

Code of Conduct



About this document

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 sound and long-term 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 seeking guidance or help 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

Are my actions legal, fair and ethical?

Do my actions align with SEB Purpose and Behaviours?

Do my actions benefit the customer and keep the bank safe and secure?

Would a customer, colleague or my manager consider my behaviour appropriate?

Would my actions 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?

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.

Our purpose

SEB has always believed that the future depends on making great ideas happen. Our purpose is to positively shape the future, with responsible advice and capital. Today and for generations to come.

We have a strong ambition to accelerate the pace towards a sustainable future for people, businesses and society. We want to be a leading catalyst in the sustainability transition.

We apply a long-term perspective in everything we do, standing by our customers in good times and in bad, because we know our business is built on relationships and the trust placed in us.

The key is our team of skilled employees, and their dedication to providing the best possible customer experience. It's all about creating value through financial products and services that meet our customers' needs in an ever-changing world.

Our core behaviours

To stay true to our heritage, purpose and strategy, we are expected to live up to our SEB Behaviours, Create value, Act long-term and Build positive relationships, which apply to how we act, do business and interact with colleagues, customers and other stakeholders. Our behaviour indicators provide a framework and are included when evaluating performance and development.

Create value

- Anticipate customers' needs and act proactively
- Co-create in new ways, experiment and use data
- Listen and include different perspectives
- Embrace change and learn from mistakes
- Future-proof yourself and share your knowledge

Act long-term

- Make responsible choices
- Dare to stand up for what you believe in
- Take ownership for getting things done
- Reduce inefficiencies and simplify
- Keep on driving and challenge status quo

Build positive relationships

- Team up for a greater customer experience
- Collaborate across teams
- Inspire those around you
- Help and care for each other
- Give positive feedback and celebrate success



Dear Colleague,

At SEB, we are in the business of trust. We are all dependent on that our customers, shareholders and other stakeholders have confidence in us – this is crucial for us in order to conduct our business successfully.

Basically, it is about how we act and behave towards our customers, shareholders and society at large, as well as towards each other within the bank.

I like to talk about “business acumen”. For me, this means long-term relationships, to act with a strong ethical compass closely tied to our purpose and behaviours. We must always act in a professional manner and treat customers fairly, with responsible advice and capital. That is how we continue to build long-term relationships, create long-term value and positively shape the future – today and for generations to come.

The world is constantly changing and getting more complex, and so is the environment in which we operate. Whether it comes to regulatory issues, new technological possibilities or managing the risks that the financial system is exposed to, we must do our utmost to try to be on top. We continuously adapt and challenge our routines and how we work, always questioning how our actions affect customers, shareholders, colleagues and society over time, with the

constant aim of trying to become an even better bank.

This Code of Conduct sets the standard for how we act, and this along with our purpose and behaviours connect us all. If one person 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, including the commercial responsibility of managing the bank’s resources in a sound way. All of us must do our utmost to safeguard the trust from our stakeholders, and speak up if we see behaviours and actions that are inappropriate or not allowed.

Most of the time, it is about common sense, but in case of doubt, or if you need more guidance, you have a responsibility to contact your manager or relevant specialist. You can also seek advice from our colleagues in Compliance.

I am convinced that our inner compass in most cases works well. However, we cannot rest, we must always continue to develop our business acumen.

A handwritten signature in black ink, reading "Johan Torgeby".

Johan Torgeby President & CEO

Our role in society for a sustainable future

As a bank, SEB plays a critical role in society. The services we provide are essential for creating economic growth and social value. SEB makes it possible for households, entrepreneurs and businesses to finance, invest, and manage payments and savings. We identify and manage both risks and opportunities, and in doing so we promote economic development, growth, new jobs and international trade, and contribute to financial security.


We have a strong ambition to accelerate the pace towards a sustainable future for people, businesses and society. The business shall always be underpinned by strong governance, ethics, and long-term relationships. By engaging with our customers on their transition journeys and by offering responsible advice and sustainable

products and services we believe we can make the greatest positive impact. Innovation and responsible behaviour go hand-in-hand, which is also how we aim to conduct our business. We take an active part in the development of society, but never support political parties through donations or otherwise.

SEB is committed to several global initiatives and international codes of conduct which guide our business decision. Among them are UN Global Compact, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the UNEP FI Principles for Responsible Banking, the Net-Zero Banking Alliance, the Principles for Responsible Investments and Net Zero Asset Managers initiative.



Responsible and ethical behaviour

A photograph of a man with a grey beard and hair, wearing a dark suit, white shirt, and dark tie. He is sitting on a grey upholstered chair, looking down at a tablet computer he is holding in his left hand. In his right hand, he holds a white pen. To his right, a woman with long, light-colored hair is partially visible, wearing a light-colored blazer. The background is a dark wall with a framed abstract artwork. A lamp with a white shade is visible on the left side of the frame.

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 with them. We also provide training for our staff so that everyone working within SEB knows how to act in different situations.

Our customer relationships

For us, our customers always come first. By building long-term relationships 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, as described below.

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 customers and their 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, for example 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 terrorist financing.

