Code of Conduct

Do the right things
and do things right

B2HOLDING®

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"As B2Holding Group employees, we are all responsible for ethical behaviour & compliance"

- Erik J. Johnsen,
CEO B2Holding Group

WE DO THINGS RIGHT

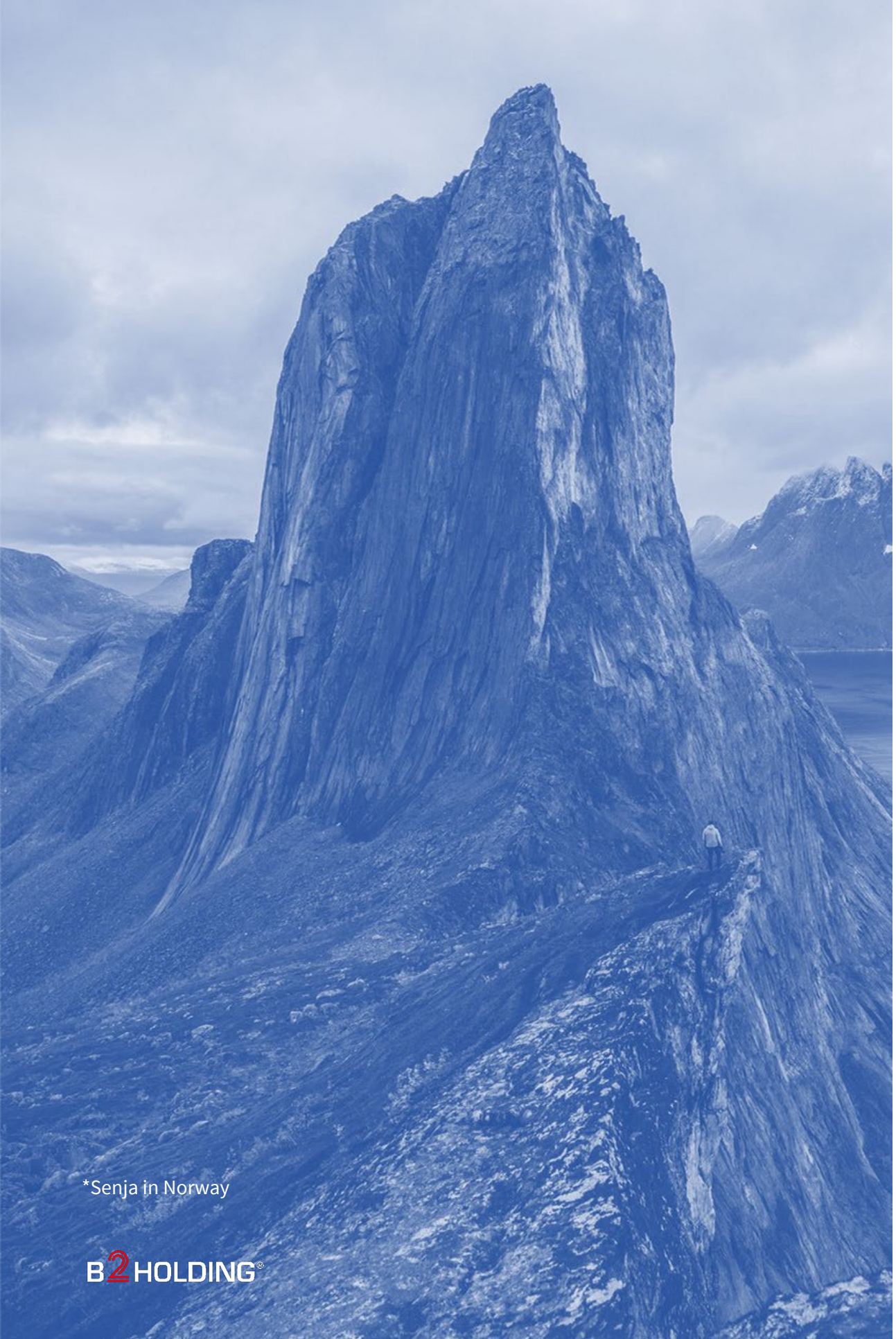
The B2Holding Group has a valuable reputation as a solution-oriented and trustworthy player within the debt collection industry. Honesty and fairness are fundamental principles in our way of doing business and we are recognised for respecting our customers and business partners.

The Code of Conduct supports these fundamental principles of B2Holding and is our foundation for building and sustaining professional and long-term relations with our stakeholders and maintaining high ethical standards in every decision made.

