



ANNEX 2 to the Human Rights Report
**Modern Slavery and Human
Trafficking Statement**

Approved by the Board of Directors of Nordea Bank Abp

ANNEX 2 – Modern Slavery and Human Trafficking Statement

This is Nordea's Modern Slavery and Human Trafficking Statement, published pursuant to the UK Modern Slavery Act 2015 ("The Act"). The Act sets out a range of measures for dealing with modern slavery and human trafficking under UK law. A commercial organisation that supplies goods or services in the United Kingdom and has a total global turnover exceeding GBP 36m is required to prepare and publish a modern slavery and human trafficking statement.

This is Nordea's statement for the financial year ending 31 December 2024.

The Statement is an annex to our Human Rights Report, which is available in English on our website and complements the Sustainability Statement in our Annual Report.

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1 About Nordea

The Nordea Group (hereafter “we”), comprising Nordea Bank Abp and its consolidated subsidiaries, is the leading financial services provider in the Nordics, with a 200-year history of supporting the region’s economies. Our values are deeply rooted in these open, progressive and collaborative societies.

Our purpose is to enable dreams and aspirations for a greater good. We strive to be personal, expert and responsible – to deliver great customer service and contribute to successful and sustainable economic development in the Nordics.

We offer a comprehensive range of banking and financial products and services to household and corporate customers, including financial institutions. Our household banking services include mortgages and consumer loans, credit and debit cards, and a wide selection of savings, life insurance and pension products. Our corporate banking services include business loans; cash management, payment and account services; risk management products and advisory services; debt and equity-related products for liquidity and capital raising purposes; corporate finance; institutional asset management services; and corporate life and pension products. We also distribute general insurance products.

Our headquarters are in Helsinki, Finland, and we have local head offices in Copenhagen (Denmark), Oslo (Norway) and Stockholm (Sweden). Each of our four business areas – Personal Banking, Business Banking, Large Corporates & Institutions, and Asset & Wealth Management – has operations in all four Nordic countries.

Our vision is to be the preferred partner for our Nordic customers, including for their banking needs outside the Nordics. Our teams in Nordea Asset Management are located in various branches and subsidiary offices in Europe, the Americas and Asia.

In addition to impacting society through our business areas, we are a large employer with over 30,000 employees, located mainly in the Nordic countries and Poland.

As the leading Nordic financial services provider, we have a key role to play in driving society towards a sustainable future. Sustainability is at the core of our business strategy, integrated into all aspects of our business operations. Our sustainability strategy rests on four strategic pillars¹: social responsibility, financial

¹ Read more about our strategic pillars at [Our sustainability targets | Nordea](#).

strength, climate and environmental action, and governance and culture. These pillars are derived from the UN's [Sustainable Development Goals \(SDGs\)](#), all of which are related to human rights.²

We believe that managing human rights impacts and avoiding adverse human rights impacts is not only the right thing to do, but also a smart thing to do, as such impacts may, over time, become risks to the business.

