

# **Nordea thematic guideline on social responsibility**

**December 2023**

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# 1 Introduction

*The Universal Declaration of Human Rights states that all human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.*

We – the Nordea Group – recognise that respect for human rights is essential to creating a just and sustainable world. At Nordea, we treat each other with respect and dignity, and listen to and value input from others, both within and outside the bank. Based on the data we have available, we use our governance and due diligence processes to assess the human rights impacts of our operations and business relationships, guided by the [UN Guiding Principles on Business and Human Rights](#) and the [OECD Guidelines for Multinational Enterprises](#).

As a leading Nordic universal bank, we have a key role to play in driving society towards a sustainable future. Sustainability is at the core of our business strategy, integrated into all aspects of our business operations. Managing social impacts, both positive and negative, is a vital part of our strategy, since risks to people<sup>1</sup> become risks to business. It may also help us gain access to new markets and customers and attract business partners and employees.

## 1.1 Purpose and scope

The purpose of this guideline is to describe how we have integrated human rights into our Group strategy and the measures we are taking to ensure that human rights risks are managed properly.

Our sustainability strategy rests on four strategic pillars<sup>2</sup>: social responsibility, financial strength, climate and environmental action, and governance and culture. The pillars are derived from the UN's [Sustainable Development Goals](#). As these are linked to human rights, our actions and targets align with our human rights obligations.

This guideline elaborates on our social responsibility strategic pillar, describing our position, commitments and efforts to uphold social and human rights in our workforce and value chain, and in wider society.

The guideline applies to our own operations, branches, business units and subsidiaries. It thus includes the financial services we offer, such as corporate and household lending, wealth management, investments, and our advisory services for institutional, corporate and private customers.

It applies to all markets and relevant sectors in which we operate or conduct business, and includes our full value chain. However, we acknowledge the challenges inherent in a value chain perspective, given the complexity of data sourcing and impact assessments concerning risks to people. In addition, we recognise that some sectors are more exposed to human rights risks than others. We are taking these considerations into account in the implementation of this guideline.

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<sup>1</sup> According to UN Guiding Principles Reporting Framework, human rights assessment uses the lens of “risk to people”, referring to impacts on the human rights of employees, customers, local communities and other stakeholders affected by own activities, operations or products. “Risk to business”, on the other hand, refers to impacts on financial and/or reputational standing.

<sup>2</sup> Read more about our strategic pillars at [Our sustainability targets | Nordea](#).

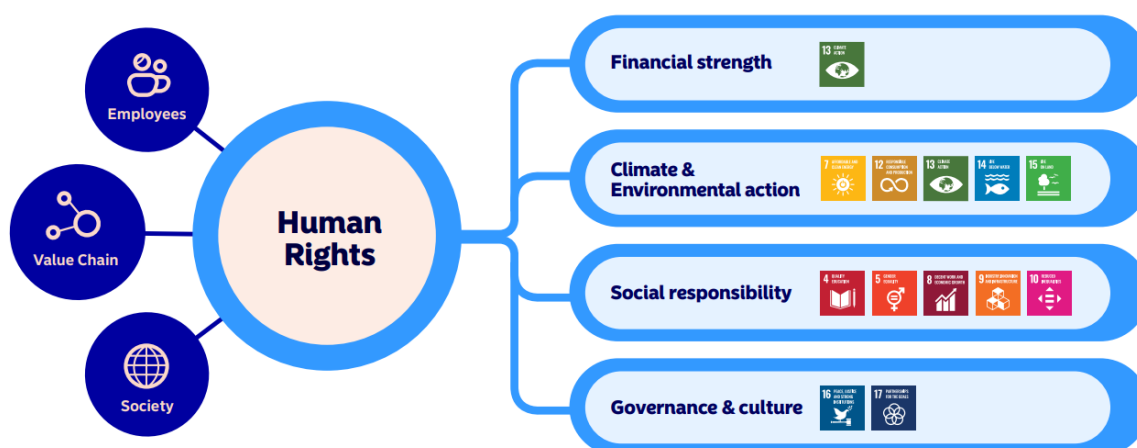
The guideline was developed by Nordea Group Sustainability, with contributions from stakeholders across the Group, and has been approved by the chair of the Sustainability and Ethics Committee. The work was informed by relevant legal requirements, internationally agreed standards and recognised external human rights experts.