As B2Holding Group employees, we are all responsible for ethical behaviour, compliance, and making sure that we follow the laws, regulations, and ethical practices that apply to our jobs and our business.

By following the B2Holding Group's Code of Conduct in your daily work and by speaking up when misconduct is witnessed, you are an important contributor to ensure our business is conducted in a responsible and sustainable way.

Erik Just Johnsen
Chief Executive Officer



WE MAINTAIN

High ethical standards

Although we operate in many different countries, which have different laws, regulations and local customs, we want to conduct our business according to the highest ethical standards, no matter where we are from.

Therefore in B2Holding we expect all the Employees to:

- comply with the Code of Conduct,
- maintain high ethical standards in all decisions made,
- perform their duties and obligations with honesty, integrity and professionalism,
- be transparent in their actions and communications,
- put the corporate values above the desire for personal benefits,
- admit their mistakes and faults and ensure their prompt rectification,
- respect and comply with the policies and procedures of the Group.

Managers are additionally expected to:

- set the tone at the top,
- act as role models and lead by example.

Our standards in a workplace

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WE CARE ABOUT

An equal and diverse workplace

We are committed to provide a fair, professional and safe workplace environment.

We aim to be a workplace where all employees thrive and are given equal opportunities for professional development.

We are committed to equality, diversity and to a culture that is free from discrimination including all unequal treatment, exclusion or preference based on race, gender, age, disability, sexual orientation, religion, political views, national or ethnic origin or any other characteristic that results in compromising the principle of equality.

What this means to you:

- Treat everyone with respect, fairness and dignity.
- Develop good relationships and be supportive to your colleagues.

WE CARE ABOUT

Data protection and privacy

We are committed to protecting personal data and respecting privacy.

Every reasonable step is taken to maintain data accurate, adequate, relevant and limited to the purpose for which they are processed.

We will only use personal data for appropriate purposes. Personal data will be processed in accordance with our Privacy Policy based on the General Data Protection Regulation (GDPR) and other applicable legislation.

What this means to you:

- You are allowed to access or share personal data only if you are authorised and to the extent necessary for performing your duties.
- You must follow information security guidelines provided by B2Holding, incl. participation in direct trainings and eLearning.
- You are obliged to immediately report any incidents of information security or personal data breaches you notice.

WE DO NOT TOLERATE

Harassment and bullying

We do not tolerate any verbal or physical conduct that harasses others, disrupts others work performance or creates a hostile work environment.

We want everybody, at all times, to feel respected and welcome.

What this means to you:

- We expect you to treat everyone you meet through work or work-related activities in a respectful manner.
- Do not engage in harassment, bullying, workplace violence or other behaviour that may be regarded as threatening or degrading.
- Respect other people's customs or culture.
- Offensive messages, belittling remarks and inappropriate jokes are not acceptable.

WE DO NOT TOLERATE

Alcohol and drugs in the workplace

We do not tolerate the use of alcohol nor drugs at any time in the workplace.

We are committed to assure an alcohol and drug free workplace to our employees. We do not tolerate any substances that might threaten the healthy and safe environment and negatively affect how employees perform their jobs.

At events and trips organized by the company, one should show moderation and caution when using alcohol, and other intoxicants are not accepted.

What this means to you:

- Never work under the influence of drugs or alcohol.
- Report drug violations and suspicious behavior or activity.