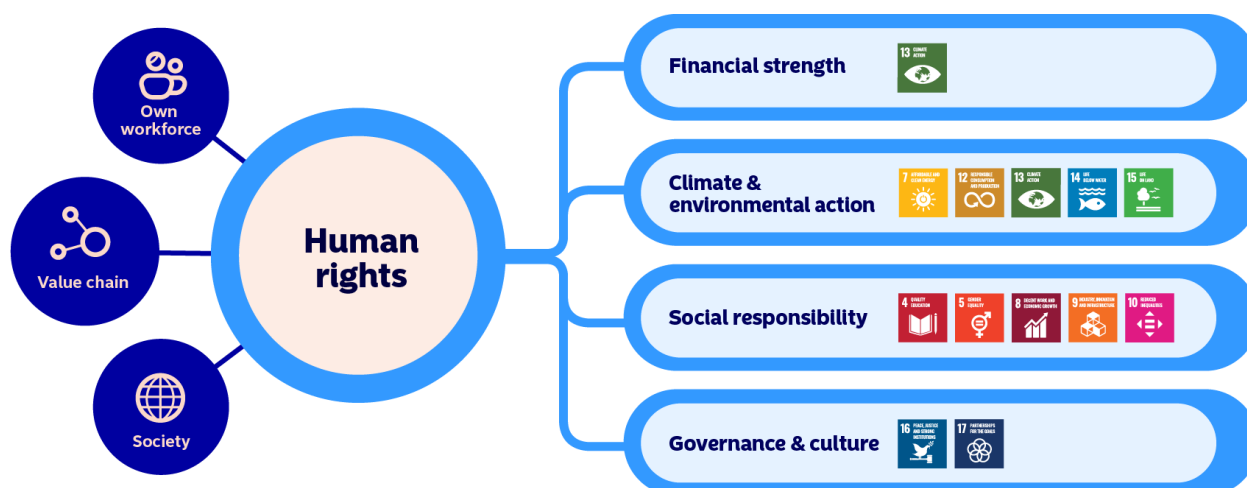


Illustration: The strategic pillars under our sustainability strategy are integrated into all aspects of our business operations.

You can read more about our work relating to other aspects of sustainability in our Annual Report and our [Sustainability Policy](#). More information about the Nordea Group, including our [organisational chart](#) and an explanation of our [legal structure](#), can be found on our [website](#).

2 Our commitment to respect human rights

We are committed to respecting internationally recognised human rights standards and meeting the corporate responsibility to respect human rights as defined in the UNGPs and OECD Guidelines. We expect the same of our suppliers, the companies in our investment portfolio, our lending customers, and our other business

² Read more about the relation between the UN SDGs and human rights in [SDG_HR_Table.pdf](#).

relationships. Our commitment to support and respect human rights is stated and further elaborated in our [Code of Conduct](#) and [Human Rights Policy](#).

We are also guided by the following voluntary commitments, to which we have pledged our support as signatories:

- the UN Global Compact
- the Principles for Responsible Investment
- the Principles for Responsible Banking
- the Equator Principles.

In addition, we are a member of the Investor Alliance for Human Rights.

3 Preventing modern slavery and human trafficking

We disapprove of all forms of modern slavery and human trafficking. We also recognise that we may be exposed to modern slavery and human trafficking risks, mainly through suppliers of the goods and services we procure and through companies we offer our services to or invest in. Of the different forms of modern slavery, we consider our exposure to be mainly to the risk of labour exploitation.

Primarily through our financing and investments, but also within our own operations, we work to identify and abolish forced labour, human trafficking, modern slavery and child labour through policies, guidelines, assessments and actions. More about our work in this area can be found in the following sections.

We also recognise that the Nordic region is a destination for human trafficking. This is therefore a prioritised risk in our crime detection and prevention efforts.

4 Overview of our human rights due diligence

We recognise both the significance of, and challenges associated with, respecting human rights. We also recognise that, just like any other business, we may cause, contribute to or be directly linked to various adverse human rights impacts through our operations, our suppliers, or the businesses we lend to or invest in. We are therefore committed to conducting and continually improving our human rights due diligence in these different areas. Our progress is at different levels of maturity depending on the area, as highlighted in section 3.4 below.

To evaluate the current state of our human rights due diligence process, we conducted a maturity assessment during the 2024 reporting period. Supported by external expertise, a newly established internal Human Rights Due Diligence

Taskforce performed a systematic review of our existing efforts to respect human rights across all business activities and relationships. The Taskforce adopted a Group-wide approach and developed a comprehensive implementation plan to coordinate our human rights due diligence processes.

We also gain valuable insights into our human rights due diligence performance through external evaluations, such as ESG ratings and benchmarking exercises. During the reporting period we were pleased to see the BankTrack Human Rights Benchmark recognise us as one of few banks that had made significant improvements.³ The BankTrack Human Rights Benchmark evaluates 50 of the largest banks globally on their human rights policies, processes, reporting and practices.

Additionally, during the reporting period we initiated an assessment to prepare for the upcoming implementation of the Corporate Sustainability Due Diligence Directive (to apply from mid-2027).

Based on the insights gained from these internal and external reviews, we continued planning for the enhancement of our Group-wide, coordinated human rights due diligence process.

The general principles for conducting human rights due diligence at Nordea include taking responsibility for identifying and assessing impacts and measures to address them. In addition to performing risk and materiality assessments, we continually work to improve our screening and monitoring to identify human rights risks associated with our suppliers, investments, lending and customers. In order to prevent and mitigate adverse human rights impacts, we integrate these findings into our processes and take suitable action. If we cause or contribute to adverse human rights impacts, we initiate appropriate processes, engaging with affected stakeholders or independent experts as needed. When direct engagement is not possible, we explore proxy alternatives, such as industry initiatives or trade unions, to support remediation.

