

# Code of Conduct



Adopted by the Board of Directors of Skandinaviska Enskilda Banken AB (publ) 5 December 2017.

SEB

# Introduction

This Code of Conduct describes SEB’s way of working and guides us in our business relationships. The Code helps us in our efforts to always act responsibly and ethically in order to build long lasting relationships with customers and other stakeholders. This is also our policy on ethical matters. All SEB employees are responsible for adhering to the content of this document and for asking their manager and when relevant Compliance for guidance in case of doubt.

The Code of Conduct covers all employees of the SEB Group – in all markets where SEB operates – and all those who represent companies within the Group, including members of the board, independent contractors and consultants.

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## Your responsibilities – ask yourself

- Is it legal, fair and ethical?
- Does my behaviour align with SEB’s purpose, vision and values?
- Does what I am doing benefit the customer and keep the bank safe and secure?
- Would a customer, colleague or my manager consider my behaviour appropriate?
- Would my action stand up to scrutiny by media without harming the SEB brand?
- Am I prepared to challenge something I don’t think is right, and do I welcome being challenged by others?
- In a five-year perspective, will my behaviour be beneficial, from a customer and an SEB perspective?

*Would you like to raise an issue? Turn to your manager or contact your compliance officer. You can also use our whistleblowing channel, read more in the section Whistleblowing procedures for details.*

# Purpose, vision and core values

## Purpose, vision and core values

We believe that entrepreneurial minds and innovative companies are key in creating a better world. We are here to enable them to achieve their aspirations and succeed through good times and bad.

## Our vision

To deliver world-class service to our customers.

## Our values

Our core values are more than just four words. They give us an inner compass to follow in our ambition to achieve our vision. They guide us in our efforts to add value, meet our customers' expectations and to earn their trust. We are also measured and followed up on how well we live our core values.

### Customers first

We naturally put our customers' needs first, always seeking to understand how to deliver real value.

### Commitment

We are personally dedicated to the success of our customers and are accountable for our actions.

### Collaboration

We achieve more because we work together. We share, challenge and learn from our experiences as a team.

### Simplicity

We strive to simplify what's complex. We value our customers' time by being accessible, straightforward and transparent.



## Dear colleague,

At SEB, we are in the business of trust. We are all together dependent on that our customers, shareholders and other stakeholders have confidence in us. Without this, we cannot continue to conduct our business successfully.

Basically, it is about how we act and behave towards our customers and other business partners, as well as towards each other within SEB. I like to talk about "business acumen". For me, this means long-term relations, to act with a strong ethical compass closely tied to our purpose, vision and our values. This is how we create value for our customers and for SEB.

The world and our environment are constantly changing, and norms and values are shifting. Therefore, we must constantly challenge our routines and how we work, questioning how our actions affect customers and other stakeholders over time. What was right and true ten years ago, might that be questionable today?

This Code of Conduct sets the standard for how we work, and the values in it connect us all. If one of us violates the Code, it might affect all of SEB and thus all of us. We are therefore, each and every one of us, responsible for setting good examples and to speak up if we see behaviours and actions that are inappropriate or not allowed.

Most of the time, it's about common sense, but in case of doubt, you have a responsibility to contact your manager or relevant specialist to discuss a matter of ethical nature or should you need more guidance. When relevant you should also seek advice from Compliance.

I am convinced that our inner compass in most cases works well. But that does not mean we can lean back, instead we will continue to develop our business acumen.

*Johan Torgeby*  
President and Chief Executive Officer

## Our role in society for a sustainable future

Banks play a fundamental role in society. We support individuals, businesses and society-at-large by providing financing and savings solutions, risk management and payment services. At SEB, we are well aware of our impact on society, that we are part of it and actively must relate to the development in a constantly changing environment.

Our business shall be underpinned by strong ethics and good governance, long-term relationships and highly committed people delivering the corporate strategy and managing the social and environmental impact of our business. As global trends change, we need to continuously develop our way of working in order to meet our customers' needs and expectations. We have a strong ambition to contribute to sustainable growth and to make a difference to customers,

employees and society at large and thus to our shareholders. SEB does not support political parties through donations or otherwise. SEB has adopted a number of global initiatives and international codes of conduct which guide our business decision. Among them are UN Global Compact, the Principles for Responsible Investments and UN's Guiding Principles on Business and Human Rights.



