

CODE OF CONDUCT

SEPTEMBER 2025



SAGA

WHO is this for?

Saga's Code of Conduct applies to all colleagues

WHY is this important?

Saga is committed to high standards in relation to the fair and ethical treatment of colleagues, and likewise colleagues are expected to behave in an ethical manner when dealing with customers, suppliers and within the wider external environment when representing the Company.

We require the highest standard of personal and professional honesty and integrity from colleagues in all business dealings and relationships with customers, other colleagues and suppliers.

WHAT are the details of this?

Our Code of Conduct is a summary of the policies and procedures that detail the required standards in the way we treat our customers, suppliers and each other.

More detail of each policy can be found by clicking the links.

Treating Customers Fairly (TCF)

As a regulated business, the Financial Conduct Authority (FCA) require us to demonstrate that we are consistently treating customers fairly and have 6 principles:

- **Customer Confidence:** Customers can be confident that they are dealing with firms where the fair treatment of customers is central to the corporate culture
- **Product Design:** Products and services marketed and sold in the retail market are designed to meet the needs of identified customer groups and are targeted accordingly

- **Clear Information:** Customers are provided with clear information and are kept appropriately informed before, during and after the point of sale
- **Suitable Advice:** Where customers receive advice, that advice is suitable and takes account of their circumstances
- **Product Performance:** Customers are provided with products that perform as firms have led them to expect, and the associated service is both of an acceptable standard and as they have been led to expect
- **Post-Sale Barriers:** Customers do not face unreasonable post-sale barriers imposed by firms to change products, switch providers, submit claims, or make complaints.

These principles are crucial for ensuring that customers are treated fairly, regardless of whether the service or product they are purchasing is covered by the FCA. All colleagues are expected to adhere to these principles in their roles, whether they are directly involved in selling and or supporting those colleagues that do.

Within the scope of their job colleagues should consider the principles and how they should apply. Any instance where there is a risk of failing to adhere to the principles should be reported upwards in order that a satisfactorily compliant resolution may be achieved.

Acceptance of Gifts and Hospitality

No reward, gift or favour in return for, or dependent on, the outcome of any discussions with third party suppliers may be given or received. A low value gift from a third party supplier is usually acceptable but consideration should be given to **the Anti-Bribery and Anti-Corruption Policy** found [here](#) before accepting any such gift. High value gifts are not to be accepted. All gifts

accepted by colleagues should be recorded by their manager.

Conflicts of Interest

Colleagues may find themselves in a situation where the interests of customers, suppliers, shareholders, colleagues and possibly their own interests are in conflict. If in any doubt they should remove themselves from any situation where a conflict of interest may arise. The approach of all colleagues must be to be as transparent as possible in all dealings and ensure that any approach taken is discussed with their manager and recorded appropriately. See our **Conflicts of Interest Policy** for more details.

Improper Payments or Inducements

It is not acceptable to give or receive bribes, inducement or similar payments and gifts in order to gain or retain business for the company, or from a supplier. Such behaviour is unethical and could result in substantial fines for the company and damage the reputation of the company. See our **Anti-Bribery and Anti-Corruption Policy** [here](#) for more details.

Speak Up

Colleagues that experience or observe behaviour or actions that are not aligned to Saga's purpose or values, as well as company policy, laws and regulations are encouraged to speak up about this in a way that they feel comfortable to do so.

This could include concerns about crime; a failure to comply with any legal or regulatory obligation; miscarriage of justice; failure to maintain health and safety of any individual; damage to the environment; fraud or financial irregularity; blackmail; corruption or bribery. See [here](#) for more information on our **Speak Up Policy**

Access to Customer Accounts

Many colleagues have access to customer accounts however must only access a customer account when they have a valid business reason for doing so. Colleagues must not access their own account or details, nor those of their family, friends or work colleagues. If this situation should arise it should be reported to their manager immediately.

Misuse of Official Position for Personal Gain

The reputation of the brands that exist within Saga is key to the success of the business. Colleagues must not use any Saga brand name, or their official position within the company, to influence customers, suppliers or other third parties for personal gain, benefit or to pursue private transactions. Colleagues may not use company stationary for the same reasons. Complaints and requests of a private nature both within Saga and with external companies should be made via the normal procedure available to other customers.

Key Point

This Code of Conduct may be referred to when dealing with any internal disciplinary issues or legal/criminal action, together with any other specific company policies which may apply.

Roles and responsibilities

Colleagues

Colleagues are expected to familiarise themselves with Company policies and practices and ensure they that they understand and adhere to these at all times.

Colleagues are also required to know what is expected of them and to deliver their best at all times, contributing to their team and ultimately the wider Company objectives.

Managers

Managers are expected to know, understand and adhere to Company policies, rules and corporate governance. They should also ensure that their teams have a similar understanding and are familiar with appropriate procedures.

Managers are also responsible for ensuring that each colleague has the opportunity to give their best, that they understand their objectives, and receive appropriate and timely feedback on their progress and contribution.

Saga

- Our policies will be fair, always compliant with legislation as a minimum, providing an enhanced colleague experience where we can
- We'll use external and internal insight to design modern policies that respond to an evolving workplace and life events
- We trust that this policy will answer any questions you may have at this time but please reach out to the People Team should you have any additional queries or questions

Policy Owner: People Team

Reviewed: September 2025

Version: 1 (rebranded Personal Standards & Ethics Policy)