³ [The BankTrack Global Human Rights Benchmark 2024.](#)

5 Human rights governance and executive oversight

At Nordea corporate governance refers to relations between our senior management, our Board of Directors, our shareholders and other stakeholders, such as employees and their representatives. It also determines the structure used to define our objectives, the means of achieving them and monitoring the results obtained. Strong corporate governance is thus about having clear and systematic decision-making processes; providing clarity regarding responsibilities; avoiding conflicts of interest; and ensuring satisfactory internal control, risk management, transparency and accountability.

Our human rights governance is integrated into our sustainability governance structure, which in turn is founded on the principles of accountability and transparency, and on ethical principles. Our governance is designed to embed respect for human rights across our operations. It fosters collaboration, engagement and accountability throughout the organisation, enabling us to address human rights challenges effectively.

The Board Operations and Sustainability Committee (BOSC), Board Risk Committee, Board Remuneration and People Committee and Board Audit Committee assist the Group Board (NBB) in fulfilling its oversight responsibilities regarding Group adherence to human rights commitments and goals, and associated remuneration.

The President and Group CEO works together with a team of senior leaders within the Group Leadership Team (GLT), which reports directly to him. The GLT supports the President and Group CEO in managing the Group, and the GLT members are responsible for the performance, operations, risks, resources and development of their respective business areas or Group functions in accordance with the Nordea Group strategy, in the best interest of Nordea and in compliance with applicable laws and regulations.

The President and Group CEO, supported by the Group Leadership Team (GLT), is responsible for overseeing the implementation of our human rights commitments as part of our Group strategy. GLT is further supported by the Sustainability and Ethics Committee (SEC), the Risk Committee and the Asset & Liability Committee, coordinating within the Group to ensure commitment to and ownership of Group-wide prioritisations, decisions and implementations of human rights considerations. In addition, we have a Group Accountable Executive, reporting directly to the President and Group CEO, responsible for sustainability, including human rights.

The Group Sustainability unit plays a central role in driving our Group strategy and commitments, and in leading the implementation of activities related to social responsibility. It serves as an expert group, providing expertise and guidance on integrating human rights considerations throughout our operations. The implementation is further supported by functions such as Group Legal, Group Risk and Group Compliance to ensure proper risk management, alignment with regulations, and adherence to applicable legislation.

Upholding human rights in our daily business practices is the responsibility of each employee, regardless of their role or department. All employees are accountable for integrating respect for human rights into their work and contributing to our collective efforts, as stated in our Code of Conduct.

We have dedicated sustainability-focused ESG teams across our business areas and Group functions, staffed by sustainability professionals who support units and relationship managers with internal rules interpretation, training, and standard operating procedures. These teams include ESG analysts who gather information, conduct analyses, and develop processes and tools, including those related to human rights. Our business developers, who are primarily based within Group Sustainability, provide strategic oversight and drive implementation to ensure we meet our sustainability commitments.

We have established governance and a structured process to ensure that salient human rights issues receive the appropriate level of attention from senior management and governance bodies. Identified salient issues are discussed with SEC and are subsequently presented to GLT, BOSC and NBB. Additionally, while each unit follows its own escalation process, SEC is ultimately responsible for addressing all breaches or ethical concerns, ensuring that human rights and ethical considerations are consistently embedded in decision-making.

In 2024 salient human rights issues were presented and discussed in several governance fora. As part of our annual sustainability update, identified salient human rights issues were presented to GLT, BOSC and NBB. This process supports our senior leadership in being fully informed of potential human rights challenges and incorporating these considerations into their strategic planning, reinforcing our commitment to uphold human rights across all areas of our operations.

