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# Bluestep Bank AB

## Code of Conduct Policy

**Version: 1.3**  
**Effective: 23<sup>rd</sup> of October 2024**

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## 1. Policy Details

This Code of Conduct Policy have been adopted by the Board of Directors (the “Board”) of Bluestep Bank AB (publ) (“BBAB” or the “Company”) in accordance with the Swedish Financial Supervisory Authority Regulations and General Guidelines (FFFS 2014:1) regarding governance, risk management and control at credit institutions.

The rules and procedures set out in this Policy apply to the Company, its established branch offices and subsidiaries.

### 1.1. Policy name

This is the Code of Conduct Policy version 1.3 (the “Policy”)

### 1.2. Commencement

This Policy commences on the 23<sup>rd</sup> of October 2024.

## 2. Introduction

The Policy covers all employees in the Company and all those who represent the Company, including the Board, independent contractors and consultants (together the “Employees”).

The purpose of this Policy is to present an overview of the conduct standards that the Employees must live up to at BBAB in order to do the right thing for our customers, colleagues, and society. This is also to ensure that Employees comply with the applicable laws, regulations, internal standards and also promote risk awareness through a strong risk culture conveying the Board’s expectation that activities will not go beyond defined risk appetite and limit.

The Policy together with BBAB’s core values describes our way of working and guides us in our business relationships. The Policy should ensure that the Employees in their work to build long-term relationships with customers and other stakeholders. All Employees are responsible for following the content of this document and for requesting guidance when needed.

## 3. Conduct Standards

### 3.1. Conduct in customer interactions

The relationship with customers is always of central importance and it is important that customers get accurate and relevant information in a simple, easily accessible and easy-to-understand way so that they understand the Company’s products and pricing. Transparency is always very important and especially important for people that for some reason has extra difficulty absorbing information, for example by being new to the language. Employees should in a clear and comprehensive manner explain what the customer is getting into and on what terms. In this way, security is created for the customers. The Employees should ask relevant questions about the customer’s situation and take the time to explain all aspects for the customer so that future unwanted surprises can be avoided. Part of transparency are that customers are treated equally, free from prejudice, and that assessments are based on facts.

In Sweden there are regulatory requirements of documented knowledge for employees that are working with mortgages and are involved in customer interactions. Within BBAB, all employees covered by this requirement are required to take Swedsec's<sup>1</sup> licensing test for mortgages. Other employees are also offered that opportunity if deemed appropriate.

In Finland there are regulatory requirements of documented knowledge if you are working with mortgages and are involved in customer interactions. Within BBAB, all employees covered by this requirement are required to take an online course package from Finva Finanssikoulutus Oy (Finva)<sup>2</sup> that corresponds to the requirements. Other employees are also offered that opportunity if deemed appropriate.

In Norway today, there is no corresponding requirement in the industry<sup>3</sup>. However, BBAB is affiliated with and follows the requirements of authorisation for Credit and mortgage from The Finance Industry Authorisation schemes (FinAut)<sup>4</sup>.

### 3.2. Conflicts of interest

BBAB should to the extent possible avoid the occurrence of conflicts of interest. In case where a conflict of interest cannot be avoided, it must be handled in a way so that customers' and/or BBAB's interests are not affected. This to maintain confidence in BBAB and the capital market, and to run the business honestly, fairly and professionally.

BBAB should continuously monitor conditions and situations that may give rise to conflicts of interest. In connection to changes of the business it should always be an assessment whether a conflict of interest arises or may arise. BBAB should always make an assessment of what is best for the customer to ensure that customers are treated fairly. All Employees who perform services on behalf of BBAB is also obliged to notify Head of Compliance as soon as possible if there is a risk that a circumstance giving rise to a conflict of interest may exist.

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<sup>1</sup> <https://www.swedsec.se/>

<sup>2</sup> <https://www.finva.fi/koulutukset/asuntoluottodirektiivin-vaateet-verkkokurssit-ja-osaamisen-todentaminen>

<sup>3</sup> Will be a requirement in the legislation as from the 1<sup>st</sup> of January 2025.

