

TABLE OF CONTENTS

1. OBJECTIVE.....	1
2. DEFINITIONS.....	1
3. LIST OF APPENDICES.....	2
4. ROLES AND RESPONSIBILITIES.....	2
5. OUR CORE VALUES.....	3
6. RESPONSIBLE AND ETHICAL BEHAVIOUR.....	4
7. PRINCIPLES OF CONDUCT ENTAILING BRIBERY AND CORRUPTION.....	5
8. REPORTING.....	6
The Third Party’s (the Vendor) confirmation to the code of responsible business conduct.....	8
2 Confirmations.....	8

1. OBJECTIVE

- 1.1. This Luminor Code of Conduct Policy (hereinafter - Code) outlines the general principles for how we do business in Luminor. In this Code we are setting up our ethical behaviour through stated moral principles, standards of behaviour and our values. We in Luminor aspire to the highest standards of ethical and professional conduct, as well as conduct our activities in compliance with the applicable laws and internal policies when dealing with shareholders, Customers, Business Partners, communities, and each other.
- 1.2. All Employees are expected to abide by the rules set out in the Code and by putting this Code into practice.
- 1.3. Failure to comply with any provision of this Code is a violation and may result in disciplinary or legal actions and sanctions, regulatory criticism or reputational damages. The Employee who violates the rules set out in this Code and engages into business or activities that include or could be considered unethical, unlawful, risks criminal liability according to national regulations, as well as Luminor taking national labour law related measures against him/her. Breaches may result in reprimands and warnings, and in severe cases dismissal. Suspicion of crime is reported to the police.
- 1.4. The Code also describes the requirements for anti-bribery and anti-corruption practices and is intended to support Luminor and Employees in their efforts to prevent bribery and corruption. Bribery and corruption increase reputational risk, distorts competition, and affects trustworthiness. For these reasons, Luminor practices principle of zero tolerance towards Bribery and Corruption. The same is expected from Employees, Business Partners and other collaboration partners of any kind.

2. DEFINITIONS

- 2.1. The capitalized terms, which are not defined herein below, are defined in the Internal Regulations Glossary.
- 2.2. The below capitalized terms shall have the following meaning:
 - 2.2.1. **Bribery** - A specific offence, either a promise, offer, acceptance, or transfer of an advantage which is used as a reward to illegitimately change action that would otherwise not be changed. A bribe could have both monetary and non-monetary value.
 - 2.2.2. **Conduct Risk Committee** - Luminor’s internal Forum chaired by the Chief Compliance Officer to review and oversee Luminor’s conduct, business integrity and sustainability matters.
 - 2.2.3. **Customer** - means a natural or legal person to whom the Luminor provides or intends to provide financial services.
 - 2.2.4. **Business Partner** – individual or a company that supplies or is planning to potentially supply Luminor with the products or services or cooperates with Luminor under joint venture, cooperation, partnership or similar arrangements or to which Luminor provides services (except for the Customers in terms of provision of financial services).
 - 2.2.5. **Corruption** - An abuse of entrusted power for private gain. It can be either active, whereby bribe is offered, or passive, whereby bribe is accepted. In addition, it can be undertaken by a person to gain the improper advantage to him/herself or to others.

