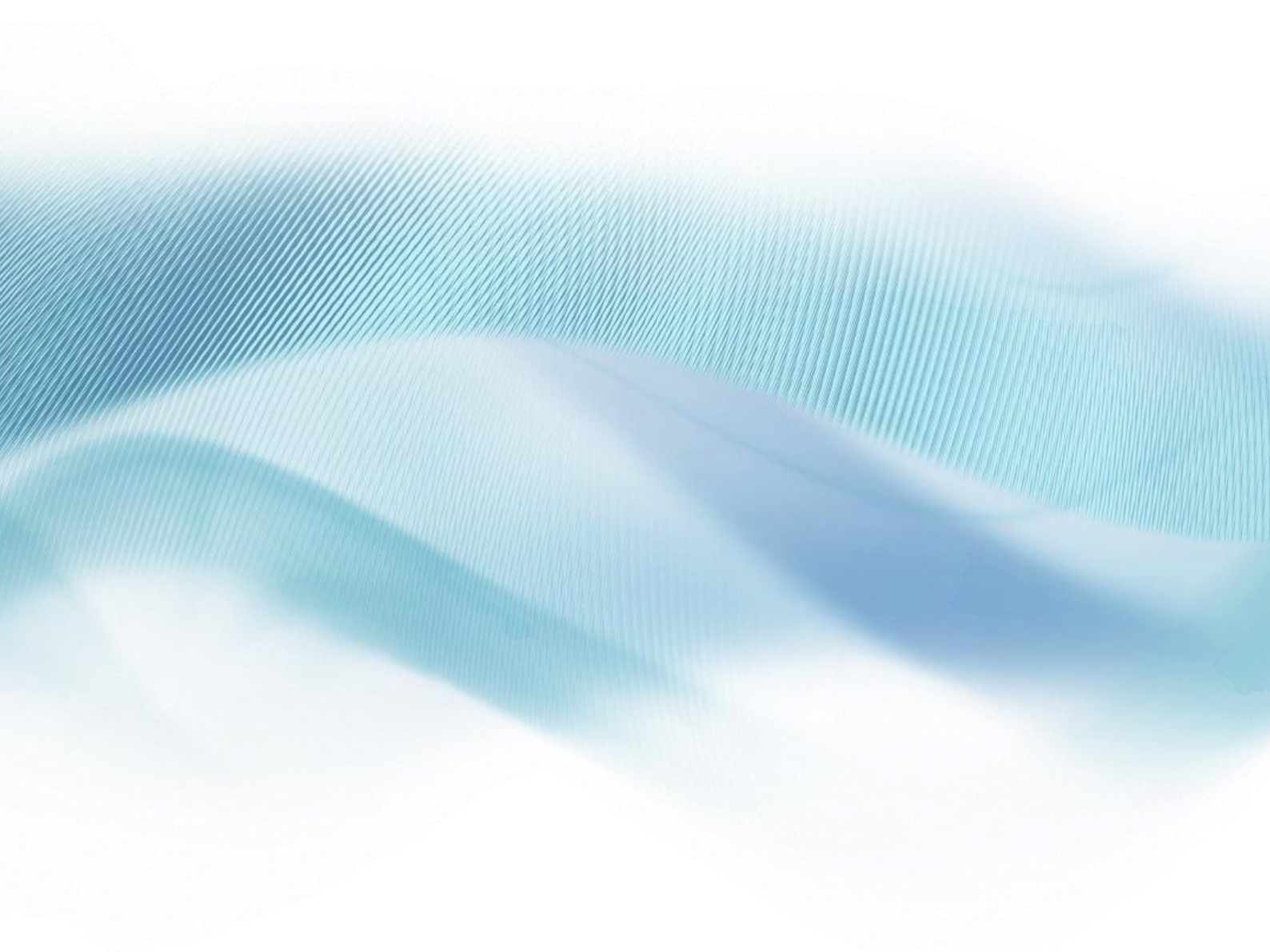


# CODE OF CONDUCT 2024

Fondsmæglerselskabet CABA Capital A/S

CVR: 38 10 25 75



*At CABA Capital, we recognize the financial sector's unique responsibility to support the green transition through its investments and financing activities.*

*Our primary goal is to provide alternative investment products (AIFs) that offer attractive returns and risk ratios, with a focus on mortgage bonds, government bonds, and related derivatives.*

*Mortgage bonds play a beneficial role in society by providing affordable, secure, and sustainable financing to borrowers, which helps promote homeownership and encourages property owners to maintain and optimize their homes for energy efficiency. This, in turn, contributes to sustainable development, the overall property market, and citizens' living conditions.*

*Thus, we believe that everyone should have access to affordable and long-term financing.*

*We also believe that investing in sustainable countries with democratic states that respect human rights, social conditions, and the environment can drive higher returns and lower risks.*

*Through our financial market activities, we contribute to maintaining effective and liquid bond markets, which are beneficial for states, homeowners, and sustainable development.*

## 1.1 **Introduction**

- 1.1.1 This Code of Conduct ("The Code") describes the behaviour expected of employees and the board of directors of Fondsmæglerselskabet CABA Capital A/S ("The Company").
- 1.1.2 The Code has been developed in accordance with the Company's business model, including size and organization, as well as the nature, scope, and complexity of the Company's business, and supports the way we build and maintain long-term relationships with all our stakeholders.
- 1.1.3 The Code presents broad principles and should be reviewed along with the other policies and procedures of the Company.