Our standards towards the market and business partners

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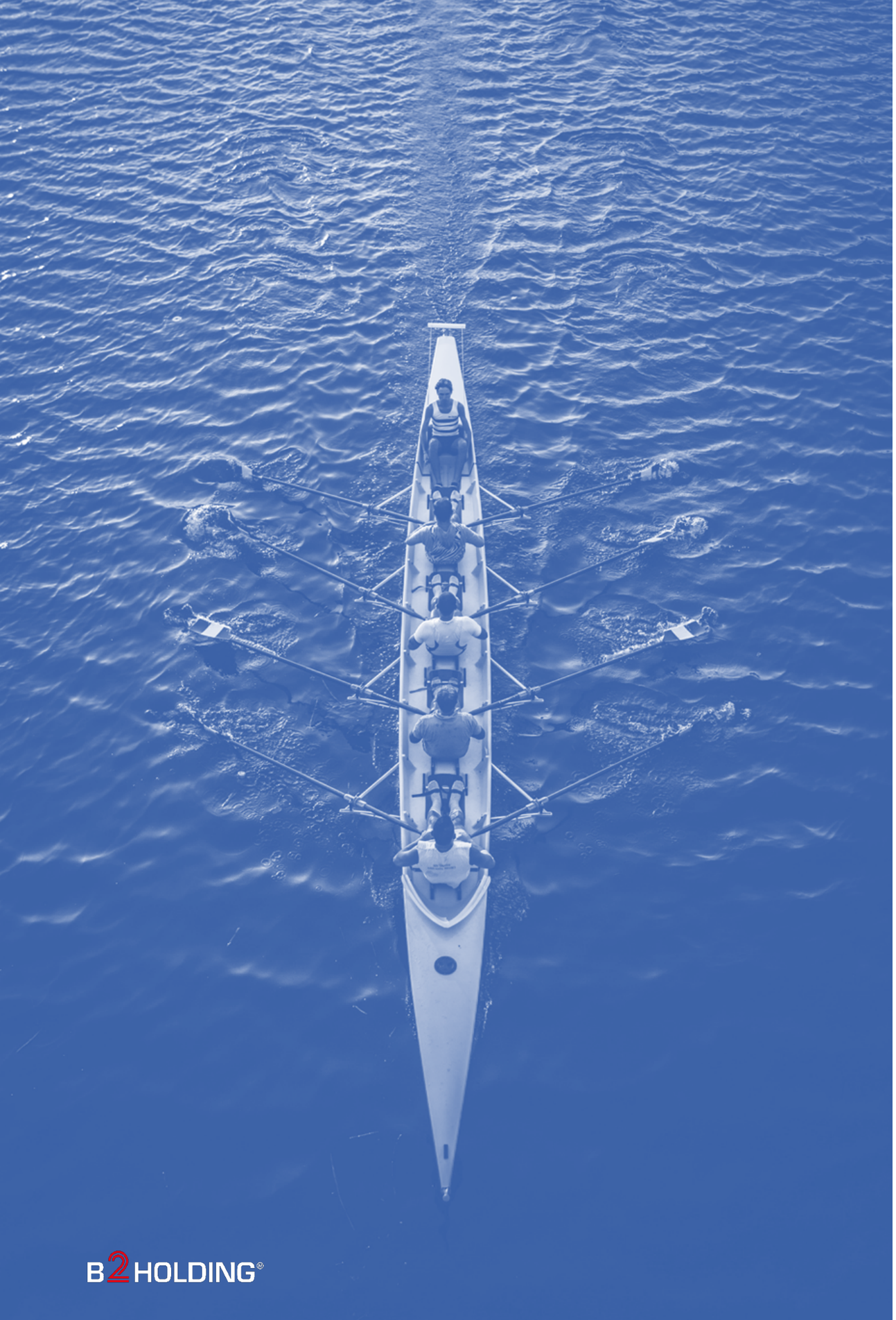


WE CARE ABOUT

Fair competition

We support a competitive marketplace, respect and adhere to fair competition.

We will not engage in or tolerate anyone who engages in anti-competitive behaviour, such as price fixing, bid rigging, market sharing or abuse of market power.

We expect full compliance with applicable antitrust and competition laws.

What this means to you:

- You should not slander B2Holding competitors, instead – focus on our superior services.
- You are expected to obtain competitive advantage only through fair and lawful means.

WE DO NOT TOLERATE

Illegal/unethical benefits nor gifts

We do not offer benefits or gifts, whether directly or through intermediaries, to any customer, supplier, business partner or stakeholder, which is in violation of applicable laws or ethical standards.

Likewise, we do not accept gifts, benefits or entertainment, whether directly or through intermediaries, that may be regarded as an attempt to improperly influence a business decision and that could affect the objectivity and professional judgement in our work.

What this means to you:

- Do not offer or accept payment, gifts, travel or hospitality in return for a favorable decision or business advantage.
- Consider how an acceptance or offer will be perceived by others and never offer or accept anything that is or could be perceived as an improper advantage.
- Make sure that any acceptance and offering of hospitality is open, transparent and accurately documented.

WE DO NOT TOLERATE

Bribery and corruption

We act honestly without corrupt influences. We expect the same from third parties cooperating with B2Holding.

We do not tolerate any form of bribery or corruption as they are illegal and remove objectivity from the decision-making process.

What this means to you:

- Never engage in, authorize or tolerate corruption.
- Do not offer or accept an improper advantage. An improper advantage is an advantage that has no legitimate business purpose for B2Holding and is given to influence the recipient's decision-making.

