

# Policy Code of Conduct

## 1 Purpose

As a company, TF Bank is dependent on the public's confidence in us.

The Code of Conduct is formulated as a summary that clarifies which guidelines you must follow as an employee and what expectations the company places on you in terms of personal judgment and responsibility. It also sets out the company's responsibilities and ambitions in relation to being a fair employer that provides a healthy work environment for all its employees.

The summary is a complement to the more detailed policies and instructions. No rules can replace personal responsibility. We encourage an 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 a sound business practice.

## 2 Scope

The Code of Conduct covers all activities and employees.

# Policy Statement and Principles

## 3 Ethics

### 3.1 Basic ethical principles

- TF Bank shall comply with laws and regulations, the general advice of public authorities and regulations as well as internal rules.
- TF Bank shall, with care, proper behavior and expertise, try to meet the needs of customers and business partners within the framework of the products and services provided by TF Bank.
- TF Bank shall be operated in a responsible and professional manner and maintain a healthy risk culture.
- TF Bank's information on products and services shall be clear and simple so that the customer is given the conditions to understand the meaning of the discussed and proposed products and services.
- TF Bank's human view respects the integrity and value of each individual.
- TF Bank shall treat all people correctly and fairly regardless of, for example, age, gender, sexual orientation, religion and ethnic background and should not benefit one customer over another.
- TF Bank works for equal opportunity and against discrimination in all forms.

- TF Bank shall fulfill commitments in the manner and within the time promised and manage the information provided by the customer about its relationships in compliance with the rules on banking secrecy and the protection of personal data.
- TF Bank should have high integrity and an honest approach.
- TF Bank shall apply sound and ethical practices to the business, as well as in relation to business partners and suppliers

### 3.2 Conflicts of Interest

All TF Bank employees shall in contact with customers, partners and the general public behave in such a way as to maintain public confidence in the company. We therefore have procedures in place to identify situations that may lead to a conflict of interest, measures to be taken to address such conflicts of interest as well as ongoing proactive work against conflicts of interest. 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.

Employees of TF Bank may not undertake assignments or operate in a way which may adversely affect the work of the company or may involve conflicts of interest. In case of doubt, you should ask the nearest manager or the company's Chief Compliance Officer for advice.

It is important that an employee in relation to customers is aware of and considers any conflicts of interest that may arise in business relations. The best way to prevent a conflict of interest from adversely affecting a client is to ensure that measures taken in such respect could be based solely on the client's own interests, and that the measures are taken independently of the interests, other actions or employees of the company or other customers.

### 3.3 Privacy

An employee who is, or has been, affiliated with TF Bank as an employee or contractor, shall not unauthorisedly disclose or exploit what they have been informed of regarding someone else's business or personal circumstances. Confidentiality shall also apply to business and other circumstances of the undertaking. It should be noted that confidentiality applies even after the end of employment. All TF Bank employees shall sign and observe a confidentiality relationship.

### 3.4 Corruption and bribery

TF Bank has zero tolerance for bribery and corruption. TF Bank and its employees and representatives should exercise great caution when conducting activities in areas where there is knowledge of or suspicion that corruption exists.

Representation, gifts and travel can be disguised forms of bribery. In case of any doubt arises whether an offer may have the character of bribery, the staff member shall decline participation, receipt of gifts or similar

### 3.5 Money Laundering

Bank strives 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.

TF Bank work in combating money laundering and terrorist financing shall be based on Company'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.

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

### 3.6 Reporting irregularities

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. 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.

## 4 Diversity and equality

TF Bank is determined to:

- Actively seek to ensure that both physical and psychosocial work environment are suitable for all employees.

*By this we mean to take into account that all employees, regardless of age, gender, sexual orientation, religion and ethnic background should be given equal opportunities/conditions regarding working hours, comfortable facilities, language and tasks.*

- Enable for all employees to combine work and parenthood.

*By this we mean to make it easier for parents by, for example, enabling the use of flexible working hours and meetings during regular working hours.*

- Prevent harassment.

*By this we mean to counteract actions that relate to unwelcome behavior and that may be perceived as offensive to the employee's privacy.*

- Investigate all cases of discrimination and harassment in the workplace and take appropriate action.
- Give all employees opportunities for development and training.

*By this we mean that all employees, regardless of gender, ethnicity, religion, or other belief should be given equal opportunities for development within the framework of their knowledge, will and ability.*

- Actively promote a balanced gender mix within our business.

*By this we mean to achieve a more even distribution of women and men in different types of jobs and positions and to always work to ensure that vacancies are sought by and offered both women and men.*

- Give all employees equal pay and conditions for equal progress when the work carried out is equal or equivalent and has comparable difficulty.

*By this we mean to ensure that no employees are discriminated.*

## 5 Work environment

In TF Bank, a good work environment is achieved by

- integrating health and safety into everything we do,
- encouraging leadership that promotes safety at all levels,
- creating an understanding that safety behavior is critical and that all accidents are preventable.

TF Bank continuously evaluates the company's efforts in the field of health and safety at work in order to be able to make continuous improvements in its daily work environment.

Great emphasis is put on a preventive work environment, which takes place in close cooperation between management, employees, work safety representatives and occupational healthcare.

The work environment responsibility is in the organisation. The managers coordinate and run the day-to-day work environment and create a good and safe working environment through participation and co-responsibility from the employees.

Each employee at TF Bank should be given the opportunity to:

- Know the goals and vision of the business and their own job
- Understand their role and the importance of their work
- Influence their own work situation
- Feel responsible for their tasks and have the necessary means for it
- Develop their skills and competencies in order to meet the requirements
- Take their health responsibly

## 6 Review and Revision

This policy will be reviewed on an annual basis or when necessary to reflect changes in laws, regulations, or TF Bank's business environment. Amendments must be approved by the Board of Directors.