## 2 Our position and commitment

### 2.1 Human rights

We see human rights as the foundation for our social responsibility work and fundamental to ensuring continued business growth and a social license to operate<sup>3</sup>.

We take our corporate responsibility to respect human rights very seriously. In our business operations, we are guided by the UN Guiding Principles on Business and Human Rights and expect the same from our suppliers, the companies in our investment portfolio, our lending customers, and our business relationships.



Read more about our human rights-related responsibilities in our [Human Rights Policy](#) and [Code of Conduct](#).

### 2.2 Thematic focus areas for positive contribution

To support the strategic direction outlined in our Group Strategy and Human Rights Policy, we have assessed and identified the following three thematic focus areas where we can leverage our market position and size to make a positive contribution to society.

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<sup>3</sup> <https://unglobalcompact.org/>



**Just transition**



**Diversity and inclusion**



**Financial well-being**

### **2.2.1 Just transition**



Just transitions refers to preserving human rights and mitigating adverse societal impacts in the transition to a low-carbon economy, leaving no one behind. A balanced transition is essential for mitigating adverse human rights impacts, in particular for vulnerable groups.

As a responsible financial actor, we play an important role in redirecting the flow of capital towards sustainable investments, contributing to the transition to a low-carbon, climate-resilient and circular economy. By engaging with our portfolio companies, customers and suppliers in their sustainability transitions, we maintain our commitment to support the mitigation of potential adverse impacts on employees, communities and societies stemming from climate and environmental physical and transition risks.

### **2.2.2 Diversity and inclusion**



Diversity is the presence of differences in traits, experiences and backgrounds among our people, customers and other stakeholders. Inclusion means appreciating these differences and ensuring they are welcomed, and providing equal access to financial products and services, i.e. financial inclusion.

We can leverage our position as a strong European bank with a diverse workforce and strong diversity and inclusion expertise to engage with our value chain and contribute to creating more diverse and inclusive companies – and a more diverse and inclusive society. In particular, we strive to increase financial inclusion by ensuring that our products, services and processes are available to all customers on equal terms and fulfil relevant accessibility requirements.

Financial inclusion is a prerequisite for achieving financial well-being. We therefore strive to create a more inclusive financial future for our customers and the communities in which we operate. To ensure we can support the financial needs of all groups, we are committed to making sure that our products, services and processes fulfil relevant accessibility requirements.

We recognise that there are certain – vulnerable – groups at risk of financial exclusion. We aim to engage in meaningful consultation and dialogue with customers and communities in order to understand the concerns, needs and aspirations of these groups, seek their input, and enable information-sharing.

### 2.2.3 Financial well-being



Financial well-being refers to individuals, households and small/medium-sized companies having the ability and confidence to manage financial obligations, plan for their future and be as prepared as possible for the unexpected.

As stated by the United Nations Environment Programme Finance Initiative<sup>4</sup>, ambitious efforts to increase well-being have proven to have positive impacts on society, individuals, entrepreneurs and the wider economy, and at the same time contribute to the positive development of products and services to benefit a wider customer base. Lack of financial skills limits individuals' access to economic opportunities, creates and perpetuates inequalities, and increases individuals' exposure to significant risks and economic insecurity.

We believe that, with our broad customer base, we have the opportunity to contribute to creating and maintaining financial well-being built on human rights. We want to facilitate improved financial well-being by strengthening the financial skills of individuals and businesses and unlocking access to financial opportunities for our customers.

## 3 Human rights governance

Governance plays an important role in the implementation of human rights commitments and the embedding of human rights considerations across our organisation. It fosters collaboration, engagement and accountability throughout the organisation, thus enabling us to address human rights challenges effectively. Our human rights governance, based on our sustainability governance structure, is further explained in our Human Rights Policy.