## Responsible and ethical behaviour

Banking is based on relationships and trust. Consequently, it is crucial for us not only to adhere to all laws and regulations in the countries in which we do business but also to maintain high ethical standards. Our internal rules and procedures are in place to achieve this and all decisions shall be in line also with them. We also provide training for all our staff so that you will know how to act in different situations.

### Our customer relationships

For us, our customers always come first. By building long-term relations with them, we broaden our understanding of their financial needs and business challenges so that we can support them to fulfil their aspirations. We need to take several aspects of building customer relations into account:

- Knowing and understanding our customers
- Advice to customers
- Taxes
- How we handle complaints

### Knowing and understanding our customers

We must always know and understand our customers to be able to provide great service. We need to have some basic information on all our customers. The more complex the relationship and the customer's organisation are, the better we need to know and understand the customer and its business activities including how and why they want to do business with us. Otherwise, we choose not to enter into business relationships. Also, there are laws requiring us to do this.

The business activities we carry out in SEB require certain licenses (such as banking, insurance and fund management licenses). These licenses come with requirements to comply with many laws and other external rules, e.g. requiring us to obtain in-depth knowledge about our customers. Such know-your-customer (KYC) requirements are included in for example, laws on investment services and the prevention of money laundering and financing of terrorism.

We shall always, by applying the KYC-process, secure the identity of our customers and any person acting on behalf of a customer. Where appropriate an assessment of the source of their wealth and funds shall be done. For legal entities, we must also know who their beneficial owners actually are and who has the mandate to make decisions.



We apply enhanced due diligence for business relationships with for example politically exposed persons and customers from countries or industries considered as high risk. In cases of high risk, the customer must be presented to the Customer Adoption Committee. The committee will not only assign the appropriate due diligence-level, but also decide whether or not it is appropriate to enter into a business relationship with the customer. We monitor ongoing business relationships by verifying and documenting that the transactions which are carried out match the information we have on the customer in question – including their business and risk profile and, where relevant, source of funds. Documentation and information on the customer must always be up-to-date and relevant.

We only grant credits when there is well-founded reason to assume that the customer will be able to fulfil his credit obligation on the contracted terms.

**Advice to customers**

We safeguard our customers' interests and we always base our advice to customers on our understanding of their needs, never anything else.

Our relationships with customers must not be influenced by any other external considerations. We must not, for example, recommend a product to a customer on the sole basis that we will make more money from that particular product. We shall ensure that our customers understand the products they are using and the advice we provide as well as the risks associated with them.

**Taxes**

We pay taxes in accordance with applicable laws and regulations in all countries where we operate. We undertake all dealings with tax authorities in a professional, transparent and timely manner, both when it comes to our own tax matters and in reporting obligations regarding customers. We do not use nor facilitate tax evasion schemes. We work actively with risk assessments, frameworks and controls in order to ensure compliance by all SEB units. We do not use structures lacking business rationale in order to avoid taxes. Neither do we provide products or promote structures where the sole purpose is tax advantages. We do not co-operate with external parties to facilitate tax evasion, nor to facilitate transactions which we are unwilling to provide ourselves where the sole purpose is tax advantages.

**Ask yourself!**  
Will the advice I provide to customers stand up to scrutiny?

**How we handle complaints**

We always strive to improve and to deliver better services to our customers. We value that our customers share their experiences of how they perceive both the service they receive and the products and services we offer. Therefore we provide information on how customers can give us their views. When we receive customer complaints, we handle them promptly and professionally, at the latest within two business days.

**Financial crime**

As part of the financial system, we are committed to detect and prevent financial crime such as fraud, money laundering and financing of terrorism as well as insider trading and market manipulation.

Aspects of financial crime and the ways to detect and prevent it are:

- Money laundering and financing of terrorism
- Market abuse
- Employees' transactions in financial instruments

We have put in a place rigorous procedures and systems to detect and prevent financial crime that apply across the whole Group. We monitor official registers of individuals and organisations that could be linked to money laundering, fraud and terrorism. We take measures to ensure that we do not unintentionally facilitate financial crime and we constantly strive to improve and develop our procedures for preventing it. Also, we use sophisticated systems to monitor transactions for suspicious behaviour associated with money laundering, financing of terrorism and market abuse. We report suspicious activities to the relevant authorities.

