

Sustainability

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Reporting principles – Sustainability

Swedbank's sustainability reporting follows the Global Reporting Initiative Standards (GRI) 2021 and the reporting is limited to the bank's material sustainability topics, defined through a materiality assessment in accordance with the GRI Standards 2021. The reporting is also carried out in accordance with the EU Taxonomy Regulation (see pages 219–244) and the sustainability reporting requirements in the Annual Accounts Act (see page 270). Additionally, the reporting follows the Principles for Responsible Banking (see pages 265–268) and Taskforce on climate-related financial disclosures (see page 269).

Swedbank carried out a materiality assessment in 2023. The notes in this year's report are based on the bank's material topics. In Note S1, the material topic of sustainability advice, products and services is reported. In Note S2, Environmental information, the material topics of climate change as well as biodiversity and ecosystems are reported. Here you will also find reporting in accordance with the EU's taxonomy regulation. In Note S3, Social information, the material topic of the Group's own workforce is reported. In Note S4, Governance information, the material topics of business conduct, financial crime, IT systems and information

security are reported. The revised note structure is the first step in adapting the reporting to upcoming reporting requirements from the EU.

The GRI indicators that the reporting follows are listed in the GRI Index on pages 261–264 and the reporting's scope in Note P24, page 193.

The sustainability reporting is included in Swedbank's Annual and Sustainability Report, which is published annually. The reporting relates to the period 1 January through 31 December 2023 and the publication date is 22 February 2024.

The sustainability reporting is reviewed by independent auditors from PwC according to the assurance report on page 279. The reporting relates to the Swedbank Group, i.e. the Parent Company, Swedbank AB, and its subsidiaries.

Revisions, restatements and omissions

Revisions and restatements of data are reported when information that has been calculated in a new way is presented in the report. Recalculations of data are found in tables where recalculations have been made as well as in the GRI Index.



Governance and sustainability

Swedbank has a well-established governance model in accordance with the bank's purpose: to empower the many people and businesses to create a better future.

Swedbank's governance documents for sustainability comprise policies, instructions, directives and guidelines/guides which have their basis in the UN Global Compact's ten principles and which also take the precautionary principle into consideration. The Group's operations management also includes Swedbank's Strategic Direction, Group-level targets, implementation, monitoring and reporting for the purpose of integrating a sustainability perspective in the bank's core processes.

The Board of Directors has ultimate responsibility for sustainability management, takes decisions on the bank's overarching sustainability direction and content of Swedbank's policies and annually approves the sustainability report as part of the Group's Annual and Sustainability Report. Swedbank's policies relevant to its sustainability work are available to all stakeholders on the website: <https://www.swedbank.com/sustainability>.

The Board integrates sustainability in its committees, and during the year it expanded the Remuneration Committee to comprise both remuneration and sustainability. The main responsibility of the reconstituted committee is to support and strengthen the bank's strategic sustainability work with a focus on the benefits to the business. Among the areas that were addressed by the committee during the year were the monitoring of the bank's prioritised sustainability activities as well as strategic work in financial health and the green energy transition in the real estate industry.

The Audit Committee ensures the reliability and effectiveness of the financial reporting as well as the sustainability reporting. In 2023, the Audit Committee has taken certain preparatory measures in order to meet the increased responsibility incumbent on the committee according to the new rules for sustainability reporting. The Risk and Capital Committee is responsible for the bank's risks, including ESG risks and how they are managed. For more information on the bank's management of ESG risks, see pages 113–115.

The Board's work is evaluated annually, as is the CEO's; see page 50 for more information.

The Board received an in-depth review of several sustainability topics during the year. The bank's work related to energy efficiency improvements in properties and to customers' financial health, as well as how this is integrated in the business, was presented and discussed. During the year, the Board also received training on the bank's organisation and structure, in addition to reviewing and discussing the work being done by society and the bank to combat fraud. The implementation of sustainability regulations was also a priority in 2023.

The President and CEO is responsible for ensuring that Swedbank follows its Strategic Direction. To monitor this, the CEO has sustainability-related key performance indicators (KPIs), which are reported semi-annually to the Board. Corresponding KPIs for the business areas and Group Functions are reported to the CEO on a quarterly basis.

The CEO is responsible for the Group's position statements on the defence industry and climate change as well as instructions to support the implementation of the bank's policies. Swedbank's position statements specify how sustainability is integrated in business decisions and are more operationally oriented than the bank's policies.

Committees: The Sustainability Committee works on a Group-wide level and manages sustainability-related matters. The Sustainability Committee is led by the Head of Group Brand, Communication and Sustainability with a mandate from the CEO. The members include representatives at the management level from the bank's various business areas and Group Functions. The representatives are appointed by the Group Executive Committee. The committee's Chair issues recommendations and issues can also be escalated to the CEO. Where frameworks do not provide enough guidance for business decisions, the issues can be escalated to Swedbank's Sustainability Committee. All business areas and Group Functions have the option to escalate issues to the committee. Meeting minutes are distributed to the CEO and Group Executive Committee.

The Baltic countries also have local sustainability committees that follow the same working principles as the Sustainability Committee at the Group level.

Sustainability-related issues are also brought up in preparatory forums such as the Group Risk and Compliance Committee and the Group Credit Committee. The procurement unit has a Procurement Sustainability Council that manages procurement-related sustainability issues. Where frameworks do not provide enough guidance for business decisions, the issues can be escalated to Swedbank's Sustainability Committee.

To ensure that sustainability is integrated in the bank's operations, the Group Functions, business areas and product areas are responsible for the integration of frameworks, policies and governance linked to sustainability. They are responsible for sustainability issues within their areas of operation and for managing the impact of these issues. The Group Executive Committee delegates operational responsibility for targets and activities to managers within the Group's units and subsidiaries.