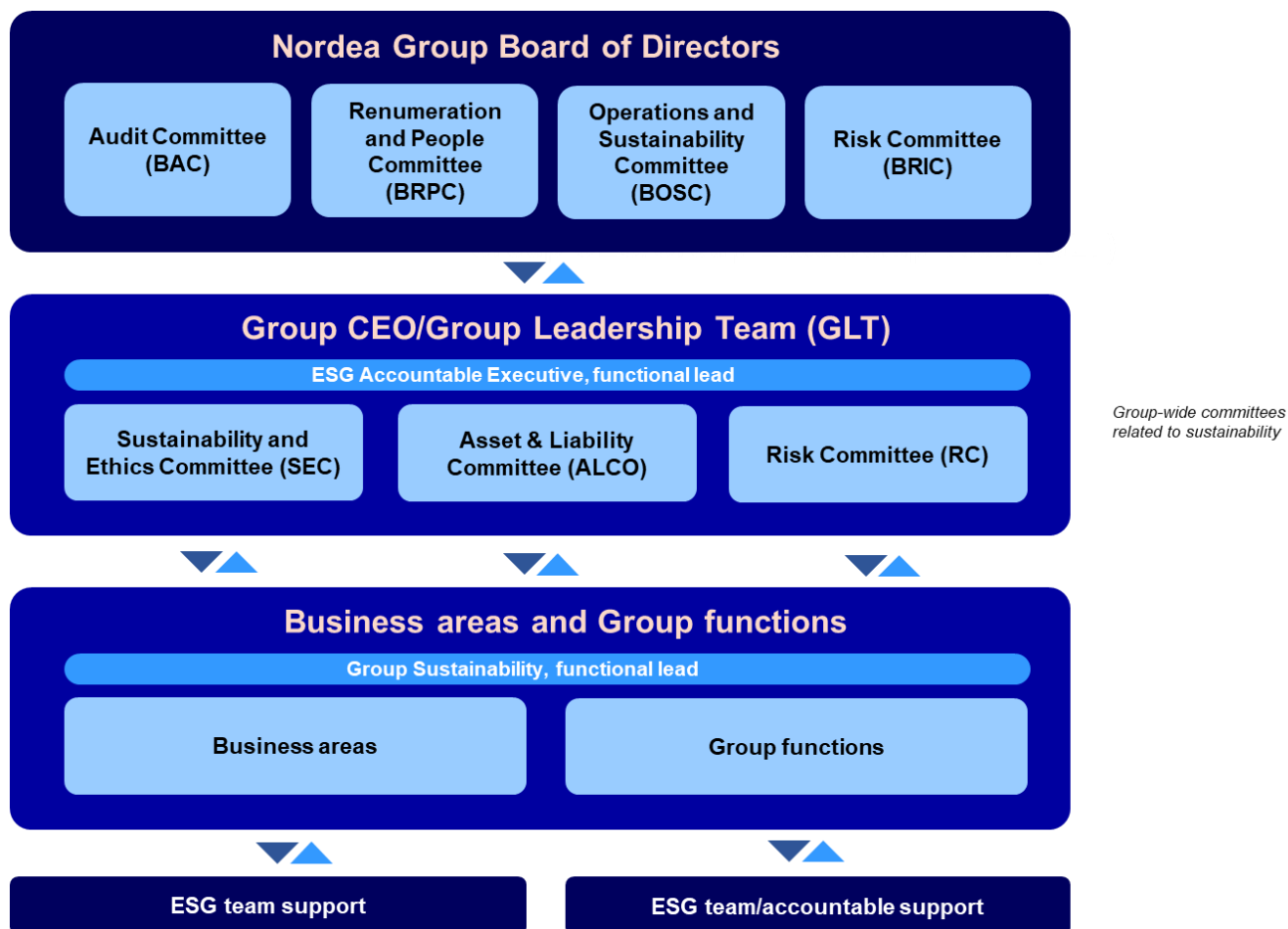


Illustration: Our sustainability governance structure

6 Grievance mechanisms and remedy process

We are committed to conducting business to the highest ethical standards and in accordance with applicable laws, rules and regulations. We therefore encourage all customers, employees and other stakeholders to always report any suspicion of fraudulent or unethical behaviour on the part of Nordea or its employees using our whistleblowing function, Raise Your Concern (RYC).

We ensure that all stakeholders – including customers, partners, affected communities, and employees – have the right to report concerns, including those related to human rights grievances. To support this, we have a secure and accessible electronic reporting tool, WhistleB. This allows anonymous reporting, ensuring confidentiality and protection for whistleblowers. It is a critical component of our commitment to transparency and accountability, particularly in addressing

human rights issues, as it ensures that grievances can be raised and addressed promptly and effectively.

