

Sustainability Policy

Adopted by	The Board
Date of adoption	16 July 2025 (replaces 26 June 2024)
Applies for	The Bank and all Subsidiaries
Group Framework Owner	The CFO
Information class	Public
Legal basis	N/A
Related Group Regulations	Policy on Diversity, Equity and Inclusion, Policy for Financial and ESG Reporting, and Code of Conduct
Supporting material	Position Statement Climate Change and Nature, and Position Statement Arms and Defence

1 Introduction

Swedbank's vision is a financially sound and sustainable society where Swedbank empowers the many people and businesses to create a better future. Swedbank is committed to advancing sustainable business development with the aim of integrating financial performance with environmental and social responsibility, supported by strong governance practices.

We strive to take a leading role in the transformation toward a more sustainable future. This approach is based on the belief that sustainability and financial success are intrinsically linked, and that responsible practices support long-term value creation.

2 Purpose and scope

For Swedbank, "sustainability" is, within the scope of the Swedbank Group's business, the practice of fulfilling the current needs of society while ensuring that future generations can meet their needs. This implies having a strategy and business conduct that aims to maintain a balance among environmental, social, financial, governance and ethical aspects, with an ambition to create a positive impact that supports economic growth, social well-being, and sustainable use of environmental resources.

The scope of this Sustainability Policy is to outline Swedbank's sustainability governance and management as well as Swedbank's guiding principles for environmental and social aspects. Additional sustainability-related aspects are addressed in other internal steering documents.

Swedbank bases its sustainability work on its business strategy, applicable laws and regulations, scientific findings, international agreements and business-related frameworks. Swedbank's sustainability efforts are supported by participating in several voluntary sustainability initiatives, including the UN Principles for Responsible Banking (PRB), UN Principles for Responsible Investment (PRI), the Net-Zero Banking Alliance (NZBA), the UN Global Compact, and the UN Guiding Principles on Business and Human Rights. Supporting and committing to such initiatives enable alignment with international best practices, promotes transparency, drives progress and fosters continuous development of financial practices.

3 Sustainability Governance

Effective governance is essential to ensuring accountability, transparency, and the successful integration of sustainability across the organization. This section outlines the structures and responsibilities that guide Swedbank's sustainability work. The chart below illustrates sustainability governance in Swedbank at the levels of Shareholders and General Meeting, the Board of Directors (the Board), and the CEO.



The **Board** holds overall accountability for ensuring that Swedbank's strategies are well-suited for its operations. Further, the Board has the overall accountability for ensuring that Swedbank has adequate and effective governance structures and control processes in place. The Board ensures that these processes are consistently applied across the organisation and that they are integrated with risk measurement and management frameworks. The Board shall ensure that the organisation and management of Swedbank's operations are characterised by sound internal control.

The **Audit Committee** shall review and monitor Swedbank's sustainability reporting process. The Audit Committee shall assist the Board in fulfilling its responsibility for evaluating and ensuring the reliability and quality of the sustainability report, including the process, performance and monitoring of the double materiality assessment (DMA) as part of the sustainability report.

The **Governance Committee** assists the Board in fulfilling its oversight responsibilities in relation to the overall approach to corporate governance of Swedbank and its subsidiaries.¹

The **Risk and Capital Committee** assists the Board in fulfilling its responsibility for ensuring that Swedbank has sound risk management, including sustainability-related risks. The management of material risks identified in the DMA are covered by the Risk and Capital Committees' duties and responsibilities.

The **Remuneration and Sustainability Committee** shall ensure that the CEO establishes and maintains adequate and effective sustainability management and steering in accordance with the strategy set by the Board and Swedbank's overarching obligations related to

¹ The Remuneration and Sustainability Committee is responsible for sustainability governance.

sustainability. Strategic matters relating to the DMA are covered by the Remuneration and Sustainability Committee's duties and responsibilities.

The **CEO** is responsible for implementing and following up strategies set by the Board, including Swedbank's strategic direction including sustainability. To support this, the Board has established sustainability-related Key Performance Indicators (KPIs) for the CEO which are reported semi-annually. Corresponding KPIs for business areas, product areas and group functions are reported quarterly to the CEO. To support informed decision-making, the CEO has established several committees tasked with preparing matters, across various domains, including sustainability.

4 Environment

Swedbank encourages the transition to a low-carbon and climate-resilient and nature-conscious economy. The following guiding principles support Swedbank's conduct and operations in these areas.

Addressing climate change

Swedbank is committed to reducing greenhouse gas emissions and to contributing to the phasing out of fossil fuels across its operations and value chain, aligning with the goals of the Paris Agreement. This includes supporting a sustainable, just and inclusive transition through its business activities, in an orderly and structured manner. Swedbank aims to achieve net-zero emissions by 2050 covering emissions related to its own operations, lending and investment portfolios. Climate targets are set in alignment with 1.5°C pathways.