- **Group units:** CFO Office assumed responsibility for some parts within sustainability in 2023, such as reporting and data. Previously, responsibility rested with Group Brand, Communication and Sustainability. The new organisational setup aims to meet upcoming reporting requirements and integrate the sustainability reporting with the bank's other reporting. Group Brand, Communication and Sustainability, under the leadership of the Head of Group Brand, Communication and Sustainability, is responsible for the integration of sustainability in the bank's strategy and business plan. Group Sustainability, which is part of this unit, is led by the bank's Head of Sustainability and supports the bank on sustainability-related issues involving strategy, targets and monitoring. The Head of Group Sustainability reports to the Head of Group Brand, Communication and Sustainability.

- **Business areas:** The bank's business areas, Swedish Banking, Baltic Banking and Corporates and Institutions, are working to ensure that the bank lives up to customers' increased sustainability expectations. To do so, each business area has dedicated sustainability experts. These experts are responsible for implementing the Group's sustainability framework, prioritised development activities, delivering on the bank's emission reduction targets for financed emissions, and ensuring that resources and competence are in place to meet customers' expectations.

- **Product areas:** Group Products & Advice integrates sustainability in various areas such as lending, savings, insurance products, payments, cards and advisory processes, as well as in material subsidiaries (Swedbank Robur, Swedbank Insurance, Swedbank Mortgage and PayEx). This unit has dedicated sustainability teams and/or managers, who together with other departments ensure that various stakeholders' sustainability demands are met.

External audit: The sustainability reporting is reviewed by a third party based on the criteria in the GRI Standards 2021.

For more information, see Swedbank's Corporate Governance Report on pages 46–68.

Materiality assessment

Swedbank's sustainability work is defined by the bank's business strategy. With a materiality assessment as the basis, where the stakeholder dialogue plays an important role, topics that are relevant for the bank are evaluated.

The EU's upcoming regulatory reporting requirements (Corporate Sustainability Reporting Directive, CSRD) and a clearer focus on integration of sustainability in the bank's operations will be two key driving forces in the coming years. Swedbank is obligated to report based on the new requirements for the financial year 2024. In preparation for the upcoming requirements, a materiality assessment was conducted at an overarching level in 2023, where parts of the bank's value chain were taken into consideration. The bank sees potential in developing the assessment and its methodology and establishing relevant processes as part of the CSRD implementation. In 2024, an update of the assessment is planned to ensure that it fully aligns with the reporting requirements.

The year's assessment was initially based on the principle of double materiality. This means that it takes into account both impact and financial materiality, i.e. how Swedbank impacts people and the environment as well as how Swedbank is impacted financially by external sustainability-related factors, which are analysed through business risks and opportunities within sustainability.

Impact materiality

Based on the upcoming regulatory reporting requirements and the topics of strategic importance to the bank, approximately 20 sustainability topics were identified for assessment by the bank's primary stakeholder groups. These topics, covering environmental and social aspects on sustainability, were used as a basis for the impact materiality assessment. The stakeholders who participated in the impact materiality assessment were investors, customers, supplier representatives, employees, including internal sustainability experts, and non-profit organisations. The survey was conducted in the form of questionnaires, interviews and workshops. The assessment was also based on the bank's internal strategic analysis, market analysis, external reports, legislation and frameworks relating to the topic. Representatives from Swedbank's management and Board of Directors also participated in the final assessment.

After having identified a gross list of topics and conducting stakeholder dialogues, a workshop was held to assess impact materiality. It was attended by a large number of employees with sustainability-related expertise from various

units within the bank. Prior to the workshop, a preliminary analysis was conducted where actual or potential impact, positive or negative, for people or the environment, were identified for each topic. (For more information, see page 212.) The purpose of the workshop was to identify and determine which impact materiality each topic was considered to have, both actual and potential. Based on the results of the workshop, a calculation was made to determine each topic's materiality, an Impact Materiality Score. A threshold determined whether the topic should be classified as material for the bank from the standpoint of impact materiality.

The impact materiality assessment was largely based on the market analysis and interviews with various stakeholders. It was primarily based on qualitative data, but where possible, quantitative data was applied.

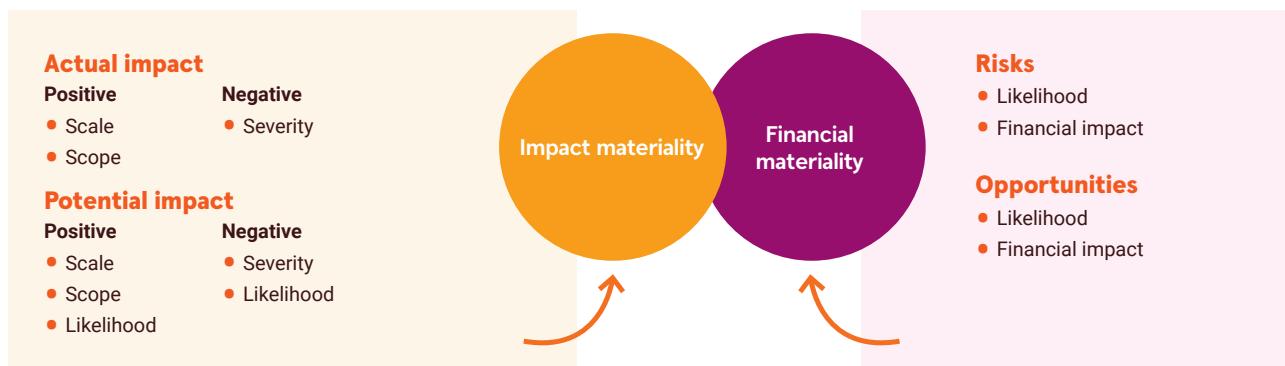
Financial materiality

In order to assess financial materiality, sustainability-related business risks and opportunities were evaluated based on likelihood and financial impact. They were identified based on the topics that could give rise to actual and potential sustainability impacts and on the stakeholder dialogues.

