mentioned Sustainability Information based on the evidence we have obtained.

We conducted our limited assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 Assurance Engagements Other than Audits or Reviews of Historical Financial Information and, in respect of the greenhouse gas emissions information included in the Sustainability Information, in accordance with ISAE 3410 Assurance Engagements on Greenhouse Gas Statements, both issued by the International Auditing and Assurance Standards Board ("IAASB").

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Those standards require that we plan and perform this engagement to obtain limited assurance about whether the Sustainability Information is free from material misstatement, whether due to fraud or error.

#### Independence and quality control

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) of the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

#### Summary of procedures performed

The procedures we performed were based on our professional judgement. In carrying out our limited assurance engagement in respect of the Sustainability Information, and included, among

- Inquiries with relevant personnel to understand the business and reporting process, including the sustainability strategy, principles and management of material topics;
- Inquiries of relevant personnel and inspection of documentation to understand the reporting system during the reporting period, including the process and internal controls for collecting, collating and reporting the Sustainability Information;
- · Verification that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the applicable criteria;
- · Performance of analytical review procedures on the data and trends;
- Inspection, on a sample basis, of internal and external documents;
- . Assessment as to whether the Report contains the information required by Art. 964b (1) and (2) CO and Ordinance on Climate Disclosures.

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Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

**TCFD Report** 

#### Use of our Report and Reference to Limitation of Liability

We issue this report to Leonteq solely in accordance with the terms of our engagement. Without assuming or accepting any responsibility or liability in respect of this report to any party other than Leonteq, we have consented to the publication of our report within Leonteq's Sustainability Report and Governance Report for the purpose of Leonteq evidencing that it has obtained an independent assurance report in connection with the Sustainability information. This consent does not and will not affect or extend for any purpose or on any basis our responsibilities. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than Leonteg, for our work, for this report, or for the conclusions we have formed

#### Deloitte AG

Sandro Schoenenberger Licensed Audit Expert Auditor in Charge

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Abetare Zymeri Licensed Audit Expert

Ammen/

Zurich, 26 February 2025

# Leonteq's Sustainability Report 2024 can be accessed at

www.leonteq.com/annual-report-2024/ sustainability-report

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