

Business of conduct and ethics policy

Date of decision	2025.04.01
Adopted by	The Board of Directors of Ominimo Sweden AB, Reg. No. 559515-3189 (the “ Company ”)
Owner	The Chairman of the Board of Directors
Legal basis	The Swedish Financial Supervisory Authority’s (the “ SFSA ”) general advice (FFFS 1998:22) on guidelines for handling ethical issues at institutions under the Authority’s supervision (the “ General Guidelines ”)

Amendment history

Date	Version	Created by	Description of the amendment

1 Introduction

1.1 Background and purpose

The Company is an insurance intermediary authorised by the SFSA. As an insurance intermediary, the Company should comply with the General Guidelines.

According to the General Guidelines, the institutions under the supervision of the SFSA shall conduct their business in such a manner that the public’s confidence in the institution and in the financial market is maintained and that the business may otherwise be deemed to be sound. A sound development of the business requires that the institution conducts its business ethically. Every institution under the supervision of the SFSA should adopt guidelines for handling ethical issues within its operations. The guidelines should cover the actions of employees in situations where, from an ethical perspective, appropriate behaviour may be unclear or where the relevant legal provisions do not provide sufficient guidance.

The purpose of this Business of conduct and ethics policy (the “**Policy**”) is to ensure that the Company conducts its business in an honest and fair manner, acting with due skill, care and



diligence, avoids conflicts of interest and, where conflicts of interest arise, ensure that customers are treated fairly.

1.2 Communication and implementation

The Board of Directors of the Company is responsible for ensuring that the Company's employees are aware of the contents of this Policy.

2 General ethical principles

In order to ensure that the Company conducts its business with a high ethical standard, the following principles shall apply in its operations:

1. the Company's activities shall be characterised by good ethics, including strong integrity and high professionalism;
2. all decisions and actions in the Company's activities shall be characterised by high ethical standards;
3. the Company shall only engage in activities that are in compliance with applicable laws, regulations and relevant agreements;
4. activities shall be conducted in such a way that confidence in the Company is gradually strengthened over time;
5. the Company shall show due respect for its customers, partners, counterparties and competitors, regardless of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age;
6. all decisions and actions of the Company should withstand public scrutiny;
7. employees of the Company shall act honestly and fairly in their dealings and with due skill, care and diligence; and
8. the Company shall ensure that the necessary resources and procedures are in place to enable it to operate in accordance with this Policy.

3 Specific ethical principles

3.1 Advice and related services

The Company does not provide advice regarding its insurance products. Information regarding the insurance products shall be provided to the customer in good time before the insurance contracts is entered into

Customers shall not be advised or otherwise induced to sign contracts or other documents without first having carefully read the document in question.

The meaning and importance of contractual terms shall not be diminished by statements to the effect that they are not intended to be applied or that they are included merely for the sake of convenience or by similar wording.

3.2 **Business assignments**

The Company shall not engage in any transaction that is linked to documents that are drafted for the sake of convenience or documents that contain terms or information that are inaccurate, incomplete or misleading in order to give misleading information about the actual meaning of the transaction.

3.3 **Marketing**

Marketing of the Company's brand, services and products shall be designed to promote the interests of customers and potential customers in finding the Company's services and products that meet their requirements and needs.

The marketing shall be consistent with good insurance distribution practice and good marketing practice and shall otherwise be designed so that it cannot be perceived as unfair, discreditable, offensive or insulting, regardless of whether it is received by anyone other than the person to whom it is directed.

3.4 **Representation and gifts**

Receiving or offering excessive entertainment, travel or gifts related to the Company's duties may result in criminal liability for bribery or corruption.

Employees should exercise moderation regarding customer representation, travel and gifts related to the employment with the Company. In unclear cases, the employee should consult with the Chairman of the Board of Directors.

3.5 **Economic crime**

The Company shall not be involved in any transaction that is in any way likely to be connected with any criminal activity. In the event that an employee does not understand the intent or significance of a transaction, the immediate manager or the compliance function shall be consulted prior to the transaction.

3.6 **Conflict of interest**

An employee may not deal with matters in which the employee has a personal interest or matters in which such an interest is held by a relative of the employee or by a company in which the employee or a relative of the employee has a material interest.

3.7 **Secondary or other activities**

Employees must inform and discuss with the Chairman of the Board of Directors the appropriateness of any secondary or ancillary activities. An employee shall not engage in secondary activities until the Chairman of the Board of Directors has approved such assignment. An employee shall refrain from any activity that in any way competes with the Company's business.



4 Monitoring, control and reporting

It is the responsibility of each employee to ensure compliance with this Policy and to verify that their own actions are consistent with this Policy.

If there is reason to believe that a particular transaction, action or decision may be contrary to this Policy, the matter shall be escalated to the Board of Directors without delay.

5 Review

The Board of Directors has adopted this Policy and will review it annually. The annual review shall be carried out on the basis of a proposal by the Chairman of the Board of Directors.