In accordance with upcoming reporting requirements from the EU, large corporates have to report all ESG-related risks that are considered financially material. The assessment of financial materiality linked to sustainability risks was conducted with the help of a method developed by Group Risk on the basis of the bank's existing framework for ESG risk management. The assessment was conducted by internal risk experts and comprised current and potential ESG risks on the basis of three different scenarios: (i) Net-zero emissions by 2050, (ii) "Delayed transition", and (iii) "Current policies", which are provided by the Network for Greening the Financial System (NGFS). NGFS scenarios are used by supervisory authorities and financial institutions in the EU to evaluate climate-related risks.

The assessment of financial materiality linked to business opportunities was conducted during a workshop with representatives from the bank's business areas. A preliminary analysis of the bank's business opportunities was conducted by the Group's sustainability unit based on business intelligence, trends, competitive analyses and input from customers. During the workshop, participants were asked

Factors included in the assessment of actual and potential impacts, risks and opportunities



Impact materiality is assessed for positive and negative actual and potential impacts for society or the environment based on the above factors.

Financial materiality is assessed for risks and opportunities based on the above factors.

An overarching process description of the materiality assessment is found on page 25.

to evaluate the business opportunities based on likelihood and potential size of the financial impact. A threshold determined whether the area was classified as material for the bank based on sustainability-related business opportunities.

Given that the level of maturity when it comes to quantifying sustainability risks and opportunities will improve over time, quantitative factors are expected to become gradually more important in the analysis as more data becomes available.

Material sustainability topics

By taking impacts, risks and opportunities into consideration for each sustainability matter, a basis was compiled for the final assessment of that matter. Internal sustainability experts participated in a workshop that served as the final phase of the materiality assessment. Members of the Group Executive Committee and the Board of Directors participated as well. They were also notified of, and reviewed, the final results.

The sustainability topics defined as material are listed below and serve as the basis of the sustainability reporting for 2023.

- Sustainability advice, products and services, note S1, chapter 1.1 – 1.4
- Climate change, note S2, chapter 2.2
- Biodiversity and ecosystems, note S2, chapter 2.3
- Own workforce, note S3, chapter 3.1
- Business conduct, note S4, chapter 4.1
- Financial crime, note S4, chapter 4.2
- IT systems and information security, note S4, chapter 4.3

Biodiversity and ecosystems are a new material topic for the bank compared to previous assessments. A high level of availability and societal engagement were not considered material in this year's analysis. The remaining material topics are similar to those included in previous years reporting.

See the figure below for actual and potential impact within each material topic.

Examples of actual and potential impacts on society and the environment (i.e., the bank's impact) and related activities within each material sustainability topic. See also the sustainability notes on pages 214–260.

Material sustainability topic	Actual impacts	Potential impacts
Sustainable advice, products and services	"Sustainability advice, products and services" refers to offerings that support initiatives that benefit the environment and are socially responsible. For example, this includes products designed to finance energy efficiencies in the real estate sector or to promote a sound savings culture through advice, thereby contributing to the financial health of society.	Swedbank's sustainable banking products, such as green or sustainability-linked loans, can encourage companies to transition and assume more sustainable business models.
Climate change	The impact on the climate can be both positive and negative and often depends on what and which types of businesses are financed or invested in. The impact is mainly indirect through indirect greenhouse gas emissions. By analysing and evaluating the climate impact of investments and financing, as well as by setting requirements, there is a reduced risk that investments and loans will go to businesses that harm the environment and climate.	Swedbank and others in the financial market can generate indirect climate impact through their businesses. Consequently, there are opportunities to contribute to the climate transition by financing important investments in emission reductions.
Biodiversity and ecosystems	The impact on biodiversity and ecosystems can be both positive and negative depending on what and which types of businesses are financed or invested in. The impact is mainly indirect and may, for example, include pollutants or changes in land use. Through a sustainability analysis in connection with investment or financing, the risk that investments or loans could go to businesses that harm the environment and ecosystems is evaluated.	Swedbank and other banks that are active in sectors with a direct environmental impact, e.g. energy, forestry and agriculture, thereby have an indirect opportunity to have an impact by setting environmental requirements in their financing.
Own workforce	As an employer with many employees and high demands on work environments and working conditions, we play a role in keeping employees healthy and ensuring that they thrive in the workplace. By offering a safe work environment where personal development is encouraged, we create opportunities to build skills, maximise performance and create long-term relationships, both internally and externally.	As a major employer, Swedbank has an opportunity to avoid negative impacts by e.g. combatting discrimination and alleviating stress that harms employees' mental health. A sound corporate culture and good work environments can lead to a reduction in employee turnover.
Business conduct	Responsible banking is important to contribute to financial stability and sound risk-taking that promote sustainable economic development in society.	It is important that Swedbank and other banks work actively to promote responsible business conduct in order to maintain trust in the bank and avoid corruption, financial crime and other unethical conduct. On an overall level, this type of conduct constitutes a threat to a sustainable society and to the integrity and stability of the financial system.
Financial crime	Financial crime is a major societal problem, and digitisation has facilitated criminality. In its home markets, Swedbank is a significant part of the financial infrastructure. This position carries with it both a responsibility and an opportunity to counteract the negative impacts of financial crime such as money laundering and fraud. The bank works actively to prevent itself and its customers from being exploited by, or exposed to, financial crime, e.g. through Group-wide processes to identify and manage financial crime, the design of products and services, and collaborations with authorities and the private sector. One example of a negative impact is when criminal elements exploit the financial system.	Swedbank and other banks operate in a sector that is the target of money laundering and other financial crime. By developing services and systems, Swedbank can reduce the risk as well as contribute through education and spreading knowledge, thus increasing society's knowledge of how to protect oneself against financial crime.
IT systems and information security	Society's digitisation is speeding up the development of digital banking services, and this is increasing the need for stable IT environments and protection against external threats. Secure IT systems, including stable and reliable digital channels and internal IT environments, are needed to maintain a stable financial infrastructure.	Unstable IT and information systems can have negative effects on the ability of Swedbank and other banks to maintain a secure and stable infrastructure for society as a whole.

