



## Purpose

This document, the Soldo Code of Conduct (“the Soldo Code”), outlines the standards and principles that guide our actions and decisions within the Soldo Group.

## Expressing the Essence of Soldo in our Code of Conduct

The Soldo Code is our foundation – it guides everyone who represents Soldo, shaping how we work and make decisions. It ensures we understand our responsibilities and have the clarity to bring the ‘essence of Soldo’ to life every day.

We stand for honesty and integrity in everything we do. We champion learning and growth, embrace humanity, and operate with complete transparency. Above all, we do what’s right – always.

Complying with the Soldo Code is fundamental to maintaining Soldo’s integrity, reliability, and reputation. It forms a core part of our contractual obligations.

Details about the Soldo Code are available on our Confluence pages. Please direct questions and requests to your manager. We welcome any suggestions for improving our Code at [ESG@soldo.com](mailto:ESG@soldo.com).

## We reflect Soldo's integrity in everything we do

### Integrity in representation

At Soldo, we hold ourselves to the highest standards, acting with integrity and professionalism in every decision we make.

We build trust through honesty, transparency, and accountability. We stand by our commitments, our own actions, and ensure our words and decisions align.

We put our customers first, treating them with fairness and professionalism. By understanding their needs, we create products and services that truly deliver value.

### Acting with diligence

We bring expertise, care, and diligence to everything we do. Committed to continuous learning, we sharpen our skills, deepen our knowledge, and stay ahead of the legal and regulatory landscape – ensuring we always operate at our best.

## **Doing what is right**

### Compliance with laws and ethics

At Soldo, we uphold the highest standards of legal and regulatory integrity. We strictly follow all relevant laws and market conduct standards, ensuring that compliance isn't just a requirement – it's fundamental to how we operate.

Every employee and representative play a role in maintaining this integrity. We stay informed, act in good faith, and take responsibility for meeting regulatory expectations without delay – especially in key areas like financial services, marketing, and sales.

We are committed to working transparently and cooperatively with regulators. Our Financial Services companies follow additional conduct standards, with further requirements for senior roles under specific regulatory regimes.

### Conflict of interest

We strictly avoid situations that could create – or appear to create – a conflict of interest. Any potential conflicts are treated with utmost seriousness. They must be openly disclosed and managed according to our company policy.

### Commitment to free and fair competition

We are committed to fair competition and fully comply with competition laws. Our client-first approach ensures that everything we do is in their best interests and aligned with our internal policies.

### Anti-corruption and anti-bribery

Soldo is unwavering in our commitment to integrity and transparency across all our business dealings. We rigorously adhere to global anti-bribery and corruption laws, maintaining a zero-tolerance stance. Professionalism, fairness, and ethics guide every relationship and transaction we engage in.

### Ensuring transparency in communication and accuracy in records

We prioritise clear, simple communication that is easy for everyone to understand. Our interactions are respectful, using straightforward language to ensure clarity.

We maintain accurate, up-to-date, and complete records across all types, ensuring consistency and reliability.

## **We protect our assets and maintain strict confidentiality**

### **Safeguarding our assets**

Our physical and intellectual property drives our innovation and success. As part of the Soldo team, we all share the responsibility of protecting our company assets – both tangible and intangible – and treating them with the utmost care and respect.

## **Upholding information and data privacy**

We prioritise data security, adhering to strict cybersecurity policies to safeguard both our organisation and clients from unauthorised access and breaches.

We are fully committed to complying with data protection laws like the Data Protection Act and GDPR, ensuring the secure handling of personal and financial data.

Confidentiality and ethical conduct are at the core of our operations. Protecting sensitive information from unauthorised access is everyone's responsibility.

## **We work together as one team**

At Soldo, we value each individual and harness our collective strength. Our culture is built on trust, fuelled by ambition, and defined by an unwavering commitment to delivering excellence for our customers.

## **Embracing our shared humanity: Celebrating diversity and inclusion**

Our culture is grounded in a deep respect for human rights and ethical business practices. We honour the dignity of every individual, striving to build an inclusive environment that celebrates diversity and champions equality.

We empower authenticity, and are inspired by the strength, resilience, and passion of each person contributing to our journey. Together, we are shaping our company and driving meaningful change.

Diversity, in all its forms, enriches our path and pushes us toward a brighter future.

## **Cultivating knowledge: Embracing lifelong learning**

Continuous learning is the key to unlocking each person's potential. At Soldo, we offer mentoring, training, and development opportunities that we believe benefit both individuals and our company.

Soldo offers an Onboarding training program for all new staff, including a specific subject matter for our Financial Services staff.

## **Maintaining a safe workplace**

We are actively building a safe, healthy work environment and do not tolerate violence, threats, or intimidation.

## **We respect our planet**

We are dedicated to building a sustainable future by embracing responsible business practices. We believe it's our duty to protect the environment and lead positive changes, working to reduce our impact and promote sustainability across all areas of our business.

## **We report concerns**

If something appears to be amiss, please bring it to our attention. Adhering to the Soldo Code and Group policies is essential. Employees are encouraged to report any concerns by speaking with their manager, contacting HR or Legal, or using our whistleblowing tool at [soldo.integrityline.com](https://soldo.integrityline.com). Please choose the option that is most convenient for you.

Our Financial Services companies follow additional conduct standards, with further requirements for senior roles under their specific regulatory regimes.

#### **Appendix 1 for Soldo Financial Services Ireland DAC - Central Bank of Ireland (CBI) Individual Accountability Framework and Guidance**

We are committed to the regulatory Common Conduct Standards, and we always ensure that:

- we act with honesty and integrity
- we act with due skill, care and diligence
- we cooperate with the regulators in good faith and without delay
- we act to deliver good outcomes for our customers and treat them fairly and professionally
- we observe proper standards of market conduct

The Additional Conduct Standards require that the individuals who hold pre-approval control functions in Ireland are required to ensure:

- that the business of the company is controlled effectively
- that the business of the company is conducted in accordance with its obligations under financial services legislation
- that any delegated tasks are assigned to an appropriate person with effective oversight and
- that any information of which the regulator would reasonably expect notice in respect of the business of the company is disclosed promptly and appropriately to the regulator

#### **Appendix 2 for Soldo Financial Services Ltd - Financial Conduct Authority (FCA) Handbook, Guidance and Publications**

We are committed to the regulatory Individual Conduct Rules, and we always ensure that:

- we act with honesty and integrity
- we act with due skill, care and diligence
- we are open and cooperative with the FCA, the PRA and other regulators
- we deliver good outcomes for our customers, their interests and treat them fairly
- we observe proper standards of market conduct

In addition, we are committed to the Senior Manager Conduct Rules and our Senior Management Functions (SMF) holders:

- take reasonable steps to ensure that the business of the company is controlled effectively
- take reasonable steps to ensure that the business of the company complies with the relevant requirements and standards of the regulatory system
- take reasonable steps to ensure that any delegation of their responsibilities is to an appropriate person and that they oversee the discharge of the delegated responsibility effectively
- disclose appropriately any information of which the FCA or PRA would reasonably expect notice