

## Business Partner Code of Conduct

### 1. INTRODUCTION

B2Holding ASA and its subsidiaries (jointly referred to as “**B2Holding**” or the “**Group**” and local subsidiary referred to as “**Business Unit- The Company**”) are committed to be a “trusted and innovative partner that actively re-shapes the credit management industry in all markets” where the Group operates.

B2Holding acts in accordance with its Code of Conduct and Policies, which outline the core values of the Group. In particular, when conducting business with **Business Partners**, B2Holding is committed, among others:

- To comply with applicable laws, regulations, policies, and procedures,
- To act with integrity and openness,
- To demonstrate fairness and transparency in its dealings with individuals and organisations,
- To disclose any perceived or real conflicts of interest,
- To encourage fair and open competition while seeking value for money and innovative solutions,
- To adopt procurement processes to make it easy to do business,
- To protect and prevent the release of commercial-in-confidence information,
- To not seek, or accept, any financial or non-financial benefits from potential, current or past Business Partners,
- To respond to reasonable requests for advice and information, including tender debriefings and
- To investigate complaints.

B2Holding expects its Business Partners to operate with comparable values and to conduct their business in an ethical manner and act with integrity.

### 2. PURPOSE, SCOPE AND APPLICATION

The Business Partners Code of Conduct (referred to as the “**Code**”) outlines the ethical standards, principles and behaviours the Company expects from its Business Partners when conducting business with or on behalf of the Company.

### 3. NOTIFICATION, BREACH REPORTING AND NON-COMPLIANCE

This Code shall be made available to all Business Partners. The Company expects all Business Partners to comply and ensure compliance with all the values outlined therein while conducting business with or on behalf of the Company.

Business Partners shall promptly inform their Company contact or a member of B2Holding Management/ The Company Management about any breach of this Code and/or about any corrupt, illegal or unethical conduct.

Business Partners can report identified or suspected irregularities using B2Holding's Whistleblowing channel which can be accessed on: <https://report.whistleb.com/b2holding>.

The Company reserves the right to take measures in order to verify a Business Partners' compliance with this Code. In case of non-compliance with this Code, or demonstrated corrupt, illegal or unethical conduct, B2Holding/ The Company reserves the right to seek corrective actions.

Non-compliance with this Code may lead, among others, the Company:

- To not enter into a business relationship with the Business Partners,
- To suspend or terminate the existing agreements or contracts with the Business Partners,
- To initiate an investigation and/or
- To refer or report the case to the competent authorities.

### 4. DEFINITIONS

**Business Partners** – includes Vendors, Clients, Suppliers, Investors, and more generally any third party with which B2Holding/ The Company does business.

**Clients** – companies (primarily banks and financing companies, but also telecom operators, retail and utility companies) to which The Company is providing debt related services, acting on their behalf.

**Employees** – all B2Holding directors, officers, staff, temporary workers, interns, consultants, contractors or any other persons who are or were employed by a Business Unit or otherwise works or worked for B2Holding/ The Company, regardless of the duration of their employment contract, the type of relationship or geographical location.

**Investors** – financial entities co-investing in debt portfolios together or in cooperation with B2Holding.

**Suppliers** – any natural or legal person and their employees, agents, representatives and subcontractors who supply goods and services to B2Holding/ The Company.

**Vendors** –companies (primarily banks and financing companies, but also telecom operators, retail and utility companies) selling debt portfolios to B2Holding/ The Company.

## 5. BUSINESS PARTNERS' EXPECTED VALUES

The Company expects its Business Partners to comply with all legal and regulatory requirements regarding ethics including, among others:

### Compliance with Laws

Business Partners shall comply with all applicable laws, rules, and regulations of the jurisdictions in which they operate.

### Money laundering, corruption and other fraudulent action

Business Partners shall be neither fictitious, nor involved in money laundering crime or corruption activities, nor included on any sanctions list/s or black list/s by trade organisations, consumer rights protection authorities or similar organisations for providing non-serious business.

### Unfair and abusive practices

Business Partners shall use fair pricing practices or charge fee or interest that are comply with the local laws. The Business Partners shall neither use lending terms that can be regarded as offensive, abusive or deviate from market rates, offer consumer loans with a short duration against a high interest rate, nor pursue aggressive sales or lending methods for their products or services in a way that can be considered unfair.

### Gifts, hospitality and other benefits

Business Partners shall not at any time offer or provide any inappropriate financial or non-financial benefits to the Company **Employees**. The Company Employees are not authorised to request inappropriate financial or non-financial benefits and are expected to decline such benefits.

### Conflicts of interest

A conflict of interest can arise when a person's business and private interests intersect. Private interests can include a person's own professional and financial interests, as well as past and present associations with other individuals, groups, or family. Business Partners shall immediately report to the Company any conflicts of interest, whether real or perceived.

### Confidentiality and intellectual property rights

Information provided by or collected from the Company is provided on a confidential basis, unless otherwise explicitly indicated, or the information is already in the public domain. The Business Partners shall respect and honour the Company's confidentiality and intellectual property rights.

## Personal Data

Business Partners shall conduct their activities toward the Company in compliance with the EU General Data Protection Regulation (GDPR) rules, principles and requirements.

## Workplace health and safety

Business Partners shall provide a safe work environment and integrate sound health and safety management practices into their business. They shall comply with all applicable laws and regulations relating to workplace, health, and safety.

## Labour and human rights

Business Partners shall provide a fair and ethical workplace and to make all reasonable efforts to ensure that businesses within their supply chain are not engaged in, or complicit with, human rights abuses.

## Non-discrimination and diversity

Harassment or discrimination based, among others, on race, sex, nationality, ethnicity, age, sexual orientation, religion, political affiliation, shall not be tolerated. Business Partners shall provide a workplace free of harassment and discrimination, offer equal opportunity in employment, and foster diversity in their organisation.

## Environmental sustainability

Business Partners shall minimise the environmental impact of their operations and maintain environmentally responsible policies and practices.

## 6. ROLES AND RESPONSIBILITIES

The Chief Legal, Compliance and HR Officer is the owner of this Code.

The Company CEO is responsible for ensuring the implementation and application of this Code in its Company.

## 7. REVIEW

To ensure continuing suitability, adequacy, and effectiveness of this Code, the Chief Legal, Compliance and HR Officer shall review, update and/or revise it, as appropriate, on a yearly basis.

The Sustainability Committee, the Group Internal Auditor and the Chief Brand and Sustainability Officer shall be able to make proposals to improve or to foster the adaptation of this Code, and any changes to this Code shall be made available to the Business Partners.

## Revision history

VERSION	DATE	DESCRIPTION
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1.0	16.09.2021	Approved by the Board of Directors of B2Holding ASA
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2.0	15.09.2022	Reviewed and approved by Group CLC & HRO
3.0	16.01.2023	Transpose at Company level

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