Stakeholder engagement

In addition to the materiality assessment, Swedbank maintains a continuous dialogue with various stakeholders. The bank's main stakeholder groups are customers, employees, owners and investors, as well as society and the world around us. Other stakeholder groups include authorities, municipalities and county councils, regulators, pension managers, asset managers, analysts, journalists, unions, students, foundations, non-profit organisations, interest groups, trade organisations, associations, colleges and universities, suppliers, subsidiaries, the Savings Banks, competitors, ratings agencies and indexes, and auditors.

In its internal and external communication with various stakeholder groups, e.g. in presentations, meetings and reports, Swedbank presents the measures that have been taken following dialogues and the impact they have had.

Customers

Swedbank engages in dialogues with its customers primarily through interactions in the bank's digital channels, as well as at its branches and various customer events. Swedbank also participates in seminars with sustainability-related themes. Feedback from customers, e.g. through customer surveys, is integrated on a continuous basis in the bank's processes, improvement measures and development work. Through the bank's process for customer complaints, customers also have the opportunity to contact the bank on individual issues.

Important issues raised during the year included:

- Continued demand for savings and investment products with sustainability themes as well as advice on the green transition.
- Increased interest in sustainability-related financing solutions.
- Questions about the bank's work with cybersecurity linked to geopolitical developments.
- How sustainability issues are integrated in the bank's governance model and how they impact customers today and in the future, e.g. how corporate customers will finance their transition and how this could impact future financing.
- Increased interest in sustainability-related regulations and their impact.
- Fraud and what Swedbank is doing to prevent it.
- Questions about personal finance given the economic conditions, which include rising prices and high interest rates.
- Increased interest in how companies can reduce their climate impact (including science-based and net-zero targets) and how this impacts the customer's sector and business.
- The impact of energy security and energy prices on the green transition.

Employees

A good work environment, a work-life balance and opportunities for upskilling are important to employee performance, engagement and well-being. To measure and track how employees feel about their work situation, surveys are conducted continuously. The results of the surveys and employees' opinions are discussed and followed up within each unit and lead to improvement measures. Important issues raised during the year included:

- Continued effort to link employees' day-to-day work to the Strategic Direction.
- Encouragement of an open feedback culture that facilitates successful performance by employees and the organisation.
- Increased expectations on the bank's leaders and continuous support and upskilling in key areas through specialised training.
- Development of processes that focus on the shift from physical to digital to create more flexible ways of working.
- Continued effort to create a safe, inclusive and secure workplace.
- Continuous support and upskilling in key areas through training.

Owners and investors

One of the bank's most important stakeholder groups is owners and investors. By being profitable and generating a return for its owners, the bank can help to benefit society. A dialogue is maintained with existing and potential owners and investors, who are continuously provided with information through quarterly reports, the Annual and Sustainability Report, meetings, teleconferences, Swedbank's website and press releases. Input from owners and investors is taken into consideration

at the Annual General Meeting, where issues can be heard and suggested improvements passed along to operating units. Important issues raised during the year included:

- How higher interest rates and inflation impact Swedish households and the housing market.
- Which factors influence the development of net interest income.
- How bank taxes in Sweden and the Baltic countries are expected to impact earnings.
- US regulatory investigations of Swedbank Group.
- Credit quality of lending to commercial real estate companies.
- Expected dividend capacity.

Society and the world around us

Swedbank cooperates continuously with supervisory authorities and decision-makers on issues related to the current sustainability agenda. The dialogue is conducted both directly with authorities and collaboratively with other banks through various industry organisations. For example, Swedbank is a member of the Swedish Bankers' Association's Sustainability Council and Sustainability Committee, the European Savings and Retail Banking Group's (ESBG) Sustainable Finance Committee and Corporate Social Responsibility Committee, the European Banking Federation's (EBF) ESG Financial Markets Task Force, and the Institute of International Finance Sustainable Finance Policy Expert Group. Most of the discussions are with the Ministry for Finance, the SFSA and other relevant Swedish authorities, but also with the European Commission, the European Central Bank and the European Banking Authority. Swedbank continuously monitors media reporting on sustainability, both social and environmental, with a bearing on the bank's operations in all of our home markets. To support societal development, the bank is involved in various sustainability initiatives. Important issues raised during the year included:

- Issues related to EU regulations (e.g. SFDR, CSDDD and EPBD). For example, the importance of harmonised rules for sustainability reporting as well as proposals for revising frameworks for energy classification of properties. The focus was also on the need for national plans to achieve global biodiversity targets.
- Sustainability dialogues with various industry and stakeholder organisations, often with a focus on climate change as well as personal finance.
- In the media, biodiversity, social sustainability and climate change related to finance were covered during the year.
- Macroeconomic conditions were discussed given the high inflation and rising interest rates, but also in the wake of extreme events in recent years, such as the Covid-19 pandemic, Russia's expanded invasion of Ukraine, and the war in the Middle East.

Sustainability index

As the industry changes and adapts to higher sustainability demands from stakeholders, the bank's sustainability rating remains stable at a high level.