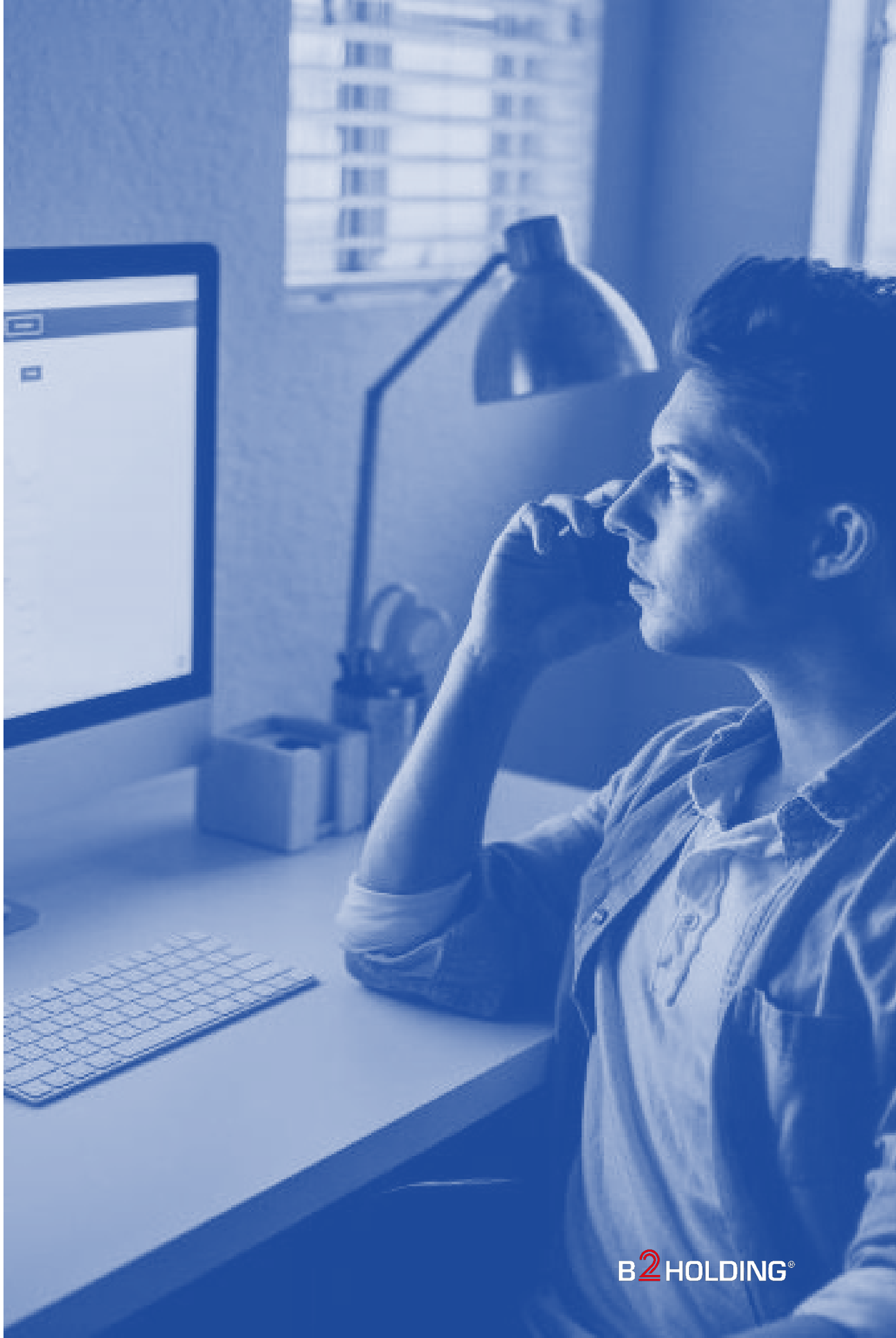
WE DO NOT TOLERATE

Conflict of interest

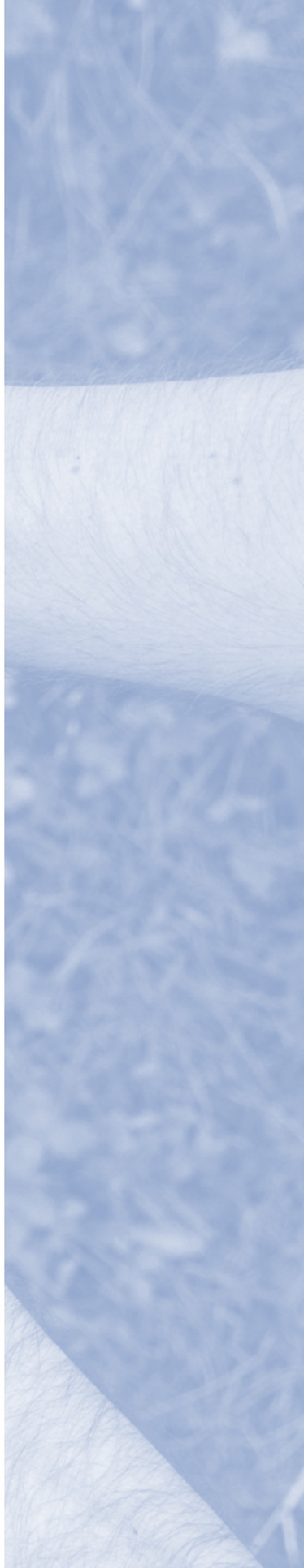
In B2Holding, business decisions are based on the best interests of our Group, without regard to personal benefit, relationships or considerations. We act ethically and never use our association with B2Holding for personal gains.

What this means to you:

- Confidential information must not be revealed to competitors or used for own business.
- Do not favor family members/close friends over other candidates or employees.
- Do not accept secret payments/benefits that could favor certain suppliers/services.
- Be open, disclose and discuss with your manager any situation that might lead to an actual or perceived conflict of interest.



Our standards towards our communities and the environment



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WE CARE ABOUT

Communities and the environment

We strive to minimize the overall environmental impact and carbon footprint with the same level of respect and fairness that we treat our stakeholders.

We contribute to the society: from playing a vital part of the credit ecosystem, to local initiatives by employees contributing to a large extent in local care-taking projects, and financial support to organizations for children and underprivileged groups in the communities where we operate.

What this means to you:

- You are expected to support CSR actions initiated by B2Holding and your local company.
- You are expected to avoid printing unnecessary documents and use electronic versions where possible.

WE DO NOT TOLERATE

Political or religious involvement

We observe strict neutrality regarding political and religious interests, therefore neither the names nor resources of B2Holding shall be used to promote such interests. This however does not conflict with the respect we have towards the diversity appearing in the personal religious and political beliefs of our employees.

What this means to you:

- Company funds shall not be used to financially support any political party or religious associations.
- Do not use B2Holding devices, such as copy machine to multiply advertising leaflets or similar for political or religious associations.

Our standards towards our investors and co-investors

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WE CARE ABOUT

Our investors' and co-investors' interests

We service portfolios in an efficient and professional manner, and we place emphasis on being more productive and effective every day to provide excellent results.

We aim at long business relationships. We cooperate, show initiative and are dedicated. We incorporate an agile approach and aim for excellence.