**Ask yourself!**  
Did I take actions when I noted that the client made a transaction that seemed odd?  
Do my actions keep the bank safe and secure?

**Money laundering and financing of terrorism**

Money laundering is the process whereby illegal profits are converted into funds that appear to be legitimate. This covers more than just cash transactions. Financing of terrorism is the funding of terrorism and other severe crimes both through legal and illegal funds. Knowing and understanding our customers are important measures to prevent money laundering and financing of terrorism.

**Market abuse**

Insider information is information about circumstances which have not been made public or are not generally known and which, if they were known, would be likely to significantly affect the price of financial instruments. Anyone who has insider information is forbidden to disseminate or trade on the information. We continually assess whether the information we receive constitutes insider information. Within SEB, we only share insider information on a need to know basis and that the information will remain confidential. Don't forget that this applies both to insider information regarding the SEB share as well as other insider information that we may have.

**Employees' trading in financial instruments**

Most employees are subject to restrictions as regards transactions undertaken for their own account on the securities market. If you are one of these, you are subject to rules concerning, for example, minimum holding periods and have a duty of notification towards SEB regarding your holdings in financial instruments. In addition, you might also have an obligation to request approval from SEB prior to doing transactions in financial instruments.

**How we handle information and secrecy**

Customers entrust us with their information and we preserve that trust by keeping the information confidential. Additionally, we protect SEB by keeping the internal information about our business processes, products etc. equally confidential.

This is why all employees, consultants and others who provide services to SEB sign a declaration of confidentiality. The obligation to keep information confidential also applies outside of office hours as well as after your employment at SEB has ceased.

There are several aspects of how we handle information and secrecy such as:

- Confidential customer information – banking secrecy
- Personal data protection – integrity
- Our assets and confidential information

**Ask yourself!**  
Did I ensure that the colleague that requested information about my client needed that information to carry out his or her work tasks?  
Would the customer, colleague or my manager consider my behaviour appropriate?

**Confidential customer information – banking secrecy**

All information relating to our customers is confidential – including information about whether there is, or has ever been, any association between us and a customer.

The confidentiality also applies internally – this means that we only share or discuss confidential information, with colleagues that need it to carry out their work.

We also prevent the unauthorised dissemination of confidential customer information, e.g. by archiving it securely, encrypting information that is sent by e-mail and by applying restricted access routines.

We may only disclose information protected by banking secrecy with the customer's express consent, or where we are required to in accordance with relevant laws and regulations.

**Personal data protection – integrity**

We have specific principles for how we protect and process personal data.

We only gather, use and disseminate personal data if we need the data for certain regulated purposes, e.g. in order to fulfil either an agreement or a legal obligation or if we have been given a consent to do it. Particularly strict rules apply if the data is sensitive, e.g. about someone's health.

As a general rule, we provide customers with information on how we will process their personal data at the point at which we gather it. In principal, personal data may only be used for the purpose it was originally gathered.

In most countries, our customers are entitled to review their personal data that we have about them and to be informed of how we obtained it, how it is used and to whom we have disseminated it.

**Ask yourself!**  
When writing notes about client conversations in our internal systems – do I write them in a way so that I can stand up for these if read by the customer?

**Our assets and confidential information**

SEB's name (even on the company stationery or in e-mails), relationships, information or any other property may only be used for legitimate business purposes. You may occasionally use your professional SEB e-mail account for private matters but never for personal gain. We also protect SEB by keeping the internal information confidential and ensuring that the right decision maker takes the decision in case anyone else shall use SEB's property.

**Ask yourself!**  
Have I used my SEB e-mail account for personal gain?

**Open communication**

We want our customers, shareholders, employees, investors and other concerned parties to be able to form a balanced and accurate picture of SEB. Therefore we are open and proactive in our communication. To ensure that we live up to this overall ambition, communications are to be characterised by speed, proactivity, trustworthiness and transparency.