- 2.2.6. **Conflict of Interest** –as defined in Conflict of Interest Policy
- 2.2.7. **Discrimination** - direct and indirect discrimination, harassment, instructions to discriminate on the basis of gender, race, nationality, citizenship, language, origin, social status, faith, beliefs or views, age, sexual orientation, disability, ethnicity, religion or other categories.
- 2.2.8. **Employee** - A natural person who is the employee of Luminor or a member of collective governing body in Luminor, and, in certain cases – a former or potential employee of Luminor and consultants working for Luminor on the basis of civil law (lease of employee or similar) contract.
- 2.2.9. **Event** - any kind of business entertainment provided by either Customer, Business Partners or other third parties to or for benefit of the employees, or by employees to or for benefit of Customers, Business Partners or other third parties. Event includes, but not limited to: social events, meals, trips and accommodations, tickets to sporting, cultural or other entertainment events, charitable dinners, conferences, training, as well, charitable, or similar events provided by Customers, Business Partners or other third parties for which Luminor purchases or arranges tickets or attendance.
- 2.2.10. **ESG** - as defined in Sustainability Policy
- 2.2.11. **Management** - includes members of the Supervisory Council, Management Board and Heads of the structural units.
- 2.2.12. **Management Board** - means the Management Board of Luminor Bank AS.
- 2.2.13. **PEP** – as defined in Anti-Financial and Sanctions Definitions Annex
- 2.2.14. **Public Officials** – individuals who perform duties in the public service and perform public administration activities. It includes all employed persons who work in state and municipal institutions and receive remuneration from state or municipal budgets, e.g., state and municipal politicians, civil servants, judges, heads of state and municipal institutions, the owner or shareholder (even if only partially) of public enterprises.
- 2.2.15. **Supervisory Council** – means the Supervisory Council of Luminor Bank AS
- 2.2.16. **Related Person** - a person related to the Employee by family relationship or close links. These are:
 - 2.2.16.1. Persons related by family relations to an Employee mean any of the following: the spouse or any partner of the Employee considered by national law as equivalent to a spouse; a dependent child (children) or adult child (children) or stepchild (stepchildren), parents, stepparents, sibling(s), relative(s)-in-law of the Employee, sharing the same household or any other person who shares the same household with the Employee.
 - 2.2.16.2. Persons related by close links to an Employee mean the legal entity, partnership, trust, other forms without establishing a legal entity, the managerial or supervisory responsibilities of which are discharged by an Employee or their Related Persons by family relations, or which is directly or indirectly controlled by such person, or which is set up for the benefit of such person, or who can be influenced by such person, or whose economic interests are equivalent to those of such person.
- 2.2.17. **Sustainable Products and Services** - A product and (or) service that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy, or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations, or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.

3. LIST OF APPENDICES

- 3.1. Appendix 1 – The Code of Responsible Business Conduct for Third Parties
- 3.2. Appendix 2 - Business Partner's Confirmation of Adherence to Internal Code of Conduct

4. ROLES AND RESPONSIBILITIES

- 4.1. Each **Employee** has an individual responsibility for ensuring compliance with principles of conduct defined by this Code and for preventing, detecting and reporting on Bribery and Corruption.

- 4.2. The **Management** has a responsibility to ensure that this Code is known and conformed to within his/her respective area of responsibility. The Management is responsible to lead by example and demonstrate their openness, integrity and ethical behaviour in every act or expression.
- 4.3. The **Supervisory Council** Luminor's Group governing body which approves and oversees implementation and compliance with the Code.
- 4.4. The roles and responsibilities of the **Management Board** are:
 - 4.4.1. implementation of and adherence of the Code, by overseeing adequate and effective internal control system set by Compliance for anti-bribery and anti-corruption risk management and implementation of the principles of conduct;
 - 4.4.2. development and maintenance of effective protection of human rights, prevention of violence and harassment, ensuring non-discrimination, equality and diversity practices in Luminor.
- 4.5. The roles and responsibilities of **Compliance Division** are:
 - 4.5.1. to set the framework for ethical and professional business conduct in Luminor
 - 4.5.2. to set the framework for effective internal control system for management of anti-bribery and anti-corruption activities including the regular assessment;
 - 4.5.3. providing support to Employees;
 - 4.5.4. Provide regular training to all Employees related to the Code, as well as advise structural units in matters subject to the Code;
 - 4.5.5. to conduct investigations and report issues related to this Code directly to Chief Compliance Officer and/or to the Management Board, Supervisory Council as appropriate and as defined in internal regulations;
 - 4.5.6. to perform regular independent Anti-Bribery and Anti-Corruption Risk Assessment.
- 4.6. The roles of the **Conduct Risk Committee** (hereinafter – CRC) are:
 - 4.6.1. evaluate the ethical misbehaviour situations reported to CRC and provide further guidance for mitigating actions;
 - 4.6.2. monitor the measures set by the Management Board that ensure the compliance with the Code;
 - 4.6.3. review the reports on findings of investigations related to ethical misbehaviour situations and exercise oversight, where possible, over any such investigation affecting Luminor;
 - 4.6.4. decide whether and on which terms to start or continue business relationship with Business Partner which is related to Luminor employee or Related Person;
 - 4.6.5. manage and oversee the development, implementation, and review of Luminor sustainability matters. CRC ensures integration of ESG-related requirements considerations into the Code. The Forum advises the Management Board and/or Supervisory Council in promotion of risk awareness, including climate risk through a strong risk culture.