## 4 Implementing respect for human rights

To fulfil our strategic ambitions regarding just transition, diversity and inclusion, and financial well-being, we have embedded respect for human rights in our everyday operations as a fundamental guiding principle. We work to continually integrate human rights considerations into our policies, practices and decision-making processes, ensuring that respect for human rights is integral to how we conduct business. Through ongoing awareness-building, training, and accountability mechanisms, we empower our employees to uphold human rights in their daily activities.

However, a just transition that is fair and inclusive cannot be achieved alone: it relies on collaboration beyond our own operations. We therefore need to understand human rights factors beyond our operations and pursue a just transition in dialogue with stakeholders from across our value chain and society.

This section describes the focus areas within our own operations, value chain and wider society. It includes implementation activities and addresses our ambitions to integrate human rights standards into our strategy, governance and risk management.

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<sup>4</sup> [PRB-Guidance-Financial-Inclusion-2.pdf \(unepfi.org\)](#)

## **4.1 Own operations**

The following section describes our current and upcoming efforts as an employer and service provider.

### **4.1.1 Labour rights**

The working conditions of our employees are, at a minimum, compliant with internationally recognised labour standards and the laws of the countries in which we operate. In addition, we comply with the core labour standards of the International Labour Organization (ILO). These include preventing child and forced labour, adhering to the principle of non-discrimination in the workplace, and respecting the right to freedom of association and assembly and the right to collective bargaining. We acknowledge the right of our employees to self-organise and bargain collectively, and work with them to ensure their health and safety.

### **4.1.2 Diversity and inclusion**

To maintain our dedication to be a diverse and inclusive bank for employees, customers and society, we work with diversity and inclusion (D&I) in our strategic business discussions and daily operations.

We have established a governance structure, including a D&I committee and local D&I councils, to ensure accountability for upholding D&I and facilitate country-specific initiatives. Local Employee Resource Groups (ERGs) are also supported to foster an inclusive workplace through voluntary activities.

We have specific D&I guidelines on equal opportunities, such as parental leave for all parents in Nordea regardless of family type, and guidelines for transgender support that outline our commitment and responsibility to create a safe and inclusive work environment for all.

To drive financial inclusion, we arrange technical and content updates to Nordea web pages, mobile applications for consumer banking services, identification methods and electronic signatures to make sure they fulfil accessibility requirements.

Read more about our principles and guidelines for enhancing D&I in our [Diversity & Inclusion Policy](#). See also our [Remuneration Policy](#), which supports these principles by ensuring equal pay for equal work and actions to address observed gender pay gaps.

### **4.1.3 Discrimination and harassment**

All people in Nordea are responsible for ensuring a positive environment of equal and fair treatment. We approach each other, our customers and our other stakeholders with an open mindset, taking into account individual personalities and circumstances. We encourage anyone who has experienced or noticed discrimination, harassment or any other form of abuse to speak up and report it through our Group People function, our Raise Your Concern investigation team, or anonymously through our whistleblowing channel, WhistleB. These tools are further explained in the grievance/remediation section below.

Our internal control, risk management and governance frameworks support our commitment to eliminate discrimination, ensuring that our principles are upheld, overseen and monitored. We have implemented detailed measures and processes to address discrimination and harassment in our organisation. These are outlined in our [Policy summary against Discrimination and Harassment](#).

#### 4.1.4 Safe and healthy workplace

To protect our employees' physical and mental well-being in the workplace, we ensure that all employees have an inclusive, healthy and safe work environment and access to occupational health care in accordance with local regulations. We prevent work-related incidents to the extent possible in order to maintain and promote employees' work capacity and functional capacity. Occupational health and safety risks are identified and followed up according to structured processes, with reporting to and oversight from senior leadership. Training and tools are provided to leaders and employees to increase awareness, promote health and ensure a good working environment.

#### 4.1.5 Privacy and data protection

To fulfil our commitments related to privacy and data protection, we continuously enhance our ability to ensure compliance with applicable privacy laws. Relevant information can be found in our [Privacy Policy](#).

