

A black and white photograph of a person in a white shirt, seen from the side, holding a large sheet of paper. The background is a blurred city skyline at night. A dark, semi-transparent rectangular box is overlaid on the lower right portion of the image, containing the text 'OUR CODE OF CONDUCT' in white, bold, uppercase letters.

**OUR CODE OF CONDUCT**

# WORK ENVIRONMENT

**A healthy culture and sound and safe working environment are important strategic issues for TF Bank. The objective of the company's work environment efforts is to create a physically, mentally and socially healthy and developing workplace for all employees.**

As a bank, we are dependent on the public's confidence in us and you as an employee affect the customer more than with the impression you leave.

The Code of Conduct is formulated as a summary that clarifies which guidelines you must follow as an employee and what expectations the bank places on you in terms of personal judgment and responsibility.

The summary is a complement to the more detailed policies and instructions. No rules can replace personal responsibility. The rules are there to be followed, but above all to encourage open discussion of conflicts that may arise at work.

Each employee is responsible for how successful we are in transforming this into a healthy culture and sound.

## **DIVERSITY**

By diversity, TF Bank means the differences that makes us all unique. This includes visible differences such as age, gender, ethnicity and physical conditions as well as underlying differences such as religion, beliefs, ways of thinking and acting. At TF Bank, we treat all people with respect and dignity in accordance with our business principles.

## **EQUALITY**

By gender equality, TF Bank believes that women and men have the same rights, obligations and opportunities in all essential aspects of life.

TF Bank is determined to:

- Actively seek to ensure that both physical and psycho-social work environment are suitable for all employees.
- Make it easier for all employees to combine work and parenthood.
- Prevent harassment.
- Investigate all cases of discrimination and harassment in the workplace and take appropriate action.
- Give all employees opportunities for development and training.
- Actively promote a more balanced gender balance within our businesses.
- Give all employees equal pay and conditions for equal progress when the work carried out is equal or equivalent and has level of difficulty.



# COMMUNICATION

The purpose of nurturing TF Bank's investor relations is to ensure a fair valuation. TF Bank's communication should build investor trust in the company and its development, minimise the risk of rumours and speculation, and contribute to an increased interest in the company's financial instruments.

- TF Bank's communication should be long-term and in accordance with the vision, business concept, strategies and goals.
- Disclosure of information should be made in accordance with Nasdaq Stockholm's regulatory framework and applicable legislation and regulation. Any event that may affect TF Bank's valuation should be communicated immediately, i.e. directly in connection with the decision being taken, the election taking place or the event becoming known to the company.
- Information to employees should be a priority taking into account Nasdaq Stockholm's regulations.
- Communication should be fast, open, factual, well structured and well planned, in ups and downs.
- In order for the image of TF Bank to be unambiguous, all communications should be based on the same basic message and communicated by a few spokespeople – as specified in the company's communication policy available on Intranet.



# ANTI MONEY-LAUNDERING

**TF Bank is working to minimise the risks of its operations being used for money laundering or terrorist financing. There is a particular policy for how TF Bank and its employees should act. The policy is available to all employees on the company's intranet. Below is a summary of the content in this policy.**

## **ABOUT THE BUSINESS**

TF Bank operates in Sweden, Finland, Norway, Denmark, Estonia, Latvia, Lithuania, Poland, Germany and Austria via subsidiary, branch or cross-border banking licence. Branches and subsidiaries work in combating money laundering and terrorist financing shall be based on TF Bank's internal rules with relevant adjustments based on national requirements in the specific area.

TF Bank shall have a documented comprehensive risk assessment and procedures for carrying out, evaluating and updating the risk assessment. TF Bank shall have adapted country-specific money laundering instructions decided by TF Bank's CEO to a relevant extent. Instructions should be complemented by process descriptions and procedures describing in detail the work to counteract money laundering. These procedures shall be based on identified risks and conditions within the business. The instructions shall indicate how TF Bank uses a risk-based approach to combat money laundering and financing of terrorism.

All TF Bank staff shall be trained in the area of working against money laundering and terrorist financing. The training shall be carried out on an ongoing basis and be adapted to each operation/department. The content of the training and the persons who have undergone the training shall be documented.

Regarding new employments, these persons shall be trained within a reasonable time. It is a right for each employee to demand this and an obligation for TF Bank to ensure training.



# INSIDER TRADING

**TF Bank is actively working to ensure that relevant laws and regulations are being followed. There is a specific policy on how TF Bank and its employees should act regarding insider information. The policy is available to all employees on the company's intranet. Below is a summary of the content in this policy.**

Employees of TF Bank or other persons who have access to inside information shall be included in a log book drawn up by the Company. Inside information is defined as: Information, regardless of form, of a specific nature that has not been published, which directly or indirectly concerns the company or company's share and which, if published, would have a material impact on the price of the company's share.

TF Bank has a responsibility to establish and continuously update a so-called log book of all persons who have access to inside information. These persons include not only employees of TF Bank, but also consultants and other persons who have access to inside information. There is a detailed insider policy that all employees can take part of on TF Bank's intranet.

The responsible person for maintaining an insider list is the CEO or a of the CEO delegated person.

Some persons, especially PDMR's (persons discharging managerial responsibilities), including members of the executive management group and board have so called insider status. Although TF Bank is always required to notify and request the approval of persons included in the insider list, persons with insider status shall always ask the CEO whether a log book is opened before trading takes place in TF Bank's share.

PDMR's in TF Bank shall notify TF Bank and the Swedish Financial Supervisory Authority (Finansinspektionen) if transactions take place in the company's shares or other related financial instruments. This reporting shall take place no later than three days after the transaction. Closely associated persons of PDMR's must also comply with these rules.

TF Bank has appointed the CEO to deal with compliance with these rules while TF Bank Investor Relations has been appointed to assist insiders in connection with changes in their holdings.



# NON-COMPLIANCE AND REPORTING

Events that may be in violation of a law or TF Bank's Code of Conduct shall be reported. All employees are obliged to report to the nearest manager. These relate to all the issues involved in this document and in TF bank's other policies. Everything aims to act on TF Bank in all stages to comply with Swedish law. Reports can be sent to TF Bank's reporting system for incidents and all reports are confidential. There is also the possibility of anonymous reporting of non-compliance and reporting.

This folder contains the overall principles of TF Bank's Code of Conduct and is followed on an ongoing basis by mandatory training.





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