Enabling the green energy transition

Swedbank aims to support customers in their sustainability transition through tailored offerings and services. A strategic focus is placed on enabling the energy transition in the real estate sector, given Swedbank's exposure in all four home markets.

Respecting nature and biodiversity

Swedbank recognises the critical role of healthy ecosystems for economic and societal resilience, and for long-term value creation. Swedbank's ambition is to be part of the journey of integrating nature and biodiversity in the financial sector.

5 Social engagement

Social engagement encompasses Swedbank's contribution to upholding high standards on human rights, fair working conditions and broader societal engagement. The following guiding principles support Swedbank's conduct and operations in these areas.

Respect for human rights and fair working conditions

For Swedbank, "human rights" in accordance with the Universal Declaration of 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.

Swedbank is committed to respecting internationally recognised human rights and international humanitarian law in all areas of its operations, including working conditions. The promotion of a sound and sustainable financial system, alongside with prevention of financial crime are essential elements in this regard.

Swedbank's commitments include adherence to nationally adopted UN treaties and conventions on human rights and labour law, as well as the UN Guiding Principles on Business and Human Rights which provide a framework for responsible business conduct. In

labour relations, this means respect for the freedom of association, the right to collective bargaining, zero tolerance of child or forced labour, and the right to a safe and healthy workplace, with statutory working hours and fair remuneration, all of which might be part of collective agreements. These principles are also expected to be followed by companies that Swedbank finances or invests in as well as suppliers and other business partners.

Swedbank and its employees may not discriminate or harass based on gender, gender identity or expression, sexual orientation, age, race, colour, ethnic or social origin, genetic features, language, membership of a national minority, property, birth, disability, religion or belief, political or any other opinion. Swedbank recognises that certain groups may be particularly vulnerable to human rights violations. Special attention shall therefore be given to upholding principles of non-discrimination, participation and accountability in relation to these groups.

Swedbank considers fair working conditions as both a responsibility and a strategic advantage in attracting and retaining talent. One of the cornerstones of Swedbank's strategy is to offer a workplace where employees can grow and develop and make a sustainable impact, in a caring and inclusive environment.

Promoting diversity, equity, and inclusion

Swedbank strives to be an inclusive organisation, caring for, and being open and accessible to all customers, employees and suppliers. Swedbank applies a zero-tolerance against discrimination, harassment, sexual harassment, and bullying.

Promoting financial health and societal engagement

Swedbank promotes financial health by increasing awareness and understanding about key financial concepts, with the aim of empowering individuals and businesses to make informed financial decisions and improve long-term financial well-being. Swedbank is committed to a strong level of engagement in society and local communities, recognising its structural role within the financial system. Swedbank supports the promotion of education and financial literacy, entrepreneurship, and the development of a sustainable society.

6 Sustainability management and integration

Sustainability is integrated in Swedbank's business strategy and Swedbank strives to identify and manage sustainability related impacts, risks and opportunities, by for example integrating sustainability into financial products and services. This helps to guide customers toward investments and financial decisions that support sustainable choices and long-term financial security.

Stakeholder management

The interests of Swedbank's key stakeholders, including customers, employees, investors and authorities, are taken into account in the development of Swedbank's sustainability strategy and associated targets.

Sustainability risk management

Swedbank identifies, assesses, and manages sustainability risks as part of its broader risk management framework. The ambition is to address sustainability risks in a manner consistent with the bank's overall approach to managing material risks, ensuring alignment over time through continuous improvement and integration.

Sustainability due diligence

Swedbank shall integrate sustainability due diligence across its operations, subsidiaries, and business relationships – which include identifying, preventing and mitigating adverse human rights and environmental impacts. Priority shall be given to areas with the highest risk for

adverse impact caused by, contributed to, or linked to Swedbank's operations. Ongoing stakeholder engagement supports the identification and management of potential and actual impacts. Swedbank's anonymous whistleblowing process encourages employees and other stakeholders to report suspected breaches of Swedbank's obligations and policies.

Targets and reporting

Swedbank shall work with clear and measurable sustainability-related targets. Progress shall regularly be reported, and any deficiencies shall be addressed and followed-up appropriately. Sustainability reporting is conducted in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and is based on the principle of double materiality. Additional external reporting is carried out in accordance with the standards of relevant international frameworks to which Swedbank is committed.

Competence development and information

Building and maintaining sustainability-related knowledge is essential for fulfilling commitments and ensuring relevance to customers and business partners. Swedbank is committed to fostering continuous competence development in sustainability throughout the organisation and providing timely access to relevant information, together, these efforts equip employees with the necessary tools to make informed decisions that align with our sustainability goals.