

Dokumentnamn	Anti-corruption policy		
Dokumentägare	Fastställd av	Datum	Ersätter dok. daterad
<i>General Counsel</i>	<i>Board of Directors</i>	<i>2023-09-13</i>	<i>2023-05-05</i>
INFORMATIONSKLASS ALLMÄN	Relaterade styrdokument		Publ. Intranät/webb
	<i>Anti-corruption instruction</i>		Yes

Table of content

1.	Introduction.....	3
1.1	Background and purpose	3
1.2	Legal basis	3
2.	Definitions.....	3
3.	Organization and areas of responsibility.....	4
3.1	The Board.....	4
3.2	Chief Executive Officer	4
3.3	General Counsel	4
3.4	Compliance Function.....	4
3.5	Respective manager in charge.....	4
3.6	Employees, external parties and contractors.....	4
4.	Bribery and corruption	5
4.1	General points of departure	5
4.2	Risk analysis.....	5
5.	Prohibitions and principles.....	5
5.1	Collector Bank's position.....	5
5.2	Principles for receipt of benefits	6
6.	Code of conduct.....	7
7.	Control of overvaluation and evaluation of intermediaries	7
8.	Training and information.....	7
9.	Whistleblowing.....	7
10.	Internal reporting	7
11.	Follow-up and approval.....	8
11.1	Follow-up	8
11.2	Updating and approval.....	8

1. Introduction

1.1 Background and purpose

Collector Bank AB and its branches, jointly referred to as “Collector Bank” or “the bank”, has a responsibility to introduce, apply and maintain suitable internal regulations and guidelines, designed to be able to effectively avoid risks of corruption and to discover corrupt behaviours.

The purpose of this policy is to ensure compliance with Collector Bank’s position against bribery and corruption as presented by Section 4.1 and to ensure that Collector Bank has a good and effective handling of corruption risks, suitable measures to be able to prevent I these risks and to create a culture against and awareness about corruption.

The policy covers Collector Bank’s entire business and all employees and shall also be applied in case Collector Bank has commissioned an external party or contractor to carry out a part of the business.

1.2 Legal basis

This policy is prepared in accordance with the following external regulations:

- Code to Prevent Corruption in Business (“The Business Anti-Corruption Code”), which supplements the Swedish Penal Code (1962:700) penal regulations on bribery in Chapter 10, Sections 5a-e.

2. Definitions

Benefit – find a definition in section 5.2.1.

Conflicts of interest – Situations or circumstances on the part of Collector Bank that entail an interest in Collector Bank or representatives of Collector Bank acting in conflict with the interests of Collector Bank or Collector Bank’s customers. This can occur in the relationship between different customers, due to different relationships between Collector Bank and its customers or in the relationship between representatives of Collector Bank and Collector Bank.

Situations or circumstances on the part of Collector Bank shall be viewed in a broad sense and include its owners, Board of Directors, individual Board members, management and other employees, contractors, cooperative partners and other actors with direct or indirect connections to Collector Bank, such as e.g., Group companies and other related companies. For more detailed information, refer to Collector Bank’s *Policy for the handling of conflicts of interest*.

Corruption – Abusing one’s position to achieve undue advantage for one’s own gain or that of another.

Intermediaries – Parties who have been appointed to represent Collector Bank for a certain matter and to whom Collector Bank provides money or other assets. Intermediaries can be, for example, agents, consultants, representatives, subsidiaries, brokers, business brokers, suppliers or external actors that mediate in transactions with Collector Bank.

Bribery – Giving or receiving a gift or benefit to achieve an undue advantage for oneself or another.

Nepotism – A favouring of friends or relatives for e.g., various assignments or positions, without considering merits.

3. Organization and areas of responsibility

3.1 The Board

The board is responsible for Collector Bank's business and has the overall responsibility for Collector Bank's internal control and governance. The responsibility requires the Board to combat corruption.

3.2 Chief Executive Officer

The CEO is responsible for the operating activities and for ensuring that internal regulations to combat corruption are implemented and applied in the business.

The CEO shall issue instructions that more closely describe issues and give examples of gifts and benefits that can occur in Collector Bank's business.

