

Insider Trading Rules

of ServiceHunter AG

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Summary

Generally, you are free to trade shares, but you must disclose your motivation to do so. If you make short-term gains with your trading, the company can demand that you share up to 75% of these gains with the other shareholders by handing them over to the company.

Parties

ServiceHunter AG, Birmensdorferstrasse 94, 8003 Zürich («Company»)

_____ («You»)

Goal

The goal of this agreement is to sterilize the harms of insider trading without preventing an efficient market from forming. Insider trading has the great benefit of pushing the market price of a share closer to its true value, a property which economists refer to as market efficiency. At the same time, we want to provide an incentive to keep the shareholders informed about the state of the company in an informal and effective way, thus mandating the disclosure of all information that insider trading is based on. That way, the shareholders can reach their own judgement about the relevance of a given piece of information and take their own actions. In order to prevent insiders from making unfair trading gains by exploiting their privileged access to information, the agreement contains provisions to socialize these gains by sharing them with the other shareholders.

Insiders / Equal Treatment

The company makes sure that all insiders (employees and board members) adhere to these rules. For employees, the insider trading rules are an integral part of the employment contract.

Trading Restrictions and Disclosure of Information

You are free buy or sell shares through the share dispenser provided by the company on its website. When doing so, you must publicly disclose your trade (number of shares, price and time) and your motivation (why did you decide to buy or sell?). If you are not allowed to disclose the information your trade is based on, then you are not allowed to trade. When in doubt whether the relevant information is confidential, you should prepare the relevant information and ask your manager for a permission to disclose it. Trading outside the share dispenser requires the prior approval of the company.

Sharing of Insider Gains

If your trade results in realized or unrealized gains within seven days ("gain period"), you may be forced to return up to 75% ("sharing quota") of these gains to the other shareholders by handing them over to the company. In case of a buy, the gain is the number of acquired shares times the market price at the end of the gain period minus the amount paid to acquire the shares. In case of a sale, the gain is the averted loss, calculated by multiplying the number of sold shares with the market price at the end of the period and subtracting the product from the sales proceeds. The market price is defined as the last price offered by the share dispenser. In case of multiple trades within the gain period, the relevant gain is the net gain (i.e. it is possible to subtract losses) and the period is prolonged until 90% of the relevant trade volume happened at least seven days ago, whereas the volume of a trade is defined as the number of shares multiplied with their price.

Enforcement

For now, the sharing of gains is enforced informally. Upon request from any shareholder, the company can demand from you to share your trading gains as defined in the previous section. However, the company must do so within 30 days after the end of the gain period.

Exceptions

Shares received in the context of an employee incentive program or other form of compensation do not fall under this agreement.

Gains that are lower than 500 CHF do not need to be shared.

Termination

This agreement ends automatically one month after you cease to be an insider of the company and the gain period of your last trade as an insider ended.

Signatures

(Only necessary if there is no employment contract or if the employment contract does not refer to the insider trading rules).

Insider / "You"

To the extent rights and duties of the Company are concerned:

ServiceHunter AG

Marie-Christin Kamann
CEO

Arman Margaryan
CTO