

# CODE OF CONDUCT

FOR TF BANK

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## 1 Introduction

At TF Bank, we operate within a sector that require high standards of responsibility. Responsible lending is core in our mission of creating financial flexibility to people when they need it. Upholding high standards necessitates a collective dedication to integrity and respect.

We are dedicated to creating a workplace where every team member feels valued and where simplicity and adaptability govern our approach to change.

Our Code of Conduct should serve as a guiding compass for all TF Bank employees. It helps us navigate and provides guidance for handling complex situations that may arise. Acting legally, fairly, and ethically are expectations that we have on all employees.

By taking responsibility together, we strengthen our long-term success as a trusted partner for our customers, ensuring our long-term success.

With this vision in mind, we will continue to build a bank that inspires pride, today and tomorrow.

#### 2 Background and purpose

The Code of Conduct is a guideline you must follow as an employee that will support you in taking decisions and follow ethical practices at work.

It also sets out the company's responsibilities and ambitions of being a fair employer that provides a healthy work environment for all employees.

The summary is a complement to the more detailed instructions.

No rules can however replace the personal responsibility of each employee.

## 3 Scope

The Code of Conduct is decided by TF Bank's Board of Directors. The Board is also responsible for the audit of it.

• We expect that all employees, contractors and business partners follow the principles of the Code of Conduct.

## 4 Ethics

#### 4.1 Basic ethical principles

- TF Bank shall comply with all relevant laws and regulations, both internal and external.
- TF Bank shall be operated in a responsible and professional manner and maintain



a company culture based on sound risk management.

- TF Bank's information on products and services shall be clear and simple to avoid misunderstanding and not create space for misinterpretation.
- TF Bank works for equal opportunity and against discrimination in all forms.

TF Bank will not engage in, or support, discrimination on the basis of race, colour, gender, language, religion, political or other opinion, national or social origin, union affiliation, sexual orientation, health status, family responsibilities, age, disability or other distinguishing characteristics.

All employment-related decisions such as hiring, remuneration, benefits, training, advancement, disciplinary actions, contract termination and retirement shall be based only on relevant and objective criteria.

A conflict of interest occurs when an individual's personal interests - family, friendships, financial, or social factors - could compromise his or her judgment, decisions, or actions in the workplace.

TF Bank employees shall not operate in a way that may adversely affect the success of the company involving conflicts of interest in any work-related matters (for example in contacts with customers, partners, suppliers and other employees).

All TF Bank employees shall follow the Company policy and procedures that provide instructions about avoidance of, or measures to be taken to avoid, or mitigate conflicts of interest.

The policy is available to all employees on the Company's intranet.

# 4.2 Confidentiality

TF Bank employees shall not share any confidential information about the Company, customers and co-workers.

The confidentiality obligation applies also after the end of the employment.

Confidential information is all information that is not published officially to the public, or shared within the company due to chinese walls, information barriers or bank secrecy.

It is prohibited to give yourself access to unauthorized folders or download confidential information.

In case of doubts with identification of which data that is confidential, an employee shall always take the safe approach and shall not disclose any information until confirmation is received from the nearest manager or, if necessary, compliance.

# 4.3Corruption and bribery

TF Bank has a zero tolerance approach to bribery and corruption. TF Bank and its employees and representatives should never engage in any form of bribery, corruption, any illegal method to influence public officials, the judiciary or private parties.



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, receiving of gifts or similar.

## 4.4Money laundering and terrorist financing

TF Bank is firmly committed to combating all types of financial crimes, including money laundering and terrorism financing.

It is therefore strictly prohibited to participate in activities or transactions that could be part of money laundering and terrorist financing.

TF Bank has implemented a rigorous program aimed at preventing TF Bank from being used for such purposes.

More information on how TF Bank works to counter money laundering and terrorism financing is available in "Governance documents" storage.

## 4.5 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 or anonymously following the Whistleblowing procedure.

## 5 Diversity and equality

TF Bank is determined to:

• Ensure that the physical and psychosocial work environments 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.

• Create a work environment that supports parents in their role.

By this we mean that TF Bank creates solutions for parents that they can fulfill both their employee and parent role.

• Prevent harassment.

By this we mean to have a process to investigate all cases of discrimination and harassment in the workplace and take appropriate action and create awareness about how to recognize and react to any harassment.

• 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 distribution of women and men in all

• Give all employees equal pay and conditions for equal job and competencies with the respect for the practices in the local labor market.

By this we mean that the decision about individual pay & conditions shall be taken regardless of gender, ethnicity, religion or other belief.

## 6 Work environment

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 all accidents are preventable.

TF Bank ensures that work environment conditions are evaluated regularly and are continuously improved.

It is everyone's responsibility to keep work environment safe.

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

- know the goals and vision of the business, and their own role's contribution.
- understand his/her role and the importance of their own work.
- take responsibility for his/her tasks.
- develop his/her skills and competencies in order to meet the requirements.
- take his/her health and safety responsibility.

In case of any concerns if behavior/action is in accordance with Code of Conduct an Employee should consult with the nearest Manager or compliance.