



2008

CSR Report 2008

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Nordea in brief

Nordea is the largest financial services group in the Nordic and Baltic Sea region. In 2008 over 33,000 Nordea employees contributed to maintaining a strong position in a turbulent market. Assets under management at year end were EUR 126 bn, and Nordea had a market capitalisation of approximately EUR 13 bn.



Nordea – with an outstanding starting point

A unique customer base

Approx. 10 million Household customers and 700,000 active Corporate customers

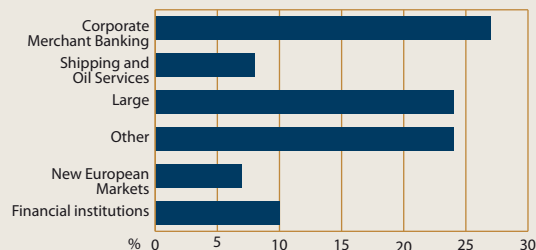
Strong distribution power

Approx. 1,400 branches

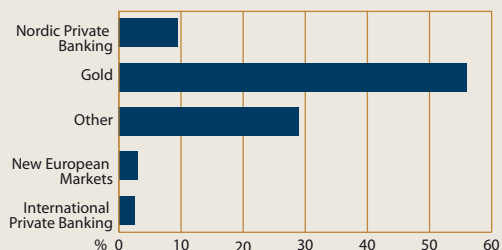
Financial strength

EUR 15.8bn in tier 1 capital
Tier 1 ratio 9.3% before transition rules

Share of income, corporate customers, by segment, 2008



Share of income, household customers, by segment, 2008



Generated and distributed value 2008, EUR m



Nordea's operations are contributing to the economic systems in the countries where we operate; during the course of 2008 the economic value generated was distributed to different stakeholders as presented above.

CEO statement



In challenging times it is increasingly important for financial institutions to act as responsible members of society. This has become evident during the financial crises occurring since 2008. Our responsibility is therefore to provide financial services to our customers on competitive terms, an important role we play in society.

Nordea aspires to be perceived as a responsible and trustworthy financial partner for our customers. We are committed to our company value to create Great Customer Experiences, and we continue to stand by the customers even in difficult times.

Our values are very important to us. We aim to live according to our values: Great Customer Experiences, It's All About People, and One Nordea Team and make them part of all we do and represent. This goes hand in hand with our Corporate Social Responsibility (CSR) commitments. We strive to make CSR an integral part of our business. The CSR policies and procedures, like our business strategy, reflect our mission, vision, values and our ultimate goal, to create Great Nordea. We have developed and implemented various groupwide standards of good conduct and sound business relationships, and we have policies, procedures and tools in place to address many of the social and environmental dimensions of our business.

We are also strongly committed to our role and responsibilities in society. Nordea endorses several voluntary standards for responsible business practices, such as the UN Global Compact, the UN Environmental Programme Finance Initiative (UNEP FI), the UN Principles for Responsible Investments (UNPRI), and the Equator Principles. We also play an active role in other networks and organisations, and we prioritise close and constructive relationships with our stakeholders.

Nordea has had CSR commitments in place since 2002, and we have measured our carbon emissions since 2003. In 2008 we renewed our CSR priorities and strategy and launched several initiatives to help us going forward.

Our communication is one of the most concrete changes we have made within CSR. The first result of this change is this CSR report. I hope you find it as interesting and important as I do.

Christian Clausen
CEO of Nordea Bank

About this report

This report covers CSR initiatives and activities concerning the Nordea group in the Nordic region (Denmark, Finland, Norway and Sweden) during 2008. Nordea also has operations in Poland, Lithuania, Estonia, Latvia, and Russia. These countries will be included in coming editions of the CSR report. Nordea's CSR reporting cycle is annual.

Some positions and initiatives described in the report may apply only to selected units or parts of the organisation, and in such cases, the units concerned are identified.

This is the first edition of the combined and integrated Nordea CSR report¹⁾. Nordea has since 2002 produced an annual environmental report, the Nordea Environmental Footprint (NEF), and since 2006, also a Communication on Progress (COP) report related to the Group's commitment to the UN Global Compact. The latest CSR reports from Nordea were the 2007 NEF and the 2007 COP.

The current report is produced according to the Global Reporting Initiative (GRI) G3 Sustainability Reporting Guidelines and the Financial Services Sector Supplement (FSSS) Final Version (2008). The GRI indicator index applied by Nordea is shown on page 25.

As per year-end December 2008, the Swedish state is the single largest shareholder in Nordea. Nordea has chosen to apply the Swedish government's Guidelines for External Reporting by State-Owned Companies (as adopted by the Swedish Government on 29 November 2007) to our CSR reporting.

In accordance with the reporting guidelines laid down by the Swedish government, Nordea's CSR report has been reviewed by external auditors and the limited assurance report performed by Nordea's auditors, KPMG, is found on page 27.

Nordea²⁾ has signed the UN initiative The Principles for Responsible Investments, PRI, which aims to promote sustainable investments.

Nordea is a signatory to the UN Global Compact (UNGC), and this report also serves as Nordea's annual Communication on Progress (COP) report to the UNGC for the operating year 2008.

Nordea has adopted the Equator Principles (EP). This report fulfils the annual reporting requirements of the EP and serves as Nordea's EP status report for the operating year 2008.

The context of the report is guided by our aim to communicate our most material CSR impact and activities to our stakeholders.

¹⁾ This CSR report supersedes all previous reports, thereby the term "combined and integrated".

²⁾ Nordea Fonder AB, Sweden; Nordea Investment Management AB, Sweden; Nordea Investment Funds, Finland; Nordea Fondene Norge AS, Norway; Nordea Invest, Denmark.



CSR strategy and results 2008

Nordea has worked systematically with CSR since the group's inception in 2001. Step by step we have identified and addressed relevant issues to ensure fulfilment of our obligations as corporate citizens, and we have undertaken several voluntary commitments to reinforce our position. Based on this solid experience we refined our CSR strategy in 2008.

Nordea is a value-driven organisation strongly committed to CSR. In 2007, the group's mission, vision, and values were revised (see page 8 for details). With this as a basis, Nordea updated its CSR strategy in 2008 to reflect the new values.

Following a thorough process involving many parts of the organisation, a recommendation for a revised CSR strategy was presented to the Group Executive Management in June 2008. The main decision was to make CSR a more tangible part of every day work and to introduce more systematic measurements. This is implemented progressively with some of the new initiatives already showing positive results.

Following approval of the recommended strategy, an operational and implementation phase was initiated. During the autumn of 2008, additional resources were provided and a new CSR secretariat established. The new secretariat was mandated to present an implementation plan for the new strategy due for January 2009. The first deliveries from the newly formed CSR secretariat will take place during the first quarter 2009 and will proceed steadily throughout 2009. The current integrated CSR report is a product of the new CSR secretariat.

The CSR strategy comprises two main focus areas:

- Activities to promote increased awareness, acceptance and improved behaviour among Nordea's employees.
- Operational and qualifying activities that make Nordea fulfil our CSR targets and commitments.



Implementing the activities is a major and complex task. Some prospects and pilot tests of various alternatives have been made in the latter part of 2008.