<sup>4</sup> <https://www.finaut.no/>

More detailed information can be found in the latest version of “the Managing Conflicts of Interest Policy” adopted by the Board.

### **3.3. Anti-corruption and bribery**

For BBAB to meet its goals, it is an important prerequisite that clients and the general public have confidence in BBAB. In order to ensure this confidence, it is important that the the Employees observe ethical codes and act to meet the ethical requirements set out in the Company's internal governance framework.

BBAB apply the code to prevent corruption in business which has been prepared by the Swedish Anti-Corruption Institute (*Sw. Institutet mot mutor*) and the Swedish Bankers' Association's (*Sw. Svenska Bankföreningen*) ethical guidelines for banks. BBAB shall also apply the ethical rules prepared by the Association of Swedish Finance Houses (*Sw. Finansbolagens Förening*).

Ethical guidelines are, by nature, generally held. If an Employee has any doubt as to how he or she should act in a specific situation, he or she should contact his or her manager or the Head of Compliance for advice.

Occasionally, Employees will be offered gifts or other benefits from third parties. If there is any doubt whether it is acceptable to receive the gift, it is better not to accept the gift, regardless of the gift's value. If in doubt, the Employee should always discuss this with his or her manager.

Nevertheless, there might be situations where an Employee, due to politeness, is obliged to receive a gift which is too expensive. Upon receiving such a gift, the Employee should report the incident to the Head of Compliance to ensure that the gift is taken care of by the Company and added to BBAB's assets. Further, an Employee may not give, promise or offer any person an unjustified advantage of any kind.

More detailed information can be found in the latest version of “the Ethical Guidelines Policy and Instruction” adopted by the Board.

### **3.4. Anti-money laundering and prevention of terrorist financing**

As a mortgage lender and holder of deposits there is a risk that the business may be used for financial crime and that not only destroys the integrity of the financial institutions that

are used to carry out criminal acts, it also negatively affects the society we live in, so a proactive responsibility must be taken to mitigate the risk of misuse.

BBAB follows the rules that exist to minimise the risk of being used for money laundering and financing of terrorism. Work continuously to ensure that the Company follow every rule in the area, that risk-based measures are taken and that Employees are continuously trained.

To be as safe as possible from this type of crime all Employees need to be risk conscious, keep up with developments in society and understand in what way the business may be used so that the risks can counteracted, for example through new or changed controls. Awareness needs to be present in all Employees, every day.

All Employees that have a reason to believe or suspect that any transaction or activity, or potential transaction or activity, could involve the proceeds of criminal conduct must complete a suspicion report and send it immediately according to established internal routines.

More detailed information can be found in the latest version of “the Anti money laundering and prevention of terrorist financing Policy” adopted by the Board.

### **3.5. Data protection and confidentiality**

Maintaining confidence in BBAB and the financial system also means safeguarding the personal, private, and confidential information that are processed. This applies regardless of whether the information has been obtained from customers, Employees, external partners, associates, suppliers, authorities, or other sources within the Company.

Personal data may only be processed based on specified, explicit, and legitimate purposes, and not be processed for any purpose(s) incompatible with the original purpose(s).

An Employee who has access to personal data must only process the data in accordance with the purpose of the processing, and may not share, distribute, or otherwise disclose the personal data to a third party unless instructed to do so by the Company.

Security breaches which jeopardise the confidentiality or integrity of personal data processed by the Company should be reported immediately to a supervisor and to the Data Protection Officer.

More detailed information can be found in the latest version of “the Data Protection Policy” adopted by the Board.

### **3.6. Insider information and market manipulation**

The fundamental idea of being a Company with listed instruments is that all stakeholders shall be given opportunity to trade on the same conditions. Price-sensitive information (inside information) shall reach all existing and potential stakeholders simultaneously and all existing and potential stakeholders shall be treated equally.