We shall always, by applying the KYC-process, secure the identity of our customers and any person acting on behalf of a customer. For legal entities, we must also understand the ownership and control structure and know who their beneficial owners are. For all customers we need to understand the purpose and nature of the business relationship and where appropriate assess the source of their wealth and funds.

We apply enhanced due diligence measures for business relationships that pose a higher risk, for example politically exposed persons or customers assessed as high risk due to other risk factors such as involvement with 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 decide whether or not it is appropriate to enter into or maintain a business relationship with the customer and, if so, how the risk in the business relationship should be managed.

We monitor ongoing business relationships by verifying and assessing 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 the credit obligation on the contracted terms.

Advice to customers

We safeguard our customers' interests and we always base our customer advice 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 must ensure that our customers understand the products we recommend, including associated risks.

Taxes

SEB plays a significant role in society, contributing to economic growth and prosperity both as an employer and through providing customers with products and services. In all of this, the subject of taxes and tax governance is relevant and important. Operating in more than 20 countries, SEB acknowledges the changing landscape around tax from both regulators and society and puts strong efforts in securing compliance with applicable tax laws and regulations.

Products and services offered by SEB impact the tax situation for SEB and our customers and must always have business rationale. SEB must not use, encourage or facilitate products or services in conflict with tax legislation or anti-tax avoidance law. SEB must not co-operate with external parties to facilitate products or services in conflict with tax legislation or anti-tax avoidance law.

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, and wherever possible within two business days. Where this is not possible, the customer will be informed of how the complaint will be handled.

Financial crime

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

In order to prevent, detect and report financial crime, we have rigorous procedures and systems that apply across the whole Group. SEB continuously works to live up to and adapt to new regulations in the area of anti-money laundering and terrorist financing. We monitor official registers of individuals and organisations that could be linked to money laundering, fraud and terrorism. We continuously take measures to strengthen our abilities to not unintentionally facilitate financial crime, and we constantly strive to improve and develop our procedures to prevent the risks of being used for criminal purposes. Also, we use transaction monitoring systems to detect suspicious activities and high-risk transactions, and we report suspicious activities to the relevant authorities.

Ask yourself!

Have I taken necessary measures to fully understand the situation and do I feel comfortable about the customer and its activities?

Money laundering and terrorist financing

Money laundering is the process whereby illegal profits are converted into funds that appear to

be legitimate. This covers profits from organised crime such as proceeds from drugs and trafficking. Terrorist financing is the funding of terrorism and other severe crimes both through legal and illegal funds. To enable SEB to contribute to financial stability and to keep the bank safe and secure, it is crucial to identify, understand and address the risks we are facing in terms of money laundering and terrorist financing.

Market abuse

Market abuse is insider trading, market manipulation, or attempts thereof. We have a duty to detect and report suspected market abuse. If we ever suspect that a person is trading based on inside information, e.g. by timing trades very well before market movements, or a person is unduly impacting supply or demand of financial instruments, e.g. by trading between own accounts, then we need to report it to the relevant authorities. If we ever come in contact with inside information, it must be kept strictly confidential and it is forbidden to make any investment decisions based on it. This applies to inside information regarding SEB as well as to other inside information that we may have.

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 confidentiality undertaking. The obligation to keep information confidential also applies outside of office hours as well as after the employment at SEB has ended. There are several aspects of how we handle information and secrecy, as described below.

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.

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?

Personal data protection – integrity

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

We only collect, use and disseminate personal data if we need the data for certain regulated purposes, for example 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, such as personal data concerning health.

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

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.

SEB has designated a Group Data Protection Officer.

SEB's Customer Data Ethics Policy describe the framework for Customer Data Ethics at SEB, defined as the responsible and sustainable handling of customer data, and refers to data ethics, AI ethics and digital ethics.

Ask yourself!

When I write notes about customer conversations in our internal systems – do I then express myself so that I can stand for them if the customer were to read them?

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?

How we communicate

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

There are several aspects of open communication, as described below.

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 maintain good and transparent 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, everyone is 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 communication principles 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. When communicating internally, we are all expected to communicate in a professional manner.

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. The Media Relations & External Communication team has the overall responsibility for contacts with the media and can provide guidance in all media related matters. SEB also has dedicated spokespersons expressing SEB's stand-point and views. SEB employees can respond to media within their area of expertise, but as a general principle the Head of Group Brand, Marketing and Communication, Head of Media Relations & External Communication or delegated communication officers should be consulted before contacts with media.

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, which are described below.

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 SEB where certain activities are carried out are physically and systematically separated from other parts of SEB.

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

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.

Personal transactions in financial instruments

Almost all employees are subject to restrictions regarding transactions undertaken for their own account on the securities market. If you are subject to these rules, you must consider a one-month holding period before realising a profit, and you have a duty to notify SEB about your holdings and transactions in financial instruments. In addition, you may also have an obligation to ask for permission from SEB before trading in financial instruments.

Assignments outside SEB

Our employees' commitment to, and responsibility towards, SEB is irreproachable. 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".

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.

Employees shall notify their immediate manager of any change in approved external assignments. Once a year, each manager shall remind their employees about the obligation to notify any new external assignments as well as any change in circumstances that may affect already approved assignments.

