

Code of Conduct and Ethics

save[®]

Our Vision

Our vision is to create the most compelling savings platform of the 21st century.

Our Mission

Our mission is to improve the financial wellbeing of people everywhere.

Our Code of Conduct and Ethics

Save is a leading Savetech platform that strives to provide unparalleled value to its customers through technology, product innovation, and above all added value and fairness. Our customers entrust us with their life savings - as their fiduciary it is paramount that we build a company culture that mirrors our core values.

Our aim is to foster an ethical culture where responsible behavior enables us to grow and protect our customers. Our Code of Conduct and Ethics (the “Code”) is based on three pillars:

1. **Customer focus**, which is about providing services that create long-term value, focusing on solid investment returns and anticipating and managing conflicts of interest.
2. **Excellence in everything we do**, from innovative products and services, to how we collaborate across teams to deliver the best service to our customers.
3. **Sustainable performance**, which is about working consistently to strengthen our reputation as a savings platform that is able to provide consistent returns and safety of assets for our customers.

Our Code applies to everyone and everything we do, including our dealings with customers, stakeholders, counterparties, shareholders, regulators and business partners – and each other. And it is the basis for all our internal policies and procedures.

Our Board of Directors and our investors stand behind the Code – and our teams are required to be behind it, too. Everyone at Save must ensure our day-to-day actions and decisions follow the standards set out herewith. Above all, in order to deliver on our mission, we must put the interests of our customers, Save, and our shareholders, above our own.

Sincerely,



Michael Nelskyla
Chairman and CEO

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Laws, Rules and Regulations

Following the Law

We obey the local laws, rules and regulations, work and do business – as well as our own governance and compliance requirements. We work with our regulators, being forthcoming and transparent in our dealings with them.

Fair Dealing and Fair Competition

We succeed by outperforming our competitors fairly and honestly, not by resorting to unfair or underhand tactics.

We don't stretch, distort or try to hide the facts or the truth. Nor do we use information we are not meant to have to gain an unfair advantage over competitors.

We act fairly, honestly and in good faith with everyone we deal with: our clients, business partners, competitors, suppliers, the public and each other.

Fighting Crime

Anti-Money Laundering

We have rigorous systems and policies in place to detect, report and stop any suspected money laundering and we will only deal with counterparties who adhere to these standards.

Anti-Corruption

We have zero tolerance for corruption or any kind of bribery. We don't offer or accept improper gifts or payments in the course of our business.

Criminal Activity

We carry out due diligence and keep a constant lookout for any suspicious activities, reporting them to senior management or our compliance officers as soon as we discover them and we follow strict know-your- customer regulations.

Tax Related Matters

We follow all the laws, rules, regulations that apply to us, not just to the letter, but in their true spirit of the law. We pay and report all taxes due. We report information relating to our own tax position and that of our clients and employees as required.

Behaving Responsibly and Ethically

Values and Ethics

We don't just follow the laws, rules and regulations in everything we do. We do what is right, and ensure we behave with integrity at all times.

Customer Relationships

We look after our customers for the long term, winning their loyalty by earning their trust through excellence of service.

We try to anticipate what our customers are going to need before they ask. We go out of our way to give them an exceptional service. We make sure our services are fit for our customers and are marketed in a way that is not detrimental to their interests. We treat our customers fairly, and with the equal courtesy and respect.

Conflicts of Interest

We put our customers' best interests before our own – and Saves interests before our personal interests.

We have systems to identify and manage potential conflicts of interest. And as soon as we do identify any such conflicts, we raise them immediately with our line manager or with Legal or Compliance.

Sharing, Using and Storing Information

Reporting and Information Sharing

When we share or report anything, especially financial information – to either the public or our regulators – we take great care to make sure it is accurate, up to date and as easy to understand as it can be (and in line with any legal or regulatory requirements and best practices).

Insider Information

We never use insider information (non-public material information) or use information we are entrusted outside of their intended purpose.

We only ever share such information on a need-to-know basis. That applies to people inside and outside Save, in line with our internal procedures, as well as any relevant laws, rules and regulations.

