

# Code of Conduct

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*This policy is published in Swedish and English. In the event of any differences between the English version and the Swedish original, the Swedish version shall prevail.*

## Background and purpose

The Code of Conduct ("The Code") describes and elaborates on Avanza's values and business ethics. The Code provides among other things guidance to employees on how they can contribute to Avanza's success in building long-term relationships with customers.

The purpose of the Code is to achieve the following principal objectives:

- To describe the responsibility that comes with being an employee of Avanza.
- To describe Avanza's business ethics.
- To guide Avanza's employees in how to resolve potentially difficult ethical situations.
- To establish routines for reporting issues that involve the Code.
- To show other stakeholders that Avanza acts ethically and professionally.

## Scope and entry into force

The Code applies to Board members, managers and all employees of Avanza regardless of their employment arrangement, including contractors such as consultants.

In the performance of their duties, Avanza's internal regulations must be followed, including the procedures and other internal rules that apply at any given time to the specific task. It is the responsibility of the individual to stay updated on and understand the internal rules, laws and other external regulations pertinent to their work.

The Code applies from the date it is adopted.

## Application

In most situations, it is fairly easy to determine how the Code is applied. Some situations can be complex, however. The corporate culture and the good judgment and common sense of the employees are critical for us to maintain high ethical standards at Avanza. As guidance, these basic questions can be asked:

- What do laws and internal rules say about my conduct?
- Is it fair and ethical?
- How would I ideally be expected to act?
- Can I stand behind my conduct?
- Can my conduct affect Avanza's reputation?
- How are our customers affected by my conduct?
- Would you accept this situation if you were a customer, colleague, shareholder or other stakeholder?
- Have I sought guidance and listened to advice from colleagues, managers and relevant functions?

## Working at Avanza

Avanza highly values its employees. We believe that a combination of competences and engaged individuals are critical to our success. We also believe that engaged, attuned leadership is important to our continued growth and success.

Working at Avanza means being part of an environment in constant change and development. We encourage collaboration and sharing experiences between colleagues, so that we can offer customers the best solutions in the most cost-effective way.

## Philosophy

At Avanza, the corporate culture and the company's philosophy have always been a focus and are the basis for the company Avanza is today. Keeping the philosophy alive is a constant effort that spans from recruiting new employees to our day-to-day work, including how we treat each other and our customers.

- A= Everyone at Avanza
- K= We help a colleague help a customer.
- A= We take responsibility.
- N= We challenge and think differently.
- k= We have fun together.



## Recruiting, diversity and gender equality

Avanza's aim is to be an employer of choice for prospective and current employees. Employees with the right skills are critical for Avanza to offer the high level of quality and service to our customers that we expect from our operations. This makes recruiting a strategic issue.

Every employee at Avanza should unquestionably be treated equally and have the same opportunities for development regardless of gender, gender identity, ethnicity, religion or other belief, disability, sexual orientation and age.

Avanza feels that groups of employees with different experiences and perspectives are more effective and dynamic than those that are too alike. This makes Avanza more effective and profitable. Assembling the right teams is an important management responsibility and a natural component of long-term human resource management.

The purpose of diversity and gender equality work at Avanza is to ensure that no discrimination occurs and to raise the quality of our work, create a positive work environment and continuously improve Avanza.

## Discrimination and harassment

No employee may be subjected to harassment, discrimination or abuse. Abusive behaviour can be targeted at an individual or a group. As representatives of the employer, Avanza's managers have a responsibility for ensuring that there is no harassment, discrimination or abusive treatment. Every employee is expected to take responsibility for their actions and not harass others. Those who are subjected to harassment, discrimination or abusive treatment have the right to interpret what they perceive as abusive.

## Political and religious beliefs

Avanza does not wish to influence its employees' personal beliefs in any way. We therefore do not want employees to engage in political activity in the workplace or in Avanza's name. It also means that we never donate from Avanza's assets or resources to political or religious organisations or political candidates.