Internally, we highlight the importance of reporting any actions that constitute a violation of laws and regulations (including own policies, instructions or guidelines issued to comply with laws and regulations) and that could thus harm our business or reputation or the health or security of our employees or customers.

The whistleblowing process is supported by a dedicated committee in each of the Nordic countries, Poland and Estonia.

Cases reported through RYC form part of the monitoring of compliance with our Code of Conduct. Summaries of key trends and case statistics are also reported on a no-names basis to the Chief Compliance Officer, Chief People Officer and Chief Risk Officer in addition to being included in management reports and reports to the Board of Directors. Furthermore, the RYC process and investigations are subject to regular quality controls, with defined escalation procedures for reporting any process deviations.

While our grievance mechanisms facilitate the reporting and escalation of concerns, our remedy process provides a structured approach to addressing and resolving these issues. If our operations are found to have caused or contributed to adverse impacts on human rights, we initiate appropriate remedial actions. In these cases, we actively collaborate with relevant judicial or non-judicial mechanisms as necessary to address and rectify the situation.

Our remediation processes are important elements of our human rights due diligence, involving engagement and dialogue with impacted and potentially impacted rights holders. These include workers, workers' representatives and trade unions, and other relevant parties. Within such processes, barriers to effective stakeholder engagement must be taken into account.

If it is not possible to engage directly with the impacted parties, we consider reasonable alternatives, such as consulting credible, independent expert resources, including human rights defenders, trade unions and civil society groups. If the impacts are not directly caused by us, we consider engaging with, for example, industry initiatives or local trade unions to support remediation.

7 Our salient human rights issues

Based on the methodology explained above, we identified areas where our operations and value chain are exposed to significant actual and potential adverse

impacts on human rights. The results of the saliency assessment are presented per relevant area below.

Own workforce: Here, the key human rights issues are related to ensuring favourable working conditions. While no severe human rights impacts have been identified in this context, deeper assessment and monitoring are necessary, especially regarding high stress levels and gender imbalance in sick leave.

Supply chain: Within our supply chain, the main human rights impacts include labour rights and occupational health and safety. These impacts may arise in sectors supplying products or services to us. It is therefore essential that we ensure our suppliers have proper due diligence processes in place to identify and address potential adverse human rights impacts, specifically as regards labour practices and conditions for workers.

In addition to assessing the operations of our Tier 1 suppliers, our procurement sustainability experts conducted an initial human rights impact assessment of our supply chain to map the industries in which our suppliers operate and identify areas where there might be an elevated risk of negative impact on people. Based on our suppliers' operating context and the nature of the service or product they deliver to us, salient human rights issues in our supply chain beyond Tier 1 were identified. These relate to labour rights, occupational health and safety, child labour and forced labour.

In the absence of robust oversight, unethical practices can arise, particularly in the manufacture of electronic devices (which may be procured by us). The IT sector has been criticised for poor working conditions in manufacturing facilities, especially in Asia, where production can involve exposure to hazardous materials and risks due to improper electronic waste recycling.⁴ We must therefore ensure ethical procurement policies and work to ensure fair labour practices to mitigate these risks and protect workers throughout the supply chain.

Corporate lending: In our corporate lending activities, the primary human rights impacts involve occupational health and safety and land rights in clients' own operations. These issues can be particularly prominent in sectors such as real estate, agriculture and shipping, where failure to properly manage these risks could negatively affect the safety and welfare of workers or disrupt local communities.

⁴ Working conditions in a global perspective, Eurofound and International Labour Organization, May 2019.

For instance, urban expansion and housing developments on public land have sparked conflicts with local communities in the Nordic region. These projects have been criticised for encroaching on protected green spaces and traditional areas of public use, raising concerns regarding transparency, fair compensation and consultation with affected communities. Furthermore, Finland, Norway and Sweden are home to the indigenous Sámi people, whose right to self-determination is protected by international human rights. [Banks financing companies or projects in Sámi homeland areas may be directly linked to adverse human rights impacts on Sámi people's rights](#) over their land and natural resources. Such cases underscore the importance of considering human rights impact assessments in lending decisions.