Ask yourself!

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

Gifts, entertainment and bribes

SEB 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 representing or 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 to public officials to obtain a service or to speed up a process or decision).

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.

SEB's Anti-Corruption Policy define the framework for anti-corruption in SEB and establish principles for the analysis of risk of corruption and measures to prevent corruption.

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, as described below.

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.

⁷⁵In cases where we 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 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 and with equal opportunities for all. Everyone should feel included and be given the same opportunities for professional and personal development. We are guided by our purpose and core behaviours in everything we do.

SEB's core behaviours – create value, act long-term and build positive relationships, guide us in our daily work. The way we behave, act and do business should also serve SEB's corporate purpose.

We expect our leaders to induce a strong sense of purpose to the business and embrace equal opportunities for employees to achieve their full potential. We value our employees' commitment, self-leadership, responsibility and ability to collaborate and be considerate towards colleagues, as well as their willingness to serve our customers.

SEB works actively with the entire organisation, leaders and teams in order to meet a changing environment and do what it takes to continue creating long-term value for our customers, shareholders and other stakeholders. We promote an inclusive culture where our employees feel respected and valued. To reflect our customer base and diversity in society, we always strive to ensure that our teams and management are balanced in terms of gender, age, competences, as well as national and ethnic origin. We reject all forms of discrimination or harassment, and strive to ensure that all employees, regardless of ethnic or national origin, gender, transgender identity or expression, skin colour, faith, religion, citizenship, age, disability, civil status or sexual orientation are treated with respect, and that all employees are given equal opportunities. 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 and long-term value.

We are all each other's work environment and we have an individual responsibility to ensure that we have an attractive and safe work environment in which every employee is appreciated and respected.


We are responsible to react if we discover behaviours that are inconsistent with our ethical guidelines, and take appropriate action if, as an example, a colleague engages in harmful use or irresponsible activities.

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

Ask yourself!

Do I always act in accordance with our core behaviours? What can I do to contribute to overall team performance and company culture?

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 irregularities.

You may also report potential or actual breaches of regulatory or internal requirements through SEB's Whistleblowing process.

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

There are several aspects of upholding the Code, as described below.

Adherence to the Code

General adherence to the Code is discussed on a regular basis and mind-sets and behaviours are evaluated in the yearly performance development dialogues. The content in the Code is also discussed in a range of workshops and other fora 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 or any other party affected by our business would discover potential or actual breaches of regulatory or internal requirements, unethical or unlawful behaviour, you should report your observations.

The Head of Group Compliance and the Head of Group Internal Audit shall, when it is considered appropriate and taking into consideration the duty of confidentiality and personal data protection requirements, inform the Audit and Compliance Committee of the Board of Directors and the Chief Executive Officer of reported incidents.

How to file a whistleblowing report

Primarily a whistleblowing report shall be made to the entity concerned within the SEB Group. You may also choose to report directly to SEB Group level.

SEB Group and SEB whistleblowing channel

Please, use the digital channel WhistleB. Search for Whistleblowing on SEB’s intranet or on SEB’s external website, sebgroup.com/whistleblowing.

SEB’s Head of Group Compliance and Head of Group Internal Audit are recipients of the whistleblowing report and will receive a notification that a report has been filed and will be able to log in to the digital service WhistleB to review and take appropriate action on your report.

You may also, report verbally to or request a physical meeting with the Head of Group Compliance or the Head of Group Internal Audit.

Separate whistleblowing channels for subsidiaries in the SEB Group

Please, use the digital channel WhistleB for relevant subsidiary. Search for Whistleblowing on SEB’s intranet or on SEB’s external website, sebgroup.com/whistleblowing.

Choose the relevant subsidiary.

The responsible Compliance Officer and the Head of Internal Audit for the relevant subsidiary are recipients of the whistleblowing report and will receive a notification that a report has been filed and will be able to log in to the digital service WhistleB to review and take appropriate action on your report.

You may also report verbally to or request a physical meeting with the responsible Compliance Officer or the Head of Internal Audit for the respective subsidiaries.

Handling of the whistleblowing report

The recipients of the whistleblowing report are the two independent control functions, Group Compliance and Group Internal Audit.

You can file a report during or outside working hours and you can report anonymously. If you have not reported anonymously your identity will be kept confidential 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 be the case, you will be properly informed.

The WhistleB service used by SEB meet high security requirements regarding data security and protection of the whistleblower's identity.

Within seven days you will receive a confirmation that the report has been received, if it can be done without compromising your identity.

If you have filed a report to a subsidiary the information provided might be shared with the parent company in the SEB Group for the purpose of investigation, unless you have objected to the sharing of information.

We encourage whistleblowing and we will not take any measures against anyone having filed a whistleblowing report, either at the time the report is made, or subsequently.

External reporting channels - the Swedish Financial Supervisory Authority

It is possible to report externally to the Swedish Financial Supervisory Authority.

Go to [fi.se](https://www.fi.se) and search for "Whistleblowers".

For subsidiaries whistleblowing reports shall be addressed to relevant supervisory authority.