

## Group CEO Instructions on Tax

### 1 Purpose and scope

The purpose of these instructions is to establish the principles for how to manage tax in a compliant and responsible manner in Nordea Group (“Nordea” or “the Group”), thereby protecting value for customers and shareholders. Further, these instructions define the overall tax governance including roles and responsibilities within Nordea in relation to any tax charges, including related reporting, to tax authorities. Tax charges include inter alia taxes, duties and other fiscal charges (excluding resolution fees in accordance with EU Directive 2014/59 EU).

All employees within the Nordea Group, including non-permanent staff working on behalf of Nordea, are subject to these instructions. It is the responsibility of each manager to ensure that these instructions are where relevant known and conformed to within his/her respective area of responsibility.

### 2 Policy statements

As tax charges are a significant cost for Nordea, a compliant and efficient management of tax and related risks is necessary to support the strategic and financial targets. In particular, Nordea:

- aims at ensuring a good local tax reputation,
- do not promote tax evasion or, what may be perceived, as aggressive tax planning
- manages tax risks to ensure that the correct tax is paid,
- applies tax positions consistent with the tax laws and practices of the tax jurisdictions in which Nordea operates,
- aims at paying and reporting taxes in due time and with due consideration,
- takes a commercial approach rather than a tax driven approach when operating its business,
- commit to be transparent with the tax authorities in each jurisdiction regarding Nordea tax positions filed
- complies with international reporting standards as implemented in national laws or bi- or multilateral conventions as well as other national requirements on customer tax reporting
- commit to include Nordea tax management in the Sustainability reporting.

### **3 Tax Risk appetite framework**

In respect of Nordea tax risk appetite, the Group Board shall annually decide on the Group Risk Appetite framework, including the risk appetite statements and corresponding thresholds.

**26 November 2019**