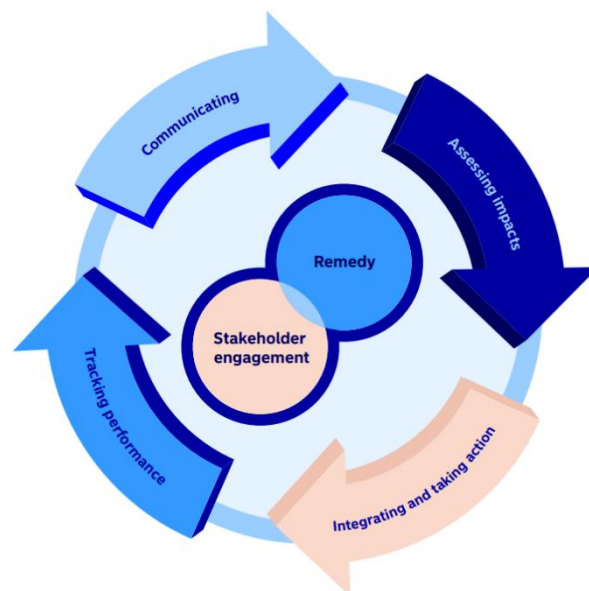
### 4.2 Value chain

This section describes our human rights due diligence process and the specific requirements set for our lending, investments and supply chain operations. It also includes achievements and activities planned for further development.

#### 4.2.1 Human rights due diligence

We recognise that we may contribute or be linked to adverse human rights impacts through our operations, suppliers or the businesses we lend to or invest in.

We are committed to continually improving our human rights due diligence in these different areas to align with the UN Guiding Principles on Business and Human Rights. This includes identifying and assessing potential adverse human rights impacts and measures to address them. We also engage with stakeholders, including affected communities, and seek their input to develop the effectiveness of our due diligence processes.





#### **4.2.1.1 Assessing impacts**

We take responsibility for identifying and assessing impacts and measures to address them. In addition to performing risk and materiality assessments, we continually work to improve our screening and monitoring to identify human rights risks associated with our suppliers, investments, lending and customers.

#### **4.2.1.2 Integrating and taking action**

If we identify that our actions have resulted in or directly contributed to adverse impacts on human rights, we initiate appropriate processes. In such cases, we actively collaborate with relevant judicial or non-judicial mechanisms as necessary to address and rectify the situation.

Our remediation processes are important elements of our human rights due diligence, and involve engagement and dialogue with impacted and potentially impacted rightsholders. The latter include workers, workers' representatives and trade unions, and other relevant parties. Within such processes, barriers to effective stakeholder engagement must be taken into account.

If it is not possible to engage directly with the impacted parties, we consider reasonable alternatives, such as consulting credible, independent expert resources, including human rights defenders, trade unions and civil society groups. If the impacts are not directly caused by us, we consider engaging with, for example, industry initiatives or local trade unions to support remediation.

#### **4.2.1.3 Tracking performance**

The UN Guiding Principles on Business and Human Rights emphasise the importance of tracking performance regarding human rights due diligence. As a consequence, we are expected to establish monitoring and evaluation mechanisms to assess the effectiveness of our human rights practices. This includes tracking the implementation of policies and processes, measuring outcomes, identifying areas for improvement, and regularly reporting on progress. By monitoring our performance, we can ensure accountability, demonstrate our commitment to human rights, and identify opportunities to strengthen our due diligence efforts.

Nordea Group Compliance oversees tracking of the effectiveness of our Code of Conduct and internal rules linked to our human rights-related commitments issued and implemented by their responsible owners. This tracking is integrated into our existing internal monitoring and reporting processes.

All external reporting is annually assessed by internal and external auditors. We also periodically assess the industry initiatives in which we participate to make sure the collaboration is helping to identify, prevent or mitigate any adverse impacts.

#### **4.2.1.4 Communication**

We are committed to regularly reviewing and updating the public on our human rights-related efforts, development and performance. We communicate on these matters through our annual report and responsible investment report, our social responsibility thematic guideline, and our reporting under the UK Modern Slavery Act and Norwegian Transparency Act. We also report annually on our progress with respect to the UN Global Compact, Principles for Responsible Banking, Principles for Responsible Investment and UK Stewardship Code.