Avanza opposes all political and religious activity that incites extremism or challenges our commitment to individual and cultural diversity and equal opportunity for all.

## Drug-free and safe workplace

To meet our responsibility to employees, customers, shareholders and other stakeholders, Avanza maintains a healthy and productive workplace. All use of drugs, or being under the influence of drugs, in the workplace is prohibited.

Employee safety in the workplace is a priority. This applies to every aspect of working conditions. We are all responsible for maintaining a safe workplace by following current occupational health and safety rules.

## Avanza's assets

In addition to our largest asset – our employees and their skills and experience – Avanza has physical assets such as technological and other equipment, as well as intangible assets such as computer programs, concepts, trademarks, etc. All systems, information or processes which are not widely known to the public and give Avanza a competitive advantage, such as corporate and strategic plans, compensation received, financial information and business secrets, are classified information.

Avanza's assets, including communication systems, may be used only for legitimate business purposes and not for personal gain. Avanza takes all reasonable measures to protect assets which are owned by, or entrusted to Avanza, against loss, theft or damage or misuse. This includes not revealing business secrets and not allowing others to use Avanza's assets without the consent of an authorised officer of Avanza.

Avanza's name, email address, systems, locations or business relationships may not be used for private purposes.

## Information security

To protect communication systems and information assets in processes, IT systems and cloud services, Avanza has information security regulations that all employees must follow. Their purpose is to safeguard the confidentiality, privacy and availability of the assets in a way that makes the information available when needed, accessible to the right individuals, and that we ensure it is accurate and thorough. This is important from a business and customer perspective, but also due to the laws and external regulations that Avanza is required to follow.

## Confidentiality

As an employee, it is important to protect confidential information that is generated through Avanza's business. Confidential information includes information on Avanza's:

- operations, results and strategies,
- business plans and processes,
- technology and systems,
- all customer information (current, former and potential customers)

Avanza requires employees and others who perform services on Avanza's behalf to sign a confidentiality agreement. The obligation to keep information confidential applies even after you have ended your employment or assignment with Avanza.

Avanza protects the personal information of all employees. Employment records may not be shared or discussed, other than with the approval of the employee or if required by law or upon the request of a court of law.

## **Trade union agreement**

Avanza supports the right of its employees to organise and negotiate collectively. Avanza believes in the abilities and participation of individuals and has chosen not to enter into any trade union agreements. Avanza offers similar, or better, terms than comparable trade union agreements.

## **Management of conflicts of interest**

### **General**

Business decisions and other measures must always be taken with the best interests of Avanza, its shareholders and customers in mind, and can never be motivated by personal considerations or relations. It is important that relationships with potential or current customers, suppliers, competitors or supervisory authorities do not influence our independence and reputation. It is also important to avoid conflicts of interest between Avanza's interests and those of the individual, or the interests of any related party. For this reason, you may not participate in the discussion of any issue where you, or a close relation, have a material interest that could conflict with Avanza's interests.

Avanza must take all reasonable measures to identify conflicts of interest and organise its operations in such a way as to avoid and prevent conflicts of interest. When such measures are insufficient and conflicts arise, customers shall be notified. In situations where conflicts of interest can arise, Avanza trusts you to use good judgment, to ask for advice when necessary, and to use the highest ethical standards in your professional and personal contacts.

### **Insider trading**

Those with inside information may not trade securities in companies whose shares are listed for trading on a marketplace. The ban against insider trading applies to all securities issued by Avanza Bank Holding, as well as securities issued by other companies. The ban applies regardless of how the person obtained access to the information.

Inside information refers to information that potentially could affect a share price but has not yet been made public, i.e. unreleased information which is specific in nature and which a sensible investor potentially could use in their investment decisions. The ban against insider trading can be found in the Market Abuse Regulation. According to the rules on market abuse, it is also prohibited to disclose inside information to others, recommend that others trade on inside information or pass on a trading recommendation based on inside information.

