



# **Sustainability Policy for the SEB Group**

derived from the Rules of Procedure of the Board of Directors

adopted by the Board of Directors  
of Skandinaviska Enskilda Banken AB (publ)  
28 April 2026

**Sustainable Banking**

# Sustainability Policy

## 1. Introduction

SEB Group's purpose is to positively shape the future with responsible advice and capital, today and for generations to come. By providing transition advice, financing and investments, SEB Group helps its customers on the path towards a low carbon and sustainable economy. Through its ambitions and goals, SEB Group aims to accelerate the pace towards a sustainable future for people, businesses and society. Integrating sustainability into SEB Group's everyday business is in line with SEB Group's long-term strategy, risk appetite framework and fundamental to SEB Group's ability to support its customers in the transition, and thereby positively shape the future.

## 2. Purpose and context

- 2.1** The purpose of this Policy is to define the framework for sustainability in SEB Group and provide a governing platform for SEB Group's sustainability work for all business decisions, including credit and investment decisions.
- 2.2** This Sustainability Policy is supplemented by the Sustainability Governance Instruction, two thematic sustainability policies, and accompanying sector policies which regulate SEB Group's view on specific key issues in various industry sectors that are considered critical from an environmental and social perspective.
- 2.3** The policies in 2.2 together with other public policies on SEB conduct and in combination with internal governance documents form the foundation for SEB Group's sustainability position supporting the long-term business strategy.

## 3. Scope

- 3.1** This Policy applies to SEB Group, excluding SEB Asset Management Holding AB and its subsidiaries and Gamla Livförsäkringsaktiebolaget SEB Trygg Liv, which have their own sustainability policies, taking local rules into account where relevant.

## 4. Sustainability Statement

- 4.1** SEB Group aims to be a leading catalyst in the sustainability transition. It is convinced that companies that include sustainability in their operations and business decisions have the prerequisites to be more successful in the long term. SEB Group is therefore committed to support its customers in the transition towards a sustainable and low carbon economy in line with the Paris

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Agreement. To this end, SEB Group has net zero GHG emissions target for its credit and investment portfolios in line with the Paris Agreement.

**4.2** Achieving the United Nations' Sustainable Development Goals (SDGs) and the Paris Agreement will have significant implications on global investment needs. SEB Group seeks to contribute to the goals by combining sustainability advisory expertise and sustainable products in the offerings to its customers, enabling them in their contribution to the realisation of society's goals. Thereby, SEB Group will create value from a financial, social and environmental perspective together with its customers.

**4.3** In addition, SEB Group aims to minimise risks for any direct and indirect adverse impact on the climate and environment as well as on human rights and labour rights. Strengthened capabilities within cybersecurity and financial crime prevention is a priority to protect the well-being of SEB Group's customers and society at large. SEB Group does not use nor facilitate tax evasion or tax avoidance arrangements.

## 5. Sustainability Management

**5.1** As sustainability is integrated into all aspects of commercial activities throughout society, SEB Group's ability to support its customers will be dependent on a continuous development of sustainability capacity and know-how across SEB Group, combined with established supportive functions, external and internal metrics and incentives to develop in line with SEB Group's customers' and stakeholders' demands. SEB publicly communicates its progress through KPIs in the areas of sustainability activity in finance and investments, carbon exposure in energy financing, and 2030 sector targets.

**5.2** To reach the goal of being a leading catalyst in society's sustainability transition, SEB Group continuously enhances its sustainability-related capabilities. The following are "*Important Enablers*" to realize SEB Group's strategic ambitions:

- *Advisory capacity.* SEB Group aims to provide top-ranking research and advisory capacity. That requires a solid internal "critical mass" of sustainability know-how of public and private research, as well as a solid understanding of the regulatory landscape and its implications.
- *Transition assessment.* SEB Group develops its customer transition advisory offering through a Customer Sustainability Classification tool combined with associated credibility and risk modules. Together they provide relevant insights to track the climate impact and risk of SEB Group's credit portfolio, and facilitates sustainability-related financing in the market.

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- *Product development.* SEB Group aims to be at the forefront of developing new sustainable financing and investment opportunities for its customers.
- *Investment offering.* SEB Group aims to have a comprehensive and competitive investment offering with sustainability risks and sustainability impacts integrated into investment processes and products.
- *Impact.* SEB Group aims to actively steer its impact in line with its sustainability commitments through the deployment of services, products and capital, and support such transition with transparent metrics.
- *Sustainability Data Management.* SEB Group continuously develops its efforts to in-source, enhance and produce extensive, correct and timely sustainability data, which will allow capturing sustainability-related business opportunities, measuring impact and risk as well as supporting its customers in their sustainability transition. Such data will furthermore enable SEB Group to fulfil external sustainability reporting requirements.
- *Competence development.* SEB Group invests in its staff's abilities to support customers by continuously offering internal and external training, ensuring a thought-leading position within business-related sustainability activities.
- *Risk management.* Through integration of ESG considerations into risk management processes, SEB Group's handling of sustainability-related risks ensures that business is conducted within the risk mandate set by the Board of Directors and the President. Management of sustainability-related risks is based on the principles and framework stated in the Risk Policy for the SEB Group and Risk Appetite Framework of SEB Group.

## **6. Stakeholder Engagement**

- 6.1** SEB Group's stakeholders take an interest in sustainability. Owners, creditors, customers, suppliers and employees are all important stakeholders, as is society at large. SEB Group values their opinions, priorities and preferences. SEB Group's position and importance in society combined with its stakeholders' views form the foundation for SEB Group's Sustainability commitments and strategy.