#### **4.2.1.5 Stakeholder engagement**

As outlined in the UN Guiding Principles on Business and Human Rights, stakeholder engagement plays an important role in the human rights due diligence process. Stakeholder engagement involves actively seeking input from and collaborating with internal and external stakeholders, including affected individuals, communities, workers, civil society organisations and experts. By engaging with stakeholders, we can gain valuable insights, identify and address human rights risks and impacts, and ensure that our actions and decisions are informed by diverse perspectives and experiences.

Engaging with our stakeholders on the topic of risks to people and incorporating their feedback is instrumental to the continual improvement of our human rights work. We also acknowledge the benefits of having trusted and transparent communication, and aim to be confident that affected stakeholders are satisfied with the outcome or remedy agreed between us. It is therefore essential that we identify the stakeholders or proxies affected by our salient human rights issues.

#### **4.2.1.6 Grievance/remediation**

We are committed to conducting business to the highest ethical standards and in accordance with applicable laws, rules and regulations. We therefore encourage all customers, employees and other stakeholders always to report any suspicion of fraudulent or unethical behaviour on the part of Nordea or its employees using our whistleblowing function, Raise Your Concern (RYC). We ensure that all stakeholders, including customers, partners, affected communities and employees, have the right to speak up and always feel safe in doing so if they have concerns about suspected misconduct, such as breaches of human rights, or irregularities, such as fraudulent, inappropriate, dishonest, illegal or negligent activity or behaviour, connected with our operations, products or services. This includes any action that constitutes a violation of laws or regulations, or of our internal policies, instructions or guidelines. Furthermore, it is also possible to report anonymously via our electronic reporting channel, WhistleB.

Internally, we highlight the importance of reporting any actions that constitute a violation of laws and regulations (including own policies, instructions or guidelines issued to comply with laws and regulations) and that could thus harm our business or reputation or the health or security of our employees or customers.

The whistleblowing process is supported by a dedicated committee in each of the Nordic countries, Poland and Estonia.

Cases reported through RYC form part of the monitoring of compliance with our Code of Conduct. Summaries of key trends and case statistics are also reported on a no-names basis to the Chief Compliance Officer, Chief People Officer and Chief Risk Officer in addition to being included in management reports and reports to the Board of Directors. Furthermore, the RYC process and investigations are subject to regular quality controls, with defined escalation procedures for reporting any process deviations.

## 4.2.2 Business operations

This section describes our due diligence efforts with regard to our supply chain and investment and lending activities, and includes a description of strategic important areas.

### 4.2.2.1 Supply chain

Respect for human rights is embedded throughout our procurement process. We include indicators such as the risk of child labour, the risk of modern slavery, the right to freedom of association and decent working conditions in both our supplier screening prior to contracting and our continuous monitoring after contracting. Through the screening process, we also identify whether the supplier is subject to negative media exposure or regulatory action due to human rights-related misconduct, which enables us to take appropriate action.

All our suppliers must contractually commit to the principles set out in our Supplier Code of Conduct. The latter includes positions on human rights and labour rights and an obligation for suppliers to ensure that subcontractors adhere to the same principles. It also includes an audit clause where we reserve the right to audit both suppliers and subcontractors to verify whether the principles are being implemented in practice. We thus ensure that sustainability requirements are integrated into our supplier and contract management.

Furthermore, we have formalised our human rights due diligence process and detailed these principles in our internal Sustainable Procurement Guideline. Here, we describe how we assess human rights-related risks in our supply chain, how we take action to prevent and mitigate such risks, and how we track progress and communicate the findings of the different stages of the procurement process.

Additionally, we have conducted a human rights impact assessment of our supply chain to map the industries in which our suppliers operate and identify where there might be an elevated risk of negative impact on people. Based on our suppliers' operating context and the nature of the service or product they deliver to us, we have identified the salient human rights issues in our supply chain, i.e. the areas where human rights are at risk of being severely negatively impacted. We have identified poor working conditions, child labour and forced labour as the areas of greatest importance. This information will be included in the annual review of our frameworks and guidelines to ensure that we continue to make progress in the area of human rights. In 2024 we will focus on improving our understanding and tracking our impacts to ensure our actions have the intended effect.