Members of the Board of Directors and management of Avanza Bank Holdings are assumed, from time to time, to have access to inside information on the company. Because of this, such persons must report their holdings and those of related parties in the Avanza share and any changes in such holdings to Swedish Financial Supervisory Authority.

## Trading by employees

All employees of Avanza and certain contractors, as well as accounts over which employees/contractors have authority, and transactions by related parties which the employee/contractor has knowledge of, are subject to the trading rules stated in "Policy on security transactions by employees and contractors" and annexes from the Swedish Securities Dealers Association.

In brief, the trading rules require securities to be retained for at least one calendar month before they can be sold at a profit. In addition, trading is prohibited in the Avanza share during a period of 30 days before each scheduled interim report.

## Outside activities

As an employee of Avanza, it is important that outside activities are beyond reproach. Taking a job outside Avanza or an assignment as a board member or similar position (does not apply to tenant-owner associations or the like) must also be approved in advance by an immediate supervisor.

## Gifts and hospitality

Avanza follows the anti-corruption laws and practices in Sweden. Under no circumstances will Avanza accept offers of, or accept, bribes or other similar unlawful payments to or from any person or unit in Avanza.

## Customer relations

Long-term customer relationships are the key to our success. Avanza's success and reputation are built on the values created by all Avanza employees in our daily interactions with customers.

## Guiding principles

Respect for customer privacy is necessary to build strong relationships. This makes it critical to keep customer information safe and use it properly. At Avanza, we will not resort to improper business practices such as questionable sales methods or bribes. We act fairly and professionally. Our aim is to improve collaboration between various parts of Avanza in order to continuously meet or surpass our customers' expectations. We appreciate feedback from our customers, so that we can steadily improve our offerings.

## Know Your Customer

It is becoming increasingly important for financial institutions to know their customers. From a business perspective, the main reason to identify our customers' needs is so that we can provide them with the right products and services. It also makes it easier to monitor their obligations vis-à-vis Avanza. From a legal standpoint, the legal entities within Avanza are responsible for ensuring that customers are identified and legitimate and that their actions can be understood (e.g. through the Know Your Customer, KYC process).

## Anti-money laundering and counter-terrorist financing

Money laundering is a way to conceal ill-gotten gains by making it look like they were earned legitimately. Avanza is a financial group offering banking services, securities and insurance products to customers around Sweden and to some extent internationally, which creates a risk that Avanza may be exploited for purposes of money laundering and terrorist financing. Avanza therefore takes measures to ensure it is not intentionally the target of terrorist financing, e.g. by monitoring official

lists of individuals and organisations that may be connected to terrorism. Avanza also continuously updates its procedures to prevent money laundering and terrorist financing. When money laundering or terrorist financing is suspected, the suspicious activities are reported to the relevant authorities.

## **Management of customer information**

Employees at Avanza shall only have access to and may only use the customer information necessary for them to perform their duties. This means that employees may not seek information on a customer unless it is necessary to fulfil a duty.

As an employee of Avanza, you may never reveal customer information to anyone not authorised to receive it. This also applies to other Avanza employees who do not need such information to fulfil their duties. The customer may consent to have their personal customer information shared with a third party, e.g. by using Avanza's power of attorney. Information can also be shared with authorities as required by law or regulation.

Every employee is responsible for taking appropriate precautions against unauthorised disclosure of customer information. As an employee of Avanza, you may not discuss sensitive issues or confidential information in public or otherwise with colleagues, unless required for them to fulfil their duties.

## **Personal data**

Personal information may be collected, used or shared only with the knowledge and permission of the person about whom the data concerns, unless otherwise required by contractual arrangement, law or regulation, or requested by a court of law. In principle, personal data may only be used for the purpose for which it was originally collected. Access to personal data within Avanza is limited to employees who have a legitimate need to access it.

Customers have the right to ask whether Avanza has any personal information on them, and if so the right to see that information. Customers also have the right to know how Avanza obtained the information, how the company uses it and with whom the information has been shared.

