

Code of Conduct





Is it legal, fair and ethical?

Working in banking involves a high degree of responsibility. Regardless of what roles we have in the Group, we must conduct ourselves in a way that inspires trust on the part of customers, partners, authorities and other stakeholders.

Using a large portion of common sense will get us well on the way and this Code of Conduct will help us when we require further guidance. The Code of Conduct applies to all employees in the Resurs Group. Our managers have a particular responsibility to act as good role models.

In most situations, it is easy to determine how to apply the code, while other situations can be more complex. Use your best judgement. If you encounter situations where the code does not provide guidance, ask yourself "Is it legal, fair and ethical?"

If you are unsure about how to apply the code or how to act in certain situations, please discuss the matter with your immediate supervisor, HR or Compliance.

Nils Carlsson
CEO

Our values

A desire to develop lies at the heart of our business culture. To develop as individuals and to develop our business.

We are a constantly changing workplace, and our values are our guiding principles. These are part of our day-to-day business and guides us in dealing with each other and our work tasks.

DRIVEN We are curious, committed and constantly encourage each other to take the next step and tackle the next challenge.

OPEN We seize opportunities by being unpretentious and responsive.

INNOVATIVE We try new directions by applying our creativity and imagination.

TRUSTWORTHY We earn our trust by keeping our promises and delivering the right quality.





Working in Resurs Group

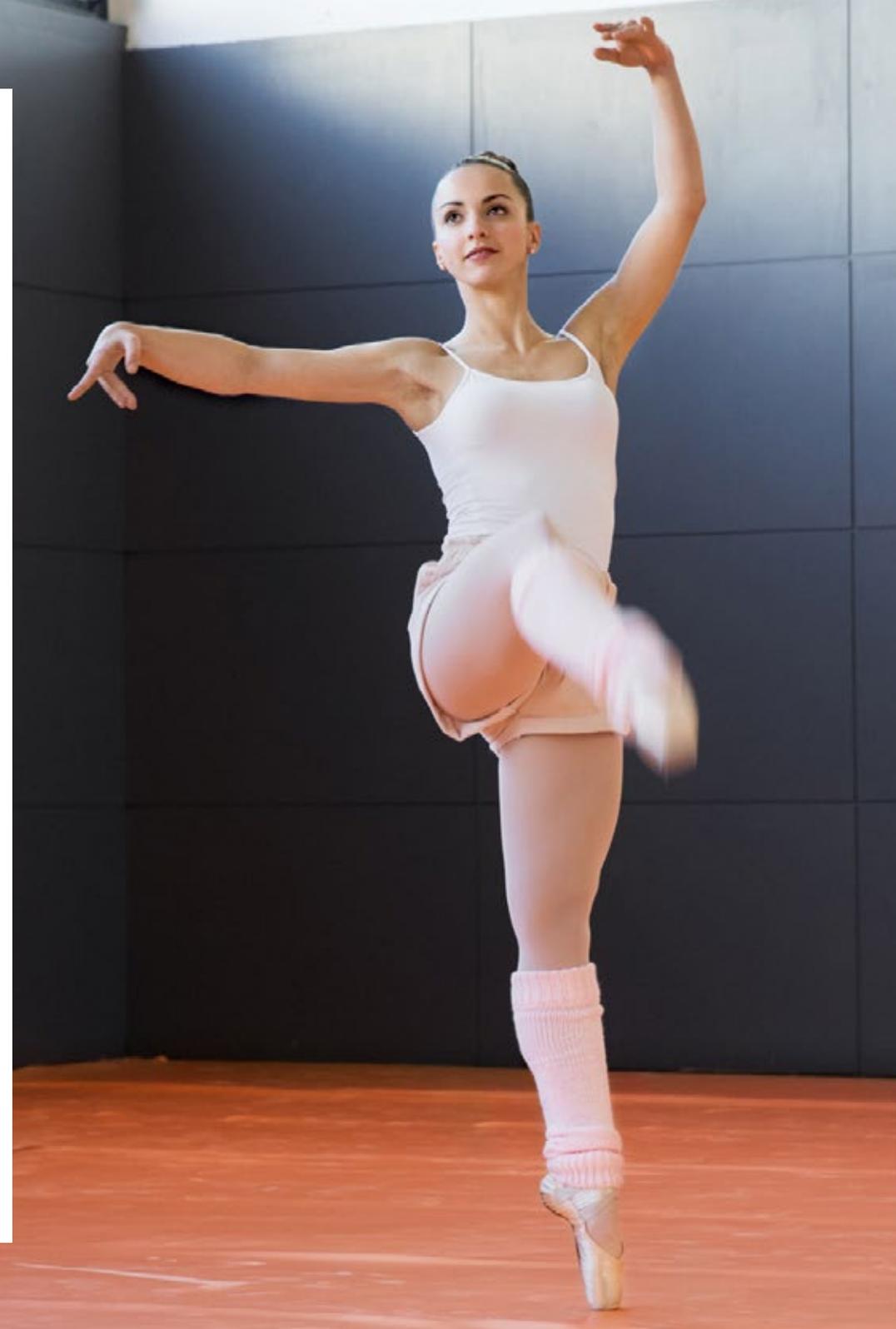
We all form part of each other's working environment and together we generate the best conditions for being able to do a good job. This is best achieved through being open and transparent with each other and not holding back when it comes to providing feedback.