The operational and qualifying CSR activities decided on include:

- Replace paper communication with customers with electronic channels where possible.
- Strengthen the provision of environmentally friendly products
- Profile social and environmental responsibility dimensions in our supply chain and monitor the observance of these standards by way of environmental audits.
- Reduce energy consumption for electricity, heating and cooling.
- Energy efficiency programmes applied to IT and other infrastructure.
- Provide effective technology platforms and virtual meeting places to facilitate closer internal cooperation and reduce travel.
- CSR reporting.

Most of these operational activities were initiated during 2008, with implementation continuing into 2009. Some of the activities, such as the programme to reduce paper-based communication with customers, delivered positive results already in 2008.



Highlights 2008

- Renewed overall CSR strategy
- New Nordea Ecological Footprint programme initiated
- CSR is now closer integrated with business

Committed to values

” Values provide guidelines for how we should act and make decisions. They should be mirrored in our business plans, in the way we work and in our actions towards customers and each other. Our values are the basis for all that we do.

Gunn Wærsted, member of Nordea Group Executive Management



Nordea's values describe what Nordea should stand for and provide guidance for the attitude and actions to be shown towards customers, colleagues and others. The core values are:

Great customer experiences

- We think and act with the customer in mind
- We understand individual customer needs and exceed expectations
- We deliver professionally
- We create long-term relationships

It's all about people

- We acknowledge that people make the difference
- We enable people to perform and grow
- We foster initiative-taking and timely execution
- We assess performance in an honest and fair way

One Nordea team

- We team up to create value
- We work together across the organisation
- We show trust and assume accountability
- We make rules and instructions clear and applicable

The above values were introduced in spring 2007.

The values have changed the ways of working in Nordea. In order to become more customer- and people-oriented, the organisation, operating model and target setting have been changed to strengthen cooperation throughout the value chain and streamline work processes. Moreover, our people strategy has been revised and the leadership competencies for our managers have been readjusted based on our values.

Please read more about our internal and external commitments on page 19–23.



Stakeholder engagements

Stakeholders are parties who influence us, or whom are influenced by what we do. These relationships are important to us, and we manage them accordingly.

Stakeholders may be internal or external, and they may be represented in an organised manner or as individuals. We engage with our stakeholders both bilaterally and through industry networks, relevant organisations and other relevant channels¹⁾.

Our shareholders and customers are the external stakeholder groups that are most important to us. Without them, there would be no Nordea, and our other stakeholder engagements depend on the commitment shown by our shareholders and that we maintain sound relations with our customers and do sound business. Great customer experiences is, at the end of the day, one of our core values, and our stakeholder engagement with our customers is to deliver that every day and constantly improving in the way we do it.

Our most prominent internal stakeholders, is our personnel. We maintain employer – employee relationships through well regulated measures and procedures. You may read more about some of them in the 'Our people' chapter.

Other stakeholder groups include investors and analysts, government, our business partners, non-governmental organisations, academics, and CSR relevant organisations we are members of or represented in (see text box), among others.

We select and engage with stakeholders in different ways and through different channels. Some such relationships are well regulated, where as others are ad hoc and driven by issues or circumstances. But underlying the specific issues or situations at stake, we manage our stakeholder relationships based on a variety of criteria, such as, for example, relevance to our mission, vision and values; relevance to our CSR commitments; common interests, or other reasons. We listen to our stakeholders and communicate with them with mutual respect, integrity and professionalism.

Stakeholder activities in 2008 included repeated involvement and engagements with all our stakeholder groups and the bodies where we are represented, for example through meetings with shareholders, financial analysts and SRI analysts; CSR expertise support and advice to Nordea business units; participation in Nordea internal education events; serving requests for information from shareholders, customers, other business partners, academics and students, and advocacy groups (non-governmental organisations, NGOs), and CSR reporting.

¹⁾ One condition for sound stakeholder relations is good corporate governance. More information on Nordea's corporate governance can be found in the Nordea Annual Report 2008.

Nordea's CSR-specific memberships and participation in organised stakeholder bodies include:

- Representation in the Swedish government's CSR reference group.
- Representation in the Swedish government's CSR initiative Globalt Ansvar.
- Representation in the CSR reference group in the Swedish Bankers Association (Svenska Bankföreningen).
- Representation in the CSR reference group in the Danish Bankers Association (Finansraadet).
- Representation in the CSR reference group in the Federation of Finnish Financial Services (FK – Finanssialan Keskusliitto).
- Representation in CSR activities with the Norwegian Financial Services Association (FNH – Finansnæringens Hovedorganisasjon).
- Representation in networks related to our external commitments (UN Global Compact, UNEP FI, UNPRI, and the Equator Principles).
- Membership in CSR Europe.
- Membership in Jobs and Society (Sweden), which also serves as CSR Sweden, a national affiliate of CSR Europe.

CSR in line with business

Focusing on responsibility and sustainability implies certain obligations, but also great opportunities. Utilising those opportunities to do good while also doing good business is a dimension of our corporate citizenship that serves our shareholders and stakeholders alike.

Electronic banking services

Nordea is, amongst other things, a leading Internet bank. In 2008, Nordea had 4.9 million Nordic netbank customers, almost 290 million netbank log-ons and facilitated more than 213 million netbank transfers and payments. Over 80% of all household customer payments are made electronically, and the rate is increasing steadily year by year.

Nordea is also active in promoting electronic banking services towards corporate and institutional customers. In 2008, 98% of corporate payments were made electronically. The electronic invoice adds new environmental aspects into the chain of payments, as companies do no longer need paper invoices when charging their customers for products or services. Together with e-payments, e-invoices save nature by reducing the need for transportation and paper, and it is a more energy efficient way of forming the modern value chain.

For Nordea's household customers, netbanking is also increasingly becoming a way of communicating with the bank – without needs for transportation to a branch office and regardless of banking hours.

In line with our strategic decision to aim for as much paperless communication with customers as possible in favour of electronic channels, Nordea introduced in 2008 a program in our four Nordic home markets to gradually replace paper-based standardised customer information like periodical account statements, notifications of interest rate changes etc, with electronic information routed through our netbank. This saves paper as well as processing and postage, and represents great environmental and financial savings for both Nordea and customers alike.

In 2008, its first year of operation, this strategic initiative reduced the number of paper-based statements by 1.6 million. In 2009, the savings are expected to amount to approximately 4.7 million less paper-based statements.

The actual amount of paper items saved is higher than the above figures indicate, as many statements contain more than one page of printed information, and for most paper-based statements, an envelope is also needed.

Corporate credits

In Nordea risks in specific industries are controlled through industry policies setting requirements and limits on the overall industry exposure and these risks are monitored by industry monitoring groups. One of the risk categories is environmental risks.

Environmental risk may be broadly defined as the financial risk related to and/or caused by the natural environment, i.e. financial consequences – in the form of present or future costs and liabilities – that are a result of the customer's environmental impact.

In 2001 Nordea developed the Environmental Risk Assessment Tool (ERAT) with the purpose to consider environmentally related risks in the corporate lending process.

In order to better handle the corporate social responsibility (CSR) risks in the corporate lending process, Nordea's management decided in 2007 to develop another tool to supplement ERAT, the so-called Social and Political Risk Assessment Tool (SPRAT), currently under implementation.



Acting responsibly is an important prerequisite for a company to achieve sustainable good returns.



Erik Feldt, Head of Governance & SRI, Asset Management Products

The main purpose of SPRAT is to distinctively identify relevant social and political risks in a particular customer's business with potential impact on the customer's ability to fulfil the credit obligations or likelihood of damage to Nordea. Nordea's risk definitions in this regard build on commonly accepted international standards such as those produced by the World Bank and the UN Global Compact, to which Nordea is a signatory.

