## Code of Conduct

**Resurs**Holding

## Is it legal, fair, and ethical?

At Resurs we must act responsibly and be seen as a respected actor.

Our shared commitment to integrity, respect and ethical leadership are principles that permeate every part of our business. Our code of conduct is a guide to creating a workplace where every individual feels valued and where transparency and honesty are the cornerstones of everything we do.

Our code of conduct is for all employees at Resurs. It helps us navigate and provides guidance for handling complex situations that may arise. It's not an only about following the law, but also to follow our high ethical standard.

Acting legally, fairly, and ethically are expectations that we have on our employees.

By taking responsibility together, we strengthen our brand and long-term success as a leading and reliable partner for our customers.

We will continue to build a bank that we can be proud of, today and tomorrow.

Magnus Fredin CEO



## **Our drivers**

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

Resurs is a constantly changing workplace, and our drivers 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.

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## Working at Resurs

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 constructive feedback.

Diverse teams with employees who have different backgrounds, genders, experiences, and perspectives enrich the business in many ways, making Resurs a more innovative, profitable, and efficient organisation. If the diversity of society is reflected in the make-up of the workforce, additional valuable customer benefit can be created.

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

- We have zero-tolerance for discrimination, harassment, sexual harassment, and bullying.
- We promote inclusion, equality, and diversity.
- All employees have access to equal development and career opportunities, 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 take ownership for our own continuous development through formal and informal learning and complete the mandatory trainings.
- 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, contracts, and other conditions of employment are compatible with national and local legislation and relevant ILO conventions.
- We provide safe, healthy, and secure workplaces and comply with all applicable laws and regulations concerning safety at work and working conditions.
- We take precautions to prevent workplace accidents or injuries, by understanding the risks in our daily work environment.



## Focus on the customer

Openness and transparency form the basis of all our communication. We aim to provide and promote services and relevant products that meet customer needs and are readily understandable.

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 customers 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 applications reconsidered if the customer considers that relevant information has been added or that information has been misinterpreted.

- 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 encourage feedback from our customers and identify and handle complaints in a timely, fair, and consistent manner.
- 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**

Resurs has zero tolerance for all forms of corruption. The fundamental principle is that all business activities are to be conducted in accordance with applicable laws and regulations and in a manner that maintains high ethical standards.

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 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. Applicable anti-corruption legislation is strictly adhered to.

Our Corporate Compliance Counsel provides advice and guidance as required.

- Our employees undergo continuous anti-corruption training, and the Resurs
  Code of Conduct forms a mandatory part of the introduction training for new employees.
- No employees handles matters relating to themselves or related physical or legal persons.
- Employees' external activities must be reported to and approved by their immediate supervisors.
- We identify and manage conflicts of interests. Any employee that identifies a conflict of interest that is not being managed must report this directly to the Head of People & Culture.
- We do not offer, promise, grant 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.
- We do not request or accept undue benefits from others in exchange for performing their work tasks or assignments on behalf of Resurs.
- 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.
- We report and investigate issues that may relate to bribery or corruption.
- We safeguard competition in the market and comply with competition laws.
- We therefore never participate in the exchange of information intended to limit competition.
- 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 for example 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, for example information on our intranet, is intended Resurs employees only and must not be disclosed to others. If we are contacted by journalists, we will refer them to the Chief Communication Marketing Officer.

- Employees must not use Resurs 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 continually work on security issues, risk assessments, training, and instructions, as well as monitoring and reviewing personal data processing.

### **Resurs in society**

Our social commitment is expressed primarily through organisations and initiatives that aim to help people take control over their lives and their futures.

Resurs uses responsible and sustainable credit lending to contribute to financial inclusion and to help more people realise their dreams and make life investments without going beyond what their finances will allow.

Our commitment to sustainability recognizes that climate change is one of today's biggest challenges. All bodies of society, both public and private, need to do more and accelerate the pace. Resurs has an important role to play in reducing the environmental and social impacts associated with our own operations and with our customers.

We are guided by well-established sustainability frameworks such as the United Nations Global Compact and the United Nations Sustainability Development Goals.

human rights laws **ENGAGEMENT** values **ENVIRONMENT** insights

#### **Resurs in society**

- We strive to increase the positive impact of our business decisions and to support a sustainable future for society and the environment.
- We respect fundamental and internationally recognised human rights in all areas of operation and have a responsibility to ensure our business activities do not negatively impact 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 actively work to reduce the environmental footprint of our operations and in our value chain and contribute to achieving our objectives to reduce the impacts of our day-to-day operations.
- We work actively to promote financial health by providing tools, insights, and knowledge to our stakeholders through for instance Resurs Society and MyEconomy.

### **Our responsibility**

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

The Group CEO has the ultimate responsibility for ensuring that the Code of Conduct is implemented and respected. Resurs 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 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.

Resurs 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 Head of People & Culture, in consultation with the employee's immediate superior.

### If something is not right

Employees and other people who are otherwise in a work-related situation at Resurs can report on serious irregularities and behaviour that may be unethical or illegal via Resurs's whistle-blower channels, on both Resurs's website and our intranet. Informants may choose to remain anonymous and can never be traced.

The reporting service is provided by an external party. Reporting of potential or actual irregularities will not lead to victimisation or retaliation.



## Key policies and guidelines

- Guidelines on diversity and inclusion
- Guidelines on Offensive Treatment and Discrimination
- Health and Safety guidelines
- Environmental Policy
- Sustainability Policy
- Guidelines on Business Travel
- Credit Policy
- Policy for managing conflicts of interest
- Guidelines on physical security
- Salary guidelines
- Governance and Risk Policy
- Policy on Information Security
- Whistleblowing 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
- Insiderpolicy
- Guidelines Supplier Code of Conduct
- Communication Policy
- Guidelines on the use of social media
- Guidelines on the procurement process
- Guidelines Company cars

