

Mysafety Code Of Conduct

Classification:	Public
Adopted by:	BoD
Date of approval:	August 1, 2016
Last reviewed:	December 20, 2024
Document owner:	CEO

Introduction

Mysafety AB 556702-9318 conducts, via its subsidiaries in Sweden and Finland and to the Norwegian market, insurance intermediation and agency. With “We” below means Mysafety Försäkringar AB, SBM Försäkring AB and Mysafety Oy as well as their respective parent companies.

A yearly revision of this document shall be conducted by the document owner, and the document shall be updated when necessary.

Summary

General strategic intentions that ensure that Mysafety act ethically in all circumstances.

Content

1. We comply with legislation, authority requirements and good practice, incl. good insurance distribution practice/good insurance practice
2. We conduct responsible business
3. We fight financial crime and grey economy – we know our customers
4. We treat information confidentially and follow data protection regulations
5. We fight corruption and bribery
6. We do not abuse insider information
7. We protect a sustainable future - ESG
8. We care about the staff and the working community
9. Cooperation principles – Partner Code of Conduct
 - a) Legislation and authority regulations
 - b) Privacy protection and information security
 - c) Mode of operation and cooperation
 - d) Responsibility for people
 - e) Sustainable development and environmental responsibility
 - f) Compliance with the principles

1. We comply with legislation, authority requirements and good practice, incl. good insurance distribution practice/good insurance practice

In our operations, we comply with national and international laws, decrees and regulations issued by authorities as well as internal guidelines, instructions, and operating principles.

The Code of Conduct describes how Mysafety operates in accordance with legislation and our own ethical principles. The purpose of these Code of Conduct is to provide our employees and partners with a clear protocol for their actions and to serve as a guideline for potential conflicts of interest. Every employee at Mysafety is obliged to comply with the Code of Conduct, together with other internal principles, guidelines, and policies, in their work.

Good insurance distribution practice/good insurance practice. In the insurance business we comply with good insurance distribution practice/good insurance practice. By good insurance distribution practice/good insurance practice we mean, among other things, that the business must be ethically sustainable, reasonable, and fair towards our customers.

Good sales and marketing practice. We provide all the information about the product and service that may be important when the customer makes relevant decisions. In marketing, we do not give untruthful or misleading information about the product, service, Mysafety as a company or its competitors, and we do not use inappropriate or unethical procedures.

2. We conduct responsible business

Our business is to offer our customers insurances for an unstoppable living. We will help our customers to secure their lives and their business. It is our duty to act responsibly, transparently, and in a sustainable manner.

Our customers represent our key stakeholders and the basis for our entire existence, therefore personal service and good accessibility are crucial parts of our customer service.

Good governance. We have comprehensive internal operating guidelines in place. Together with legislation, the internal guidelines and related personnel training, we ensure that all employees at Mysafety are complying with the company guidelines and rules.

Responsible employer. We do everything in our power to create a positive employee experience, which in Mysafety means meaningful work, engagement of employees and opportunities to influence, fair and equal treatment, an open and interactive communications culture and good leadership.

3. We fight financial crime and grey economy – we know our customers

Mysafety is committed to actively combat financial crime and grey economy and prevent money laundering and terrorist financing.

We comply with laws and regulations that apply to the prevention of money laundering and the financing of terrorism. We do not condone any internal or external abuse whatsoever.

We identify and know our owner customers and partners. We are investigating the real beneficiaries as well as the purpose and nature of customer and collaboration relationships. When we know our customers, we can also provide them even better service.

With the fight against grey economy, practical monitoring of business activity bans and prevention of money laundering through analytical activities, we protect Mysafety's customers against financial losses. At the same time for our part, we promote the business activities of honest companies whose operations comply with the regulations. We regularly educate our staff.

We report all suspicions of money laundering according to the regulation and cooperates with authorities to protect the financial system, society and our customers.

4. We treat information confidentially and follow data protection regulations

Mysafety processes all confidential information concerning companies and individuals meticulously and as stipulated by law and regulation, and we never disclose information, without consent or a specific provision, to any party other than the party concerned.

We respect insurance confidentiality and process confidential information as required by legislation. We take care of privacy protection when processing personal data.