Client Confidentiality

Our customers trust us to keep the information they've shared with us safe and secure and only use it in the ways we've agreed with them.

We follow the highest standards of information security to keep our customer information confidential and to protect legitimate their privacy rights. We have strict and up to date data security standards and procedures designed to prevent data being tampered with, accessed by the wrong people, stolen, lost or destroyed.

We never share our customers' details with anyone, unless we have their express permission to do so – or where we have a legal duty to share it with the relevant authorities. And even within Save, we will only share customer details with those colleagues who genuinely need to see it to serve our customers' best interests.

Winning with the Right Culture

Diversity and Equal Opportunity

We believe that people from different backgrounds, with different thoughts and opinions gives us a competitive advantage with valuable new ideas, approaches and experiences.

Everyone has the same chance to get ahead at Save – whatever their ethnicity, gender, national origin, age, ability, sexual orientation or religion. And we work to create a culture where everyone feels they are welcome, respected and that they are a valuable part of our team.

We do not tolerate any kind of discrimination, bullying or harassment. And we encourage each other to speak up and report it through clear channels, without fear of reprisals.

Performance and Professionalism

Our professionalism, integrity and pursuit of excellence are how we create value for our customers and shareholders. Our compensation system is designed to reward long-term value creation by balancing performance and prudent risk-taking with a focus on conduct and sound risk management practices.

We know that our business is only as strong as our people. We work hard to create a working environment where talent can thrive and reach its full potential.

Protecting our Assets

We keep Saves assets safe and secure – from sensitive, confidential information about our business, plans and people to our intellectual property, systems and equipment, as well as documents, information and other materials belonging to others that are entrusted or made available to us. That means making sure that these assets are handled properly and used in line with relevant laws and regulations and doing what we can to prevent them from being lost, stolen, damaged or misused. We retain data to fulfil regulatory retention and legal hold obligations. We will not use such assets for non-Save business or for our own personal advantage.

Health and Safety

We never do anything that might put people in danger or harm them in any way – whether they're colleagues, customers, partners, competitors, visitors or anyone else.

We keep our workplaces safe by following health and safety rules. Doing this makes sure we have safe and healthy working conditions in which our dignity is respected.

Society and the Environment

Integrating Financial and Societal Performance

We integrate financial and societal performance for the mutual benefit of our clients and our firm.

We are constantly looking for better ways to do business in a sound and socially responsible manner.

That includes monitoring, managing and reducing any negative impact we might have on the environment and on society. It means managing social and environmental risks that our own and our clients' assets are exposed to.

Investing in Society

We constantly look for ways to contribute to the well-being of our local communities – by supporting charitable activities and, including through our volunteering efforts.

Violations of our Standards

Disciplinary Actions

Anyone who breaks the rules (whether it is our Code, our policies or outside laws, rules and regulations) will face consequences – from reprimands and warnings to outright dismissals.

This includes not only the person who broke the rules, but also their line manager and anyone who knew about it but did not report it.

And where a violation amounts to criminal behavior, we will not hesitate to bring it to the attention of the relevant authorities

Upholding the Code

From our Board of Directors down, we adhere to the Code, with no exceptions. We will not accept any justification or excuse for breaking it, whatever the reason – whether for profit, convenience or competitive advantage.

Modifications to the Code

The Code defines the way we do business and is reviewed regularly to make sure it reflects our principles and standards and is consistent with the law. Whenever there's a change, an announcement will be provided to every employee.

Affirmation Process

Each of us declares that we have read and affirmed our awareness of the Code, as part of our employee or compensation agreement

Speaking Up

We immediately report any potential violations of the Code to our line manager or compliance officer. We can also report them confidentially or anonymously using FINRA and SEC whistleblowing procedures. We regard any form of retaliation against whistleblowers to be unacceptable.

We expect all staff to escalate and report any violations of laws, rules, regulations, policies, professional standards and the principles of the Code.

Questions about the Code

Any questions about any part of this Code, or what it means in practice, should consult the Save Compliance Manual or contact Our Chief Legal and/or Compliance Officer.

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