## 1.2 **Responsible Workplace**

- 1.2.1 The Company is expected to exercise proper care in its work with corporate social responsibility, both in relation to its own activities and employees, and in relation to its customers (AIFs) and their investors, and in relation to its stakeholders.
- 1.2.2 The investment service provided to approved Alternative Investment Funds (AIFs) with AIFMs is considered the Company's own activities, while stakeholders consist of partners, suppliers, and investors in the AIFs.
- 1.2.3 The Company strives to enhance the health and well-being of its employees by combining efforts to create a favourable work environment with initiatives aimed at promoting a healthy lifestyle and increased well-being. These initiatives are based on the desires of both the Company and employees and the Company's capabilities, and may include:
  - a) Possibility of working from home
  - b) Possibility of flexible working hours
  - c) Health insurance for all employees
  - d) Healthy food and nutrition
- 1.2.4 The Company has implemented a whistle-blower system that safeguards employees who report any illegal or dubious activities within the Company.
- 1.2.5 The Company fosters a robust compliance culture that is entrenched in management and upholds the Company's integrity towards employees, customers, partners, suppliers, and investors in the alternative investment funds.
- 1.2.6 The board of directors has appointed the CEO of the Company as the compliance officer, but to enhance focus and allocate additional resources to this area, the board has chosen to outsource the compliance function. The Company strives to foster a strong compliance culture by involving and educating its employees.

### 1.3 *Our Principles*

#### **1. *We act professionally and with integrity:***

- We comply with laws, regulations, industry standards, and internal guidelines.
- We are aware of and follow the requirements, procedures, and controls that apply to our individual position.
- We are conscious of our role in supporting financial stability.
- We operate with integrity on the financial markets.
- We report on suspicious matters and transactions to relevant parties, including competent authorities.
- We communicate internal knowledge to others on a need-to-know basis and only with proper authorization.
- We care about how our decisions, directly or indirectly, impact our stakeholders.
- We act in the best interests of our customers and treat customers equally in identical situations.
- We keep our promises and deliver on time.
- We communicate clearly and truthfully.
- We listen to and value input from others both inside and outside the Company.
- We reach out and help each other, and we understand the value of a teamwork.
- We have a proper tone of communication and treat others with respect.
- We promote and value diversity, and we understand that a workplace with diversity, where everyone feels included, contributes to an effective and sustainable business.
- We contribute to a positive and stimulating work environment, and we do not tolerate any form of harassment, bullying, or the like.
- We reject all forms of discrimination or unequal treatment based on gender, race, skin colour, religion or belief, political opinion, sexual orientation, national origin, social origin, ethnic origin, age, or disability.

- We practice no discrimination in relation to employment, dismissal, transfer, promotion, determination of salary, determination of working conditions or in relation to competence development.
- We make decisions based on relevant and objective criteria regarding employment, promotion, dismissal, salary, and other working conditions.
- We support and respect fundamental and internationally recognized human rights in all areas of our business and in private life.

**2. We treat risks with respect:**

- We are aware of conflicts of interest, and we are conscious that they can arise in all aspects of our work.
- We do not engage in external activities, whether in our role as an employee or as a private individual, that could give rise to a conflict of interest that could compromise our ability to act in our customers' best interest.
- We handle and report on conflicts of interest to relevant parties both internally and externally.
- We are aware that as employees and as private individuals, we represent CABA - online as well as offline.
- We have zero tolerance for bribery and corruption, and we handle and report on matters that may relate to bribery and corruption.
- We give and receive external gifts openly. Gifts over DKK 500 are recorded, indicating the type of gift, estimated value, and the names of the giver and recipient.
- We only accept gifts if there is no expectation of reciprocation, and what is given or received is symbolic gifts, and we do not accept cash and vouchers.
- We handle the risks of financial crime, and we know our customers and other relevant parties, which enables us to minimize the risk of being exploited for money laundering and financing terrorism.
- We do not offer investment services to entities whose purpose is to evade Danish tax laws.
- We check and report suspicion of financial crime.
- We respect the right to privacy, and we handle customer data and personal information securely and protect it from unauthorized, unintended, or malicious disclosure, alteration, and destruction.

**3. We treat the Earth's resources with respect:**

- We fully acknowledge the limited resources of our planet and the pressing threat of climate change. As a responsible entity, we are committed to actively reducing our environmental impact.
- We endorse and promote the adoption of technologies, products, and services that aim to support sustainable development.
- We make an effort to minimize our paper and printing usage on a daily basis.
- Whenever possible, we utilize digital signatures.
- Rather than subscribing to printed newspapers, we opt for online subscriptions.
- We recognize the harmful impact of fossil fuels and encourage the use of public transportation or electric vehicles.
- We refrain from purchasing water in plastic bottles.
- We reuse office supplies whenever it is possible.
- We strive to minimize our electricity consumption, and we always turn off appliances when they are no longer in use.

**1.4 Responsibilities**

1.4.1 It is the responsibility of the management to:

- Communicate the code of conduct to employees and board members.
- Regularly evaluate and update the code of conduct in accordance with the Company's growth and development. This review takes place at least once a year.

1.4.2 It is the responsibility of everyone to follow the code of conduct. In case of questions regarding interpretation, please contact a competent colleague or the CEO