All stages involved in the processing of personal information must comply with the principles for data protection and security approved by Mysafety. The data protection and data security competence of our personnel is maintained through regular training and up-to-date instructions, and we consider data security factors in all aspects of our activities.

5. We fight corruption and bribery

We do not accept corruption in any form. We do not accept or offer personal payments, gifts or favours that exceed normal and reasonable hospitality and that can be assumed or expected to influence Mysafety or its business decisions.

6. We do not abuse insider information

The misuse of insider information refers to the use of confidential and sensitive company information for unethical or illegal purposes. The misuse of insider information is forbidden at Mysafety, regardless of where and how such information was obtained. The ban on the use of insider information is applicable to all Mysafety's employees.

At all times, we comply with both relevant EU- and national regulations and use legal advice to safeguard our compliance. We always proud ourselves to choose the safest interpretation of relevant regulation.

7. We protect a sustainable future – ESG

We are committed to promoting the principles of sustainable development and are responsible for building our common future through targeted sustainability work.

We work to promote sustainable development and contribute to social responsibility and to solving challenges related to climate change. We take care of the social impact of our operations and promise to increase our positive impact on people, the environment and society.

We purposefully reduce the negative climate and environmental consequences of our operations. We take care of people, nature, and the local environment.

In Mysafety, we promote a corporate culture that strengthens responsibility and supports sustainable development.

8. We care about the staff and the working community

At Mysafety, we want to ensure a mentally and physically safe working environment for everyone. The experience of equality and equal treatment also strongly builds the experience of a safe working environment. In addition, we promote the knowledge and skills of the entire staff regarding diversity, equality, everyone included with which we aim to ensure the ability of the entire organization to promote this issue.

We do not accept bullying, harassment, discrimination, or other inappropriate behaviour in our work community. We have agreed operating instructions for dealing with situations of inappropriate behaviour that may arise.

9. Cooperation principles – Partner Code of Conduct

It is our obligation to act responsibly, transparently and in a sustainable manner. Our partners must act in accordance with the agreements and these cooperation principles. We also want to be a good partner and collaborator ourselves.

Mysafety's operating principles for partnership and procurement (Partner Code of Conduct) gather the central operating principles that we in the company group have committed to observe and that we expect our partners to observe.

By partners we mean partners, suppliers and other parties with whom we collaborate. In the agreements between Mysafety and its partners, you can also agree on other obligations and procedures than those described in these principles.

The principles describe the procedures that we require from our partners and that we want to promote together with them as well as the activities that we do not approve at Mysafety. The operating principles also determine how we treat each other and our mutual customers.

a) Legislation and authority regulations

Mysafety's partners are expected to comply with laws and authority regulations, as well as observe good practice and operating principles in all their operations.

In all its operations, Mysafety has undertaken to comply with the legislation, authority standards and recommendations as well as good practice and operating principles always agreed upon within the industry. Our partners must also always observe applicable legislation and authority regulations in all their activities. We also expect our partners to follow generally accepted and sustainable operating principles and good practices.

We actively fight financial crime and the grey economy as well as money laundering and terrorist financing. We report all suspicions of money laundering in accordance with the regulations. The partner is responsible for the subcontractors it uses and their operations in the same way as for its own employees. We assume that the legality of the subcontractors' operations and the observance of good practice and agreed operating principles are ensured through agreements, regular monitoring, and other appropriate means. We expect our partners to actively follow up on the legislation and government regulations that apply to their industry and that they react proactively to any changes in legislation that apply to the industry.

b) Privacy protection and information security

We respect everyone's right to privacy. Customer data and other personal data must be treated strictly confidentially and securely, as well as in a transparent and appropriate manner.

Trust is an unconditional requirement in the financial industry. Personal data must be treated confidentially. Our customers, employees and partners must be able to trust that their data will remain confidential and protected in all situations.

We assume that our partners ensure that the processing of personal data, such as its collection, storage, use, transfer, disclosure, or destruction, takes place in accordance with data protection legislation and authority regulations as well as in accordance with good practice and operating principles.