Investments: Human rights impacts related to our investments primarily arise from the activities of companies in the investment portfolios we manage. These impacts concern land rights, labour rights, occupational health and safety, and privacy. We have considered sector exposure in our assessment since higher levels of involvement may amplify the associated impacts, necessitating more robust due diligence and mitigation. At the time of the assessment, the portfolios were exposed to several sectors known for high human rights risk, including food and beverages, healthcare, technology, machinery and the automotive sector. However, there are frequent changes in the investment portfolio which affect the sector exposure. Special attention to companies operating in the high-risk sectors is thus warranted regardless of the current level of exposure to these sectors.

A contemporary example of salient human rights impacts in investments relates to electric vehicle (EV) supply chains. EVs play a critical role in the green transition, but the transition should also be just. Therefore, identifying and managing the associated risks, including labour rights abuses in mining and manufacturing, is of paramount importance.

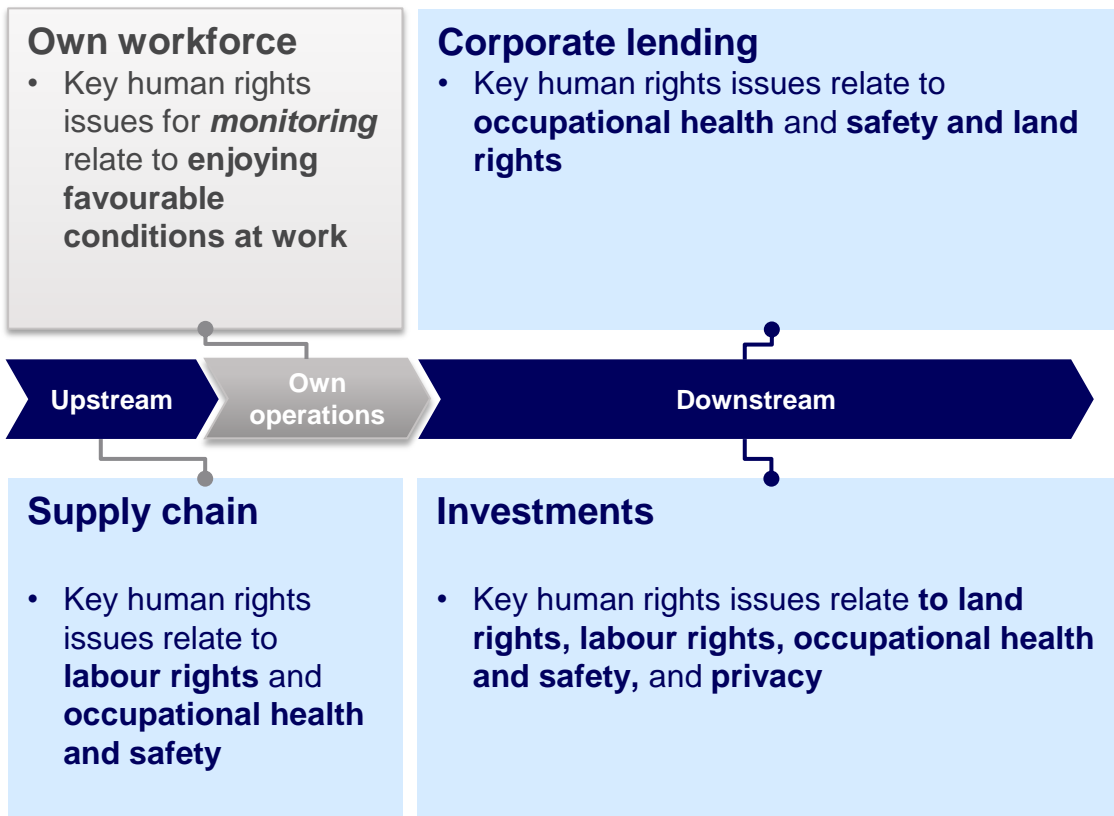


Illustration: Our salient human rights issues and key issues for monitoring.

8 Addressing our salient issues

The saliency of our human rights issues guides how we prioritise them for preventive, mitigating and remedial action. To address these issues effectively, we employ several strategic approaches:

1. Deepened assessments: We deepen our assessment of adverse human rights impacts, prioritising our salient issues. While we begin with the sectors most prone to severe negative impacts, we are responsive to evolving circumstances, recognising that the focus may shift based on our operations and external developments. Our approach ensures targeted processes and initiatives are in place to effectively prevent and mitigate potential harm.

