Nordea

DISCLOSURE POLICY

The Disclosure Policy has been approved by Nordea Bank's Board of Directors.



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1. Purpose, scope and background

1.1. Purpose and scope

This Disclosure Policy ("Policy") describes the objective and key principles Nordea Bank Abp ("Nordea Bank") and Nordea Group ("Nordea" or the "Nordea Group") follow in investor communications and the publication of financial reporting. In addition, the Policy describes the disclosure, dissemination and storage of the information within the scope of the disclosure obligation as prescribed by rules and regulations.

This Policy concerns Nordea Bank and, where applicable, its subsidiaries and it has been approved by Nordea Bank's Board of Directors. Any amendments hereto must be approved by the Board of Directors, with the exception of amendments which are of a technical nature, and which do not alter the overall concept of the Policy.

1.2. Background

Nordea Bank is a Finnish public limited liability company and the parent company of the Nordea Group (comprising the company and its subsidiaries). Nordea Bank's shares are listed on the Nasdaq stock exchanges in Helsinki, Stockholm and Copenhagen and its American Depositary Receipts (ADR) are traded in the US in US dollars. As part of its funding operations Nordea Bank and its mortgage bank subsidiaries (Nordea Hypotek AB (publ), Nordea Kredit Realkreditaktieselskab, Nordea Eiendomskreditt AS and Nordea Mortgage Bank Plc, collectively "Nordea Issuing Entities") also issue long-term debt instruments that are usually listed on various exchanges. Additionally, Nordea has other listed financial instruments as part of its business offering.

2. General principles

The general principles for all information given, communicated or disseminated by Nordea are to ensure:

- that all parties operating in the relevant markets have equal and simultaneous access to correct, relevant, clear, reliable and consistent information regarding Nordea,
- that the information is comprehensive to enable sufficient assessment of the effect of information disclosed,

- that the information is provided in accordance with applicable rules and regulations, and
- that it is provided on a non-selective basis.

3. Communication channels

Nordea regularly engages in communication activities targeted at numerous stakeholder groups and uses several channels for dissemination of information, including stock exchange and press releases, investor news, websites, investor meetings, conference calls and webcasts. Additionally, Nordea spokespersons disseminate information via magazines and publications, interviews and public presentations. The relevant communication channel is determined based on applicable rules and regulations and this Policy.

3.1. Stock exchange releases

Stock exchange releases are published to provide information simultaneously to all parties in the market on facts, matters and circumstances that Nordea believes are likely to have a significant effect on the price of Nordea Bank's shares and other financial instruments of Nordea. Stock exchange releases are also used to publish regulated information that is required to be disclosed by means of a stock exchange release, even if such releases do not in all cases include price-sensitive information.

Stock exchange releases are published simultaneously on the relevant stock exchanges and on Nordea's website at *www.nordea.com* and in respect of Nordea Issuing Entities on local language websites.

All information Nordea discloses is made available to the public in a fast and non-discriminatory manner. To ensure this, information disclosed through a stock exchange release is processed through a leading newswire distributor and simultaneously sent to:

- the regulated markets and multilateral trading facilities on which the relevant instruments are admitted to trading,
- the relevant Financial Supervisory Authority and officially appointed mechanism,
- major mass communications media, and
- subscribers of releases.

Any information that is revealed to be untruthful or misleading following its disclosure, and which may be of material significance to the investors will, without delay, be appropriately corrected or supplemented.

All releases issued by Nordea provide contact details for further information. Subscriptions for the releases can be made at Nordea's website.

3.2. Press releases

Press releases are published on matters that do not meet the regulatory requirements for a stock exchange release, but which are considered to be newsworthy, or which are otherwise considered to be of interest to Nordea Group's stakeholders.

Additionally, Nordea may issue other group level press releases related to various topics, for example, topics such as product or pricing changes. Press releases may also be issued in relation to business activities on country level and such releases may be issued in local languages only.

Generally, press releases are disseminated through a similar distribution network as stock exchange releases, but without regulatory recipients. However, local releases are issued in the language(s) deemed necessary in the local market. Press releases may be processed through a newswire distributor or disclosed only on Nordea's local websites.

Releases issued by Nordea always provide contact details for further information.

3.3. Nordea's website

Nordea's company website *www.nordea.com* is the principal source of up-to-date information on Nordea Group. Additionally, Nordea has local websites (*www.nordea.fi*, *www.nordea.se*, *www.nordea.dk*, *www.nordea.no*) for the local key Nordic markets where it operates. All releases and financial reports that are published by Nordea Bank or a Nordea Issuing Entity are simultaneously published on a Nordea website. The websites include separate pages for Nordea Issuing Entities, including information released for the respective Nordea Issuing Entity. All releases and financial reports are

available on a Nordea website for at least five years or for the minimum time described by rules and regulations.

In addition to releases, Nordea provides extensive information to investors, analysts, the media and other stakeholders on its websites. The websites contain information on, for example, strategy and operating environment, corporate responsibility and sustainability, Nordea as an investment, corporate governance, general meetings of shareholders, remuneration and macroenvironment.