There are several aspects of open communication such as:

- Correct information at the correct time
- Communication with supervisory authorities
- Employee communication
- Questions from the media

**Correct information at the correct time**

As a listed company, we publish our financial statements and other important information when this is justified or prescribed. We do not engage in inappropriate, selective announcements. We have internal rules in place to ensure that important information is consistently disseminated to investors, stock markets, analysts and the media, and that the information is correct, relevant, reliable and available to all at the correct time.

**Communication with supervisory authorities**

We strive to maintain good relationships with the supervisory authorities in those countries in which we operate. All contact with supervisory authorities must be coordinated with Group Compliance. This means that as an employee you should always first turn to Group Compliance before you contact or communicate with a supervisory authority.

**Communicating as an employee**

As an employee at SEB, we are all representing our company, and anyone communicating via for example social media in a professional capacity will always be seen to represent the entire SEB organisation. As a consequence, all communication must be in line with SEB's values and be consistent with how we communicate through other channels. As employees, we must also make a clear distinction between our private and professional presence on the internet and in social media.

**Ask yourself!**

Am I sure that what I express in social media is not damaging SEB?



**Questions from the media**

SEB is on a daily basis asked by the media to express our opinions on various issues. Group Communication has the overall responsibility for contacts with the media. All SEB employees can respond to media within their area of expertise, but if you are not used to handle media, Group Communication should be contacted so that they can help you prepare.

**Ask yourself!**

Am I the right person to answer this question from the media?

**How we manage conflicts of interest**

Public confidence in the financial markets is of vital importance to SEB. A conflict of interest arises when business or personal relationships impair someone's professional judgement or ability to act in the best interests of customers, shareholders or SEB.

There are several aspects of how we manage conflict of interest, such as:

- Avoiding and disclosing potential conflicts of interest
- Employees' own transactions
- Assignments outside SEB
- Gifts, entertainment and bribes

**Avoiding and disclosing potential conflicts of interest**

Our business decisions, just like our other actions, are never based on personal considerations or private relationships. We avoid conflicts of interest with our customers and treat them fairly. We take all reasonable measures to identify any conflict of interest and we organise our business so that we avoid and prevent them from arising. When a potential conflict of interest cannot be avoided, the customer's interests must not be disregarded and the customer concerned must be informed of the details.

In order to establish clear information barriers, parts of the bank where certain activities are carried out are physically and systematically separated from other parts of the bank.

An employee that identifies a potential conflict of interest in any other context should consult his or her line manager or Group Compliance.

**Employees' own transactions**

Our employees shall never use their position in SEB to enter into personal business relations or conduct other personal economic transactions with SEB's customers or partners. Employee's own transactions must not conflict with the interests of our customers. If a conflict of interest cannot be avoided, the interests of our customers and SEB take priority. To avoid a conflict of interest between the employee and SEB or our customers, employees may not handle banking transactions or issues in which they have a vested interest. This also applies, for example, to banking transactions or issues in which a relative, acquaintance or a company in which the employee, or a relative or an acquaintance of the employee has a major interest.

**Assignments outside SEB**

Our employees' commitment to, and responsibility towards, SEB is irrefragable. Employees' commitment to external activities, such as taking employment outside SEB (either part-time or full-time) or serve on the board or other similar body of another company or organisation, owning or carrying on business of any kind, must be notified to and approved by the employees' immediate manager and subsequently by the manager's manager according to the so called "grandfather principle".

In situations where the external assignment is related to financial services or products, real estate businesses or related to a client or a supplier of SEB, the ultimate decision must be made by the relevant Head of Division, Staff Function or Business Support. External activities that imply a conflict of interest between the employee and SEB or a customer of SEB will not be approved. Also, employees may not be involved in businesses or other undertakings that may seriously jeopardise their personal finances. The approved external assignments should be reviewed by the manager every time there is a change and at least once a year.

**Ask yourself!**

Do I have any external assignments that have not been approved by SEB?

**Gifts, entertainment and bribes**

We do not use or tolerate unlawful or immoral business practices such as bribery. We strive to prevent corruption and do not tolerate SEB becoming involved in or associated with bribery under any circumstances. No SEB employee, board member, independent contractor, consultant or other party associated with SEB may be involved directly or indirectly in offering, promising, giving, soliciting, or accepting a bribe.