2. Effective resource allocation: We focus the efforts of our workforce and our financial resources on the sectors with the greatest risks in order to effectively address the human rights issues that pose the greatest threat, such as health and safety and land rights.

3. Tailored sector-specific approaches: Recognising that human rights risks vary by sector (e.g. privacy concerns in technology versus land rights in agriculture), we

customise our strategies to meet the unique challenges of each sector – expressed in our sector guidelines – and thereby ensure more targeted and effective action.

These approaches are described in more detail for our supply chain, and lending and investment activities, below.

Supply chain

We spend around EUR 2.5bn annually on our suppliers and have contracts in place with more than 1,500 suppliers. Our supply chain is global and encompasses a wide range of industries, from technology and consultancy to facility management and travel.

Human rights in our supply chain are governed by our Group Board Directive on Procurement and further detailed in our Sustainable Procurement Guideline. The Guideline describes how to conduct due diligence in the supply chain to ensure that we do not cause, contribute to or become linked to negative impacts. It also describes how we assess human rights-related risks and impacts in our supply chain, how we take action to prevent and mitigate such risks, and how we track progress and communicate the findings in the different stages of the procurement process. The findings of our supply chain-specific human rights impact assessment are included in the annual review of our supply framework and guidelines to ensure we continue to make progress in the area of human rights.

Respect for human rights is embedded throughout our procurement process. We include human rights indicators in both our supplier screening prior to contracting and our continuous monitoring after contracting. Through the screening process, we also identify whether the supplier is subject to negative media exposure or regulatory action due to human rights-related misconduct, enabling us to take appropriate action.

All our suppliers must contractually commit to the principles set out in our Supplier Code of Conduct. The Code includes positions on human rights and labour rights and an obligation for suppliers to ensure that subcontractors adhere to the same principles. It also includes an audit clause where we reserve the right to audit both suppliers and subcontractors to verify whether the principles are being implemented in practice. We thereby ensure that sustainability requirements are integrated into our supplier and contract management.

As part of our engagement with suppliers, we participate in Atea Sustainability Focus (ASF), an initiative enabling Nordic procurement organisations and the global IT industry to engage on how to achieve more sustainable operations.

Through our representation on the ASF Advisory Board, we seek to accelerate sustainability efforts, including the protection of human rights in the IT industry. The ASF Advisory Board provides annual recommendations to the Responsible Business Alliance (RBA), the world's largest industry coalition dedicated to supply chain sustainability. The RBA comprises more than 145 companies from the IT and electronics industry, representing a collective annual revenue of around USD 5.5tn and over six million workers in the supply chain.

Corporate lending

Our lending portfolio is highly diversified, encompassing a wide range of industries and companies of different sizes. While predominantly based in the Nordic countries, the lending portfolio's footprint spans the world via the global operations of our large customers.

Integrating human rights into our external sector guidelines; internal guidance such as industry credit policies; and ESG risk assessments and tools is key to embedding human rights considerations in our lending process. In addition to complying with national laws and regulations, customers in relevant industries are expected to follow international norms and standards, and manage and mitigate adverse human rights impacts, such as forced labour, child labour, genocide, ethnic cleansing, crimes against humanity and war crimes⁵. Customers identified as breaching this position are expected to have meaningful actions in place to manage and mitigate adverse impacts on human rights.

ESG risk assessments, conducted for both existing and new customer relationships, serve to ensure that ESG-related credit risks, including social risk factors, are identified and assessed. We are currently working to strengthen our ESG assessment processes and tools in order to further integrate human rights risks into our lending activities, focusing on risk/impact identification and assessment. As part of our commitment to the Equator Principles, we also carry out an environmental and social impact assessment when financing large infrastructure and industrial projects.

⁵ As defined by the International Labour Organization.

Investments⁶

We are the largest asset manager in the Nordics and are present in Europe, the Americas and Asia. Our investment portfolios include companies from a wide range of industries and regions.

Our [Responsible Investment Policy](#) describes the framework governing Nordea Asset Management's approach to responsible investments and ESG/sustainability-related matters. The Policy applies to our Nordea-branded investment strategies, with the exception of any holdings of such strategies in external funds and discretionary mandates at the client's request. It defines our positions linked to material ESG issues, as well as international norms and conventions. This guides and helps us prioritise our stewardship activities. The Policy also includes the position we take on human rights.