3.3 General Counsel

General Counsel is responsible for:

- Implementing and documenting the risk analysis regarding corruption risks that are presented in Section 4.2 below.
- Ensuring that a system for the implementation of the preventive measures presented in Section 4.2 is in place.
- Administering registers of given, offered or unaccepted gifts and benefits.
- Ensuring that there is training for employees and new hires with regard to this policy.
- Preparing and implementing instructions that describe in more detail issues and provide examples of gifts and benefits in accordance with Section 5.2.1.
- Ensuring the check and evaluation of intermediaries in accordance with Section 7.
- Providing continuous support and advice in the event of questions or ambiguities that arise due to Collector Bank's internal rules against corruption.

3.4 Compliance Function

The Compliance Function is responsible for:

- Controlling regulatory compliance to this policy according to Section 11.
- Providing advice and support in connection with the implementation of the risk analysis that is to be carried out according to Section 4.2.

3.5 Respective manager in charge

The respective manager in charge is responsible for:

- Fulfilling obligations regarding the registration of gifts and benefits according to Section 5.2.2.
- Ensuring that employees have performed training according to Section 8.
- Manage employees violation of this policy or instruction regarding anticorruption according to Section 5.1 with support from Collector Bank's HR-department.

3.6 Employees, external parties and contractors

All employees within Collector Bank, external parties and contractors to Collector Bank are responsible for learning the information in this policy and acting based on internal rules against corruption, see section 5.1. In addition, all employees within Collector Bank are responsible for

attending the training required according to this policy upon new employment and annually, see section 8.

4. Bribery and corruption

4.1 General points of departure

Corruption can arise in many different kinds of situations, such as the giving and receiving of bribes or use of one's influence in an improper manner, but also in the form of nepotism, in connection with conflicts of interest and in the public sector. Collector Bank has zero tolerance for bribery and corruption and has an obligation to prevent and combat bribery and corruption through both active and passive efforts. By implementing and applying suitable and effective internal procedures to prevent and combat corruption and bribery, Collector Bank ensures that its business is conducted in an ethically satisfactory way with the aim of maintaining the public's trust in Collector Bank and the financial market and in order for the business to be considered as sound and responsible.

4.2 Risk analysis

Collector Bank shall annually or when necessary, conduct risk analyses that specifically pertain to the corruption risks that Collector has. The focus of the risk analysis shall be to analyse:

- What corruption risks there are for Collector Bank and within which parts of its business
- Consequences if a risk is realized
- Any deficiencies in how the identified corruption risks are managed

Based on the results of the risk analysis conducted, Collector Bank shall take suitable actions and measures to prevent the risk of corruption.

5. Prohibitions and principles

5.1 Collector Bank's position

Collector Bank has zero tolerance for bribery and corruption. It is prohibited to offer, promise or give and to request, accept a promise of or accept a bribe. Every person covered by this policy is responsible for avoiding all situations where a gift, representation or other benefit can influence his or her work or damage Collector Bank's reputation or standing.

If an employee, contractor or somebody else who is covered by the policy is involved in bribery and/or corruption, or in some other way violates this policy or Collector Bank's instruction on anticorruption, disciplinary measures and, if appropriate, legal processes will be initiated against them according to the applicable external or internal regulation.

Every person covered by the policy must:

- Assess if a gift, benefit or other invitation can influence the person's work or behaviour.
- Always turn down a gift or benefit if there is uncertainty whether the gift or benefit is permitted.
- Inform his or her immediate manager if the person has received, wants to give or has turned down a gift or benefit.
- Have knowledge of gifts and benefits that due to their nature are entirely prohibited to give or receive.

5.2 Principles for receipt of benefits

5.2.1 What is a benefit?

A benefit must be of value to the recipient. Examples of benefits are cash, gift cards, goods and services, discounts, travel, invitations, loans of money or things, event tickets, sponsorship, commission, employment or engagements, priority in a queue or a prestigious award.

To be assessed as a benefit according to this policy, it must be given to an employee or contractor by somebody other than the employer or client. A company discount for the company's employees is accordingly not to be considered a benefit according to this policy. It must also be something that the employee or contractor would have borne the cost of him- or herself.

The giving of benefits covered by this policy must be connected to the performance of an employee's work or a contractor's engagement.

A benefit can be given directly to an employee or contractor but can also be given to somebody else or through somebody else, such as a relative of the employee or the contractor.

Things of insignificant value that occur in normal work-related interaction, such as coffee and cakes in connection with a work meeting, are not counted as a benefit and this therefore falls outside this policy's area of application.