Sustainability index/ranking	2023	2022	2021
Bloomberg Gender Equality Index ¹	77	75	69
CDP (previously Carbon Disclosure Project) ²	C	B	
EY SHE Index Sweden ³	82	82	82
FTSE4Good ESG rating ⁴	4.2	4.0	4.3
ISS Corporate Rating ⁵	C (Prime)	C (Prime)	C (Prime)
MSCI ESG rating ⁶	AA	AA	AA
Sustainalytics ⁷	23.4	21.7	24.8

1) Scoring scale 0–100 (max 100)

2) Scoring scale A–D– (max A). Results not published for 2023 at the time of reporting.

3) Scoring scale 0–100 (max 100).

4) Scoring scale 0–5 (max 5). Swedbank has qualified for the FTSE4Good Index.

5) Scoring scale A+ – D– (max A+)

6) Scoring scale AAA – CCC (max AAA)

7) Scoring scale 0–10 negligible risk,

10–20 low risk, 20–30 medium risk,

30–40 high risk, 40+ severe risk

Sustainability notes

S1 Sustainable advice, products and services

Sustainability advice, products and services is a material sustainability topic for Swedbank. To capture the sustainability perspective downstream in the value chain, it is important for the bank to adapt its range of products and services based on the expectations of both private and corporate customers. With sustainability-related advice, the bank contributes to the transition that society is facing.

Swedbank wants to play a part in helping more people become financially healthy – with enough money to pay their bills, a savings buffer for unexpected expenses, pension savings, insurance to protect their personal finances, a manageable debt load and sufficient financial knowledge. Companies are offered customised advice and simple, effective solutions within sustainability to steer capital flows towards a more sustainable economy.

1.1 Asset management

Policies

- Sustainability Policy
- Environmental Policy
- Policy on Human Rights
- Policy on sustainability risk integration in investment decision-making investment and insurance advice on financial products
- Swedbank Robur's Policy for Responsible Investments
- Swedbank Robur's Sustainable Risk Policy

Other governing documents

- Instruction on Sustainability in Investment Decisions and Investment and Insurance Advice
- Position Statement Climate Change
- Position Statement Defence Equipment

Partnerships, memberships and networks

- PRI, UN Principles for Responsible Investments (Swedbank Robur)
- NZAM, The Net Zero Asset Managers initiative (Swedbank Robur)
- Climate Action 100+ (Swedbank Robur)
- Finance for Biodiversity Pledge, Nature Action 100 (Swedbank Robur)
- ICGN, International Corporate Governance Network (Swedbank Robur)

Targets	2023	2022	2021	Baseline year 2019
Within Swedbank Robur's asset management, halve emissions (tonnes CO ₂ e/USDm) by 2030 ¹	46	47	46	74
Within Swedbank Robur's asset management, raise the share of AUM with science-based climate targets to 60 per cent by 2030 (per cent) ²	44	33	30	10

- 1) Weighted average emission intensity, scopes 1&2, equity and credit investments.
- 2) Share of total AUM (%) in equity and credit investments in holdings with science-based targets.

Measures and activities

Swedbank believes that responsible and sustainable investments make a difference for sustainable development and are essential to generate long-term return. Sustainability is an essential and integral part of asset management. Swedbank is seeing increased demand for savings products with a sustainability focus. At the same time, European regulations have been strengthened and clarified for both sustainability in financial products and in terms of the information given to customers.

Asset management

Swedbank's subsidiary Swedbank Robur Fonder AB manages capital for customers, in funds and through discretionary mandates. Swedbank Robur's strategy to achieve sustainable value creation is to offer simple and innovative products that contribute to sustainable development and create value for customers. Swedbank Robur's Policy for Responsible Investments serves as a basis for its sustainability work, and applies to all of its funds.

As a major shareholder on the Stockholm Stock Exchange and with holdings in companies both in and outside Sweden, Swedbank Robur has both a responsibility and an opportunity to engage. The fund company's dialogues and work as an active owner help companies to develop their work with sustainability and corporate governance. During the year, Swedbank Robur continued to take an active role in various industry forums to improve customer information on sustainability in funds, not least in response to the EU Action Plan for Financing Sustainable Growth. Swedbank Robur has a strong focus on climate change, biodiversity and investments with a positive impact on nature, for which strategies and targets have been set.

Swedbank Robur ranked eighth in the world and first in the Nordic region in an analysis by the organisation ShareAction, in which the sustainability work of 77 international asset managers was evaluated based on how they work with governance, responsible investment, climate change, biodiversity and social issues. During the year, Swedbank Robur also published MSCI's ESG ratings publicly in its fund list, where the majority of the funds received the second-highest rating of AA.

During the summer, Swedbank Robur published its first report on the principle adverse impacts (PAI) of investment decisions on sustainability factors according to the European Sustainable Finance Disclosure Regulation (SFDR). Swedbank Robur's sustainability-related policies and strategies have been effective in identifying, prioritising and mitigating the fund company's PAI.

Carbon footprint of the funds

Swedbank Robur's climate target is to align its aggregated assets under management (AUM) with the Paris Agreement by 2025 and reach net-zero by 2040.

The net-zero target was established by Swedbank Robur in 2019 and expanded in 2021 to include interim targets in accordance with the Net Zero Asset Manager (NZAM) initiative. Follow-ups of the climate targets are made annually in Swedbank Robur's climate report. Swedbank Robur's invested capital in companies that have adopted science-based climate targets increased by 11 percentage points as a result of targeted climate work and dialogues with selected companies. In 2023, the fund company reported its indirect Scope 3 emissions for the first time. The report also describes how climate risks are managed in the investment portfolio in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosure (TCFD). For more information on management of climate risks, see Swedbank Robur's Climate Strategy. The strategy as well as related documents are available on Swedbank Robur's website.

Impact as an owner

Swedbank Robur is an active owner and maintains regular contact with boards and managements of companies, above all when its funds are major shareholders.

