

## HUMAN RIGHTS POLICY

<b>Adopted by</b>	The Board of Directors of Swedbank AB (publ)
<b>Date of adoption</b>	15 July 2021 (replaces 16 June 2020 ( ))
<b>Applies for</b>	The Bank and all Subsidiaries and all employees of the Group
<b>Group Framework Owner</b>	The Head of Group Communication and Sustainability
<b>Distribution</b>	Group Regulation section on the intranet and on Swedbank.com
<b>Language version</b>	English
<b>Information class</b>	Public
<b>Basis</b>	UN Guiding Principles on Business and Human Rights
<b>Associated supporting material</b>	N/A

### 1 Background

Swedbank’s vision is a financially sound and sustainable society where Swedbank empowers the many people and businesses to create a better future. With a large customer base in all our home markets we can drive change together with our customers and have large impact on society.

Swedbank recognises the possible risk of an adverse impact on human rights through our activities or as the result of our business relations. Swedbank is committed to always operate in accordance with universal human rights, and this approach applies to all markets where we operate and to all our business relations.

Respecting human rights is a fundamental part in our commitment towards our vision. In particular, we will promote and respect human rights by contributing to the development of a sound and sustainable financial market facilitating an accessible and reliable economic infrastructure.

### 2 Purpose

This Policy is part of Swedbank’s overall [Sustainability framework](#), and it is a supportive Policy to the Sustainability Policy. The purpose of this Policy is to provide a basis for Swedbank Group’s work to ensure that human rights are respected throughout our business operations in relation to our employees, in our business relations and in our supplier engagements.

### 3 Definitions

Human rights are defined as universal rights that should allow individuals the freedom to lead a dignified life, free from fear or want, and free to express independent beliefs. These rights shall be applied equally and universally in all countries for all individuals, regardless of nationality, place of residence, sex, national or ethnic origin, colour, religion, language, or any other status.

Swedbank bases the human rights definition and commitments on the Universal Declaration of Human Rights. We also support the principles concerning fundamental rights stipulated in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, as well as the United Nations Convention on the Rights of the Child. Furthermore, we are committed to use the UN Guiding Principles on Business and Human Rights as a starting point for our sound management of human rights-related business aspects.

## 4 Swedbank's responsibility

Swedbank's responsibilities in respecting human rights are:

- To avoid causing or contributing to adverse human rights impacts through our own activities, and to address such impacts if they occur.
- To seek to prevent or mitigate adverse human rights impacts that are directly linked to our operations, products or services by our business relationships, even if we have not contributed to those impacts.
- To use our sphere of influence for strengthening human rights in business operations.
- To embed the respect for human rights as an integral part of Swedbank's vision and values, and to encourage our employees to uphold human rights.

## 5 Human rights commitments

Respecting human rights is a fundamental part in our commitment towards a financially sound and sustainable society, and the areas below are material for Swedbank's business operations:

**Diversity and Inclusion.** Swedbank endorses the principles of diversity and inclusion. By diversity and inclusion, the Bank means that every individual, within their own abilities, qualifications and life experiences, is an equal part of the collective, regardless of gender, ethnic background, religion or other belief, age, sexual orientation, gender identity and gender expression or physical ability. For Swedbank, diversity and inclusion is the opportunity to utilise a variety of experiences and competencies to ensure that the Bank remains an attractive employer, partner, investor, and financier. Consequently, diversity and inclusion are of strategic importance and fundamental to our business. The companies we invest in or finance and the suppliers and consultants employed by Swedbank are expected to have zero tolerance for all forms of discrimination including verbal, physical, and sexual harassment.

**Labour rights.** Swedbank respects human rights in our labour practices and accept no discrimination. This includes, but is not limited to, freedom of association, the right to collective bargaining and no child or forced labour. Employees throughout our business operations shall have the right to a safe and healthy workplace, with statutory working hours and remuneration, wherein the salary shall conform to a living wage, all of which might be part of collective agreements. We also expect the same of the companies we invest in and finance, as well as by the suppliers and consultants employed by Swedbank.

**Privacy rights.** We commit to protect personal data and the rights of individuals by complying with the General Data Protection Regulation. It is important that our customers feel secure with how their personal information is used and protected. Swedbank has extensive experience with storing and handling customer data and information. Swedbank's bank secrecy obligation also protects our customers' rights and integrity.

**Special attention to vulnerable groups.** We recognise that children are an especially vulnerable group and that we all share the responsibility to respect and promote children's rights. As a bank we acknowledge our responsibility to do our utmost to prevent usage of the financial system to abuse children's rights. We recognise that also other particular groups, such as women, indigenous people, and minority groups are especially vulnerable to violations of their human rights. We commit to having a special attention for protecting their rights, by applying principles on non-discrimination, participation and accountability.

## **6 Business integration**

Swedbank acts with due diligence to avoid infringing on the rights of others in our business activities and operations. We continuously assess and seek to develop the human rights risk framework for identifying and managing risks and impacts.

Swedbank acknowledges that despite concerted efforts, abuse can occur. If the Group's activities entail a direct violation of the human rights of others, we shall take action to rectify the situation, taking into account the interests of those whose rights are being violated. We are committed to assess remedy if necessary. We also expect the same of the companies we invest in and finance, as well as by the suppliers and consultants employed by Swedbank.