



NORDEA POLICY SUMMARY AGAINST DISCRIMINATION AND HARASSMENT

This policy summary outlines Nordea's Internal Rules relating to discrimination and harassment. Nordea operates a risk management framework including policies, guidelines and procedures. This document is compiled using relevant information from across this framework.



1. Purpose and Scope

The purpose of this policy summary is to provide an overview of Nordea's internal rules regarding discrimination and harassment. These internal rules apply to Nordea Bank Abp and, subject to local regulations, to all subsidiaries within the Nordea Group ("Nordea") unless legal or supervisory requirements or proportionality considerations determine otherwise.

2. Introduction

Nordea is committed to conducting responsible and sustainable business. [The Diversity & Inclusion policy](#) sets the principles for how Nordea will enhance Diversity & Inclusion (D&I) throughout the organisation.

Nordea condemns all acts of discrimination, harassment, sexual harassment or similar violations of a person's dignity. Our employees, customers, partners and others in contact with us, have the right to be treated with fairness and respect.

All people in Nordea have a responsibility to ensure equal and fair treatment in a positive environment. We treat each other, our customers and other stakeholders with an open attitude to individual personalities and circumstances.

Nordea's internal control, risk management and governance frameworks support our commitment and ensure that our principles are adhered to, overseen and monitored.

2.1. Basic Principles

Prerequisites for conducting our business as a trusted partner to customers and

stakeholders, and to be a sustainable and inclusive employer, are that:

- **non-discrimination** is a basic right of **every customer, employee**, or other **stakeholder**
- all employees, customers, or other stakeholders feel that they can be their **authentic selves** and be **respected** and **appreciated** for this
- we offer **safe and inclusive** workplaces where our employees work without fear of abuse or violations of their dignity, and that
- **equal rights and opportunities** are recognised and implemented in our daily operations.

The Nordea [Code of Conduct](#) is clear in its instruction on how we behave towards each other and how we do business, such as compliance with laws and regulations, treating each other and customers fairly, and having the courage to speak up.

2.2. Compliance to regulation

Nordea's work against discrimination and harassment of any kinds, is based on the relevant legal requirements of each country of operation and internationally agreed upon standards:

- the UN's Universal Declaration of Human Rights,
- the ILO Discrimination (Employment and Occupation) Convention,
- the Charter of Fundamental Rights of the European Union,
- the Directives on Equal Treatment of the European Union, and
- local legislation and recommendation concerning non-discrimination and equality.

Our Compliance Risk Management Framework ensures that we continually review and reflect changes in legislation in our working environment.

3. Implementation

At Nordea, we do what is right - not only what is allowed.

By following our internal policies and rules, we enable an inclusive work environment that increases our ability to meet the needs of our customers, employees and society. We have a broad set of activities, training and tools, ensuring equal opportunities, supporting and enhancing inclusion, as well as raising awareness of diverse perspectives.

Everyone at Nordea can expect equal and fair treatment – regardless of gender, gender identity or expression, age, (dis)ability, ethnicity, race, religion, sexual orientation, parenthood, or unionisation.

3.1. Internal rules

To ensure that leaders and employees in Nordea fully understand the scope and responsibilities, we have internal **rules regarding harassment, sexual harassment, bullying and similar violations in the workplace** as well as internal rules on **Non-Discrimination**.

These internal rules ensure compliance with non-discrimination legislation, as well as encourage and support a culture of equal opportunities, equal rights and fair treatment in all entities at Nordea, and in each country in which we operate. This responsibility includes all parts of the work-life at Nordea, such as recruitment, performance assessment, talent management, promotion,

competency development, ending employment, and the work environment in our daily operation, as well as all customer relation. Remuneration is based on performance, role, competencies and skills, avoiding bias in salary setting and ensuring equal pay for equal work.

Adherence to our internal rules is subject to independent monitoring and assurance by our risk management functions and Group Internal Audit.

3.2. Pro-active work

Nordea works proactively to prevent any forms of discrimination, harassment or other violations. Several trainings and tools are available to all employees:

- Let's Talk ! supports facilitation of team discussions and provides guidance in handling incidents
- Unconscious Bias training raises awareness of risks for discrimination or similar circumstances
- Inclusive Workplace tool supports team dialogues around equality and inclusion
- Inclusive Leadership tool provides leaders with practical guidance in how to ensure equality and inclusion

To help avoid biases which can lead to discrimination and to support and enhance inclusion, the Diversity & Inclusion perspective is embedded in our recruitment training, all leadership trainings and people processes.

3.3. Incident reporting

If subjected to discrimination, harassment or other violations, Nordea has several options to report the incident to

ensure that every person feels safe to speak up. This can be done to **Group People** or to our **Raise Your Concern** investigation team, if speaking to the leader is not a suitable option for the affected person. We also offer an option to report anonymously, through [WhistleB](#).

Furthermore, we encourage all people that notice discrimination, harassment or other violation to speak up and report the incident. Any person who has reported violations of this kind is protected against punitive action or sanctions due to the taking of action, i.e. subject to reprisals. The protection also applies when someone has participated in an investigation.

3.4. Case process

When an incident has occurred, the process is firm and conducted in accordance with our **People Disciplinary Guidelines** or **Raising Your Concern Guidelines**.

The key requirements include understanding if there are conflicts of interest, collecting supporting evidence, conducting interviews, assuring quality, decision, feedback, and closure of the investigation.

Every case is investigated and processed confidentially and responsibly, in dialogue with the affected person and relevant stakeholders. When relevant, the case is processed in dialogue and collaboration with the unions. Examples of disciplinary actions are verbal sanctions, written warning or termination of employment, depending on the case.

4. Measuring and reporting

Nordea wants to make sure that every person feels that they are treated fairly and this is integrated in our [Sustainability Targets](#). Our progress is measured twice a year in our employee engagement survey, the People Pulse, where people answer anonymously.

Once a year, in the same survey, we are asking our employees if they have been exposed to discrimination, harassment or other violations during the last year. The results of the survey are disclosed in our internal D&I report, as well as externally in our Annual Report/ Sustainability report.

Furthermore, we follow up and report internally and externally on the number of cases handled during the past year.

Our Chief People Officer, Chief Risk Officer, Chief Compliance Officer and Chief Internal Auditor report to our management and Board on People Risk on a regular basis.