## **7. Sustainability Governance Framework**

- 7.1** The *Board of Directors* (Board) of Skandinaviska Enskilda Banken AB is responsible for the management of the affairs and the organisation of SEB Group. In respect to sustainability, this includes the SEB Group Business Plan, the SEB Group's sustainability strategy, this Sustainability Policy for SEB

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Group, the Sustainability Governance Instruction for SEB Group, the Thematic Policies for SEB Group, and the Annual Report and its Sustainability Statement.

- 7.2** The *President and Chief Executive Officer (CEO)* is responsible for the execution of SEB Group's sustainability strategy and implementation of the governance structure set by the Board.
- 7.3** The *Group Executive Sustainability Committee (GESC)* is established by the CEO to manage the execution of the sustainability strategy in SEB Group. GESC is a Group-wide decision-making and consultative body that is chaired by the CEO.
- 7.4** The *External Sustainability Advisory Board (SESAB)* is established by the CEO to provide strategic intelligence concerning sustainability.
- 7.5** The Chief Sustainability Officer (CSO) is appointed by the CEO. The CSO is a member of GESC and the Group Risk Committee (GRC) and a member of the Senior Leadership Committee (SLC). The CSO is the Head of Sustainable Banking.
- 7.6** *Sustainable Banking* is an organisation established by the CEO to support the execution of the sustainability strategy. Sustainable Banking is a first line Group function that is responsible for coordinating and driving the overall sustainability agenda in close collaboration with Business Divisions, Group Staff and Support functions and the CRO function.
- 7.7** The *Sustainable Product and Transaction Committees (SPTC)* are committees administrated by Sustainable Banking that decide on the right for Business Areas and Business Units in the SEB Group to use any sustainability reference in the marketing or distribution of products, services or individual transactions.
- 7.8** Each Head of Business Division, Head of Group Staff and Support function is responsible for ensuring that sustainability-related governance structures, including procedures and controls, are in line with SEB Group's Business Plan as well as sustainability policies and instructions set by the Board, the CEO and GESC.
- 7.9** Each Business Division shall have a committee to assess any potential deviations from SEB Group's sustainability policies and instructions in relation to new customers or transactional proposals through a *Sustainability Business Risk Committee (SBRC)* or equivalent.

## 8. Reporting

- 8.1** SEB Group shall be transparent in its efforts to support long-term sustainable development of its operations. SEB Group shall report publicly on sustainability performance, developments and impact in its Annual Report and

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its Sustainability Statement. Other external reporting, as a result of public commitments, follow each international organisation's reporting standard.

### 9. Sustainability commitments

**9.1** SEB Group recognises the importance of participating in and supporting international commitments that support businesses to operate in a more sustainable way. SEB Group supports the following international agreements and international frameworks (i.e., nation state-level agreements which partly or wholly relate to business, but with no formal mechanism for business to endorse or join):

| International Agreement                                                                                  | Description                                                                                                                                                                                                                                                                                     |
|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• UN Sustainable Development Goals</li></ul>                       | 17 globally agreed goals for 2030 developed by governments, the private sector and civil society to achieve a sustainable development for the planet.                                                                                                                                           |
| <ul style="list-style-type: none"><li>• The Paris Agreement</li></ul>                                    | An agreement between governments to limit global warming to well below 2 degrees compared to pre-industrial levels.                                                                                                                                                                             |
| <ul style="list-style-type: none"><li>• The Universal Declaration of Human Rights</li></ul>              | An expression by all governments in the United Nations of the rights and freedoms everyone is entitled to.                                                                                                                                                                                      |
| <ul style="list-style-type: none"><li>• The eight ILO Core Conventions on Labour Standards</li></ul>     | Eight ILO principles and rights at work that are considered fundamental for the world of work and should be prioritized for ratification into national laws.                                                                                                                                    |
| <ul style="list-style-type: none"><li>• The UN Guiding Principles on Business and Human Rights</li></ul> | A set of guidelines for states and companies to prevent, address and remedy human rights abuses committed in business operations.                                                                                                                                                               |
| <ul style="list-style-type: none"><li>• The Children's Rights and Business Principles</li></ul>          | Principles to guide companies on actions they can take in the workplace, marketplace and community to respect and support children's rights.                                                                                                                                                    |
| <ul style="list-style-type: none"><li>• The OECD Guidelines for Multinational Enterprises</li></ul>      | Recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognised standards. |

**9.2** SEB Group is a member of, or has signed, the following business-related commitments:

| International Framework                                             | Description                                                                                                                                             |
|---------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>• UN Global Compact</li></ul> | Framework for corporates to implement universal sustainability principles in the areas of human rights, labour rights, environment and anti-corruption. |

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- Principles for Responsible Banking  
A UN supported strategic sustainability framework for banking to enable a positive contribution to society by integrating the Paris Agreement and SDGs in objectives and business processes.
- Principles for Responsible Investments  
A UN supported framework with six investment principles that offer a menu of possible actions for incorporating ESG issues into investment practice to better align investors with broader objectives of society.
- Equator Principles  
A risk management framework, adopted by financial institutions, for determining, assessing and managing environmental and social risk in projects. Primarily intended to provide a minimum standard for due diligence and monitoring.
- The Net Zero Asset Managers initiative  
The members have committed to achieve net zero alignment by 2050 or sooner, drawing on the Net Zero Investment Framework to deliver these commitments.
- Poseidon Principles  
A global bank initiative to reduce the emission of greenhouse gases from shipping consistent with the International Maritime Organisation's ambitions.
- Responsible Ship Recycling Standards (RSRS)  
A joint bank initiative for ensuring environmentally and socially responsible dismantling and recycling of ships.