This year's dialogues centred on four themes: climate change, nature, human rights and corporate governance. As part of the International Investor Group on Climate Change (IIGCC) initiative, Robur collaborated with other investors and through dialogue follow up companies with especially high emissions, through dialogue, in sectors with a major climate impact. The focus of the discussions was on the companies' targets aligned with the Paris Agreement and viable transition plans.

Swedbank Robur has been a signatory of the Finance for Biodiversity Pledge for several years. The goal of this initiative is to stop species loss globally and to protect and restore biodiversity. Swedbank Robur is also a cofounder of Nature Action 100, a global investor initiative launched during the year to reverse nature loss through investor dialogue. Nature Action 100 has formulated expectations for companies as regards their commitments to protect nature. The initiative encourages companies to assess their impact on nature and their exposure to nature-related risks, as well as set time-limited targets, implement governance plans and periodically report their progress. At the beginning of the year, the fund company also participated in a pilot study as part of the development of the new Task Force on Nature-Related Financial Disclosure (TNFD).

Transparency is fundamental to Swedbank Robur's ownership work and is subject to continuous development and improvement. Swedbank Robur provides detailed information on its voting at the general meetings of Swedish and international companies and its participation in nomination committees.

Swedbank Robur promotes boards with a balanced combination of competence, experience and diversity, including gender parity, as well as between independent and non-independent directors. The boards should actively address sustainability issues relevant to the company. The fund company voted in

approximately 40 markets, including Sweden, the US, the UK, Japan and Taiwan. Swedbank Robur voted on an increased number of issues, taking a stance on all sustainability-related shareholder proposals presented at the general meetings of companies that the funds owned.

Exclusions

Swedbank Robur does not invest in controversial weapons (cluster munitions, anti-personnel mines, chemical and biological weapons) or nuclear weapons. Additionally, the funds exclude companies with revenues derived from tobacco, cannabis, pornographic material, commercial gambling, and fossil fuels. As a rule, no more than five per cent of a company's sales may come from these sources. Fossil fuel companies in transition that meet specific criteria and are in a position to meet the Paris Agreement's goal of net-zero emissions by 2050 or which have set other relevant transition targets can be exempted in certain cases. These companies are reported on Swedbank Robur's website. In addition to the abovementioned criteria, companies have been excluded because they have seriously violated international norms and conventions to protect people and the environment without showing a willingness to change. Certain funds apply additional exclusions for alcohol and weapons/armaments, among other things. For more information, see Swedbank Robur's exclusion strategy on its website.

Metrics

Asset management	2023	2022	2021
Total assets under management (SEK bn) ¹	2 015	1 726	1 966
– of which in funds (SEKbn)	1 604	1 352	1 519
Investments in sustainable bonds (SEKbn) ²	41	37	38
Total carbon emissions (million tonnes CO ₂ e) ³	2.3	1.7	1.8

- 1) 31 December 2023, refers to Swedbank's fund companies in Sweden, Estonia, Latvia and Lithuania. Other metrics in the table refer to Swedish funds.
- 2) A bond that is green, social and/or sustainable according to the International Capital Market Association (ICMA).
- 3) Total carbon emissions from equity and credit investments, scopes 1&2. Values for 2021 and 2022 have been adjusted to include credit investments. 2021 figure is based on the holdings' Market Capitalisation. 2022 and 2023 figures are based on Enterprise Value including Cash (EVIC). The method applies TCFD's recommendations and PCAF (2022): The Global GHG Accounting and Reporting Standard for Financed Emissions.

Engagement work in funds	2023	2022	2021
Voted at general meetings	968	852	786
Participation in nominating committees ¹	100	110	111
Share of women on corporate boards (Sweden) (%) ²	37	38	38
Dialogues with companies on sustainability issues ³	1 418	1 163	1 155
Dialogues on environment (%) ⁴	66	65	71
Dialogues on social issues (%) ⁴	40	44	57
Dialogues on corporate governance (%) ⁴	40	45	60

- 1) Of which 96 in companies publicly listed in Sweden and 4 in companies listed in Finland.
- 2) Refers to boards where Swedbank Robur participated in nomination committee. Nomination committee companies vary by year. The baselines for 2021–2023 averaged 36.4%, 36.0% and 36.4%, which means an increase by: 1.1 (2021), 0.5 (2022) and 0.2 (2023) percentage points.
- 3) Refers to unique companies, of which the funds had ownership interests in over 1000. Swedbank Robur's sustainability analysts, fund managers and corporate governance specialists had 1 316 dialogues with 869 companies. Suppliers had 611 dialogues with 424 companies. As part of investor initiatives, 519 dialogues were held with 389 companies.
- 4) Share of total number of contacts. Companies are contacted on several occasions, by different actors, on separate issues. Values for 2021 and 2022 have been adjusted since the metric "of which combined dialogues about E, S, G" has been removed.

EU Taxonomy-aligned assets under management, turnover (SEKbn)	2023
EU Taxonomy-aligned assets under management	20
of which securities	2
of which equity instruments	17

EU Taxonomy-aligned assets under management, capex (SEKbn)	2023
EU Taxonomy-aligned assets under management	31
of which securities	4
of which equity instruments	27

1.2 Insurance

Policies

- Sustainability Policy
- Environmental Policy
- Policy on Human Rights
- Policy on Sustainability Risk Integration in Investment decision-making, Investment and Insurance Advice on Financial Products
- Swedbank Insurance's Sustainability Policy

Other governing documents

- Instruction on Sustainability in Investment Decisions and Investment and Insurance Advice
- Position Statement Climate Change
- Position Statement Defence Equipment

Measures and activities

Sustainability in endowment and pension insurance in Sweden

Swedbank Insurance, a wholly owned subsidiary of Swedbank, offers pension, endowment and personal/risk insurance for private customers and businesses. Swedbank Insurance's sustainability policy serves as the foundation for its sustainability work and comprises all investments within traditional, unit-linked and variable universal life insurance.