We are convinced that an equal workplace, with teams comprising both employees of different ages, and with different backgrounds is the basis for us being able to reach our targets. Such teams will generate a creative environment where we can learn from each other.

As employees, we are the most important ambassadors for our company and our trademark is built by us. What we say and write about the Resurs Group can be perceived as official statements and it is therefore crucial that we think about how we express ourselves, e.g., on social media.

WORKING WITH RESURS

- We promote inclusion, equality and diversity.
- Everyone is treated fairly and without prejudice and we reject any form of discrimination and offensive or abusive victimisation.
- We take a structured approach to our work on employee development alongside a defined plan for the training that must be completed by new employees.
- We use and develop the skills of all employees, regardless of background, union affiliation, political opinion, family status, parenthood, gender, gender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age.
- We recognise and respect our employees' right to freedom of association and the right to collective bargaining in accordance with national laws and regulations.
- Our working hours, salaries and other conditions of employment are compatible with national and local legislation and relevant ILO conventions.
- We provide safe and secure workplaces and comply with all applicable laws and regulations concerning safety at work and working conditions.
- We work preventively with health and safety and focus on promoting healthy habits.



Focus on the customer

Openness and transparency form the basis of all our communication.

We will always try to use the simplest possible language in all documents and all external communication. The information must be comprehensive, correct, balanced and not misleading so that our customers and partners understand what it means to do business with us when it comes to both rights and obligations.