3.4. Social media

Nordea's social media channels are used to announce certain stock exchange or press releases and other articles. The social media channels are normally used to reach an accurate targeted group. Nordea may also use paid campaigns on social media to enable better targeting, for example, for certain financial event invitations. Nordea has official channels on LinkedIn, X, Threads, YouTube, Facebook and Instagram.

Social media is also used for disseminating up-to-date information about Nordea's milestones, product releases, or other events that impact the progress of the bank and the customer offering. As a general rule, Nordea never deletes posts from its feeds, rather all posts are stored on the platform. However, Nordea may delete posts containing information on technical issues that are no longer deemed relevant.

3.5. Media, investor and analyst engagement

Nordea's management and Investor Relations ("IR") regularly meet with investors, capital market representatives and other stakeholders either virtually or face-to-face. A phone conference for investors, analysts and other stakeholders is normally arranged in relation to the publication of quarterly results, and in relation to other relevant events. Nordea also arranges a mixture of one-on-one meetings and group meetings at Nordea's premises and participates in investor conferences and road shows to various markets in addition to the presentations of financial results. Information provided in these events is based on the annual and quarterly reports, the quarterly investor presentation available on the websites, and general company presentations – therefore the relevant information has always been published to the market before such interactions.

Accordingly, if material new information is to be provided at such events a stock exchange or press release, as applicable, is issued ahead of the meeting's commencement.

Group level press conferences on financial reporting and other major issues are global through streaming via the Internet in order to reach media and investors in all major markets simultaneously. Furthermore, capital markets days are arranged when it is considered that a more comprehensive theme or general presentation would give the market greater understanding of Nordea's business. Nordea also organises a pre-silent conference call for financial analysts, which is open to the public. This call aims to remind analysts of past disclosures, events during the quarter and market data, all available in the public domain. No material new information is disclosed in such conferences.

Nordea adheres to an "open door" policy for results presentations and capital markets days and invitations are issued by means of a press release and posted on the websites. As a rule, only Group Leadership Team members, designated subject matter experts and IR communicate with market participants on behalf of Nordea. Nordea has established a list of personnel authorised to issue statements to the media on matters within their sphere of responsibilities.

4. Inside information

Nordea has adopted group-wide rules on administration of inside information. In order to ensure that Nordea handles and discloses inside information according to applicable rules and regulations, an insider coordination team ("ICT") has been established. The ICT assesses whether certain information constitutes inside information according to the applicable rules.

Nordea discloses inside information concerning Nordea in accordance with regulations as soon as possible. Where such information arises in the course of a protracted process, Nordea discloses the relevant final event as soon as possible after it has occurred. The disclosure of inside information may, however, be delayed if the conditions set by regulations are met. Inside information refers to information of a precise nature, which has not been made public, relating, directly or indirectly, to Nordea Bank or a Nordea

Issuing Entity or a financial instrument issued by Nordea, and which would, if it were made public, likely have a significant effect on the price of the financial instrument or the price of a related derivative financial instrument.

5. Financial reporting, other reports and related information

5.1. Financial reporting and annual reporting

Nordea Bank publishes information concerning its financial position and results in financial statements releases, annual reports, half year financial reports and interim reports. Financial data is disclosed for both Nordea and reportable business areas and group functions.

Each Annual Report comprises financial statements, Board of Directors' report, including the Sustainability Statement, Auditor's report, Corporate Governance Statement, as well as information on Nordea's business, performance and strategy and sustainability. The Board of Directors' report also includes country-by-country reporting in accordance with the Finnish Act on Credit Institutions (610/2014). The Remuneration Report for Governing Bodies is published as a separate report simultaneously.

The financial statements release, interim reports and half year financial report are published according to the pre-disclosed financial calendar as stock exchange releases. The financial calendar containing the dates for financial releases during the next financial year is disclosed before the end of the preceding financial year.

Nordea Issuing Entities publish information concerning their financial position and results in financial statements releases (where prescribed by local rules), annual reports and half year financial reports.

5.2. Alternative performance measures

In its financial reports, Nordea discloses various alternative performance measures. These measures together with the details related to the calculation of them are published quarterly as part of the quarterly financial results materials on Nordea's website.

5.3. Sustainability reporting

Nordea has reported on its environmental and sustainability performance on an annual basis since 2002. Nordea Bank publishes a statutory Sustainability Statement, which is included in the Board of Directors' report in the annual report of Nordea Bank. The Sustainability Statement, including taxonomy reporting, is prepared in accordance with the Corporate Sustainability Reporting Directive and its related delegated acts, as implemented into Finnish legislation.

In addition to the statutory sustainability reporting, Nordea Bank may from time to time publish voluntary sustainability disclosures on Nordea's environmental and sustainability performance deemed relevant for its stakeholders.

5.4. Capital reporting

Information on capital management and capital adequacy is presented in the Capital and Risk Management Report. On the basis of its consolidated situation, Nordea provides Capital and Risk Management Report disclosures quarterly according to Part Eight of Regulation (EU) No 575/2013 (CRR). The disclosures constitute a comprehensive disclosure of risks, risk management and capital management. The report includes disclosures, or references to other disclosures, required under Part Eight of the CRR and by the EBA technical standards on disclosure requirements.