Swedbank Insurance supports both the Paris Agreement and the UN Sustainable Development Goals. The insurance company offers products where the included funds are evaluated based on sustainability criteria. During the year, Swedbank Insurance worked to improve and simplify information on sustainability on its website and in product sheets and customer handouts on the sustainability work of the funds. The aim is to enable customers to make sustainable financial decisions. During the year, the insurance company reported at the company level on the principle adverse impacts (PAI) of investment choices on sustainability factors, according to the SFDR.

The sustainability level of the fund offering is a priority area. The insurance company works continuously to align the sustainability level of its funds with the requirement that the funds its investors are offered take climate action. The insurance company actively participates in industry forums to improve customer information on sustainability in insurance products and to meet current and upcoming EU legislation.

The insurance company annually publishes a sustainability report. The report describes how sustainability is integrated in the investment offering in traditional, unit-linked and variable universal life insurance. The carbon footprint is measured, calculated and reported for the investment portfolios.

During the year, Swedbank Insurance acted as anchor investor in Swedbank Robur's new Climate Bond fund, an actively managed fund that invests in sustainable bonds with a focus on climate action, where the money is earmarked to finance sustainable energy, nature conservation and combating climate change. Furthermore, the insurance company performed a climate analysis of holdings in equities and corporate bonds in selected sectors. The analysis was performed with the help of the PACTA tool. The results showed that the insurance company's share of investments with a high level of exposure to climate risks was low compared to the global market.

Swedbank Insurance expanded the sustainability work in its value chain during the year and introduced it as a parameter in the procurement process for reinsurance services. The focus was on climate change and biodiversity.

During the year, the insurance company participated in Mistra BIOPATH, a research collaboration to map and understand the financial system's role when it comes to biodiversity. The insurance company also participates in the TNFD.

Property & casualty insurance and life insurance in the Baltic countries

Swedbank Property & Casualty Insurance and Swedbank Life Insurance are wholly owned subsidiaries of Swedbank Estonia with branch offices in Latvia and Lithuania. Swedbank Property & Casualty offers property, auto, travel and payment protection insurance. Swedbank Life offers term life and savings insurance to the mass market.

As of 2023, the insurance-based investment products align with the requirements for the light green level within the SFDR. At the same time, the monitoring of sustainability data and internal controls to increase transparency were strengthened, as was integration of sustainability in investment decisions. The Policy for Responsible Investments was updated, and the guidelines on managing noncompliance with sustainability aspects within the funds were clarified.

1.3 Finance

Policies

- Sustainability Policy
- Environmental Policy
- Policy on Human Rights
- Credit Policy
- Policy on Enterprise Risk Management

Other governing documents

- Position Statement Climate Change
- Position Statement Defence Equipment
- Swedbank Sustainable Funding Framework
- Directive on ESG aspects in credit assessment

Partnerships, memberships and networks

- EEMI, Energy Efficient Mortgage Initiative
- Sweden Green Building Council

Target	2023	2022	2021
Growth in Sustainable Asset Register (SEKm)	74 138	59 297	44 655

Measures and activities

Sustainable finance is part of Swedbank's core business. In the banking sector, it is critical to understand and actively address sustainability issues in order to be able to contribute to responsible, long-term lending. For Swedbank, sustainable finance means focusing on the customer's financial needs while at the same time identifying and managing sustainability risks.

Sustainability analysis in lending

Swedbank takes sustainability risks into consideration in all credit decisions. During the year, work continued on the development of a new digitised sustainability tool, which has been implemented for all of the bank's business areas and for the Savings Banks. The aim of the enhanced analysis is to further improve the bank's advice and risk management. The analysis takes into account sector-specific risks from three perspectives: environmental, social and governance. This makes it possible to identify the most material sustainability risks in a specific sector in an automated way, which in turn serves as the basis for customer-specific analysis and dialogue. This gives the bank a better understanding of how customers manage the identified sustainability factors.

If a loan application is considered to have an elevated sustainability risk, it is escalated to the Swedbank Sustainability Committee for further discussion and guidance. In its corporate lending, Swedbank performs a basic assessment of sustainability-related factors, depending on the type of business and its complexity. When corporate customers have an exposure of at least SEK 8m or EUR 0.8m, a sustainability analysis of the customer is conducted using the bank's ESG tool. A detailed analysis is carried out with the tool for corporate customers with revenues of at least SEK 500m (EUR 50m) or total assets of SEK 1 000m (EUR 100m) regardless of credit volume.

Sector guidelines and position statements are available to support the sustainability analysis and provide insight into sustainability issues in various industries and guidance on which questions to ask and which areas are especially important for the particular industry.

Exclusions and position statements

Swedbank does not directly finance coal mining and coal-fired power production. Special restrictions are also placed on oil, gas and peat. Swedbank does not directly finance exploration of new or expansion of existing oil and gas fields, new crude oil tankers and extraction of peat for energy production. Swedbank does not finance companies that generate more than five per cent of their revenue from any of the abovementioned activities, with the exception of companies in oil, gas and peat that are in transition and meet special criteria and which are deemed able to meet the Paris Agreement's targets.

Swedbank only provides financial services to the defence equipment sector when they align with national regulations and sanctions adopted by the UN Security Council, the EU or the US. Swedbank has zero tolerance for controversial weapons (including nuclear weapons) and does not provide financial services to companies that produce, maintain or trade this type of weapon.

Sustainable Asset Registry

The Swedbank Sustainable Funding Framework enables the bank to issue green, social and sustainable bonds that support the UN Sustainable Development Goals.

One year after the launch of the framework, Swedbank issued an inaugural EUR 500m social bond, the proceeds of which are being fully allocated to three of the four social asset categories in the Sustainable Funding Framework: employment generation, socioeconomic advancement and empowerment, and affordable housing.