Information about a customer relationship with Mysafety is confidential by law. When a partner processes such personal data for which Mysafety is responsible in its capacity as data controller, the party must ensure that its staff and subcontractors observe both the matters established in the agreement and other instructions and regulations on the processing of personal data. The partner is also responsible for information security in its own operations as well as for the training and instructions of the staff and other parties. Personal data incidents directed at personal data for which Mysafety is responsible must be reported to Mysafety without delay at the address dataskyddsbud@mysafety.se / tietosuojavastaava@mysafety.fi.

c) Mode of operation and cooperation

In our collaborative relationships and supply chains, we emphasize transparent, fair, and professional operations. We want to promote responsible practices together with our partners.

In the management of the Mysafety's companies, good management is observed, which is based on the legislation that applies to the financial and insurance industry, regulations and instructions issued by the Financial Supervisory Authority and, where applicable, recommendations for corporate governance.

We support and promote responsible and ethical business operations and transparency in decision-making and business operations. In our working relationships, we expect the parties to have an appreciative and respectful attitude towards each other and to take mutually agreed measures. We treat our partners professionally, fairly, and equally, and expect the same reliable and honest treatment from them as well. In Mysafety, decisions on cooperation and procurement are made on an equal and open basis. Through our measures, we promote fair, healthy, and efficient competition.

We do not accept corruption in any form. We do not accept or offer personal transactions, gifts or favours that exceed normal and reasonable hospitality and that can be assumed or expected to influence Mysafety or its business decisions. We respect each other's intellectual property rights and corporate image in the collaboration. In our cooperative relationship, we do not allow the use or exploitation of the other party's company name, company ID or other intellectual property rights without the prior consent of the rights holder, nor do we endanger the reputation of the other party. We ensure the protection of each other's trade secrets and other confidential information and do not use or disclose them unlawfully. We expect our partners to do the same.

We assume that our partners promote a good staff and customer experience in their operations and follow their development regularly. We expect our partners to participate in the development of the joint business and customer satisfaction as well as in the reporting that concerns the collaboration.

d) Responsibility for people

People's occupational safety and suitable working conditions must be ensured in accordance with laws and agreements. We expect our partners to treat their staff and customers equally.

We expect our partners to comply with the law and the general recommendations in matters concerning the staff's employment conditions, working conditions and employment contracts. These must also be ensured in subcontractor chains. We take care of our employees' safety, occupational health and working ability in a preventive way. We assume that our partners take care of their own staff's occupational safety and ensures that the requirements set by the law for the protection of people's safety and health are met both in its own operations and in the subcontractor chains.

Mysafety is committed to promoting equality and equal treatment of people and to meeting human rights in its own operations and in its cooperation relationships. We do not accept discrimination, harassment, or other unfair treatment in our working community or in our collaboration. We take care of the safety and integrity of our employees and our customers. We expect our partners to act in the same way in their own working community, their working relationships and in their customer service.

e) Sustainable development and environmental responsibility

Mysafety is committed to promoting the realization of the principles of sustainable development in its business operations. We expect our partners to bear responsibility for their own environmental and social impact. We want to cooperate with such parties who promote these principles together with us.



It is our duty to strive to reduce the negative consequences of our operations on people, the environment and society and to seek solutions and alternatives to increase the positive effects and prevent damage. We expect our partners to take care of their own environmental obligations and we expect them to work to promote sustainable development.

Our task is to secure the future of our owners, customers and our business operations by working actively to limit climate change and to adapt to it. We purposefully reduce the negative climate and environmental consequences of our operations. We take care of people, nature, and the local environment.

We expect our partners to work to reduce the negative consequences of climate change and promote environmentally friendly business practices and set related goals for their operations. We encourage all actors to reduce emissions from energy consumption and traffic, promote material efficiency and recycling, and develop responsibility in their operations.

At Mysafety, we regularly evaluate and follow up how our sustainability goals progress and how our operations affect the environment and society. Our collaborators, partners and suppliers play a key role in the implementation of responsibility and sustainability in our business value chain. We expect our partners to take these into account in their own business operations and subcontractor chains as well as to report on issues concerning the environment, social responsibility, and corporate governance, taking into account the company's size and resources.