Employees who work within the BBAB must be familiar and comply with the provisions governing market abuse issues and the handling of inside information. It is the individual’s responsibility to be familiar and comply with applicable laws and other regulations in force from time to time.

The existence of any and all potential inside information must be reported immediately to any of the Chief Executive Officer, the Chief Financial Officer, the Head of Treasury and the Chief Legal Officer. Note that such a report per se contains sensitive information and should be handled appropriately.

The person responsible for a project, transaction or circumstance to which the inside information relates is responsible for ensuring that reporting takes place in accordance with the above. The reporting shall state the type of inside information involved, the persons with access to the information (including complete personal and contact information), the capacity in which such persons have received inside information (i.e. a description of the individual’s role, function and reason for having received the information), the company in which the person is employed, and the date and time when the individuals in question obtained access to the information.

More detailed information can be found in the latest version of “the Information Policy” and “the Insider Policy” adopted by the Board.



### 3.7. Whistleblowing

BBAB has a whistleblowing process to allow Employees or other categories of persons associated with BBAB<sup>5</sup> (the “Reporting persons”) to report irregularities. If a Reporting person discovers behaviours that could be unethical or illegal, they should report these observations.

Procedures for reporting of breaches/Whistleblowing can be found on BBAB’s intranet and BBAB’s webpages.

The type of issues that can be reported through the whistleblowing system include (but are not restricted to) the following: breaches of laws and regulations, fraud and false documentation, violations of workplace safety and violations of environmental rules.

More detailed information can be found in the latest version of “the Managing of events of material significance policy and instruction” adopted by the Board.

### 3.8. Remuneration

BBAB has a clear policy, instructions and processes which secures sound remuneration structures within the business. The Remuneration Policy is in agreement with and promotes an effective risk management, thus preventing excessive risk-taking.

Furthermore, the Remuneration Policy is designed to ensure that remuneration to individual employees does not counteract BBAB’s long-term interest and therefore no variable remuneration is paid. BBAB believes in and promotes a sound and dynamic culture as a means for achieving long-term success and encourage performance, equality, the right behaviour and balanced risk taking in line with shareholders’ expectations.

This will support BBAB’s ability to attract, develop and retain highly motivated, skilled and performance-oriented employees and will ensure that remuneration to individuals is based on gender neutral factors.

More detailed information can be found in the latest version of “the Remuneration Policy” adopted by the Board.

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<sup>5</sup> For example those applying for a job at BBAB, trainees, consultants, shareholders, Board members of BBAB and any person working under the supervision and direction of contractors, subcontractors and suppliers to BBAB.

### 3.9. Human rights

At BBAB, all Employees must have the same rights, obligations and opportunities in everything related to the workplace, regardless of gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age.

Neither can discrimination occur in relation to business partners, customers and suppliers or others with whom BBAB comes into contact. Offensive or derogatory behaviour is not accepted within BBAB and work actively with zero tolerance for harassment and sexual harassment.

Discrimination, harassment and abuse can cause great suffering for the people affected. It also hinders positive development of the Company and, in the long run, the development of the organisation as a whole. It is therefore of utmost importance to mark that these behaviours are not allowed at BBAB and that Employees take responsibility for and act when he or she see behaviours that cross the line.

All forms of harassment and abusive discrimination are unacceptable at BBAB. Should this still occur, there are routines for investigation and action. Reporting must be done to the nearest manager or Human resources department.

More detailed information can be found in the latest version of “the Sustainability Policy” adopted by the Board.

### 3.10. Personal finances

To protect BBABs integrity as a Banking Company, it is important that Employees manage their personal finances in a responsible manner and avoid engaging in risky transactions that may create a conflict of interest, a perception of impropriety, or carries a risk of jeopardising the Company's integrity or reputation.

Further, BBAB's Employees shall not have side assignments that can reasonably affect their ability to perform their duties. All Employees shall report their external side assignments in connection with the beginning of the employment to his/her manager before they are obtained. BBAB's Chief Executive Officer or his assignees shall approve external directorships and side assignments. The Legal department is responsible for keeping an updated register over relevant side assignments.