A bribe means any payment or other benefit that is intended or can reasonably be expected to influence a person's performance of their duty. Also, SEB does not pay so called facilitation payments (i.e. payments not stipulated in law or other regulations that are levied by public officials for the formal handling of cases at courts or other authorities).

Bribes, or suspicions concerning bribes, involve a reputation risk and potential damage to the SEB brand. In case employees encounter them, they should report them to their line manager and Group Compliance.

It can be difficult to assess whether a benefit in the form of a gift or an offer to participate in an event can be considered a bribe or an acceptable part of a business relationship. If uncertain you should therefore:

- Inform your immediate manager beforehand,
- ensure that benefits that you give and receive only has a moderate value, and
- avoid benefits that could influence the giver's or the recipient's behaviour at work.

Have in mind that a benefit that risks being seen as a bribe might cause problems, not just to us but also to our customers.

Managers that are being informed about benefits and are unsure how to act shall always contact Group Compliance and their own immediate manager.

**Ask yourself!**  
I am invited to a conference and dinner by a supplier. Would my participation in any way impact the way I and thus SEB do business with the supplier?

**Our relationships with suppliers, other business partners and competitors**

We aim to surpass our competitors in a fair and honest way. We achieve competitive advantages by attaining the highest quality performance, never through unethical or illegal business practices. We never do business with anyone who we believe may damage SEB's reputation.

There are several aspects of our relationships with suppliers, other business partners and competitors such as:

- Good business ethics
- Healthy competition and avoiding restrictive trade practices
- When someone is both a customer and supplier

**Ask yourself!**  
A competitor proposes that we shall discuss the pricing strategies for a certain product that we both offer – what would be the effect?



**Good business ethics**

We honour good business ethics and follow the rules that apply in the countries in which SEB operates. In order to deploy our assets in the best possible way, and to derive benefit from our purchasing power with the aim of creating value for our customers and shareholders, we purchase all goods and services in a coordinated manner and based on objective factors such as quality, price, availability, delivery, reliability and service. We reach agreement with our suppliers that they must comply with our internal rules where applicable, observe confidentiality and agree to keep the business relationship with SEB confidential, unless otherwise agreed.

**Healthy competition and avoiding restrictive trade practices**

We obey all rules relating to healthy competition and so called unfair restrictive trade practices in the countries in which we operate. The rules are often complex and vary considerably from country to country. They are generally designed to promote healthy competition between companies. Disobeying

these rules may lead to heavy fines for a company and, in certain countries the people involved may also be fined personally. Accordingly, we avoid situations that may lead to unlawful behaviour that stifles competition such as:

- proposals from competitors to share pricing information or other competing marketing information, or to divide up the markets or customers,
- attempts by existing or potential customers to prevent us from conducting business relationships or entering into agreements with another customer, and
- discussions on competitively sensitive subjects such as prices, pricing methods, costs and marketing strategies.

**When someone is both a customer and supplier**

We often purchase goods and services from suppliers that are also customers of SEB. We manage the respective relationships separately, in order to avoid conflicts of interest.



# SEB as a workplace

Together, we all contribute to making SEB a great place to work. As an employer, SEB has a responsibility to ensure that all employees are treated equally and with respect. Everyone should feel included and be given the same opportunities for professional and personal development. Values and behaviours as well as individual ability and ambition are important long-term success factors for being part of our team.

SEB's core values – customers first, commitment, collaboration and simplicity – are the foundation for everything we do. They guide us in our daily work and we are all expected to behave in accordance with them.

SEB works actively with the entire organisation, leaders and teams in order to meet a changing environment and create what it takes to continue to be a successful company. We strive to promote an inclusive culture where our employees feel respected and valued, that our workforce reflects our customer base and the diversity in society and to ensure that our teams and management are balanced in terms of gender, age, competences, and geographical provenance.

We expect our leaders to induce a strong sense of purpose to the business and opportunities for employees to achieve their full potential. Everyone should be able to develop professionally and as a human being. We value the individual's commitment, ability to collaborate and willingness to serve our customers.

We reject all forms of discrimination or harassment, whether this is based on an individual's ethnic or national origin, gender, skin colour, faith, religion, citizenship, age, disability, civil status or sexual orientation. This is equally important in relation to customers and other stakeholders as well as in relation to our colleagues.