Accompanying the Capital and Risk Management Report are the required disclosures for the Nordea Issuing Entities.

The Capital and Risk Management Report is made available at nordea.com and/or through the Pillar 3 data hub. The subsidiaries' disclosures are published through the same channels after the publication date of each subsidiary's annual report.

5.5. Other reports and publications

Nordea also publishes other reports as prescribed by rules and regulations, including but not limited to, Nordea Bank's Remuneration Policy for Governing Bodies and Nordea Bank's Human Rights Report, including the Norwegian Transparency Act Statement and

the UK Modern Slavery and Human Trafficking Statement. All reports are available on company websites.

5.6. Outlook

Nordea Bank may provide forward-looking statements in the form of a financial target, outlook statement and related guidance for a period determined by the company in connection with its results releases or capital market days. The estimates presented by Nordea Bank are based on the company's view at the time of release on the likely future development of Nordea Group. Nordea Bank shall update its outlook and profit guidance if necessary in connection with results releases, or in a profit warning issued as a separate stock exchange release.

5.7. Profit warnings

Nordea constantly monitors the Group's financial performance, position and outlook. A profit warning is disclosed as soon as possible when Nordea's expected result or financial position deviates from previously released guidance in a way that may require a profit warning, and when such deviation is likely to have a significant effect on the price of the relevant financial instruments. Nordea publishes profit warnings as soon as possible as stock exchange releases.

5.8. Silent period

Nordea observes a silent period, which begins on the fifth banking day after a financial quarter ends, when normally the quarterly numbers are produced, and lasts until the financial report for the corresponding period has been made public. During the silent period, Nordea does not make any comments regarding Nordea's financial status to any media or investor contacts.

6. Other disclosures

6.1. Other information disclosed via stock exchange releases

Nordea discloses other regulated information and information required to be disclosed in a stock exchange release as prescribed by rules and regulations. Nordea Bank issues stock exchange releases on, for example, the following topics:

- forecasts and forward-looking statements,
- issuances of securities,
- changes in the Group Board, Group Leadership Team and external auditor(s),
- share-based incentive programmes,
- closely-related party transactions,
- financial calendar,
- share buybacks,
- changes in own holdings of Nordea shares,
- changes in capital requirements or other material regulatory changes,
- flagging in relation to the Nordea shares as set out in Chapter 9 of the Securities Markets Act and the other applicable rules, and
- managers' transactions in the Nordea Share or debt instruments issued by the Nordea Issuing Entities as set out in Article 19 of MAR and the other applicable rules.

Nordea Issuing Entities disclose other regulated information and information required to be disclosed in a stock exchange release as prescribed by applicable rules and regulations.

6.2. General meetings

General meetings of Nordea Bank are held in Helsinki or at the decision of the board of directors, without a meeting venue. Under the articles of association of Nordea Bank, a notice to a general meeting is officially issued by publishing the notice on Nordea's websites. The notice shall simultaneously be disclosed as a stock exchange release. In addition, Nordea may inform the shareholders of the general meetings also in other ways, e.g. publishing information via its own digital channels. Possible resolution proposals of the Shareholders' Nomination Board to the general meeting shall be disclosed as a stock exchange release.

Resolutions adopted by the general meeting shall be disclosed as a stock exchange release. Where the general meeting has authorised the Group Board to decide later on a specific issue, such resolution by the Group Board shall be disclosed. In addition to the notice, other relevant information regarding general meetings is made public on Nordea's websites.

Nordea Issuing Entities are fully owned subsidiaries of Nordea Bank and accordingly general meetings, when formally convened, are only attended by a single shareholder.

7. Communications in exceptional situations

Nordea has made preparations for exceptional and crisis situations and implemented related principles and responsibilities in its crisis management guidelines.

In exceptional and crisis situations Group Brand, Communication and Marketing ("GBCM") is responsible for external and internal communications, including possible public statements or dissemination of information in relevant communication channels. If the exceptional situation is of material significance to investors, a statement will be published either as a stock exchange release or a press release, as the situation requires.

8. Rumours, market speculation and information leaks

As a general policy, Nordea does not comment on market rumours, speculation by the media, share price development, actions of competitors or customers or analyst forecasts. At its discretion, Nordea may deem it necessary to correct clearly incorrect specific information.

If Nordea learns that information that is likely to have a significant effect on the price of its financial instruments has leaked prior to a public disclosure, a stock exchange release on the matter is published as soon as possible.

9. Language

Nordea Bank's official reporting language is Swedish. All material relating to the fulfilment of Nordea Bank's disclosure obligation is published in English as well. Stock exchange releases on group-level matters are issued in English, Finnish and Swedish except managers' transactions, which are issued only in English and Swedish.

Nordea Issuing Entities publish their releases and reports in their official reporting language and English.

Local press releases are issued in the language(s) deemed necessary on the local market.