## **Documentation and contracts**

It is important that the documentation Avanza offers to customers is factually correct, easy to understand and meets professional standards. All contracts and agreements with customers must be adequately documented.

## **Claims and complaints**

It is critical for Avanza that dissatisfied customers are treated in the right way and taken with the utmost seriousness. It is dissatisfied customers that we learn the most from. If we learn from dissatisfied customers and see each of them as an opportunity, we will improve the experience for all customers.

A complaint refers to when a customer in a specific case expresses displeasure with a financial service or product from Avanza. Complaints shall be answered factually and correctly, without unnecessary delay.

A claim refers to a previous complaint where the customer does not feel that Avanza has satisfied a request for compensation or a correction. Claims are handled by a specially appointed resolution officer for each licensed company in Avanza.

## Management of suppliers, other partners and competitors

Avanza strives to outcompete our competitors fairly and honestly. Avanza also looks for competitive advantages through superior professional performance, never through unethical or illegal business practices. Avanza does not do business with anyone who could damage its reputation.

### Sound business practices and guiding principles

Avanza shall comply with applicable laws for the activities it engages in. In addition, Group companies shall follow applicable international and national codes of conduct in the industry, and their own ethical requirements.

Transactions between companies or other units within Avanza shall be executed at arm's length and shall follow market principles and applicable laws. Suppliers and consultants must comply with Avanza's internal rules to the extent they apply to their assignment, and consent to keeping the relationship with Avanza confidential, provided that Avanza has not consented to disclosing the relationship.

### Management of competitors and fair competition

Avanza uses only legal and ethical methods to collect information on competitors. It is prohibited to steal protected information, take possession of classified business information obtained without the owner's consent, or persuade former or current employees of other companies to reveal such information.

Avanza is obligated to abide by competition law in Sweden. These rules are complex, but in general their purpose is to ensure fair competition between companies and to protect consumers from improper business practices. Non-compliance with these rules can lead to large fines.

Avanza's employees must avoid situations that can lead to illegal and anticompetitive behaviour. This includes:

- suggestions from competitors to collude on prices, or to divide up markets or customers,
- improper attempts by current or potential customers to prevent Avanza from doing business, or entering into contracts, with another customer,
- discussions at trade meetings on competition-sensitive topics, such as prices, pricing policies, costs and marketing strategies.

### Documentation and contracts

All contracts with suppliers, consultants and other partners shall be properly documented. The contracts shall clearly define the contractual parties, the products and services being provided, and other important conditions.

### Trade groups

Avanza supports membership in professional organisations whose purpose is to maintain sound business practices and improve the entire industry. When employees represent Avanza in a professional or other organisation, business secrets and customer information must always be kept confidential. These discussions shall never be exploited as a means for competitors to gain an understanding that could limit competition.

## External communication

Avanza's ambition is to be transparent, open and proactive in our communication with others without revealing sensitive information which can damage Avanza's current or future competitiveness or customer relations. The goal is that customers, shareholders, employees, potential investors and other stakeholders can form a balanced and reassuring picture of Avanza.

## Disclosure of information

As a listed company, Avanza Bank Holding is required to disclose information on Avanza's operations to the public, including financial reports, when such disclosures are warranted or required by law. Selective disclosure of information is prohibited. Material information shall be distributed to investors, stock exchanges, analysts or the media in a consistent and legally correct manner. The information shall be correct, relevant, reliable and promptly be made available to all.

Avanza Bank Holding must be able to present thorough, fair, timely and understandable information in all reports that the company is obligated to publish, or present to shareholders and supervisory authorities, and in all other communication that Avanza publishes. No hidden or unreported revenue, costs, assets or liabilities can be excluded. In particular, Avanza must maintain accurate financial accounts and other documents that provide a fair view of its financial position, results, business transactions, assets and liabilities.

## Internal communication

Avanza sees internal communication as an important tool to create understanding, confidence and a commitment to overarching business strategies. Internal communication plays a vital role in Avanza's success in reaching its business objectives.

