



Nordic

Code of Conduct



Tryg's Nordic Code of Conduct

Purpose and target group

We wish for our customers to perceive Tryg as the company, which is best at creating peace-of-mind and value. An important part of creating peace-of-mind is for us to have a high moral, act ethically responsible and in pursuance of legislation and the internal policies, rules and procedures set by Tryg's Management ("Tryg's rules").

The purpose of Tryg's Nordic Code of Conduct ("The Code of Conduct"), which is part of Tryg's rules, is to aggregate the essential subject fields, which Tryg's employees and others, acting on behalf of Tryg, must be acquainted with and adhere to, both in relation to customers, colleagues, competitors, suppliers and other interested parties. The target group is employees and franchisees in the Tryg A/S Group and other business partners, who Tryg, in cooperation agreements, bind to adhere to the Code of Conduct, or parts hereof.

Responsibility

Tryg wishes to create peace-of-mind and value for our customers. An important prerequisite for this is to promote a transparent and responsible behavior, where we display a high moral and act ethically responsible in pursuance of legislation and Tryg's rules in relation to both customers, each other and other interested parties.

Tryg wants to ensure that

- All employees are under duty to be acquainted with relevant legislation, the Code of Conduct and Tryg's other rules.
- Possible conflicts of interest * are identified and handled through internal rules, e.g. in connection with handling insurance issues, purchases etc.
- A set of rules exists for contacting the authorities in the countries, where Tryg is represented.

* **Conflict of interests:** May occur if an employee's personal or private interests are in conflict with Tryg's interests; if an employee is handling tasks, which may be conflicting with each other, or if Tryg's interests are in conflict with those of the customer.

** **Associated parties:** Associated parties shall mean family and companies where the employee or relatives to the employee are either the owner, manager or otherwise have a deciding influence. Family shall mean spouse/cohabitating partner, children, parents, siblings, grandparents and the like.

Sound business practice

As a responsible company we recognise the importance of the rules on good practice, marketing of and counselling on insurance products.

Tryg wants to ensure that

- Tryg observes rules on sound marketing practice and other rules on sound business practice.
- Those of our employees, who develop customer-oriented material, or who offer advice to the customers, are adequately trained in observing applicable law, including rules on good practice, and that the sales people and advisors have been introduced to the scheme of agreement (NO).
- Our business partners, who distribute our insurances, are obligated to ensure that their employees have adequate knowledge of our insurances.
- Our customer concepts ensure that we are able to provide correct and relevant advice both before, during and after an insurance event.
- Our claims procedures support that all disagreements between the customer and Tryg are handled in an objective and reassuring manner.
- Processes are in place to ensure that our customer-oriented material is updated pursuant to applicable law.

* **Good practice** – To act in accordance with sound business practice means to act honestly and loyally to our customers. Among other things, this implies that any advice we give must provide the customer with a sound and honest basis for making a decision. We may not mislead or be aggressive in our marketing, and we have a duty of disclosure to our customers. In Tryg we wish to meet our customers with respect, openness, trust and a delivery of peace-of-mind. Our values are consistent with the rules on sound business practice within insurance and are to be construed in this context.

Effective and free competition

In Tryg we support effective and free competition to the benefit of our customers and other consumers. We work to ensure that legislation on competition is observed on all levels of the Group.

Tryg wants to ensure that

- We observe current legislation on competition.
- We have rules, which in depth deal with the two prohibitions of the Danish Competition Act * and offer advice on the handling of the rules in the everyday work of the employees.
- Our leaders are educated in competition law so that they are able to handle everyday problems and guide their employees.
- We have rules ensuring that co-operation agreements with external partners are reviewed by Legal & Compliance.

* The two prohibitions of the Danish Competition Act are:

1. Prohibition against anti-competitive agreements – The prohibition is violated when two or more companies enter into an agreement, or a concerted practice, and this agreement/practice directly or indirectly leads to limitation of competition, e.g. by fixing uniform prices or terms and conditions, dividing of markets or other concerted matters constituting a competitive parameter.

2. Prohibition against abuse of dominant position – The prohibition is violated when the market share of the company is of such a size that the company may act independently from competitors and customers and has also abused this position by hindering or twisting competition.

