



Anti-Bribery and Corruption Code



UIB Nordic AB (“UIBN”) prides itself on upholding our underlying values of honesty, integrity, fairness and transparency. UIBN is dedicated to ethical business practice and we do not tolerate any form of bribery or any corrupt conduct, either within UIBN activities or those of the parties with whom we seek to do business.

Our internal Anti-Bribery and Corruption Policy (“Policy”) sets out our commitment to complying with all relevant anti-bribery and anti-corruption laws, rules, regulations and administrative standards applicable in every territory in which we operate.

UIBN have in place internal systems of control, which are followed by all of our employees. UIBN is committed to a policy of transparency and thus our employees will:

- not make, offer or accept bribes, directly or indirectly to obtain an unfair business advantage, whether directly or indirectly, to obtain an unfair business advantage. Obtaining an unfair business advantage includes any bribe to retain existing business operations, for example to renew insurance arrangements;
- conduct all business relationships honestly and with transparency, in accordance with the Policy; and
- feel free to report without fear any violations or potential violations of law or the Policy to the Compliance Function in accordance with the Whistle-blowing Policy.

Improper payments

UIBN prohibits improper payments in all forms to or from all clients, third party representatives acting on behalf of UIBN, and Third Party Producers of business to UIBN and (in particular) to or from a Government or quasi-Government Official.

An improper payment includes cash, cash equivalents, commission, goods, services, hospitality, entertainment or any other benefit, offered or provided to a third party in order to obtain an unfair business advantage.

Gifts

We do not offer, promise, pay, solicit or accept any inducements or bribes.

It is recognised that gifts are generally employed for legitimate purposes to create business relationships and specific contracts and as a gesture of goodwill. However, because gifts can also be used to gain an unfair advantage over competitors, if the cost of the gift is excessive, it could be deemed to be an inducement or a bribe.

Entertainment

Entertainment by UIBN of clients, underwriters and market participants is rationalised and attended only for the purpose of discussing bona fide general or specific business matters.

Expenses

All expenses must be precisely recorded and supported by evidence that accurately reflects the economic reality of the transaction.

Third parties

Payments to third party representatives acting on behalf of UIBN and to Third Party Producers of business to UIBN can be held to be bribes or improper payments if they are made to obtain an unfair business advantage. These are unacceptable, a breach of the Policy, and will not be tolerated.

Commission will only be paid to third parties who have rendered some service to UIBN in relation to a contract or contracts of insurance or reinsurance effected by us. The amount of commission paid must properly reflect the value of the work done by the recipient.

Anti-money laundering

UIBN will not accept or make any payments with funds known to be derived from illegitimate sources.

We are dedicated to complying with the financial crime, Anti-Money laundering and Anti-Terrorism laws in all jurisdictions in which we do business. We will conduct business only with reputable third parties who carry on legitimate business activities with funds derived from legitimate sources. In addition, UIBN will neither accept payments from clients made in cash, nor pay commission to third parties in cash or by cheque.



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UIB Nordic AB incorporated and registered in Sweden, registration no. 556517-1591. Regulated by the Finansinspektionen (Swedish Financial Supervisory Authority): 81044. Registered office: Humlegårdsgatan 5, 11446 Stockholm, Sweden. UK Financial Services Register Firm Reference Number: 454804. UIB Nordic UK is a branch of UIB Nordic AB, UIB Nordic UK registered in England and Wales at 69 Mansell Street, London E1 8AN, branch registration no. BR021796.

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