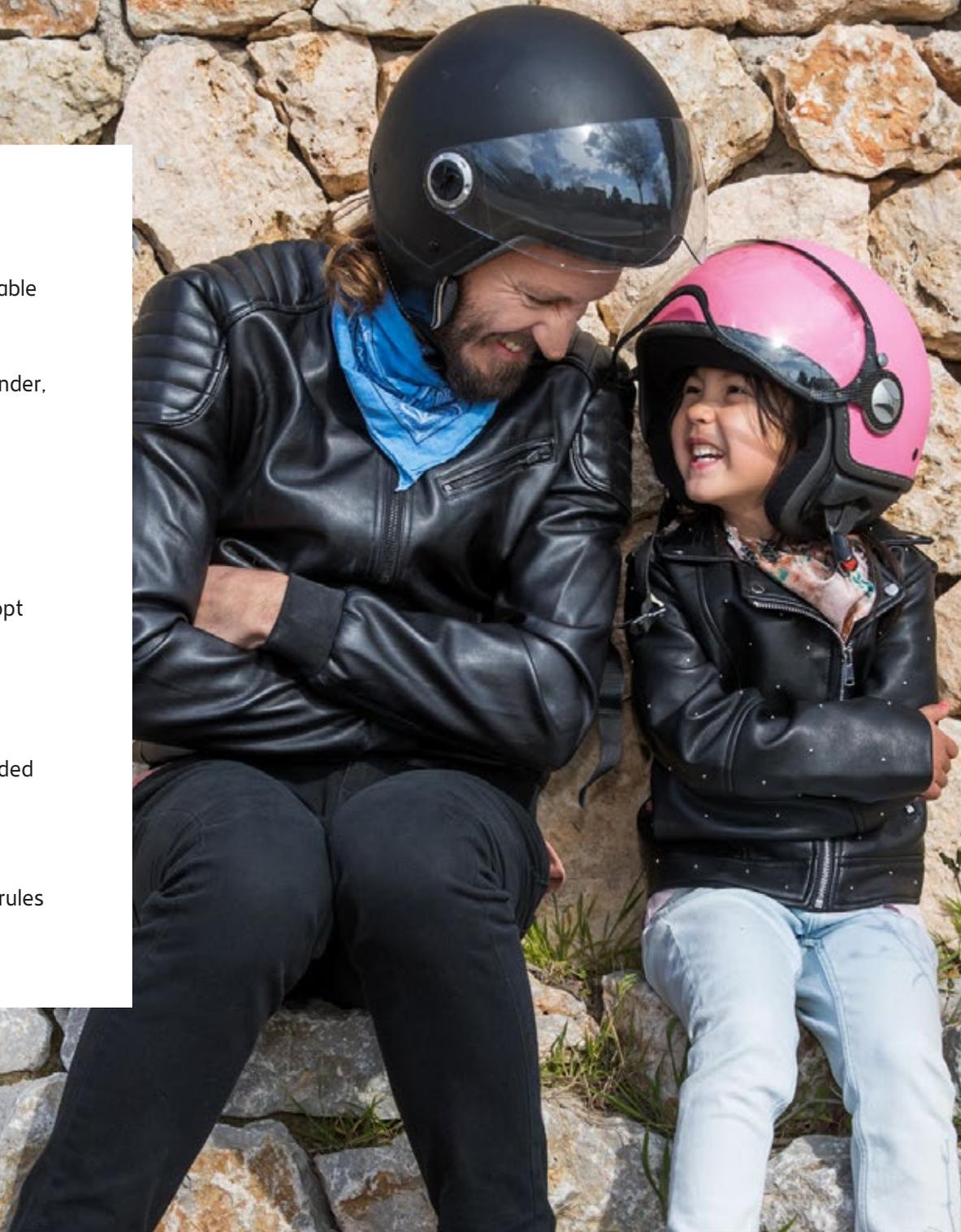
Satisfied customers and long-term relationships are prerequisites for success. When we conduct credit assessments, we grant credit only when our assessment shows that the customer will be able to fulfil their contractual obligations. We do our utmost to help if a customer requires our assistance.

Customers whose applications have been rejected can have their application reconsidered if the customer considers that relevant information has been added or that information has been misinterpreted.



FOCUS ON THE CUSTOMER

- We conduct our business responsibly and comply with applicable laws and regulations.
- We do not discriminate against any customers based on gender, age, ethnicity or other grounds of discrimination.
- We correct procedural mistakes at our own initiative when discovered.
- We value opinions and complaints, as these provide us with an opportunity to identify any issues, rectify these and adopt preventive measures.
- We follow the principles of the Swedish National Board for Consumer Complaints' decisions, as well as corresponding bodies in other countries where we conduct business, provided there is no doubt as to whether they are compatible with national law.
- We follow the International Chambers of Commerce's basic rules on advertising in all marketing activities.





Honest business

We avoid situations in which our personal interests may influence our ability to make decisions based on what is best for the company and our customers.

We do not use or tolerate illegal or unfair business practices, such as bribery. We also ensure that we do not end up in situations where we might be biased or have a conflict of interest and we comply with applicable competition laws and anti-corruption legislation.

Our Corporate Compliance Counsel provides advice and guidance as required.

HONEST BUSINESS

- Applicable anti-corruption legislation is strictly adhered to.
- Our employees undergo continuous anti-corruption training, and the Resurs Code of Conduct forms a mandatory part of the induction training for new employees.
- Every business decision is made based on the best interests of the Resurs Group and our customers.
- No employee handles matters relating to themselves or related physical or legal persons.
- Employees' external activities must be reported to and approved by their immediate supervisor.
- We identify and manage conflicts of interests in such a way that personal or professional relationships do not affect the interests of the Resurs Group or its customers. Any employee that identifies a conflict of interest that is not being managed must report this directly to the CHRO.
- We do not offer, promise, or accept money or other items of value for the purpose of unduly influencing the recipient or for the purpose of obtaining or retaining an undue business advantage. Employees do not request or accept undue benefits from others in exchange for performing their work tasks or assignments on behalf of the Resurs Group.
- We safeguard competition in the market and comply with competition laws.
- We therefore never participate in the exchange of information intended to limit competition.
- We display moderation and avoid situations in which gifts or entertainment could influence our behaviour.
- We are aware that it is not just the value of the gift that determines whether it is appropriate or not and we always conduct a comprehensive assessment of the situation.
- As a company listed on the stock exchange, we do not tolerate insider trading and we comply with applicable laws and regulations, such as the management of insider information.