ERAT and SPRAT are used in parallel, and the application and structure of the tools are similar. The pre-decision use of these tools in the credit analysis is an integrated part of Nordea's regular credit routines and mandatory for all corporate credits throughout the Nordea group beyond a threshold credit limit.

ERAT makes use of two sets of checklists that credit analysts use to determine the overall risk. The first checklist determines industry risk, and if the industry risk profile meets certain criteria, a second set of checks and test are performed on company level. The overall findings of the ERAT process result in a total environmental risk profile that is then amended to the other elements in the credit evaluation process. ERAT is mandatory for customers with credit limits over EUR 500,000.

SPRAT is a three-step process. First, a country risk profile for the country in which the customer or project is located is produced. Then, depending on the country risk, an industry risk is identified. When these two findings are combined and compared, this determines further actions to be taken in a third phase. In the end, an overall social and political risk profile is created and amended to the other factors in the credit evaluation process.

SPRAT is mandatory for customers with credit limits over EUR 5 million. SPRAT should also be used for customers with credit limits below EUR 5 million for companies that are obviously predisposed to social and political risks. The higher limit threshold for SPRAT as compared to ERAT is due to social and political risks being most commonly a feature of large, international projects predominantly outside the Nordic region, whereas environmental risks may occur in industrial projects on a wider variety of levels and locations.

Project finance

Project financing is funding in which the lender looks primarily to the revenues generated by a single project both as the source of repayment and as collateral for the exposure. Project finance is often used for large projects where several parties cooperate in project development and/or financing.

Large and complex projects also imply more diversified and complex risks than smaller projects, and the risks may have many forms and materialise in many different ways. Large industrial projects may, for instance, imply social and environmental risks due to location, local population issues and so on. If they materialise, such risks may impose large

practical and financial consequences on the project and the project participants.

The Export and Project Finance (EPF) unit is responsible for managing project finance in Nordea. EPF has long since addressed environmental and social risks in their projects, and to govern them even closer, Nordea¹⁾ adopted the Equator Principles in 2007. The Equator Principles constitute a global, voluntary standard for commercial lenders to identify and address social and environmental risks in project financing based on the World Bank's guidelines for environmentally and socially responsible financing.

Nordea's implementation of the Equator Principles includes:

- Equator Principles evaluation and compliance routines for deal managers and credit analysts have been developed.
- An Equator Principles Manual (toolkit) for credit analysts has been produced.
- The analysts and other relevant personnel have been trained in using the routines and tools.
- Organisational setups (network and workflow) for reference and advice on social and environmental risks have been established.
- The Equator Principles workflow has been integrated with Nordea's general credit evaluation and decision workflow.

The number of projects subject to the Equator Principles tends to be small, but the actual projects are sometimes very big and complex industrial projects. In 2008, three projects in the EPF portfolio qualified to be assessed according to the Equator Principles. Two of these were renewable energy projects, and one was in the pulp and paper industry.

Socially responsible investments

Asset management is an important part of Nordea's business, and also in this field, Nordea applies responsible business practices supporting generally accepted principles of sustainability. In 2007 Nordea²⁾ signed the UN Principles for Responsible Investments (UNPRI) and undertook new responsibilities as investment managers relevant to the UNPRI.

Nordea aims to incorporate environmental, social and governance issues into the investment decisions, and Nordea Investment Funds (NIF) administers a Socially Responsible Investment (SRI) policy that applies to all funds and portfolios managed by NIF. It is Nordea's view that acting responsibly is a prerequisite for a company to achieve sustainable good returns. NIF defines responsibility as observance of existing laws, regulations, relevant rules and international conventions.

¹⁾ Nordea Export and Project Finance unit.

²⁾ Nordea Fonder AB, Sweden; Nordea Investment Management AB, Sweden; Nordea Investment Funds, Finland; Nordea Fondene Norge AS, Norway; Nordea Invest, Denmark.

All assets are subject to so-called norm-based screening according to the SRI policy. The screening process starts with identification of companies in the fund portfolios that could violate the UN Global Compact and other international norms for corporate responsibility. The UN Global Compact includes principles and standards covering many important social norms, including human rights, labour standards, environment and anti-corruption. Having identified companies violating these UN principles, Nordea then exercises active ownership, primarily through dialogue, aimed at encouraging a change of behaviour. If such a dialogue is unsuccessful the holding is divested and the company is excluded from Nordea's investment portfolio.

For professional handling of the SRI activities Nordea has teamed up with the external partners Ethix and Hermes. Ethix is a leading SRI consultancy company based in Sweden and undertakes analysis and screening for Nordea. Hermes is a UK investment company and our key agent in active ownership issues.

Micro finance

During the later half of 2008, continuing into early 2009, Nordea Private Banking, together with the Danish micro finance company MYC4, has been running a pilot project for micro finance to entrepreneurs in emerging markets.

Micro finance is a lending facility enabling private or institutional lenders to provide small loans to entrepreneurs in emerging markets who are normally without access to loans from traditional banks due to lack of credit record or other reasons. The loans are secured by collateral in the corresponding projects on a commercial basis, and the borrower repays the loans subject to an agreed interest rate and timeframe. Micro finance is not philanthropy, but small-scale commercial banking that empowers individuals to take initiatives and be self-sufficient.

Several Nordea employees have been engaged as investors in the pilot project. While the pilot resulted in many positive experiences, the project will be properly evaluated when completed before Nordea decides on the next phase.

Emissions trading

Nordea Markets is one of the largest energy product facilitators in the Nordic region, and commodities, such as energy, have been defined as key strategic business areas for the future. A centralised competency centre for commodity products is being developed and investments to reinforce this strategy implementation are well under way.

Within its commodity products area, Nordea Markets has a substantial energy products portfolio consisting of natural gas, oil, coal and carbon dioxide (CO₂) emissions. The product mix reflects the need for balancing emissions that Nordea's customers have when purchasing fossil energy products.

Emissions trading schemes are administrative mechanisms used to control pollution by providing economic incentives for reducing emissions of pollutants. The European Union emissions trading scheme is currently limited to monitoring and controlling carbon dioxide emissions. Nordea provides market access for trading EU emission allowances (EUA) and also Certified Emission Reduction credits (CER) of the Clean Development Mechanism.



Our people

One of Nordea's core values is Great Customer Experiences. We work hard to create that every day of the year, wherever we present ourselves and do business. The most important resource we have for realising these great experiences is our skilled and dedicated personnel.



We deliver

In order to follow-up on how well our people perform and deliver Great Customer Experiences, Nordea conducts an annual Customer Satisfaction Index (CSI) survey.

The CSI survey is conducted in all customer segments every autumn and the results are reported on different levels in the organisation. This is used to follow up and improve our services to customers, and action plans for improvements are created at local level and centrally. The latest survey was conducted during the autumn of 2008.

The CSI result for 2007 established the baseline for the common groupwide Key Performance Indicator (KPI) on Customer Satisfaction that was introduced in Nordea's management system in 2008. Constant improvements on customer satisfaction are one of Nordea's primary goals.

The results for the Household (personal customers) market show a clear improvement in all Nordic countries. The result from the corporate customers shows unchanged absolute satisfaction, however since Nordea's Nordic peers report a clear drop in satisfaction, Nordea has actually improved its relative performance.