#### 4.2.2.1.1 Stakeholder engagement

As part of our engagement with suppliers, we participate in Atea Sustainability Focus (ASF), an initiative enabling Nordic procurement organisations and the global IT industry to engage on how to achieve more sustainable operations. Through our representation on the ASF Advisory Board, we seek to accelerate sustainability efforts in the IT industry. The ASF Advisory Board provides annual recommendations to the Responsible Business Alliance (RBA), the world's largest industry coalition dedicated to supply chain sustainability. The RBA comprises more than 145 companies from the IT and electronics industry, representing a collective annual revenue of around USD 5.5tn and over six million workers in the supply chain.

### 4.2.2.2 Investment

Our [Responsible Investment Policy](#) describes the framework governing the approach of Nordea Asset Management to responsible investments and ESG/sustainability-related matters. The Policy

applies to our Nordea-branded investment strategies, with the exception of any holdings of such strategies in external funds and discretionary mandates at clients' request. Our investments are also guided by our sector guidelines. We expect the companies we invest in to comply with internationally recognised human rights principles and to prevent and manage impacts on human rights. Upcoming regulatory initiatives related to human rights will render this all the more important.

We screen all our holdings to identify companies allegedly involved in breaches of international laws and norms regarding human rights and labour standards. If a company is identified in this screening process, we initiate an internal assessment of both the company and the incident. We also use this process to identify companies subject to exclusion based on our exclusion criteria.

#### **4.2.2.2.1 Stakeholder engagement**

Our active ownership and responsible investment activities are guided by our Responsible Investment Policy and [Engagement Policy](#). Our active ownership tools include voting, attending annual general meetings, setting standards, engaging with companies and filing resolutions.

Engaging with our investee companies, both bilaterally and through collaborative engagements and initiatives, enables us to address material sustainability risks and opportunities, including those connected with human rights. It also means we can ensure that investee companies set measurable targets and take concrete actions to meet them. While we are fully prepared to exclude or exit companies when we deem it necessary, our experience proves that active ownership can often be an effective tool to improve ESG performance, manage risk and identify opportunities.

We also participate in several initiatives related to human rights, including the Corporate Human Rights Benchmark, the Investor Alliance for Human Rights and the World Benchmarking Alliance, all of which focus on the UN Guiding Principles on Business and Human rights.

#### **4.2.2.3 Lending**

Integrating human rights into sector guidelines, industry credit policies and ESG risk assessment tools is key to embedding human rights in our lending process. In addition to complying with national laws and regulations, customers in relevant industries are expected to follow international norms and standards, and manage and mitigate adverse human rights impacts.

ESG risk assessments, conducted for both existing and new customer relationships, serve to ensure that ESG-related credit risks, including social risk factors, are identified and assessed. We are improving our ESG assessment tools and processes so as to further integrate human rights and other social risk factors into the lending process.

As part of our commitment to the Equator Principles, we also carry out an environmental and social impact assessment when financing large infrastructure and industrial projects, as relevant.

#### **4.2.2.4 Just transition planning**

Our human rights due diligence is key to identifying the potential human rights impacts of our just transition planning and implementation. It contributes important input to our customer engagement work.

Engaging with customers on the topic of human rights and social responsibility is our way to ensure a just transition. As we embed human rights into our governance and strategy, these considerations will be integrated into all aspects of the business linked to climate change adaptation and mitigation. The requirements in our sector guidelines set the conditions for our engagement, and may ultimately lead to exclusions if the customer is not receptive to dialogue.

We see engagement as our most important tool for understanding, preventing and addressing potential and actual negative impacts, and believe that we can leverage the size of our portfolio to achieve change on a systemic level.

Our climate strategy, which defines our environmental position, commitment and efforts, can be found in our [Position Statement on Climate Change](#).

#### **4.2.2.5 Children's rights**

Within the lending and investment context, our sector and thematic guidelines set requirements and expectations for companies regarding children's rights. We also recommend that new and existing customers and portfolio companies adhere to the United Nations Convention on the Rights of the Child<sup>5</sup> and the Children's Rights and Business Principles<sup>6</sup>.

