

Rules of the Sanction Commission

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1. Purpose

- 1.1. Seturion AG (SeturionX) maintains a Sanction Commission (**SACO**).
- 1.2. These rules govern the responsibilities and competences of the SACO.

2. Composition and election

- 2.1. Pursuant to Art. 24 para. 2 FMIO, the SACO is independent of the Executive Board in terms of personnel and organisation.
- 2.2. The SACO consists of a minimum of three members. The members are elected by the Board of Directors for a period of four years. At least one member of the Regulatory Board and one member independent of SeturionX must be elected, with one of these members appointed as the chair of the SACO. Re-election is possible. The members of the SACO may be dismissed prematurely for legitimate reasons.

3. Operational supervision and reporting

- 3.1. The SACO is organisationally subordinate to the regulation department, but it operates independently within its scope.
- 3.2. The SACO reports to the Board of Directors.

4. Responsibilities

- 4.1. In accordance with the procedure set out in the Directive on the Procedure of the Investigation and Sanction Bodies (**Rules of Procedure**), the SACO imposes sanctions in accordance with the provisions of the rules and directives governing the trading system, and the Admission Rules, including the Additional Rules and their implementing provisions, on natural and legal persons subject to these rules and directives.
- 4.2. The Executive Board carries out the administrative work of the SACO.

5. Conflicts of interest

- 5.1. Members of the SACO are obligated to disclose possible conflicts of interest in sanction proceedings and to recuse themselves if necessary.
- 5.2. In all other respects, the recusal provisions of the Rules of Procedure apply.

6. Sanction proceedings

The proceedings of the SACO are governed by the provisions of the Rules of Procedure.

7. Outsourcing

- 7.1. The activities of the SACO pursuant to Art. 27 FMIA and the corresponding implementation of these rules may be outsourced in whole or in part to a suitable third party by the Board of Directors of SeturionX, taking into account the legal requirements.

- 7.2. The members of the SACO must also be elected by the Board of Directors in accordance with clause 2.2 in the event that the activities of the SACO are outsourced to a third party.

8. Means of legal redress

Appeals against decisions of the SACO may be filed with the Appeal Body within 30 days of notification of the decision.

9. Final provisions

These rules were adopted by the Board of Directors, approved by FINMA on 12 March 2025 and enter into force on 13 March 2025.