It's all about people

We deliver high quality products and services, and we could not do so without our people. The quality of people is what ultimately distinguishes us from our competitors, and it is our people who are moving Nordea from Good to Great.

People strategy

Nordea's people strategy gives focus and priorities, and each of the following aspects shall be guided by and reinforce Nordea's three values; Great Customer experiences, One Nordea Team and It's all about People;

- **Building the foundation**
- **Being the employer of choice**
- **The right person in the right place at the right time**
- **Mobilising, differentiating and rewarding for performance**
- **Providing opportunities to develop and grow**
- **Practicing the required leadership**

Building the foundation – HR Basics

In 2008, Nordea implemented the Performance and Talent Management, an HR information system, in all Nordic countries to better support our people processes. This is an important step towards establishing solid processes and conditions to better understand people resources.

Being the employer of choice for those who will move us from Good to Great

The ability to realise the vision requires Nordea to have the very best employees. This applies both to the ability to attract and to retain the very best. In 2008, Nordea made efforts to strengthen the brand among selected target groups. Activities consisted of speed dating and labour fairs at schools and universities. The activities will be further targeted during 2009.

Staffing, ensuring we have the right person in the right place at the right time

In 2008, Nordea enhanced the recruitment process and the introduction programme to bring new employees up to speed quickly. The next step is to strengthening the People Planning Process, translating business plans to people needs and to further strengthening the recruitment process. Internal mobility will also be improved, to enable employees to develop with Nordea through new experiences. Ensuring that Nordea has the right person in the right place at the right time will help Nordea going from Good to Great.

Mobilising, differentiating and rewarding, thereby securing outstanding organisational performance

Nordea strives to improve Performance Management by simplifying processes and tools, and fostering a culture of feedback and coaching. More than 85% of all managers underwent coaching training in 2008, and this continues to be a focus area in 2009. And all Nordea regular staff are to partake in regular performance and career development reviews.

Employee benefits differ some between the countries, but include profitsharing, training programmes, and discounts on Nordea's retail financial services, such as loans, credit cards and currency exchange.

Providing opportunities for our people to develop and grow

The work to connect the needs of the business and all of Nordea's competence-building endeavours continues. In 2008, new academies were introduced for further training of personal bank advisers, which has led to tangible business results. This is a measure of the value of the investment, and Nordea will continue to seek effective ways to enhance skills development, e.g. through e-learning.

Practising the leadership required to enable the journey from Good to Great

In order to succeed, Nordea must grow current leaders while making sure Nordea identifies and develops those with potential to be future leaders. In 2008, Nordea's leadership competencies were introduced which represent the leadership Nordea seeks to build. These guided the development of all leadership programmes in 2008, and will continue to do so in 2009. Our Talent Management process aims to identify talents early and provide opportunities for them to realise their potential, together with us. During 2009, we make focused efforts to increase the share of females in leadership positions.

Employee satisfaction survey results

Because our people are key to making the transition from Good to Great, the People Strategy endeavours to create conditions for our employees to realise this. It is our challenge to motivate and develop our employees into realising our vision, and the Employee satisfaction survey is an evaluation tool in this area.

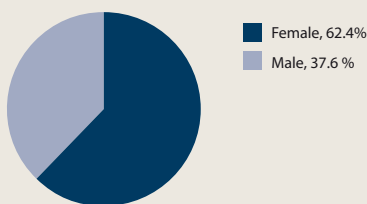
Employee satisfaction survey results

ESI, index	2008	2007	2006
Satisfaction and motivation	72	71	71
Development	72	70	-
Considered a good workplace	77	74	73
Proud to tell others where I work	80	78	75
Recommend others to start working in Nordea	76	74	72

Employee involvement

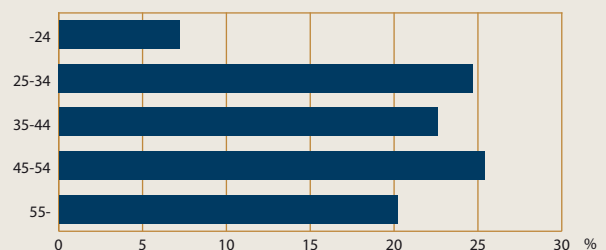
Due to the cross-border nature of the Nordea Group, special agreements have been made with the unions in the Nordic countries. These agreements allow staff representatives to be involved in certain decision-making processes impacting more than one country. By year-end, approximately 89% of Nordea employees were covered by collective bargaining agreements. The collective bargaining agreements include a number of provisions that may differ from country to country; this applies for example to terms of notice which varies from 1–6 months depending on country and also length of service. In terms of health and safety topics, the legislative requirements in Denmark, Finland, Norway and Sweden are regarded as satisfactory and the collective bargaining agreements are subordinate to national regulations.

Gender diversity



Please see the table on page 15, for a diversity break-down of employees in each country of operation.

Age structure



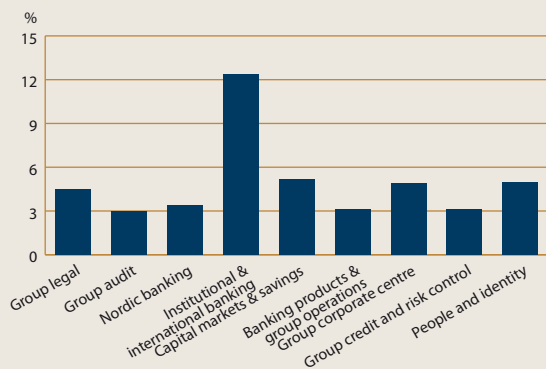
Average number of employees per country ¹⁾

	2008 Average	2008 male, %	2008 female, %
Denmark	8,428	46	54
Finland	8,311	21	79
Norway	3,560	52	48
Sweden	7,901	42	58
Poland	1,679	31	69
Luxembourg	409	61	39
Estonia	416	21	79
Latvia	513	27	73
Lithuania	354	22	78
Russia	1,602	36	64
United States	70	53	47
Great Britain	58	62	38
Singapore	52	29	71
Germany	35	50	50
China	16	38	64
Brazil	3	67	33
Nordea Group total	33,408	12,560	20,849

¹⁾ Over-time excluded, Menox and Fidenta included.

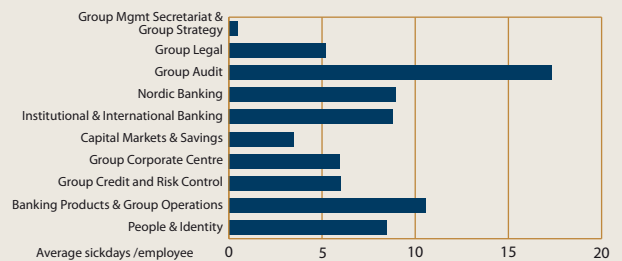


Employee turnover rate by unit



Employee turnover as a percentage of total number of employees was 5.0%. The Group CEO, Group Management secretariat and Group Strategy are not included in the diagram, as there was no turnover activity in their units. We do not track employee turnover by age group, gender, or region.

Absenteeism because of sick leave



The average sick leave per employee in 2008 was 8.3 days.

Our operations and the environment

Nordea is a financial service provider, and our physical impact on the surrounding environment is rather limited as compared to many other industries. We do use resources to conduct our operations, but we do so with care and consideration for the environment and responsible social conduct.

