

Nordea Anti-Bribery and Corruption Policy

12/4/2021



Anti-Bribery and Corruption (ABC) compliance at Nordea

ABC compliance at Nordea

Nordea acknowledges on behalf of itself and its subsidiaries that it has a responsibility towards its customers, shareholders and regulators to ensure that Nordea, its employees, and third parties do not commit acts of bribery or corruption and that applicable ABC laws and regulations are complied with.

Nordea is committed to detect, deter, manage and identify the financial crime risks that it is exposed to and to take the proportionate measures required to manage these risks across all jurisdictions in which it operates, applying a risk-based approach.

Global framework

Nordea's ABC framework includes, but is not limited to Group Board Directive on ABC and Group CEO Instructions on Gifts and Hospitality.

Nordea's Global framework enables Nordea to:

- Promote strong governance and bribery and corruption risk management throughout Nordea.
- Articulate Nordea's risk-based approach to managing its bribery and corruption risk.
- Define a clear and consistent foundation across Nordea to detect, deter, manage and identify bribery and corruption.

Requirements

The mandatory requirements include but are not limited to:

- Defined accountabilities and responsibilities, decision-making fora/committees, necessary resources and deployment of technology, where possible, for bribery and corruption risk management.
- Processes for management Information and internal and external reporting.

- Mandated independent assurance, monitoring and testing of ABC controls and measures.
- Processes for record keeping and processing of personal data.
- Regular ABC training for employees.
- Performance of financial crime risk assessments and application of risk-based approach in ABC risk management.
- Zero-risk appetite statement towards Bribery and Corruption. Nordea will only engage in business that is in accordance to applicable laws, regulations, signed commitments and Nordea's own standards of business ethics. This applies to all our employees, suppliers, contractors and other business partners wherever they operate for or on behalf of Nordea.
- A prohibition against facilitation payment and political donations
- Gifts and events must reflect the nature of the business relationship and the circumstances under which they are received or given. Specific and very stringent requirements apply when dealing with public officials. It is the responsibility of each Nordea employee to ensure that all gifts and events are appropriate and that the appropriate reporting is in place. This applies both when Nordea offers and accepts gifts and events.
- Nordea keeps guidelines and instructions regarding ABC on the Group's Intranet. In countries where the Intranet is not available, the guidelines and instructions are issued in written form. Each employee has access to the guidelines and instructions and is responsible for complying with them. Nordea encourages openness and will support and protect anyone who raises genuine concerns in good faith concerning compliance with the ABC framework.

More information is available at:
[https://www.nordea.com/Nordea Wolfsberg Financial Crime Compliance Questionnaire](https://www.nordea.com/Nordea%20Wolfsberg%20Financial%20Crime%20Compliance%20Questionnaire)