What this means to you:

- You are expected to be productive at work and strive for best results.
- You are dedicated at work and show initiative by coming up with ideas helping the business to grow.

WE DO NOT TOLERATE

Trading on inside information

Trading on inside information is illegal. Also it is not fair to buy or sell securities based on material non-public (“inside”) information we may know about because of our jobs with the Group. We comply with the law and believe everyone should make investment decisions based on the same rules and level of knowledge. Tip off others so that they may trade is also illegal and not tolerated by the Group.

What this means to you:

- If you have information about a specific event (non-public, confidential) that may influence the value of the company’s stock, it is illegal to advise people to trade shares (buy or sell) in advance of such information becoming publicly known.
- You are obliged to familiarize yourself with and follow the “Instructions for handling inside information”.

How we handle misconduct

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WE CONSULT

When we are in doubt

If you are in a complex situation where it is not clear to you what action you should take, ask yourself the following questions:

- Is my action consistent with the Code of Conduct as well as with ethical and professional standards?
- Does my action comply with B2Holding policies and applicable laws or regulations?
- Do I have enough information to make the right decision?
- Have I identified/considered other options/alternatives?
- Am I capable of making an objective decision or should I consult it?
- Would I be comfortable with my action if it was made public?
- Would I be able to defend my behavior/action successfully, if it was questioned later by my manager?

If the answer to any of these questions is ‘no,’ or you are in doubt, consult with your direct manager, local or Group Compliance Function, or someone else in the company that you trust.

WE REACT

When we witness misconduct

When a misconduct, wrongdoing, violation of our Code of Conduct, policies, regulations or laws is witnessed, or whenever we have serious concerns about behaviors or business practices that make us feel uncomfortable in terms of the accepted standards, we are all responsible for reporting them.

Report either …

- directly to your local Compliance Function and to your leader or another manager that you trust,
- via email.

CODE OF CONDUCT

For additional material or guidance, contact your local compliance officer or look at internal rules in the Knowledge library on B2Gether.

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