

# Code of Conduct



FCG's business is based on trust. It is crucial that we act accordingly, respecting our customers, partners, owners, authorities and other stakeholders in the community. Living our ethical values is a prerequisite for us to develop our business, attract the best experts in the financial industry and continue to be competitive in the market.

## Responsibility and scope

FCG expects all employees to be familiar with the Code of Conduct and apply its principles. We are all personally responsible for how we act - both internally and externally.

FCG's managers have a special responsibility to lead by example in ethical matters. However, the Code of Conduct applies to all employees within the FCG Group, in all companies and in all countries, as well for hired consultants and subcontractors who work for FCG or in one way or another represent FCG.

## Legislation, regulation and internal rules

Every employee at FCG must comply with current legislation and regulation, and this requires knowledge. Each employee at FCG has a responsibility to take part of and familiarize themselves with information provided by FCG and by the authorities. You are expected to seek the information and in-depth knowledge required to be able to carry out your work in a correct manner.

All employees are expected to take part of FCG's policies, instructions and guidelines and to follow them. FCG's internal rules are available to all employees on the intranet.

## Core values

We treat each other equally, and no discrimination may occur whatsoever. All employees have the same rights, obligations and opportunities in the workplace. We respect and take care of each other and abusive or derogatory behavior is not accepted.



We cherish a corporate culture that encourages gender equality, diversity and inclusion.

We work actively with our core values and how we apply them in everyday life to create a good working environment. FCG's core values form the basis of our corporate and business culture. They are the foundation of our processes and we follow up on how well we live our values annually.

You are expected to contribute actively, through your everyday actions, to ensure that no harassment occurs and to create the culture we want at FCG.

## Work environment

All employees, individually and as a team, contribute to a good work environment. Our work environment should be welcoming and inclusive, ensuring we are all committed, appreciated and feel good at work. FCG's work environment is based upon respect, integrity and tolerance and is characterized by job satisfaction, team spirit and participation. The workplace should be safe and not expose employees to the risk of illness or accidents.

FCG does not accept that any employee acts violently or is otherwise associated with crime. We have zero tolerance for discrimination based on gender, transgender identity, ethnicity, religion or other beliefs, disability, sexual orientation or age. FCG has zero tolerance for sexual harassment.

FCG has zero tolerance for drugs. This means that all forms of handling drugs or being under the influence of drugs in the workplace are prohibited.



## Loyalty

All employees have an obligation to be loyal to FCG and to protect information that is commercially sensitive to FCG or any of its clients. The duty of loyalty also means that you as an employee must avoid situations where you risk being disloyal to, or harming, FCG. As an employee and contractor, you are expected to inform FCG about things that may be needed for the business to perform as well as possible.

All employees are expected to dedicate their entire working hours to FCG. Under certain conditions, FCG may accept that the employee has another employment, assignment or conducts business in addition to the employment at FCG. As an example this could be assignments as a board member of a company, positions of trust in non-profit associations or part-time or extra work to a certain extent. However, such ancillary work must always be approved in writing in advance by FCG.

Ancillary activities that could damage confidence in FCG, hinder work or involve promotion or participation in activities that could compete with FCG's business are never permitted.

You must always notify your line manager of any additional job you may have beside your FCG employment. The additional job must be approved in writing by your line manager.



## Business relations

Satisfied customers are the foundation of FCG's business. We strive for long-term relationships where we understand both the customer's needs and challenges and can help them achieve their ambitions. By knowing and understanding our customers well, we can offer them the best possible business delivery and be a good business partner to them, now as well as in the future.

We are always looking for a "win-win" situation

where both FCG and the customer benefits. We act professionally with all our business partners to create long-term relationships. We strive for a business relationship based on honesty and trust. We expect the same treatment from our business partners and we expect them to respect our core values.



## Business information and trade secrets

It is not permitted to use confidential or internal information for personal or anyone else's gain. This also applies if the business information is not formally considered confidential but is used in a way that can be perceived as unethical.

