

# Anti-corruption Policy, Swedbank Group

Adopted by The Board of Directors	Date of adoption 26-06-2013	Applies to the Bank, all subsidiaries and all employees of the Group	Group Framework Owner the Head of Corporate Affairs
Responsible for implementation BA heads and Group Function heads	Distribution Group framework on the Intranet	Language version English	Information class Internal and External

## Purpose

We are part of the societies where we operate; opportunities and challenges in the local communities are our challenges and opportunities. Our investments, credits, payments and supply chains also have a global impact. This entails both local and global responsibilities on our part. Our commitment is to always operate with transparency, trust and integrity. This approach applies to all markets where we operate and to all our business relations.

Compliance with this policy is monitored in accordance with our framework and is one part of our anti-corruption program including an anti-corruption policy and a whistle blowing function.

## Definitions

**Corruption:** Abuse of entrusted power for private gain. This implies not only financial gain but also non-financial advantages. Examples of corruption are bribes, fraud, facilitation payments and nepotism.

**Bribe:** Receipt or acceptance of a promise and/or request improper benefits, for oneself or as a benefit for someone else, for the practice of employment or assignment. Granting, promising or offering improper benefits for the practice of employment or assignment.

**Facilitation payments:** Sums paid to government officials to facilitate or expedite routing, unless in accordance with applicable law.

**Nepotism:** Favouritism granted to relatives/connections regardless of merit.

**Transparency:** A principle that allows those affected by administrative decisions, business transactions or charitable work to be informed of not only about the basic facts and figures but also about the mechanisms and processes.

**Anti-corruption:** Efforts and actions taken to combat and prevent all forms of corruption at the earliest possible opportunity.

## Policy

### Internal relations

- All employees shall regularly undertake mandatory anti-money laundering training including fraud prevention and anti-corruption.
- All employees are prohibited from offering, promising, giving, requesting, accepting or agreeing to receive gifts or entertainment (including events, trips and other travelling arrangements) to or from third parties unless this is permitted by Swedbank's Gifts and Entertainment Guidelines.
- There shall be internal routines in place for employees to report benefits, gifts or favors by third parties without unnecessary delay
- All employees are prohibited from, directly or indirectly, offering, promising or transferring anything to a public official in order to influence the public official and obtain business or personal benefits.

- All employees responsible for or involved in recruitment, promotion or professional development must assure competence based human resources procedures and processes for recruitment, promotion and professional development.
- Each employee can report suspicions of, or attempts at, bribery and corruption or suspected or actual breaches of this policy, as well as breaches of standards of conduct outlined in our internal framework and codes of conduct, through the confidential whistle blowing function or directly to the relevant Compliance Officer. The whistle blower is guaranteed anonymity.
- Failure to comply with this policy will lead to investigation about the alleged breach and may result in actions under applicable labor law.

#### External relations

- Swedbank is politically neutral and does not make financial contributions to political parties, politicians or political campaigns. Employees, independent of role and seniority, that are participating in political activity or campaigning and does so as individuals and in their personal capacity must never use Swedbank's resources, networks or brand to contribute, financially or non financially, to political parties, politicians or political campaigns.
- Events, gifts and activities arranged in order to strengthen and build client relationships shall be made in good faith and in compliance with Swedbank's policy framework and local law, including this anti-corruption policy. Gifts, events and entertainment shall be reported in a transparent manner, never impact behaviours and always be moderate.
- Supplier selection shall never be based on receipt of a gift or hospitality. Supplier selection shall be conducted in a structured process with documentation demonstrating how the selection has been made.
- Swedbank commits to undertake appropriate due diligence before engaging with any third party who will perform services for the bank, or on the bank's behalf, and to include appropriate anti-bribery and anti-corruption clauses in contractual arrangements with such parties.
- Contributions to community projects or charities shall be made in good faith, with business and stakeholder perspective and in compliance with Swedbank's policy framework.
- All client relationships shall be conducted on the principles set out herein.

#### Transparency

- Swedbank shall be able to publicly demonstrate adequate procedures to prevent, mitigate and handle bribes and other forms of corruption in both own operations and in business relations.
- Swedbank shall in a transparent manner communicate the results and ambitions of the work against corruption.