5.2.2 Giving or receiving gifts and benefits

A benefit is impermissible if it influences or risks influencing the recipient's decisions or ways of performing their duties. See further guidance in current version of the CEO instruction.

For benefits that are not automatically impermissible according to the CEO Instruction, there are fundamental requirements for determining if a gift or benefit can be considered to be acceptable. These benefits shall be tested against the requirements of openness and moderation as indicated below.

Collector Bank shall have a register through the document owner where given and offered gifts and benefits are registered. Gifts and benefits that have not been able to be accepted shall also be entered in this register. The respective manager in charge is responsible for reporting gifts and benefits to the document owner for registration in accordance with the applicable instructions. The register shall be updated on a yearly basis.

5.2.3 Openness

If benefits are given, they must be given openly. This means that a benefit shall normally be directed straight at the other company, be approved by the company or be in accordance with the bank's established benefits policy. Within the framework of the requirement of openness, an employee or a contractor must also inform his or her immediate manager if he or she has received, wants to give or has turned down a gift or benefit.

5.2.4 Moderation

The gift or benefit shall be modest, which means that the benefit may not appear to influence the behaviour of the recipient. The benefit's financial or personal value must accordingly be put in proportion to the person's integrity and the impact in the specific situation, whereby factors, such as authority, position, duties, age and experience can constitute a part of the comprehensive assessment that is to be done, but also in relation to the occasion of the giving/receiving of a benefit and the relevance to business.

6. Code of conduct

In case there is ambiguity or uncertainty if a benefit is permitted, the person concerned must either turn it down immediately or, before it is accepted, consult or defer the assessment to his or her immediate manager. If this is not suitable due to the nature of the situation, or uncertainty regarding interpretation or application of the regulations in this policy, the person concerned must instead consult the General Counsel. When the General Counsel finds it appropriate, issues shall be escalated to Collector Bank's Ethics Committee. For more detailed information, refer to Collector Bank's *Instructions for the Ethics Committee*.

7. Control of overvaluation and evaluation of intermediaries

The document owner shall at all times have processes and procedures that are current and adapted based on the business, complexity and risk level to evaluate the risk of corruption in relation to intermediaries. Examples of such procedures are the evaluation of how and in what contexts intermediaries are selected, the evaluation of intermediaries as suppliers and the evaluation of compensation models for them. In the event of uncertainty regarding interpretation or application, the person concerned shall consult the General Counsel. When the General Counsel finds it appropriate, issues shall be escalated to Collector Bank's Ethics Committee. For more detailed information, refer to Collector Bank's *Instructions for the Ethics Committee*.

8. Training and information

Upon new employment, every employee is obliged to go through this policy and Collector Bank's Code of Conduct; these documents are also available on Collector Bank's intranet. New employees shall undergo training in anti-corruption and the Code of Conduct in connection with the beginning of employment. These courses are mandatory and, besides new employment, shall be carried out annually by all employees. Further courses shall be taken as necessary and based on a risk-based approach. When necessary, Collector Bank's intermediaries shall also receive training in Collector Bank's internal regulations regarding corruption and bribery.

9. Whistleblowing

Through Collector Bank's systems and procedures for whistleblowing, one can report suspicions of bribery and corruption. Further information is in the *Whistleblower policy*.

10. Internal reporting

The document owner shall when necessary or at least once a year report the following to the Board of Directors:

- The results of the risk assessment that is to be performed according to Section 4.2.
- Status of implementation and compliance to this policy and associated instructions.

In addition to this, the document owner shall immediately report to the CEO major shortcomings or incidents linked to this policy. The document owner shall share the content of the internal reporting with the Compliance Function.

11. Follow-up and approval

11.1 Follow-up

The Board of Directors bears utmost responsibility for the bank's business and is thereby also ultimately responsible for the business being conducted in accordance with this policy. Everyone covered by this policy is also responsible for compliance with the policy.

The Compliance Function is responsible for ensuring that follow-up and control of compliance with this policy are performed.

11.2 Updating and approval

This policy shall be reviewed and approved by the Board of Directors at least once annually or more regularly if needs arise. The General Counsel shall ensure that the policy is correct and follows internal and external regulations. The General Counsel shall also ensure that the policy is prepared for the Board's approval at least once annually.