### A safe and healthy work environment

At SEB, we work proactively to achieve a sound workplace. A healthy work environment is essential to the well-being of our employees and thereby lays the groundwork for successful business results.

As SEB employees, we all also have an individual responsibility to ensure that we have an attractive and safe work environment in which every employee is appreciated and respected.

We must react if we discover behaviours that are inconsistent with our ethical guidelines, and take appropriate action if, as an example, a colleague should have alcohol or drug problems or engages in irresponsible gambling.

We are also, all of us, responsible for contributing to a sound balance between work and leisure time in order to limit stress related problems.

### Ask yourself!

Do I always act in accordance with our core values?

What can I do to contribute to overall team performance?



# Upholding the Code

Our Code of Conduct guides us in our business relationships and helps us in our efforts to build long lasting relationships with customers and other parties. All of us shall know the Code and apply the principles outlined in it in our everyday work. To help us do this, we have training programmes that are mandatory for all employees.

If you are unsure how you should apply the Code, you are always encouraged to discuss the issue with your line manager, HR contact or Group Compliance. We never take measures against someone because they have raised legitimate misgivings or questions concerning ethics, discrimination or harassment, or because they have reported suspected infringements.

For more information, please see the section Whistleblowing on the following page.

There are several aspects of upholding the Code such as:

- Ensuring adherence to the Code
- Disciplinary procedures in case of violations
- Whistleblowing procedures

### Ensuring adherence to the Code

General adherence to the Code is discussed on a regular basis and how well we apply it is evaluated in the yearly performance development dialogues. The content in the Code is also discussed through a number of different forms of dilemma discussions, via the intranet as well as in a range of workshops throughout SEB.

### Disciplinary procedures in case of violations

SEB will take action against anyone who violates the Code, other internal rules or laws and regulations. Such violations could result in e.g. reprimands and warnings to demotions or, in severe cases, dismissal.

Potential incidents related to corruption and other illegal activities are naturally subject to immediate actions. When applicable, reports will be made to the relevant authorities.





### Whistleblowing procedures

Acting ethically and taking measures to prevent irregularities is an important part of our culture. We therefore have a so called "whistleblowing" process for reporting irregularities.

If you, as an employee, should discover possible unethical or unlawful behaviour, you should report your observations.

You can report either during or outside working hours and you can report anonymously. Your identity will be kept secret during the subsequent follow-up, enquiries and discussions relating to the matter, provided that we are not obliged by law to disclose it. If this should prove to be the case, you will be informed. You will face no repercussions as a result of your report, either at the time the report is made, or subsequently.

Group Compliance and Group Internal Audit must, taking into consideration the duty of confidentiality and when it is considered appropriate, inform the Audit and Compliance Committee and the CEO of the reported incidents.

#### Who to contact

We offer you a stepwise approach to raise any concerns about what might constitute a violation of this Code or other pertinent rules.



#### Local level – contact either of

- Your immediate superior
- Another senior manager within your organisation
- Your local Compliance Officer

If you feel that you are not getting an appropriate or adequate response at the local level, or if the issue you are raising is of importance beyond your own organisation, please elevate your concern to the Group level.

#### Group level – contact either of

- Head of Group Compliance
- Head of Group Internal Audit

#### You can also report anonymously via the digital service WhistleB

The service is entirely outside of SEB and meets high security requirements regarding encryption, data security and protection of the whistleblower's identity.

#### How to find the link to the digital whistleblowing process:

Go to the page "Code of Conduct/ Whistleblowing" at [sebgroup.com](http://sebgroup.com). Search for "Whistleblowing" or "Code of Conduct". Or go directly to [sebgroup.com/whistleblowing](http://sebgroup.com/whistleblowing).

Go to the page "Raising your concerns Whistle blowing" on SEB's intranet. Search for Whistleblowing or use "Shortcuts".

SEB's Head of Group Compliance and Head of Group Internal Audit will receive a notification that a report has been filed and will be able to log in to the digital service Whistle B to review and take action on the anonymous report.

SEB's whistleblowing process is open also to third parties, including but not limited to affected communities.