We have identified children's rights as a prioritised strategic key area in our social responsibility work. Together with civil society, non-governmental organisations and other relevant external stakeholders, we will develop an action plan for 2025 to ensure that we fulfil all relevant requirements and identify further opportunities to make a positive impact for children.

#### **4.2.2.6 Monitoring customer transactions for human rights breaches**

Alongside traditional transaction monitoring scenarios that provide holistic coverage of all our customers and transactions, we also undertake targeted, proactive, intelligence-based reviews of different financial and predicate crimes.

Human trafficking causes tremendous harm. As a consequence, we treat human trafficking risk as a priority in our crime detection and prevention efforts. The Nordic region is primarily a destination for the exploitation of victims trafficked from other countries. However, the recruitment and transport of people can also happen within the Nordic countries. Financial products and services can be abused by organised crime networks and individual perpetrators to finance crime, receive revenues from criminal activities or launder criminal proceeds.

At Nordea, we do our best to ensure that our resources, products and services are not used to facilitate financial crime or any other illegal activity. More information can be found in our [financial crime prevention policies and practices](#).

We screen all customers and transactions against the EU, UN, UK and US sanctions regulations, which also include a range of sanctions related to human rights violations and abuses. Individuals

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<sup>5</sup> <https://www.unicef.org/child-rights-convention>

<sup>6</sup> <https://www.unicef.org/media/96136/file/Childrens-Rights-Business-Principles-2012.pdf>

and entities that have been identified as human rights violators under these regulations are explicitly excluded from using our products and services.

### **4.2.3 Society**

This section describes our activities to help create and maintain financial well-being and social belonging built on human rights in wider society.

#### **4.2.3.1 Community engagement**

In the community engagement context, we recognise and aim to leverage our size and position as the largest bank in the Nordics to make a positive impact on society. Specifically, we draw on our competence in finance and entrepreneurship to benefit our local communities.

Our community engagement comprises various activities, including sponsorships, partnerships, own initiatives, donations, and volunteering. To empower our employees to contribute to this work, we offer everyone 16 hours of volunteering a year to dedicate to specific initiatives.

Since our overarching aim is to promote both financial well-being and social belonging, we engage in initiatives focused on teaching children and young people essential financial skills and educating old people and refugees in digital banking. In the entrepreneurship context, we concentrate on providing mentorship and facilitating connections. We actively collaborate with startup hubs and non-profit investors across our four Nordic markets, supporting companies on their path towards sustainable, scalable and global growth. [Read more about our community engagement initiatives.](#)

## **5 Next steps for our human rights work**

In 2023, as part of our efforts to further embed respect for human rights in our business, we complemented our social responsibility pillar with a human rights policy and this thematic guideline. To support the implementation, we educated the Board and senior management on the topic of human rights and developed an e-learning for all our employees (including consultants), which will be launched in early 2024. We also aim to develop a standalone human rights report for the fiscal year 2024.

We aspire to continually make our human rights due diligence more robust. To this end, in 2024, we will enhance our processes and Group-level coordination to facilitate the integration of our human rights due diligence. By taking these steps, we aim to strengthen our human rights practices and further integrate them into our decision-making processes.

We will continually work to implement this guideline and will review it annually to identify any necessary updates.

If customers, suppliers or investee companies are identified as breaching this guideline, we will follow the escalation procedure detailed in our sustainability governance framework.

## 6 Summary of the guideline

- As a leading Nordic universal bank, we have a key role to play in driving society towards a sustainable future.
- We see human rights as the foundation for the work within our social responsibility strategy and fundamental to ensuring continued business growth and a social license to operate.
- To support the strategic direction set out in our Group Strategy and Human Rights Policy, we have assessed and identified the following three thematic focus areas where we can leverage our market position and size to make a positive contribution to society:
  - just transition,
  - diversity and Inclusion,
  - financial well-being.
- Governance plays an important role in the implementation of this guideline. Our human rights governance is based on our sustainability governance structure.
- We use our governance and due diligence processes to assess the human rights impacts of our operations and business relationships, guided by the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.
- The guideline presents our implementation activities and our ambitions to integrate human rights standards into our strategy, governance and risk management with respect to our workforce and value chain and wider society.