Better use of buildings

Buildings are major objects of energy consumption. Heating, cooling, light and maintenance are the major sources of energy usage in buildings. A reduction of our ecological footprint requires a shift in behaviour; we need to reconsider how much space we need to be able to be productive, and how we use resources more efficiently.

An ecologically effective initiative by Nordea's Premises and Property Management was the so-called "17 square metres" project, launched in 2004. The objective of the project was to reduce our headquarter workspace footprint in all the Nordic countries from an average of 24.2 square metres per employee closer to 17 square metres.

The project encompassed approximately 15,000 workplaces. The results from the Nordic countries at the end of 2008 showed an average workspace size of 18.6 square metres per employee, which means that approximately 24% of available office space could be released for accommodating growing headcount in the existing buildings, instead of leasing more new office space. As a result, we use less energy per employee for heating, cooling, light, and maintenance.

Nordea Ecological Footprint

Nordea has been monitoring and reporting environmental consequences of its energy consumption since 2002, and we have, as discussed in the previous section, had energy efficiency programmes in our office buildings since 2004. Based on this experience, Nordea has sufficient routines and data quality to take a next step.

Managing and monitoring the environmental impact from the business and operations has been defined an essential part of Nordea's revised 2008 CSR strategy, and we have established the Nordea Ecological Footprint (NEF) programme to serve as an umbrella for the environmental projects. This project will be responsible for coordinating and planning communication and behaviour change throughout Nordea Group. All sub-projects within the Ecological Footprint, both existing and new ones, will be projects managed by various Nordea units, but with coordinated efforts and shared communication we work together as one Nordea team.

There are two main action areas in the NEF: Running business in Nordea, and doing business with Nordea. The



former addresses the environmental issues of our internal operations and processes, whereas the latter addresses the environmental dimension of our business and external stakeholder relationships.

Nordea's Group Internal Services Centre (GISC) is the unit mainly responsible for energy administration and consequently carbon dioxide emissions. They have therefore been given a driver role in a programme aimed at decreasing emissions and improving energy efficiency in Nordea. Nordea's Premises and Property Management group (PPM), which administers our buildings and building operations, has a lead role in this work and has been engaged in this throughout 2008. The bulk of implementation will start in 2009 and will be an ongoing process, with clear targets and time lines for deliveries.

Nordea is using a US-based Green building certification method, LEED, to analyse the environmental performance of our main office buildings and Nordea employees working processes in these buildings.

LEED (The Leadership in Energy and Environmental Design) Green Building Rating System certificate methodology has been developed by the US Green Building Council (USGBC), and provides a set of standards for environmentally sustainable design, construction and operation of environmentally efficient buildings. LEED uses a broad definition of

the building concept, as it covers all aspects of how a building is constructed, how it is administered and operated, and the impact on the behaviour of the people using it. It is a holistic view on what a building is and how it functions.

LEED is one of the most well-known certification systems globally and well recognised by investors and analysts. A LEED certificate enables Nordea to more easily coordinate and communicate our environmental work to our stakeholders.

Nordea has registered 15 office buildings in Copenhagen, Tåstrup, Helsinki, Stockholm and Oslo under this rating system to get LEED certification by end of 2009.

Green IT

One element in the revised 2008 CSR strategy is to create energy efficiency programmes applied to IT and other infrastructure. Considering this, the concept of Green IT has been introduced and developed in Nordea. Green IT in Nordea refers to using computing resources in energy efficient ways so to achieve both environmental benefits and financial gain.

A Green IT strategy has been developed by Nordea IT together with our key IT partner, Nordic Processor, which is a joint venture between Nordea and IBM. Specific actions and their potential effects have been analysed and evaluated throughout 2008, and full implementation of the strategy is due for 2009. Information on the implantation will be reported in 2009 edition of the Nordea CSR report.

Paper

As a financial services provider Nordea uses a large quantity of paper. Paper is used in practically all working processes throughout the organisation. But Nordea is making great efforts to reduce the paper consumption, already showing good results.

All the paper Nordea consumes is produced using new fibres and bleached without elementary chlorine (ECF) or totally without chlorine (TCF).

We have developed our paper-monitoring reporting progressively since 2003. Initially, we reported only on A4 copy paper used; then in the next phase A3 copy paper and letter-heads were included, and subsequently the use of envelopes and IT paper rolls. In 2008 we added the direct marketing papers from Finland and Norway to our metering.

This gradually enlarged reporting scope is most likely the main explanation of an increase in paper consumption. In relative terms, there need not be an increase, though, as the numbers of employees and business volumes (with corresponding business processes involving paper) have also gone up during the time line of paper measurements. The paper consumption calculations do not take these factors into consideration.

Waste management

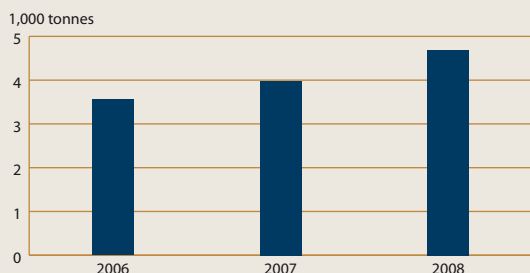
Nordea's recycled and incinerated waste chiefly consists of paper. Special treatment waste comprises e.g. fluorescent bulbs and tubes, electric batteries, toner cartridges, PCs, printers and other IT equipment. Approximately 70% of the waste Nordea creates is recycled or utilised as energy.

In 2008 the amount of Nordea's total waste increased by 16% due to expansion within the incinerated waste and landfill categories. Developments with recycled and special treatment waste, however, showed a declining tendency.

Greenhouse gas emissions

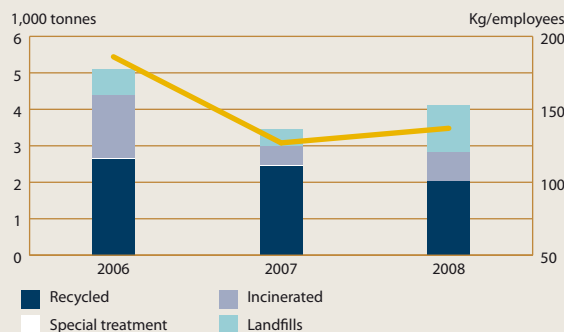
Nordea has no direct greenhouse gas emissions from our business, but the consumption of certain products and services the group purchases have been transformed and calculated as

Paper consumption



The increased paper consumption is partly due to increased operations, and partly due to increased monitoring and documentation on a central level. The paper consumption figures cover approximately 98% of all Nordea's usage in the Nordic countries.

Waste management



Waste figures are extrapolated to cover approximately 60% of employees in the Nordic countries.

carbon equivalents, and these carbon units are referred to as Nordea's greenhouse gas emissions expressed in carbon dioxide (CO₂). These emissions originate from three main sources:

- Electricity consumption (approximately 40%)
- Business travelling (approximately 40%)
- Heating and cooling of our premises (approximately 20%)

Counted per employee, our total CO₂ emissions were reduced by 5% from 2007 to 2008.

In 2008 Nordea's CO₂ emissions from operations were in the order of 87,000 tonnes, which is 1% up since 2007.

The CO₂ emissions of our energy consumption went down by 2%, while those of business travelling turned upwards, increased by 7% in 2008 due to an increase in business volumes.