Avanza uses a selection of communication media to ensure that all employees stay updated on business development and clear about their personal roles and goals. We encourage sharing and learning between colleagues throughout the company. We see feedback as a means of continuous improvement.

## Media communication

We are all ambassadors for the Avanza brand. In addition to daily communication with external parties, Avanza will sometimes be asked for opinions by the media.

To ensure a consistent and professional presence in social media, a limited number of individuals within the company are authorized to publish comments in Avanza's name.

As for contacts with journalists, as a rule the CEO will respond. Avanza's savings economists publicly speak out on savings-related issues. Contacts with analysts and investors are managed by IR, the CEO and the CFO. All other employees shall refer questions from journalists, analysts and investors to IR.

## Branding

The ambition is to communicate a consistent picture of the Avanza brand. All types of communication affect the brand (employees in their daily interactions with customers, products and services, marketing, annual reports etc.). Avanza's branding strategy and graphic identity shall ensure that customers' needs and expectations are taken into account in all our communication.



## Communication with supervisory authorities

We strive to maintain good relations with our supervisory authorities. To ensure uniform and controlled communication, all contacts with supervisory authorities shall be handled through or in consultation with Compliance.

## SwedSec licensing

As a company in the financial market, Avanza has an obligation to help maintain confidence in the market. As an element in this, Avanza is licenced by SwedSec Licensiering AB (SwedSec).

SwedSec works to maintain proficiency and compliance among employees in the financial market. It does so through licensing based on knowledge requirements and tests, and through a disciplinary proceeding in the event of violations. To ensure that SwedSec licence holders continually fulfil the knowledge requirements, they must undergo an annual knowledge update. A SwedSec license can be obtained through four different exams for:

- Advisors (not applicable to Avanza's employees)
- Specialists
- Management and control functions
- Mortgage loans

## Monitoring

It is up to each manager to ensure that the above requirements are met. The annual knowledge update is sourced centrally and distributed to employees who are SwedSec licensed.

Compliance is responsible for decisions on and the handling of notifications to SwedSec's disciplinary board of violations.

## Whistleblowing

Acting ethically and taking measures to prevent unethical or illegal behaviour are part to Avanza's culture. If you detect or suspect unethical or illegal behaviour, you are encouraged to report your observations. Whistleblowing is governed by law and gives all employees (including consultants) who report serious misconduct, special protection against reprisal by the employer. This protection is provided through the ability to file an anonymous report.

Whistleblowing can be used to notify Avanza of serious risks or deficiencies that could harm the company, Avanza's employees, customers and other stakeholders, or public confidence in the financial market as a whole, such as:

- violations or suspected violations of any of Avanza's internal rules, this code or other regulations critical to Avanza,
- banking and financial crime, deficient or questionable reporting/accounting, bribery or other unlawful transactions,
- other serious irregularities that impact the vital interests of the company or the Group or the lives and health of individuals, e.g. serious environmental crime, major deficiencies in workplace security and serious forms of discrimination and harassment,
- conflicts of interest,
- other violations of an ethical nature, or violations of legal requirements.

An employee who in good faith reports legitimate concerns about illegal or unethical behaviour has Avanza's full support, and Avanza will try to keep the identity of the individual who makes the report secret. Legal requirements or a court injunction may necessitate that the information must be released, however.

## Internal regulations

It is critical that Avanza operates in accordance with laws and other regulations and in accordance with accepted practices in the industry, and consistent with the highest ethical and moral standards. To ensure this, the Board of Directors and the CEO adopt internal regulations.

In the performance of duties, Avanza's internal regulations must be followed, including the procedures and other internal rules that apply at any given time to the specific task. It is the responsibility of the individual to stay updated on and understand the internal rules, laws and other external regulations pertinent to their work.

Failure to follow or be familiar with the internal regulations will not be accepted under any circumstances, and violations can lead to legal action. If in doubt how a specific rule should be interpreted, the employee shall ask their supervisor.