5. OUR CORE VALUES

- 5.1. Each Employee is expected to follow Luminor values which establish the way we are doing the business and treat our Customers, colleagues and Business Partners.
- 5.2. **Focus:** We have a clear focus. With a clear purpose we are empowered to take initiative and act. We follow the “can do” attitude and are always out there – we keep our Customers first.
 - 5.2.1. *We take the ownership and walk the talk.*
 - 5.2.2. *We engage only with the things we can execute with high quality.*
 - 5.2.3. *We provide solutions instead of selling products.*
- 5.3. **Curiosity:** We are driven by Curiosity. Curiosity drives the change for better tomorrow. We believe that growth and development starts from the curiosity.
 - 5.3.1. *We try and innovate, and we learn from our mistakes.*
 - 5.3.2. *We have the positive spirit – it motivates us to achieve more.*
 - 5.3.3. *Not only we know well our Customers and their needs, we are interested in them.*
- 5.4. **Collaboration:** Collaboration is based on trust. We praise the teamwork and value the team targets higher than individual. We build and guard trust – the cornerstone of collaboration.
 - 5.4.1. *We embrace the diversity and combined people's strengths.*
 - 5.4.2. *We are straightforward and open, and we do this with respect.*
 - 5.4.3. *Our relationship with Customers, each other and Business Partners is defined by equal partnership and mutual respect.*

6. RESPONSIBLE AND ETHICAL BEHAVIOUR

- 6.1. In addition to Luminor values each employee should always pursue highest standards of ethical and professional conduct. This means the following:
- 6.2. **Following the internal and external regulations:**
 - 6.2.1. We are only involved in doing business that complies with the laws and regulations and is aligned with our standards of business ethics.
 - 6.2.2. We actively prevent any type of financial crime: money laundering, financing of terrorism, sanctions breaches, tax evasion, corruption, anti-trust practices, market manipulation, and other forms of financial crime and violations of consumer protection laws.
 - 6.2.3. We have a strong risk management culture and expect Employees to be aware of risks in their areas of responsibility, we do not take excessive risk decisions.
 - 6.2.4. We ensure full compliance with all requirements outlined in applicable laws (including equality and non-discrimination laws and human rights protection rules), regulations, recommendations from the supervisory authorities, the Code, as well as in other internal regulations relevant when assuming any role in Luminor.
 - 6.2.5. We provide safe and healthy work environment. We follow health and safety requirements for the safety and health of our employees and Customers.
- 6.3. **Acting with respect and confidentiality**
 - 6.3.1. We take responsibility and hold each other and ourselves accountable. We have a shared responsibility not only to act ethically as individuals, but also to expect the same from our colleagues, regardless of position or role in the company.
 - 6.3.2. We value and support human rights and we apply zero-tolerance against discrimination, violence and harassment (including psychological and sexual harassment), bullying, or disrespectful behaviour of any kind.
 - 6.3.3. We do not make any employment decision based on sex, age, religion, race, ethnicity, disability, sexual orientation, marital status, national origin, or any other status protected by the law. We shall have equal opportunities for professional career and development, which includes hiring, promotion, training, compensation.
 - 6.3.4. We treat all sensitive Luminor and all our Customer related information confidential and treat that with respect and care both when we are working in Luminor and after terminating the employment. We apply strict “need-to-know” basis so only the people who need the confidential information to perform their tasks are entitled to it.
 - 6.3.5. We do not use company information or assets (tangible and/or intangible) for illegal or unethical purposes.
 - 6.3.6. We perform our duties with due skill, care, and diligence.
- 6.4. **Conflict of Interest**
 - 6.4.1. We avoid situations where one’s independence and integrity may be questioned.
 - 6.4.2. We do not conduct transactions that may cause a situation or leave the impression of misusing confidential or inside information. Detailed guidelines on using inside information are provided in the Guidelines on Handling of Inside Information.
 - 6.4.3. We refrain from handling cases where one or one’s Related Persons have any financial or non-financial interest, as well as potential or actual inappropriate advantages.
 - 6.4.4. We proactively manage any actual or potential conflicts of interest situations.
 - 6.4.5. Detailed guidelines on Conflicts of Interest are provided in the Conflict of Interest Management Policy.
- 6.5. **Raising concerns**
 - 6.5.1. Luminor operates in an open and transparent environment where ethical behaviour is highly valued. For this purpose, Luminor encourages to prevent and proactively detect any breaches of laws and regulations, other external regulatory enactments and internal requirements and bring them to the attention of appropriate functions within Luminor. For this purpose, Luminor has introduced a whistle-blowing channel, which is in detail described in Raising Your Concern Procedure.
 - 6.5.2. We all follow the obligation to immediately report unacceptable conduct. If we believe that our own or our colleague’s behaviour contravenes the values and principles of conduct outlined in this Code or its supporting policies, we raise the matter immediately.
 - 6.5.3. We raise concerns and ask questions – even if we are not sure that misconduct has occurred, speaking up is always the right thing to do.
- 6.6. **Acting responsibly**