Water

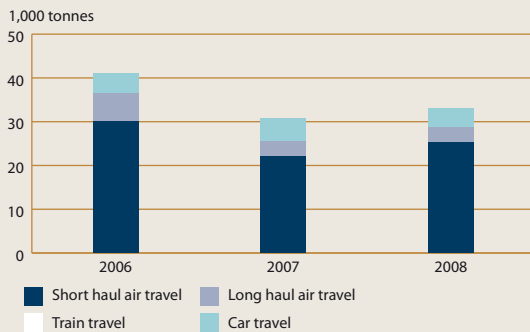
Characteristic for the Nordic area, all water consumed in Nordea is drinkable water mainly used for catering purposes, sanitation and indoor plants. Water is not a scarce resource in the Nordic region.

In 2008 Nordea's total water consumption rose by 6% as compared with 2007. During the same period the number of Nordea employees rose by 7%. Theoretically calculated every employee used around 13,200 litres of water in 2008.



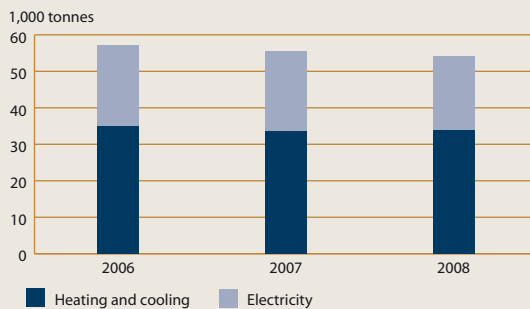
Counted per employee, our total CO₂ emissions were reduced by 5% from 2007 to 2008.

CO₂ emissions from travel



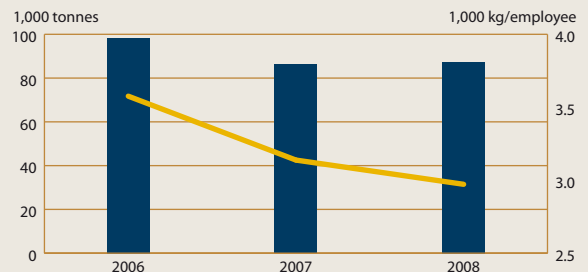
In 2008, emissions from train travels accounted for approximately 0.00004% of all Nordea's travel emissions.

CO₂ emissions from energy consumption



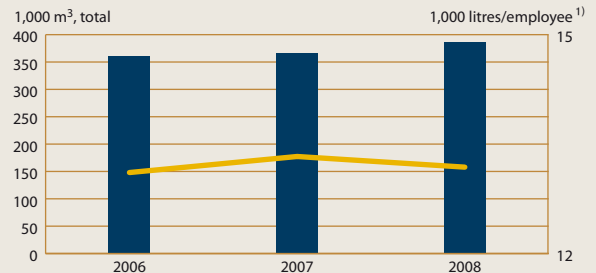
Total carbon dioxide emissions from energy consumption in Nordea premises decreased slightly in 2008, reaching a total of 54,291 tonnes.

Total CO₂ emissions



While total carbon dioxide emissions have increased with 1%, relative emissions are down with 5%.

Water consumption



¹⁾ Water figures are extrapolated to cover all Nordea's Nordic personnel.

Our commitments

As a provider of financial services to businesses and personal customers, Nordea is also a member of the wider society in our markets. This entails obligations to conduct business operations on socially responsible terms. This is called corporate citizenship, and we have voluntarily taken on clear commitments in this regard.

Internal commitments

The Corporate Citizenship Principles

In 2002, the Nordea Board of Directors adopted the Corporate Citizenship Principles, consisting of six general principles stating our position on responsible business behaviour. The Corporate Citizenship Principles, together with our values, form the foundation and key guiding principles for all our other internal and external CSR policies, commitments and undertakings.

Codes of ethics and sound business relationships

The Nordea Code of Conduct is the core policy for good

business conduct in Nordea. It applies to all personnel and everyone working on behalf of and representing Nordea. Being a groupwide instruction, covering many people and activities in several countries, it has been kept on a general level, and it is the common denominator in what we define as appropriate behaviour. More specific and sometimes stricter codes have been applied in business areas and underlying units wherever appropriate.

A common code for sound business relationships, has also been developed regulating how our personnel should relate to and handle gifts and benefits and other issues and situations with potential effect on their judgement and behaviour. There shall never be any doubt about our personnel's integrity or sound judgement, and there are strict requirements concerning exchange of gifts and services.

The Nordea Environmental Policy

Nordea considers care of the environment as a very important responsibility. Considering this, already in 2003 an environmental policy was established that applies to all personnel and regulate in general terms how environmental considerations should be managed in our business operations. It is a general guide and a common denominator on what we define as appropriate environmental standards. More specific and stricter codes have been applied in business areas and underlying units wherever appropriate.

The Corporate Citizenships Principles

Freedom

- We are committed to freedom.
- We stand for democracy and a responsible market economy.
- We support the UN Global Compact and follow the Universal Declaration of Human Rights, ILO-conventions and the OECD Guidelines for Multinational Enterprises.
- We do not discriminate based on gender, ethnic background, religion or any other grounds.

Equality

- We are committed to equal opportunities.
- We seek high professionalism and make it possible for our employees to develop and assume responsibility.
- We support diversity and a fair representation of women and men as well as ethnic minorities in our organisation.

Environment

- We are committed to caring for the environment.
- We work to reduce negative and increase positive environmental impact from our business activities.
- We have signed the UNEP Banking Principles.

Citizenship

- We are committed to good citizenship.
- We respect the laws, regulations and norms of the countries where we operate while also adhering to our Group policies.
- We work with others for a prosperous and sustainable development in the communities where our customers and employees do business and live.

Ethics

- We are committed to ethics, honesty and sincerity.
- We do not offer, request or accept unwarranted gifts and payment nor limit free and fair competition.
- By adhering to Group policies so that our integrity cannot be questioned, we enable shareholders, customers, employees and other concerned parties to make balanced and well-founded decisions.

Performance

- To ensure performance according to these principles, we adopt relevant policies, set targets in our management system, ensure that these principles are known throughout the organisation and encourage reports on non-compliance, carry out systematic follow up and deliver open and reliable reporting.

The Nordea Code of Conduct

High standards of integrity and fair business

- Nordea shall be characterised by a high degree of integrity, professionalism and ethics.
- Nordea is only involved in business that is in accordance with law, regulations, signed commitments and our own standards of business ethics.
- Nordea employees are qualified, trained and have management structures to provide the relevant services.
- When providing services, Nordea has terms and conditions for the services that set out the rights and obligations of the parties.
- Nordea has organisational structures, procedures and internal control (i.e. Chinese walls) so that sensitive market information is not spread beyond the areas in which it should be handled.
- Nordea is diligent when providing advice.
- Nordea's marketing and advertising material is not misleading and provides accurate information on the services offered.

Proper handling of customers

- Within the appropriate business context, Nordea familiarises itself with the customer's financial standing, experience and objectives.
- Nordea provides understandable information (if relevant including potential risks) on the services provided.
- Our ambition is to always ensure that the customer knows what he is deciding and understands the potential consequences.

- Conflicts of interest between Nordea and its customers are identified and prevented or managed so that customers are justly treated.
- Nordea has procedures for the processing of complaints, and provides instructions on how to file a complaint and responds to them within a reasonable time.

