

HUMAN RIGHTS POLICY

Adopted by	The Board of Directors of Swedbank AB (publ)
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Applies for	The Bank and all Subsidiaries
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Associated supporting material	Sustainability Policy, Policy on Diversity and Inclusion, Code of Conduct

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 positive 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 internationally recognized human rights and international humanitarian law, and this approach applies to all markets where we operate and to all our business relations.

Respecting human rights is a fundamental part of 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 policy framework](#), and it is a supporting 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, gender, 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, the Charter of Fundamental Rights of the European Union, as well as the European Convention on 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 for our sound management of human rights-related business aspects.

4 Swedbank's responsibility

- 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 our business operations with our clients, suppliers, and consultants.
- 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, with their own abilities, qualifications and life experiences, is an equal part of the collective, regardless of 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. All employees shall have the same opportunities when working for Swedbank, and the Banks has a zero-tolerance against discrimination, harassment, sexual harassment, and bullying. 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 and demonstrate efforts to improve the status of equality, diversity and inclusion within their own company.

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 handling customers' and employees' data and information. Swedbank's bank secrecy obligation also protects our customers' data 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, seniors, people with disabilities, refugees 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 risk framework for identifying and managing risks and impacts, including those relating to human rights.

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. We also expect the same of the companies we invest in and finance, as well as by the suppliers and consultants employed by Swedbank.