- 6.6.1. We must act responsibly as our actions have an impact on our employees, Customers, Business Partners, as well as on society and the environment.
- 6.6.2. We follow our Sustainability Policy and ESG Due Diligence Guidelines to ensure the achievement of our ESG strategic aspirations. We act according to our defined exclusion list in our Sustainability Policy and follow requirements set for our Business Partners.
- 6.6.3. We promote and implement sustainable products and services in our operations and in our work environment.

7. PRINCIPLES OF CONDUCT ENTAILING BRIBERY AND CORRUPTION

- 7.1. Luminor applies zero tolerance to any business activities of its own and activities of Employees that include or could be considered as including any kind of Bribery and Corruption. For this purpose, Employees are required:
 - 7.1.1. not to offer any bribe or any other unauthorized payment or benefit of any kind to anyone or solicit business by offering any bribe or other unauthorized payment or benefit to current or potential Customers, Business Partners, employees or any third parties;
 - 7.1.2. refuse any kind of benefit, payment, gift, or event invitation, that would not be authorized by Luminor in the ordinary course of business, and to do so in a manner that is not leading to misunderstanding or giving rise to false expectations, and to report any such offers;
 - 7.1.3. not to make facilitation payments;
 - 7.1.4. treat Related Persons and friends in a Customer or business situations in the same way as any other Customer or business relationship;
 - 7.1.5. report any breaches of this Code.
- 7.2. **Gifts and Events**
 - 7.2.1. Any receiving and offering of gifts and events from/to Customers and Business Partners are expected to be handled by all Employees in a restraint manner and by applying the principle of appropriateness and transparency to avoid any sign towards Bribery or Corruption. It is Luminor's policy to involve itself only in such gifts or events receiving and offering which are provided in a transparent manner, in line with standards of ethical, fair and professional behaviour and leave no room for any doubts about the appropriateness of the gift or event, its motives, and consequences for the parties involved. Gifts and events that have conditions attached, either expressed or implied, are never acceptable.
 - 7.2.2. Any receiving and offering of gifts and events from/to Public Officials shall be avoided. In situations where it is not possible to refrain from it, it should be treated with extra cautiousness and accepted only in exceptional cases with pre-approval by Compliance Division.
 - 7.2.3. Detailed guidelines on receiving and offering of gifts and events are provided in the Gifts and Events Reporting Procedure.
- 7.3. **Relationships with Business Partners**
 - 7.3.1. Luminor does not involve itself in business relationships, which directly or indirectly enable Bribery and Corruption.
 - 7.3.2. Luminor enters into arrangements with Business Partners that share the same values and principles on this Code, Sustainability Policy and ESG Due Diligence Guidelines. When entering into contractual arrangements with Business Partners from other than EU/EEA countries¹ Luminor requires Business Partner to adhere to Luminor Code of Responsible Business Conduct for Third Parties (Appendix No 1) or confirm their adherence to any similar internal code of such Business Partner (sample of the confirmation can be found in the Appendix No 2), where such code would be providing similar rules to that of Luminor code in all material aspects. Enhanced and continuous due diligence is carried out in case of Business Partners' activity in corruption sensitive area, business sector or country. Business Partners or any third party associated with them with a history of Bribery and Corruption incidents are also a reason for increased attention, therefore enhanced and continuous due diligence is initiated and decision on continuing business relationship is made accordingly. The same processes for conducting due diligence, as described in the Conflicts of Interest Management Policy, Procurement Policy and Outsourcing Policy are applied.
- 7.4. **High risk services, sectors, and countries**

¹ Principles of Luminor Code of Responsible Business Conduct for Third Parties derives from applicable EU/EEA law, therefore for Business Partners from EU/EEA countries adherence to such principle is a statutory obligation under applicable laws, while in other than EU/EEA countries certain standards defined in Code of Responsible Business Conduct for Third Parties may not be recognised by the same extent, therefore such Business Partners are required to adhere to same standards contractually.