Ethical employee behaviour

- Employees do not offer, request or accept inappropriate gifts, payments or travel.
- Except when using the services provided to ordinary customers through electronic media (e.g. internet banking), employees do not execute their own financial transactions.
- Employees do not participate in business transactions where conflict of interest can arise with their own economic standing or with a third-party where a close relationship exists.
- Moreover, employees do not conduct transactions that may give the impression of dishonesty or use of insider information, or that will undermine the trust and confidence in Nordea.
- Employees do not conduct private transactions or provide economic guarantees that can seriously undermine their own private financial standing.
- Employee external engagements do not interfere with their ability to perform their duties and functions as an employee or undermine trust and confidence in Nordea. In cases of uncertainty external engagements are declared.

The Nordea Environmental Policy

High standards of environmental performance

- Nordea complies with relevant environmental regulations and legislation in the countries where we operate and integrates the principles of the UNEP Statement by Financial Institutions on the Environment and Sustainable Development into its management system.
- Nordea strives to improve its environmental performance by setting targets to reduce the negative environmental impact of operations and services.
- Nordea considers environmental risks in investment and lending decisions, but the company in question has the responsibility for how environmental considerations affect its business.
- Nordea raises staff awareness and implements programmes to recycle waste in order to reduce the use of natural resources.

- Nordea promotes the usage of electronic banking technologies that improve efficiencies, save time and costs for customers and reduces environmental impact of operations and services.
- Nordea avoids unnecessary travel, promotes the use of telephone and video meetings and strives to reduce energy usage in order to reduce greenhouse gas emissions.
- Nordea seeks to reduce the negative environmental impact of products and services that the Group purchases.
- Nordea communicates the major environmental impacts of its operations and services.

External commitments

The UN Global Compact

The UN Global Compact policy is initiated by the United Nations to encourage businesses to align their strategies and operations with ten universal principles building on UN conventions in the areas of human rights, labour environment and anti-corruption. Signatories to the UN Global Compact, commit themselves to observe the ten principles and to report annually on their progress in living up to them.

Nordea signed up to the UN Global Compact in 2002, first through Nordea Bank Finland, and from December 2004 coverage was extended to the whole group when the signatory role was transferred to Nordea Bank AB (publ).

Nordea has implemented the UN Global Compact in our business practices and operations through a variety of undertakings. On a strategic level, we have specified our commitment to the UN Global Compact in our Corporate Citizenship Principles, which are our most important CSR principles, and also developed more detailed subordinate policies and routines to ensure our compliance with the Global Compact in our everyday business and activities.

In operations, we uphold the UN Global Compact labour standards in all areas, monitor and reduce environmental consequences from our operations, and we have policies and procedures in place to ensure that none of our personnel get involved in corruption or ethically unsound business relationships. In business, we develop and bring to the market

socially and environmentally responsible products and services, and we analyse and address environmental and social risks in our corporate credits procedures.

We fulfil our reporting obligations to the UN Global Compact, participate in Global Compact networks and are active dialogue partners with other UN Global Compact signatories and other stakeholders on relevant issues. Furthermore, we promote the UN Global Compact and assist other potential signatories with guidance on the practical implications of being a signatory.

The UN Global Compact

The Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment, and anti-corruption:

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labour Standards

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

UN Environmental Programme Finance Initiative (UNEP FI)

UNEP FI is a global partnership between the United Nations Environmental Programme and the financial services industry to understand, address and manage environmental and social considerations on business operations and financial performance.

Nordea has been a signatory to the UNEP FI since 2001, and has implemented the partnership charter in the business practices and operations through a variety of undertakings. The commitment to UNEP FI is specified in Nordea's Corporate Citizenship Principles, which are our most important CSR principles, and also in Nordea's Environmental Policy.

In operations, Nordea strives to monitor and reduce environmental consequences. Nordea also offers environmental information, guidance and self-testing in environmental competencies to all our personnel through our intranet. In business, Nordea develops and brings to the market socially and environmentally responsible products and services, and analyses and addresses environmental and social risks in our corporate credits procedures.

As a committed signatory, Nordea participates in UNEP FI networks and is an active dialogue partner with other UNEP FI signatories and other stakeholders on relevant issues. We promote the UNEP FI and assist other potential signatories with guidance on the practical implications of being a signatory.

UN Principles for Responsible Investments (UNPRI)

The UNPRI is a global voluntary standard for institutional investors, investment managers and professional service partners in investment services to incorporate environmental, social and governance issues in their investment and investment related products and services.

In 2007 Nordea¹⁾ signed the UNPRI and undertook new responsibilities as investment managers relevant to the Principles, and have implemented the Principles in our business practices and operations through a variety of measures. On strategic level, we have established a Socially Responsible Investment (SRI) policy which also reflects our UNPRI obligations.

Nordea develops and offers to the market UNPRI compliant SRI products, and makes use of highly qualified SRI experts for monitoring, analysing and providing advice on development and administration of these products. Performing active ownership is part of our active investment management, and we divest from engagements when companies invested in do not comply with our SRI standards and the UNPRI.

We also promote the UNPRI and arrange seminars, participate in workshops and networks with investors, investment managers and professional service partners to promote socially responsible investments.

¹⁾ Nordea Fonder AB, Sweden; Nordea Investment Management AB, Sweden; Nordea Investment Funds Finland; Nordea Fondene Norge AS, Norway, Nordea Invest, Denmark.

UNEP FI

UNEP FI dates back to the early 1990s, and is aimed to promote integration of environmental considerations into the financial sector's operations and services. There are over 160 financial and insurance institutions that are signatories to the UNEP FI Statement, which can be summarised in three overarching principles;

- **Commitment to Sustainable Development:** entails the idea of sustainable development as sound business management, and that the financial sector can contribute towards sustainable development.
- **Environmental Management and Financial Institutions:** promotes the integration of environmental considerations into operations, business decisions and asset management.
- **Public Awareness and Communication:** initiatives to share information and experiences within the industry, to foster openness in relation with stakeholders and to promote the UNEP FI Statement.

UN Principles for Responsible Investments

The result of a multi-stakeholder process coordinated by the UNEP FI and the UN Global Compact, the Principles for Responsible Investments (UNPRI) were launched in 2006. The Principles are open to all institutional investors, investment managers and professional service partners, and builds on the growing view that environmental, social and corporate governance (ESG) issues can affect the performance of investment portfolios.

The signatories to the initiative commit to six voluntary principles;

- to incorporate ESG issues into investment analysis and decision-making processes.
- to be active owners and incorporate ESG issues into our ownership policies and practices.
- to seek appropriate disclosure on ESG issues by the entities in which we invest.
- to promote acceptance and implementation of the Principles within the investment industry.
- to work together to enhance our effectiveness in implementing the Principles.
- to report on our activities and progress towards implementing the Principles.

The Equator Principles

The Equator Principles is a global, voluntary standard for commercial lenders to identify and address social and environmental risks in project financing based on the World Bank's guidelines for environmentally and socially responsible financing.

Nordea¹⁾ adopted the Equator Principles in 2007, and we have implemented the Equator Principles in our business practices and operations:

- Equator Principles evaluation and compliance routines for deal managers and credit analysts have been developed.
- An Equator Principles Manual (toolkit) for credit analysts has been produced.
- The analysts and other relevant personnel have been trained in using the routines and tools.
- Organisational setups (network and workflow) for reference and advice on social and environmental risks have been established.
- The Equator Principles workflow has been integrated with Nordea's general credit evaluation and decision workflow.



