

Ethical Guidelines

Revised 27 November 2024

Protector Forsikring ASA – Ethical Guidelines

1. Purpose

The purpose of this policy is to affirm our commitment to promoting a responsible sustainable business and ensuring that Protector does not exploit our position or behave in a way which is not in line with a high standard of ethical and/or moral behavior.

2. Scope

All Protector employees are responsible for compliance with these guidelines.

3. Roles and Responsibilities

Employees are responsible for familiarizing themselves with this policy and for their own conduct and securities trading being within applicable laws.

4. Ethics

Protector's internal guidelines require the directors and employees to maintain the highest standards in their execution of duties and responsibilities, must show fairness, honesty and integrity in all aspects of dealing with other employees, business partners and customers, the public, the business community, shareholders, suppliers, competitors and government/public authorities.

5. Company values

The Company's approach to business is based upon a core fundamental in relation to the development of culture and serve as guiding principles in everyday practice. The four core values are: Credible, Innovative (*UK: Open), Bold, Committed.

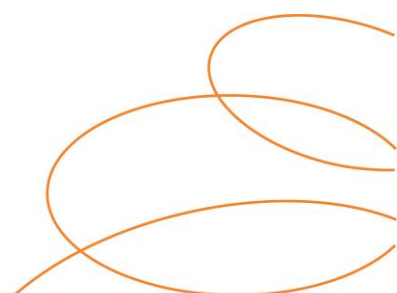
- **Credible:** Protector aims to develop competence at all levels, that business is carried out in an honest and sincere way. We demonstrate credibility and promote the ability to be relied on as honest or truthful.
- **Innovative.** *UK: Open: Protector encourages employees to be positive, open and flexible. This means the company looks for opportunities and not problems, with a solution-oriented focus in everything we do.
- **Bold:** All Protector managers and employees should focus on the facts and be transparent and clear in all communications.
- **Committed:** Protector employees are encouraged to participate, and to take the initiative. Providing good service is a priority.

6. Laws and regulations

Protector will comply with all applicable laws and official legislation and regulations of the country in which it operates. The Company commits to understanding the regulatory environment, monitoring and managing the regulatory changes.

7. Work environment

Protector should be a professional and positive workplace with an inclusive working environment. The Company and its employees will work towards creating mutually beneficial long-term relationships.

- Protector will strive to accommodate, and preferably exceed, the demands in every relevant law.
 - Protector will focus on excellence in its operations and strive to use efficient and effective working methods at all times. The company places the highest priority on protecting the health and safety of employees whilst at work.
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- All employees should contribute to creating a work environment free from discrimination of any kind, and promote an environment based on respect and fair treatment for all.
- Protector encourages all employees to be environmentally conscious and seek sustainable choices.
- Protector does not tolerate behavior that may be perceived as degrading or threatening. Conduct involving the harassment of any employee is unacceptable.
- Protector is committed to fulfilling its responsibilities on human rights and will adhere to relevant legislation in all areas of the business.

8. Standards of business practice

- Customers and policyholders will be treated in a respectful and fair way, facilitating a relationship of mutual trust and confidence.
- The Company's suppliers shall be treated impartially and in a fair way.
- Public/regulatory authorities should be accommodated in a transparent and orderly manner.
- Protector welcomes fair and open competition in all markets, both nationally and internationally.
- Protector opposes corruption in any form (bribery, "facilitation" etc.). No employee shall directly or indirectly offer, promise, give or accept bribes, illegal or improper gifts or other inappropriate benefits or payments to gain advantage professionally or privately.
- Protector is a firm that opposes money laundering in any form.
- Protector does not make contributions to political parties, political candidates or organizations which are politically active, and this policy should be followed worldwide.

9. Loyalty, conflicts of interest and confidentiality

All employees are responsible for seeking clarification in situations where they have a substantial direct or indirect interest in a transaction or other circumstances where the company is included or that the company is bound.

Conflicts of interest should be avoided. Conflicts of interest may include, but are not limited to, transactions and/or relationships with customers, suppliers, contractors, present or prospective employees, competitors or compounds.

10. Employees private interests

Employees must ensure that the company is not exposed to legal or reputational risks and the safety and security of employees, customers and the general public are not undermined.

11. Control and sanctions

Any violation or contraventions of the Rules should be immediately reported.