- 7.4.1. Luminor involvement in certain services, business sectors and countries, which are more exposed to Bribery and Corruption, may increase inherent risk level for Luminor. Services in question may be for instance provision of finance in major project initiatives or transactions involving Politically Exposed Persons (PEPs). The latter is considered to increase the risk of Bribery and Corruption due to PEPs possibility to misuse their power and influence for personal gain and to conceal funds or assets resulting from Bribery and Corruption.
- 7.4.2. Business sectors to be considered in this respect are e.g., public sector infrastructure projects and exploitation of natural resources. For identifying countries exposed to higher level of Bribery and Corruption risk, an internationally approved assessment can be used.
- 7.4.3. Business activities in areas exposed to higher level of Bribery and Corruption risk should be identified and carefully assessed and monitored. Luminor records always accurately reflect the true nature of arrangements in all situations.
- 7.5. **Facilitation of payments**
 - 7.5.1. Luminor does not make payments to secure or accelerate actions with an aim to interfere with standard processes that would otherwise be carried out in due course.
- 7.6. **Sponsoring**
 - 7.6.1. Luminor considers sponsoring as standard practice in business-to-community relations and means of marketing. This is done in a transparent manner, leaving no room for doubts about the appropriateness of the arrangements, motives and consequences for the parties involved.
- 7.7. **Political contributions**
 - 7.7.1. Luminor does not make any political contributions.
- 7.8. **Inducements**
 - 7.8.1. Luminor implements the Inducement management principles established in the Inducement Policy for The Provision of Investment and Ancillary Services.
- 7.9. **Personal financial activities**
 - 7.9.1. All Employees are expected to handle their personal financial activities with due care and consider carefully before execution all possible high-risk transactions, e.g., investing into cryptocurrencies.
- 7.10. **Reputational impact**
 - 7.10.1. All Employees are expected to ensure that their personal engagements do not trigger negative impact over Luminor's reputation or in any other way that could harm Luminor's, its Customers and Business Partners' interests.

8. REPORTING

- 8.1. As a part of Employee's commitment to good conduct, it is Employee's responsibility to disclose to Luminor potential or actual regulatory restrictions, which have or may have an impact, whether real or perceived, on Employee's role.
- 8.2. Employees are expected to report any suspicion of unacceptable practices, particularly in relation to, Bribery and Corruption practices, financial misreporting, and financial crime. These may include but are not limited to criminal offences or potential offences such as fraud, money laundering, financing of terrorism, sanctions breaches, tax evasion, corruption, conflict of interest, anti-trust practices, market manipulation and violations of consumer protection laws.
- 8.3. The Employee who has a concern about any misconduct, irregularity or illegal activity in all cases is encouraged to come forward and voice those concerns to his/her direct manager and to Compliance Division according to Raise Your Concern process. In case when concern is related with a direct manager of the Employee, reporting should be done directly to Compliance Division or to the Supervisory Council Audit Committee Chairman.
- 8.4. To receive support in areas covered by the Code, Employees are encouraged to speak to direct manager, relevant People and Culture partner or Conduct & Ethics & Reputation Department employees.
- 8.5. Luminor ensures that reporting on concerns is confidential and reporting Employees are protected from discriminating and disciplinary measures for reporting activity. The protection also applies if the employee participates in an investigation in a good faith. Employee is encouraged to report any experiences of retaliations towards themselves or others to Compliance Division by email conduct@luminorgroup.com, or to the Supervisory Council Audit Committee Chairman.
- 8.6. Luminor treats the information with confidentiality and passes it on a strict "need-to-know" basis. For the submission of the confidential information, contact: conduct@luminorgroup.com. For anonymous reporting use Luminor website.
- 8.7. Luminor ensures that Employees have a right and possibility to use external reporting tools/whistleblowing procedures, if such are available in each particular country, e.g., ones provided by local Banking Association or supervisory authorities.

