Intermediary Code of Conduct

October 2026



Bluestone.
mortgages
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Introduction

This Code applies to all intermediaries accredited by, or conducting business with, a Shawbrook Group entity. In this Code, the "Relevant Group Entity" means the Shawbrook Group company whose products or services the intermediary distributes, or with which it has an intermediary relationship. This includes Shawbrook Bank, The Mortgage Lender, Bluestone Mortgages, JBR Capital and Playter. The Relevant Group Entity values its relationships with intermediary partners and is committed to working collaboratively to support good customer outcomes, responsible business practices and long-term sustainable growth.

Both parties recognise their shared responsibility under the FCA Consumer Duty or as a general principle, to support good customer outcomes throughout the customer journey. This Code of Conduct outlines the principles, standards and behaviours expected to support fair customer treatment, compliance with relevant regulations and effective partnership working.

The Relevant Group Entity and intermediary partners will cooperate and share relevant information where appropriate to support regulatory obligations, oversight activities and the ongoing monitoring of customer outcomes.

Principles

- Work collaboratively and professionally in the best interests of customers, maintaining effective business relationships and supporting the reputation and integrity of the Relevant Group Entity and Shawbrook Group;
- Provide high-quality product selection, support and advice (where applicable), ensuring products and services are distributed appropriately and aligned to the relevant target market;
- Ensure all customer communications and representations relating to products and services are clear, fair, accurate and not misleading, and support customers in making informed financial decisions;
- Treat all customers fairly, including vulnerable customers, and ensure appropriate customer support throughout the customer journey;
- Maintain effective systems, controls and governance to monitor customer outcomes, sales appropriateness, staff incentives, complaints handling and regulatory, operational and financial crime risks;
- Operate ethically and with integrity in a manner that supports relevant compliance obligations, customer confidence and the reputation of the Relevant Group Entity and Shawbrook Group, including promoting equality, diversity and inclusion;
- Ensure all pricing, fees and commissions are transparent, fair, proportionate and compliant with applicable regulatory requirements;
- Ensure staff, appointed representatives and relevant third parties are appropriately trained, competent and compliant with all applicable laws, regulations and internal policies.

Customer outcomes and conduct

The Relevant Group Entity is committed to delivering good customer outcomes and complying with the FCA Consumer Duty, including acting to deliver fair value, supporting customer understanding and providing appropriate customer support.

Intermediaries are expected to conduct business in a customer-centric manner and act in accordance with all applicable FCA Principles for Businesses, Individual Conduct Rules and regulatory requirements.

We expect Intermediaries to:

- Act with integrity;
- Act with due skill, care and diligence;
- Pay due regard to the interests of customers and treat them fairly;
- Ensure communications are clear, fair and not misleading;
- Observe proper standards of market conduct;
- Identify, record and appropriately support vulnerable customers, and notify the Relevant Group Entity promptly of any known or suspected vulnerability, support need or material change in circumstances that may affect customer understanding, affordability or good outcomes;
- Take reasonable steps to avoid foreseeable harm and support customers in making informed financial decisions.
- Protect customer and Relevant Group Entity information in accordance with applicable data protection and information-security requirements, and notify the Relevant Group Entity promptly of any actual or suspected data breach or cyber incident that may affect the Relevant Group Entity or its customers;
- Notify the Relevant Group Entity promptly of any material regulatory, financial, operational or reputational issue that may affect the intermediary's ability to meet its obligations or may affect customers or the Relevant Group Entity, including FCA or other regulatory investigations, suspected fraud or financial crime, loss or restriction of permissions, insolvency risk, professional indemnity insurance issues and significant complaints;

Governance, oversight and professional standards

The Relevant Group Entity and its intermediary partners are expected to operate with professionalism, integrity and effective governance arrangements that support good customer outcomes, compliance with relevant regulations and the reputation of all parties.

This includes maintaining appropriate systems, controls and oversight arrangements to:

- Monitor sales quality and customer outcomes;
- Identify and manage conflicts of interest;
- Support the fair handling of complaints and customer feedback;
- Ensure appointed representatives, sub-brokers and relevant third parties are appropriately governed and supervised;
- Maintain compliance with applicable laws, regulations and industry standards.
- Cooperate with the Relevant Group Entity's reasonable requests for information, monitoring, audit, oversight and assurance activity;
- Support the Relevant Group Entity with complaints investigations, root cause analysis and remediation activity relating to customers introduced by the intermediary, including the timely provision of relevant information and records;

Both parties are committed to maintaining open and cooperative working relationships and supporting each other in meeting regulatory obligations where appropriate.

Training, competence and responsible business practices

Intermediaries are expected to ensure that relevant employees, appointed representatives and associated persons maintain appropriate levels of training, appropriate conduct , competence and professional standards to support compliance with relevant regulations and good customer outcomes.

This includes:

- Maintaining adequate knowledge and competency;
- Ensuring all customer information, documentation and submissions provided to the Relevant Group Entity is accurate, genuine and complete to support responsible lending decisions;
- Maintaining effective controls to prevent, detect and report fraud, financial crime and suspicious activity, and escalating relevant matters to the Relevant Group Entity promptly;
- Operating remuneration, fees and commission arrangements that are transparent, fair and aligned to any applicable regulatory requirements and customer interests.

The Relevant Group Entity and its intermediary partners are committed to maintaining open, constructive and collaborative relationships that support good customer outcomes, responsible business practices and long-term sustainable growth. By working together transparently and professionally, both parties can support customers effectively while maintaining high standards of integrity, governance and compliance.

T: 0800 368 1833 W: bluestonemortgages.co.uk

Lines open 9.00am - 5.30pm Monday to Friday. Calls may be recorded.

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Get in touch if you need this document in Braille, large print or audio tape.

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Effective as of 10/2026