

# Supplier Code of Conduct

## INTRODUCTION

Nordnet's long-term goal is to make our customers the best investors they can be. We coach and inspire through information, guidance, social investment networks and a variety of digital advisory services. We provide user-friendly, fast and reliable tools and applications in order for our customers to make smart investment decisions.

We recognize the importance of responsible investment, and sustainability plays a major part in the way we build long-term business success. We are committed to high standards of ethics and sustainable business practices as well as respect for human rights, fair and safe working conditions, and we expect the same from our suppliers.

Nordnet believes that strong relationships with suppliers, built on transparency and a common understanding of overall objectives, enable fact-based decision making, innovation and growth. Ethical behavior is a prerequisite for such relationships to develop.

We expect all suppliers and business partners to understand and comply with the Code, and we encourage all suppliers to promote these standards throughout their supply chain. We reserve the right to make periodic information requests of suppliers to substantiate their compliance with the Code and upon receiving reasonable notice, either give access to relevant premises or documentation to verify compliance with the Supplier Code of Conduct (the "Code").

In case of failure to meet our expectations as reflected in the Code, Nordnet's approach is to primarily encourage improvement. Critical deviations or repeated unwillingness to make improvement, however, may jeopardize the supplier's relationship with Nordnet.

The Code outlines the minimum requirements that apply to all business relationships between Nordnet and its suppliers. The standards set out in this code are based on the UN Global Compact's ten principles and reflects the expectations that we hold for our suppliers.

## Who is the Code for?

This Code applies to all suppliers of Nordnet (that includes any company within the Nordnet Group) in their dealings with Nordnet through a contractual agreement. All suppliers are individually responsible for understanding and complying with the Code.

## Compliance with Code and Laws

Suppliers must comply with all laws and regulations applicable to its business as well as the requirements set out in this Code.

In cases where the Code sets higher standards or tougher rules than those in applicable laws or regulations compliance with the Code is still mandatory.

## Reporting compliance concerns

Suppliers must ensure that every employee has the right to raise concerns about potential breaches of the Code or other policy documents without fear of reprisals.

Suppliers are encouraged to maintain a secure whistleblowing system and must not tolerate any form of retaliation against anyone who in good faith submits a report of an alleged violation.

## LABOR STANDARDS AND WORKING CONDITIONS

### Minimum age requirements

The supplier must not engage in, or benefit from, the use of child labor.

### Freedom of association and collective bargaining

Suppliers must respect the right of employees to form, join (or not to join) trade unions and bargain collectively. If the right to freedom of association and collective bargaining is restricted by local laws and regulations, suppliers must allow alternative forms of worker representation.

### Non-discrimination

Suppliers must commit to treating all employees and job applicants equally and fairly. Suppliers must establish an environment where everyone is treated with respect and dignity, and not tolerate discrimination, harassment, or bullying of any kind in the workplace.

### Labor conditions and forced labor

Suppliers are expected to have written agreements with their employees. Suppliers must comply with applicable legislation regarding working hours and rest rules. Suppliers must pay employees wages and benefits that meet or exceed the legal minimum standards, collective bargaining agreements or appropriate prevailing industry standards.

Suppliers must not engage in slavery related activities or exploitation, including forced, coerced, bonded, or compulsory labor and human trafficking.

### Human Rights

Suppliers are expected to support and respect the protection of internationally proclaimed human rights; and make sure that they are not complicit in human rights abuses.

## INFORMATION PROTECTION

### Intellectual Property and confidential information

Nordnet expects suppliers to properly handle sensitive information, including confidential, proprietary and personal information. The Supplier must only use information for the purpose which it was provided. The supplier must respect the intellectual property of Nordnet as well as others.

### Privacy

Suppliers must protect the privacy of employees, business partner representatives, and other individuals, and process personal data lawfully, fairly, and transparently. Suppliers must take all reasonable steps to ensure their personal data is accurate and up-to-date, protected by appropriate standards of security and confidentiality, and deleted when retention is no longer necessary. Data breaches must be reported to the relevant national authority in accordance with applicable laws.

## BUSINESS ETHICS

### Anti-bribery and anti-corruption

We do not tolerate any forms of bribery and corruption. Suppliers must perform their operations in accordance with all applicable laws and regulations. Suppliers must not seek, accept, or retain business advantages based on illegal or improper behavior. An adequate management system for the prevention of corruption should be maintained.

### Trade sanctions

Suppliers must ensure that its business practices are in compliance with applicable trade sanctions regulations.

### Conflict of interest

Suppliers should strive to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in its dealings with Nordnet. If there are any situations of actual or potential conflict of interest between the personal interests of those involved and the interests of Nordnet, the suppliers is expected to report this to Nordnet.

### Fair competition

Suppliers must respect and comply with all laws and regulations designed to promote fair and healthy competition and not enter into discussions or agreements with competitors concerning pricing, market sharing, or other similar activities.

## ENVIRONMENT

### Protecting the environment

Environmental sustainability is an important factor in long-term business success, and suppliers must ensure they comply with all applicable environmental laws, regulations and standards. Nordnet expects the supplier to reduce negative environmental impact through a proactive and systematic approach.

### Limiting environmental impact

The operations of suppliers should be conducted in a manner that limits the possible negative impact on the environment. This includes looking for opportunities to reduce energy, greenhouse gas emissions, and waste, and considering the environmental impact of business decisions. Suppliers are encouraged to (i) manage and recycle waste, (ii) measure and follow up on environmental performance, processes, products and services, (iii) reduce environmental impact from transportation whenever possible, and (iv) prioritize energy from renewable sources.