The Third Party's (the Vendor) confirmation to the code of responsible business conduct

1. Purpose of the Code

Luminor takes responsibility for the impact inflicted on society and the environment as a result of our business activities, and we expect our Third Parties to do the same. The Code outlines Luminor principles on responsible business conduct. The Code follows guidance provided by international standards such as the OECD Guidelines, the UN Global Compact, the UN Guiding Principles on Business and Human Rights and ILO Tripartite Declaration of Principles concerning Multinational Enterprises on Social Policy.

2. Confirmations

2.1. The Third Party confirms:

- 2.1.1. to comply with all applicable laws and regulations in the countries where the Third Party operates and in particular:
 - 2.1.1.1. to comply with applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices;
 - 2.1.1.2. to be firmly opposed to all forms of money laundering, and to take steps to prevent financial transactions being used by others to launder money;
 - 2.1.1.3. not to at any time operate in breach of general or special competition regulations, such as illegal cooperation on pricing, illegal market sharing or other behaviour that is in breach of competition laws where the Third Party operates;
- 2.1.2. to follow stricter requirements if there are differences between laws and regulations, the Code, or requirements contained in the contract concluded between Luminor and the Third Party;
- 2.1.3. to take reasonable steps to ensure the requirements set in the Code in contacts with the Third Party's own third parties;
- 2.1.4. to ensure fair treatment of employees;
- 2.1.5. to ensure forced labour is not used;
- 2.1.6. to respect the right of the Third Party's employees to establish, join or not to join trade unions and any other association of their choice;
- 2.1.7. to have an established employment processes which must be clearly communicated to all employees;
- 2.1.8. not to use child labor and adhere to respective local regulations;
- 2.1.9. to ensure that working conditions, hours and voluntary overtime are in accordance with local regulation and industry practice, and that wages and benefits meet legally mandated minimums without unauthorized deductions;
- 2.1.10. to provide a safe and healthy work place for all employees;
- 2.1.11. to have a documented and implemented health and safety management system appropriate to the size, nature and risks of the Third Party's operations;
- 2.1.12. If the Third Party's activities involve a potential and negative impact on the environment, the Third Party should publicly commit to aim to identify and minimize potential hazards to the environment;
- 2.1.13. to act in an ethical, fair and professional manner in all contact with Luminor;
- 2.1.14. to report about any serious suspected or actual breach of agreed responsible business principles to conduct@luminorgroup.com; if it concerns Luminor Group companies

- 2.1.15. to be prepared for any external disruptions to the Third Party's business, for example caused by natural disasters, terrorism, software viruses, illness, pandemic, infectious diseases, fires or other major accidents;
- 2.1.16. to designate an individual in a senior management position with responsibility for ensuring compliance with the Code¹;
- 2.1.17. to maintain appropriate records to demonstrate compliance with the requirements and provide them upon Luminor's request¹;
- 2.1.18. internal audit and compliance function of Luminor will have right of auditing of the compliance with the Code.
- 2.1.19. To ensure conflict of interest² awareness principles in cooperation with Luminor, meaning potential conflict of financial and/or personal interest relationships between Third Party' and Luminor' employees from Third Party' and Luminor cooperation perspectives; and to be ready:
 - to inform Luminor (conduct@luminorgroup.com) if conflict of interest is identified;
 - to present Conflict of Interest, stating the general nature and sources of Conflicts of Interest, as well as the resultant risks for the relevant party; and
 - to cooperate with Luminor to agree on actions to be taken to mitigate the risks.

¹ - Not applicable to SMEs excluding energy, manufacturing, construction, transport, real estate industries. "SME" will be understood as provided in EU Commission Recommendation of 6 May 2003 concerning the definition of micro, small and medium-sized enterprises (2003/361/EC)

² - A conflict of interest is a situation in which a person or organization is involved in multiple interests, financial or otherwise, and serving one interest could involve working against another. Typically, this relates to situations in which the personal interest of an individual or organization might adversely affect a duty owed to make decisions for the benefit of a third party.

Annex No 2 – BUSINESS PARTNER'S CONFIRMATION OF ADHERENCE TO INTERNAL CODE OF CONDUCT

I / we, the undersigned, duly empowered to act on behalf of (company name) hereby declare we are following our document which describes our values and responsible business conduct, which is in line with Luminor's Code of Conduct.

(name, surname, position, date and signature)