Information and information security

Transparency is important to us, but there are many situations in banking in which we must put the personal integrity and privacy of our customers and employees first.

All personal data and transactions, as well as confidential information about e.g., strategies and business plans, must be managed in a secure manner, so that no unauthorised persons can access the information.

We are careful about confidentiality and we never disclose information to unauthorised parties or to customers who are unable to identify themselves.

Internal communication, e.g., information on our intranet, is intended for Resurs Group employees only and must not be disclosed to others. If we are contacted by journalists, we will refer them to the Group's Corporate Communications Officer.

INFORMATION AND INFORMATION SECURITY

- Employees must not use Resurs Group property or information inappropriately.
- Confidential personal data is protected, and employees comply with the laws and routines applicable to the management of such personal data.
- Data is disclosed to third parties only when there is a legal basis for such disclosure and measures have been adopted to protect the personal data that is transferred.
- We work actively on anti-money laundering measures and against the financing of terrorism.



Resurs in society

The fantastic commitment within the Resurs Group also extends well beyond our own walls. We are part of the local community in the places where our offices are located, and we support associations and organisations that share the same values as us.

We aim to empower people and provide them with the conditions they need to live the life they want – today and tomorrow. We therefore donate eight volunteer hours per employee per year, providing our employees with the opportunity to get involved with some form of voluntary work during paid working hours.

Active environmental work is also another natural way for us to contribute towards sustainable development in society. We use environmental resources responsibly and we always strive to conduct our business in a sustainable manner. We support and encourage suggestions for how to further reduce our environmental impact.

The ten principles of the UN Global Compact are fundamental to us, and basic human rights must be respected by all our employees.

Our workplace shall be free from political and religious influences and we expect everyone to express such opinions outside of working hours and away from our premises.



RESURS IN SOCIETY

- We do not compromise on the requirements set out in national laws or international standards on human rights
- We never attempt to circumvent trade restrictions and we comply with UN sanctions as well as applicable sanctions according to the laws of the European Union and, to the extent possible, the USA.
- We do not use direct or indirect forced labour or other forms of involuntary labour.
- We recognise and respect the rights of every child to be protected against economic exploitation and comply with laws and international standards on child labour.
- We work to reduce our environmental impact and to comply with all applicable laws and regulations concerning the environment.
- We work continuously to digitise our business for the benefit of our customers, ourselves, and the environment.





Our responsibility

Every employee, manager and board member have a responsibility to comply to this Code of Conduct.

The Group CEO has the ultimate responsibility for ensuring that the Code of Conduct is implemented and respected. The Resurs Group is responsible for ensuring that all employees understand the information and receive ongoing training on ethical matters. Our yearly Code of Conduct e-learning programme is mandatory for all employees and must be completed. All managers in the Group must be good role models. They are also responsible for ensuring that their employees familiarise themselves with the contents of the Code of Conduct and behave accordingly.

The Resurs Group does not tolerate any illegal or unethical conduct. Anyone who does not comply with the Code of Conduct may be subject to disciplinary action, including termination of employment. The actions that will be taken are determined by the Chief Human Resources Officer, in consultation with the employee's immediate superior.

if something is not right

The Resurs Group has a whistle-blowing function. Anyone can use this to report serious irregularities safely and anonymously, for example bribery, fraud, environmental crimes, security breaches or serious incidents of discrimination or harassment.

The reporting service is provided by an external party. Anyone who makes a report under the whistle-blowing procedure will not suffer any workplace retaliation due to their reporting.





Key policies and guidelines

Guidelines on travel

Guidelines on diversity and equal opportunity

Guidelines on offensive or abusive victimisation

Health and safety guidelines

Policy for managing conflicts of interest

Guidelines on physical security

Salary guidelines

Policy on governance, management, and control of risks

Policy on information security

Whistle-blowing policy

Anti-bribery policy

Policy for measures against money laundering and terrorist financing

Data protection policy

Competition policy

Trade sanctions policy

Policy for complaints handling

Remuneration policy

Insider policy

Supplier Code of Conduct



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Resurs Holding includes Resurs Bank