Information that could harm the competitive position of FCG or any of FCG's customers, should always be handled with caution and is automatically classified as confidential. Passing on confidential information to persons inside or outside FCG is prohibited. If sharing confidential information with a colleague is necessary to perform the work at hand it must be authorized by the line manager in charge of the assignment.

## Confidentiality

Respecting our customers' integrity is necessary to build strong customer relationships. Customer information is confidential. Following routines for keeping customer information secure and using customer information appropriately, is crucial. Employees within FCG may not disclose customer information to anyone who is not authorized to access it. None other than employees who need customer-related information to fulfill their work, are allowed access. It is not permitted to pass on information about a customer's circumstances to any unauthorized party. Confidentiality applies before, during and after completion of the assignment, as long as the information can be considered sensitive.

All employees and others performing services on behalf of FCG, or on behalf of an individual customer, are required to sign a confidentiality agreement. The obligation to keep information confidential applies both during and after the employee has terminated his or her employment with FCG.

## Conflicts of interest

The business should be conducted in a manner that avoids any conflicts of interest that could harm customers. If a conflict of interest cannot be prevented, it should be handled in such a way that neither party should be put at a disadvantage.

FCG's employees may not participate in customer assignments where conflicts of interest may arise relating to their private finances, a related party's finances or legal entity in which the employee or his/her family and close friends have a significant financial interest.



## Gifts

All employees at FCG must show caution and moderation when receiving or giving gifts, observing the FCG guidelines and local legislation. All employees must behave in such a way that no undue personal dependencies, obligations or debts of gratitude arise towards any supplier, customer or third party. All external representation must have a purpose related to the business. Gifts in the form of money and value checks are not accepted.

## Sustainability

FCG wants to contribute to sustainable development. Therefore, we support the UN's goals for sustainable development and Agenda 2030. Based on our analysis of where we can have the greatest impact, we have chosen four areas that we will prioritize in the short to medium term.

We work to increase awareness of the risks associated with climate change and environmental degradation within the financial services sector.

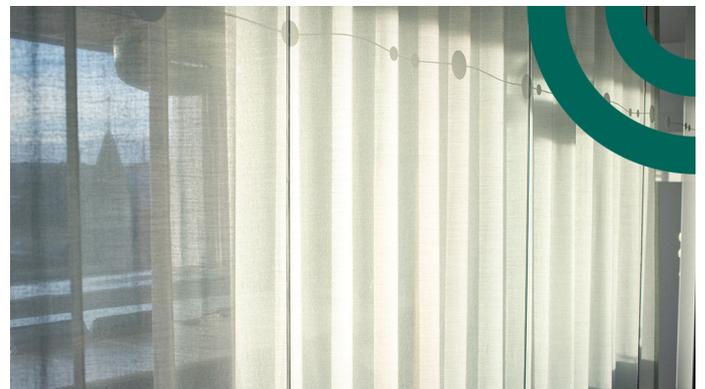
We help our customers to control and monitor the risks they are exposed to. We also help our clients detect and prevent money laundering and illegal fi-

ancial flows to organized crime and terrorist organizations. Through our work, we contribute to a more stable, efficient and healthy financial system, which in turn benefits people, companies and society.

In addition, we strive to limit our carbon footprint and our impact on the environment. We limit travel by air and encourage our employees to choose environmentally friendly transportation when travelling for professional purposes. We recycle as much as possible, choose environmentally friendly food at our events, and take environmental factors into account when choosing suppliers.

## Information via Social Media

All information shared or published via social media can have both extensive and permanent dissemination. We always think twice before we share information in social media such as LinkedIn and Facebook. We never disseminate information that is confidential, sensitive to the individual or customers or affects our agreements. When mentioning a customer or customer assignment on, for example, FCG's website, customer approval is always obtained in advance.



## Compliance with the code

The HR department at FCG is responsible for creating awareness and providing information regarding the Code of Conduct when introducing new employees. The CEO and the line managers are responsible for ensuring that the Code of Conduct is observed. Failure to comply or dubious acts that violate the Code of Conduct will not be tolerated and may, after investigation, lead to disciplinary action. This may also include situations of explicit approval of or failure to act in the event of knowledge of conduct that is expressly contrary to the Code of Conduct.