¹⁾ Nordea Export and Project Finance unit

The Equator Principles

The Equator Principles, a set of guidelines on how to mitigate environmental and social risks in project financing, were launched in 2003 by the World Bank Group's International Finance Corporation (IFC) and the bank industry. The number of signatories to the Equator Principles at end of 2008 was in excess of 60 banks and financial institutions.

The Equator Principles, which were updated in 2006, applies globally to projects across all sectors, where total project capital costs exceeds USD 10 million and the project is assessed to have a potential adverse social or environmental impact.

An Equator Principles Financial Institution (EPFI) will only provide loans to projects that conform to the principles;

- Review and categorisation: due diligence of projects includes a social and environmental review and a potential risk assessment.
- Social and Environmental Assessment: the borrower provides an S&E Assessment and proposed measures on how to mitigate and manage risks along the project.
- Applicable Social and Environmental Standards: assessment of the projects' overall compliance with established IFC and industry standards.
- Action Plan and Management System: the borrower provides an action plan listing prioritised actions, and implements an S&E management system.
- Consultation and Disclosure: the host government, borrower or third party expert consults with the communities affected by the project to ensure concerns are adequately incorporated.
- Grievance mechanism: the borrower establishes a grievance mechanism to ensure opportunities for consultation and engagement throughout the project.
- Independent review: an independent expert shall review the S&E Assessment, the Action Plan and the Consultation process.
- Covenants: the borrower will commit to incorporate covenants linked to compliance, including financing the documentation of compliance with host country regulation and Action Plan.
- Independent Monitoring and Reporting: the borrower shall appoint qualified external experts to verify and report on monitoring.
- EPFI Reporting: all signatories to the Equator Principles shall report publicly where appropriate on their implementation processes and experiences.

The way forward

We have begun the journey to become a great corporate citizen the Nordea way, one step at a time, and we are well on our way. The new CSR strategy set during 2008 points the way forward.

Nordea has always been a prudent partner to the business community; we provide capital and advice to people wishing to start a business and create jobs, and we provide existing businesses with the financial services they need. Our advisers also work hard so that personal customers may achieve financial security for themselves and their families and to make their dreams come true.

At present, the global economy is in a weak state and Nordea considers it more important than ever to stay close to our customers. Our corporate customers may be wondering what measures to undertake to meet and manage the current turmoil, and personal customers are concerned about where the economy is heading and what the implications are for them. We listen carefully to these concerns. Nordea may not have all the answers to the overall situation, but we do have the competence and capabilities to give our customer new options based on their individual situation. That is our core responsibility.

Implementation of the revised 2008 CSR strategy will focus on two main areas. The first is called 'Running business in Nordea' and addresses the CSR issues of our internal operations and processes such as increasing awareness, acceptance and behaviour among Nordea's employees. The second is called 'Doing business with Nordea' and addresses the CSR dimension of our business and external stakeholder relationships, such as activities that we need to perform in order to meet Nordea's CSR commitments. All the initiatives mentioned in this report will be continued and further refined. CSR will benefit our business and society alike as we move ahead towards becoming Great Nordea.



GRI index

Nordea reports in accordance with level C+ of the G3 guidelines of the Global Reporting Initiative (GRI). The index below includes degree of reporting and page reference to the relevant indicators in this report. In some instances reference is made to the Nordea Annual Report 2008 (AR). All core indicators are included in the table, together with the additional indicators Nordea has found relevant, and a selected number of indicators from the GRI Financial Services Sector Supplement from 2008.

- = Fully reported
- = Partly reported
- = Not reported

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LA13	Composition of governance bodies and employees according to diversity indicators	15, AR148–150	●
LA14	Ratio of basic salary of men to women		○

GRI content index		Page	
Human rights			
HR1	Investment agreements that include human rights clauses	10–12	●
HR2	Suppliers that have undergone screening on human rights, and actions taken		○
HR4	Total number of incidents of discrimination and actions taken		○
HR5	Operations where freedom of association and collective bargaining may be at significant risk and actions taken		○
HR6	Operations identified as having significant risk for incidents of child labour and actions taken		○
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour and actions taken		○
Society			
SO1	Programs for evaluating the operation's impacts on communities		○
SO2	Business units analyzed for risks related to corruption		○
SO3	Employees trained in the organization's anti-corruption policies and procedures		○
SO4	Actions taken in response to incidents of corruption		○
SO5	Participation in public policy development and lobbying		○
SO8	Monetary value of fines for non-compliance with applicable laws		○
Product responsibility			
PR1	Life cycle stages in which health and safety impacts of products and services are assessed		○
PR5	Results related to customer satisfaction, including results of surveys	13	●
PR6	Programs for adherence to laws, standards and voluntary codes for marketing communications		○
PR9	Monetary value of fines for non-compliance with regulations concerning the use of products and services		○
Financial services sector supplement indicators (selected)			
FS1	Policies with specific environmental and social components applied to business lines	10–12	●
FS2	Procedures for assessing and screening environmental and social risks in business lines	10–12	●
FS3	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions	10–12	●
FS4	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines	10–12	●
FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities	10–12	●
FS6	Percentage of the portfolio for business lines by specific region, size and by sector	12	●
FS11	Percentage of assets subject to positive and negative environmental or social screening	12	●

Limited assurance report

To the readers of Nordea's CSR Report 2008:

We have performed a review of Nordea CSR Report 2008. It is the board of directors and the executive team that are responsible for the continuous CSR activities and for the preparation and presentation of the CSR Report in accordance with applicable criteria. Our responsibility is to express a conclusion on the CSR Report based on our review.

Our review has been performed in accordance with FAR SRS (the institute for the accountancy profession in Sweden) draft recommendation "RevR 6 Assurance of sustainability reports". A review consists of making inquiries, primarily of persons responsible for CSR matters and for preparing the CSR Report, and applying analytical and other review procedures. A review is substantially less in scope than an audit conducted in accordance with the Standards on Auditing in Sweden RS and other generally accepted auditing standards. The procedures performed in a review do not enable us to obtain an assurance that would make us aware of all significant matters that might be identified in an audit. Accordingly, we do not express an audit opinion.

The criteria used in the course of performing review procedures are based on applicable parts of the "Sustainability Reporting Guidelines, G3" issued by the Global Reporting Initiative (GRI) suitable for the CSR Report. We consider those criteria to be suitable for our engagement.

Our review has, based on an assessment of materiality and risk, among other things included the following procedures:

- An update of our knowledge and understanding for Nordea's organization and activities.
- Interviews with responsible management, at different levels within the group, with the aim to assess if the qualitative and quantitative information stated in the CSR Report is complete, correct and sufficient.
- Share of internal documents to assess if the information stated in the CSR Report is complete, correct and sufficient.
- Evaluation of routines used for the collection and reporting of CSR information and data.
- Review of underlying documentation, on a test basis, to assess whether the information and data in the CSR Report is based on that documentation.
- Review of qualitative information and statements in the CSR Report.
- Assessment of Nordea's stated application level according to GRI:s guidelines.
- Overall impression of the CSR Report, and its format, considering the information's mutual correctness with applicable criteria.

Based on our review procedures, nothing has come to our attention that causes us to believe that Nordea's CSR Report 2008 has not, in all material aspects, been prepared in accordance with the above stated criteria.

Stockholm, March 30, 2009
KPMG AB

Carl Lindgren
Authorized Public Accountant

Åse Bäckström
Expert member FAR SRS

Additional information

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