The investments we manage are further guided by our Group sector guidelines. We expect investee companies to comply with internationally recognised human rights principles and to prevent and manage impacts on human rights. We also expect them to conduct due diligence as defined by the UNGPs and to report on this and their human rights impacts. Upcoming regulatory initiatives related to human rights will render this all the more important.

We screen all holdings to identify companies allegedly involved in severe breaches of international law regarding human rights and labour standards. If a company is identified in this screening process, we initiate an internal assessment of both the company and the incident. We also use this screening process to identify companies to be made subject to engagement or exclusion. We have an exclusion list of corporates, including, for example, companies excluded due to actual violations of indigenous peoples' rights.

Active ownership plays a central role in our responsible investment approach. Our active ownership tools include engaging with investee companies, individually or

⁶ This text describes our human rights approach for investments managed by Nordea Asset Management (NAM). The text is also representative of processes applied for Nordea Life & Pension (NLP), since the vast majority of NLP's assets under management are managed by NAM. NLP is the largest life and pension company in the Nordics, with EUR [85]bn in assets under management as at the end of 2024. For more detailed information about NLP's ESG policy framework, see the [NLP Responsible Investment Policy](#), [Climate Change Policy](#) and [Engagement Policy](#).

together with other investors/stakeholders; attending and voting at annual general meetings; and, when relevant, filing shareholder proposals.

Engaging with the investee companies enables us to address material sustainability risks and opportunities, including those connected with human rights. We also encourage investee companies to set measurable targets and take concrete actions to meet them. While we are prepared to exclude or exit companies when we deem it necessary, our experience shows that active ownership can often be an effective tool to improve ESG performance, manage risks and identify opportunities.

We have around 25 responsible investment experts that work with ESG issues related to the investee companies. In 2024 our responsible investment team engaged in more than 1,300 dialogues with investee companies on ESG issues, including human rights.

Besides engaging with investee companies, we engage with standard-setters to support, for example, mandatory human rights due diligence and greater transparency in ESG-related reporting. We also actively participate in investor initiatives, such as the Investor Alliance for Human Rights. We signed the Principles for Responsible Investment in 2007.

Between 2016 and 2020, we funded and, as a steering committee member, were actively involved in the development of the Corporate Human Rights Benchmark (CHRB), which was integrated with the World Benchmarking Alliance in 2020. The CHRB provides a free and publicly available comparative assessment of the world's largest publicly listed companies. It assesses companies' policies, processes and practices related to human rights. Since 2017, we have engaged with companies that scored poorly in the CHRB assessments and the implementation of their human rights responsibilities under the UNGPs.

9 Preventing financial crime and respecting sanctions

Financial crimes such as money laundering, terrorist financing, bribery and corruption can be related to serious human rights impacts. Our work on preventing financial crime therefore also plays an important role in our human rights work.

At Nordea, we do our utmost to ensure that our resources, products and services are not used to facilitate financial crime or any other illegal activities. Our website provides more information, including [our financial crime prevention policies and practices](#).

Sanctions refer to laws issued by countries such as the UK and the US and to sanctions decided by supranational organisations such as the EU and the UN. These laws/sanctions are designed to deter certain unwanted behaviour or policy from other countries, persons or groups (e.g. terrorist organisations) to achieve the issuing authority's foreign policy objectives. The UN sanction regime was established to maintain or restore international peace and security, whereas the EU global human rights sanctions regime provides a legal basis for the EU to target individuals, companies and bodies that are responsible for, involved in or associated with serious human rights violations and abuses.

At Nordea, customers and transactions are screened against relevant lists, such as the EU sanctions list. Screening is conducted first as part of the customer onboarding process and then on an ongoing basis. Customer relationships and transactions are also continuously monitored to enable the detection of any unusual activity, transactions or behaviour. If detected, such activity, transactions or behaviour will trigger internal alerts and investigations. Anything deemed suspicious will be reported to the relevant authorities. In such cases, we will also consider whether the customer relationship must be ended. Our website provides more information on [preventing financial crime](#).

10 Signature

Signature to the Modern Slavery and Human Trafficking Statement for year 2024

Helsinki, 18 February 2025

Nordea Bank Abp

Sir Stephen Hester
Chair of the Board of Directors