

Business Partner Code of Conduct

Revision history

Version	Date	Description
1.0	16.09.2021	Approved by the Board of Directors of B2Holding ASA
2.0	15.09.2022	Reviewed and approved by Group CLC & HRO
3.0	01.10.2023	Updated to reflect the new brand, new legal name and new owner

1. Introduction

B2 Impact ASA and its subsidiaries (jointly referred to as “B2 Impact” or the “Group” and local subsidiary referred to as “Business Unit”) are committed to be a “trusted and innovative partner that actively re-shapes the credit management industry in all markets” where the Group operates.

B2 Impact 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, B2 Impact 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. B2 Impact 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 B2 Impact expects from its Business Partners when conducting business with or on behalf of B2 Impact.

3. Notification, breach reporting and non-compliance

This Code shall be made available to all Business Partners. B2 Impact expects all Business Partners to comply and ensure compliance with all the values outlined therein while conducting business with or on behalf of B2 Impact.

Business Partners shall promptly inform their B2 Impact contact or a member of B2 Impact 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 B2 Impact’s Whistleblowing channel which can be accessed on: <https://report.whistleb.com/en/b2-impact>.

B2 Impact 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, B2 Impact reserves the right to seek corrective actions.

Non-compliance with this Code may lead, among others, B2 Impact:

- 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 B2 Impact does business.

Clients – companies (primarily banks and financing companies, but also telecom operators, retail and utility companies) to which B2 Impact is providing debt related services, acting on their behalf.

Employees – all B2 Impact 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 B2 Impact, 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 B2 Impact.

Suppliers – any natural or legal person and their employees, agents, representatives and subcontractors who supply goods and services to B2 Impact.

Vendors – companies (primarily banks and financing companies, but also telecom operators, retail and utility companies) selling debt portfolios to B2 Impact.

5. Business Partner's expected values

B2 Impact 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 B2 Impact Employees. B2 Impact 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 B2 Impact any conflicts of interest, whether real or perceived.

Confidentiality and intellectual property rights

Information provided by or collected from B2 Impact 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 B2 Impact's confidentiality and intellectual property rights.

Personal Data

Business Partners shall conduct their activities toward B2 Impact 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

Each local CEO is responsible for ensuring the local implementation and application of this Code in its Business Unit.

7. Ownership and review

The Chief Risk, Compliance & ESG Officer is the owner of this Code. To ensure continuing suitability, adequacy, and effectiveness of this Code, the Chief Risk, Compliance & ESG Officer should review, update and/or revise it, as appropriate, on a yearly basis.

The Sustainability Committee, the Group Internal Auditor and the Chief Risk, Compliance & ESG 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.