Duty of confidentiality, sensitive information and security

In Tryg we protect all confidential information we receive from customers, employees, injured parties, business partners and others. We understand the importance of the duty of confidentiality applying to financial businesses and handle confidential and sensitive information in a secure and prudent manner.

Tryg wants to ensure that

- We observe applicable legislation on personal data.
- We have rules describing how personal data and other information about customers is to be handled in pursuance of the Danish Act on Personal Data and the Danish Financial Business Act.
- We observe the industrial code for handling of personal data, including handling of fraud.
- Education about personal data law is available and targeted to different types of employee groups in order for them to be equipped to handle everyday problems.
- Our IT systems, computers, archives and premises are adequately secured.
- External parties and systems are subject to security clearance.
- Rules apply to when it is necessary to obtain consent.
- We have rules in Tryg ensuring observance of rules applying to internal knowledge and trading of the Tryg share.
- Agreements with employees and external parties contain provisions on duty of confidentiality/confidentiality and possible data security.

* **Internal knowledge** – "Internal knowledge" shall mean specific information not published about Tryg, securities issued by Tryg or market conditions thus concerning, which must be considered to have a significant impact on the price of securities issued by Tryg, should this information be published.

CSR

Tryg's CSR policy requires Tryg to observe legislation and international standards for CSR and to encourage responsibility. The policy also requires Tryg to consider climate issues and social sustainability in investments and purchases and to work against differential treatment.

Differential treatment of employees in connection with recruitment, hiring, promotion and dismissal is forbidden when done with reference to race, skin colour, religion or faith, political opinion, sexual orientation, age, handicap or national, social or ethnical origin. Differential treatment is also forbidden in relation to customers, referring to the above-mentioned issues.

Tryg wants to ensure that

- We observe the legislation on non-discrimination, freedom of choice of union as well as employee security and health.
- We protect and encourage human rights and employee rights.
- We contribute to reducing and preventing damage to the environment and such damage, which comes from climate changes.
- We consider social, climate-related and financial sustainability in our investments.
- Our suppliers and other interested parties contribute to fulfilling our Corporate Social Responsibility.
- Our employees and customers are not exposed to discrimination.
- We encourage equal opportunities for all in relation to employment and promotion.
- Our workplace is including and acknowledge diversity as a potential for better job satisfaction and customer service.

***Sustainable behaviour** – shall mean to act responsibly in relation to climate, social and financial matters, e.g. by reducing the risk of damage or other negative effects from our behavior to these. Sustainability is achieved by merging a short-term interest with that of a long-term interest in preserving and protecting the environment, contributing to climate adaptation and encouraging social structures, which create equal opportunities for all and ensure transparency and credibility in the business operations.

Anti-corruption, gifts and sponsorships

Tryg dissociates itself from all types of corruption in relation to both customers and other business partners. Also, Tryg dissociates itself from cash-in-hand jobs from e.g. suppliers or other business partners.

Tryg wants to ensure that

- Tryg observes applicable legislation on anti-corruption.
- Tryg's employees and business partners know the rules applying to avoid bribery and money laundering (NO)*, including Tryg's rules in relation to gifts, sponsorships and representation.
- Gifts, sponsorships and representation are not used for exercising improper influence on business partners and customers.
- Our employees do not make decisions influenced by improper receipt of gifts, arrangements etc. from our business partners and customers.
- Tryg's business partners are aware of our attitude towards cash-in-hand jobs.

*** Money laundering (only applies to NO)** – Money laundering shall mean all transactions with the purpose of changing the character of the source from where the money comes from being an illegal source (criminal act) to appearing to be a legal source.

Observance

Incident reporting

Tryg has established a whistleblower line, where employees and business partners may report suspicions about behaviour displayed by colleagues or management, which may be in breach with legislation or Tryg's rules, such as this Code of Conduct, to the extent that it constitutes serious offences. Incidents can be reported anonymously, we do, however, encourage that you identify yourself.

Tryg's compliance function and the Chairman of the Audit Committee in Tryg receive and assess all reports to the whistleblower line.