Each year an impact statement is published for the Swedbank Sustainable Asset Registry in the Swedbank Sustainable Bond Impact Report with the volume and expected impact of the loans in the registry.

Current financing in the registry is mainly for energy-efficient properties, renewable energy and green transports, in addition to the social assets.

Sustainable finance

Swedbank has a close customer dialogue to actively capture needs and help customers make sustainable choices by offering customised services and advice in sustainability. For private customers, Swedbank offers e.g. loans for installation of solar panels, energy-efficiency improvements, green mortgages and car loans/leases with specific environmental criteria. These loans are offered to private customers in all four of the bank's home markets: Sweden, Estonia, Latvia and Lithuania.

- **Green mortgages** – Loans to finance properties with an energy class or environmental certification approved by the bank according to specific criteria.
- **Green car loans and leasing** – Loans to finance cars with low carbon emissions, such as electric vehicles, fuel cell/hydrogen vehicles and hybrid vehicles according to established criteria.
- **Solar panel loans** – Loans to finance solar panels.

For corporate customers, Swedbank offers and develops new financing solutions to support a sustainable transition. Products include ESG-related bonds, green loans, green equity, sustainability-linked loans to companies, and sustainability-related advice.

- **Green loans** – Loans to finance projects that are environmentally sustainable, e.g. energy- and resource-efficient properties with low environmental impact. Offered to corporate clients in all home markets.
- **Sustainability linked loans** – Loans that can be used for general business purposes rather than for a specific use. The cost of the loan is linked to the borrower's performance relative to sustainability targets and is monitored through periodic performance reports throughout the loan's duration.
- **ESG-related bonds** – Clients of Corporates and Institutions are offered assistance to issue green, social and sustainability bonds as well as sustainability-linked bonds in the capital market.
- **Green equity** – Clients of Corporates and Institutions are offered assistance to classify their equity as green. To do so, the majority (> 50%) of the company's revenue and investments must be classified as green. Green equity is available in connection with IPOs, new share issues or as public recognition that all the company's outstanding shares are green (without a specific transaction). The concept of green equity was developed by Swedbank in partnership with Shades of Green, previously part of CICERO, now part of S&P Global, a leader in third-party assessments of frameworks for sustainable debt instruments.
- **Sustainability-related advice** – Within Swedish Banking, Swedbank collaborates with Pure Act to help small and mid-sized companies to build a sustainability strategy and formulate a sustainability plan. Clients of Corporates and Institutions are offered sustainability-related advice, including guidance on the EU Taxonomy, sustainability-related accounting standards, ESG risk management, company-specific sustainability KPIs, and updates on the latest regulatory and political developments relating to sustainability.

Metrics

Sustainability analysis, corporate lending	2023	2022	2021
Swedish Banking (number of approved loan applications)	31 030	30 573	36 399
Baltic Banking (number of analyses)	3 141	3 014	2 678
Corporates and Institutions (number of time-bound credit monitoring cases) ¹	715		
Total number of cases handled by Swedbank's Sustainability Committee	18	16	13
– of which customer-related cases	3	3	4
– of which policy- and governance-related cases	15	13	9

1) Restatement of KPIs 2023. Previously reported number of approved loans. For each customer a sustainability analysis is conducted annually as part of time-bound credit monitoring, regardless of number of approved loans. Corresponding result for previous years is not reported.

Green and social bonds, Swedbank issuer (SEKm) ¹	2023	2022	2021	EU Taxonomy-aligned loans, capex, 2023 (SEKm)	Swedish Banking	Baltic Banking	Corporates and Institutions	Total
Green bonds	40 982	27 872	30 526	Financial companies				287
Social bonds	5 555			Non-financial companies			38	2 922
1) Swedbank AB issuer.								
EU Taxonomy-aligned loans, turnover, 2023 (SEKm)	Swedish Banking	Baltic Banking	Corporates and Institutions	Companies subject to Non-Financial Directive			3 210	3 248
Financial companies			39	Households	17 137	6 120		
Non-financial companies		10	2 165	of which loans collateralised by residential immovable property	17 137	6 120		
Companies subject to Non-Financial Directive		10	2 204	Total	17 137	6 158	3 210	26 505
Households	17 137	6 120	23 257					
of which loans collateralised by residential immovable property	17 137	6 120	23 257					
Total	17 137	6 130	2 204	25 470				
Sustainable financing (SEKm)		Swedish Banking	Baltic Banking	Corporates and Institutions	2023	2022	2021	
Sustainable Asset Register¹	22 628	12 905	38 605	74 138	59 297	44 655		
Assets in green categories, total	22 628	7 609	37 453	67 690	53 044	44 655		
– of which renewable energy	47	1 665	642	2 354	2 296	2 401		
– of which energy efficiency	38				38			
– of which green buildings ²	22 123	2 872	31 818	56 813	45 064	40 277		
– of which clean transportation	420		4 957	5 377	3 648	252		
– of which sustainable management of living natural resources and land use		1 122		1 122	812	595		
– of which pollution prevention and control		1 950		1 950	1 200	1 130		
– of which sustainable water and wastewater management			36	36	24			
Assets in social categories, total	5 296	1 152	6 448	6 253				
– of which employment generation		3 690		3 690	3 670			
– of which socioeconomic advancement and empowerment		1 606	968	2 574	2 583			
– of which affordable housing			184	184				
Sustainable financing, other	575	1 562		2 137	1 888	939		
– of which energy-efficiency loans	4	220		224		18		
– of which green cars	264	1 131		1 395	1 366	721		
– of which solar panel loans	307	211		518	522	200		
Sustainability linked loans		1 711	8 474	10 185	11 460	9 146		
Total gross carrying amount³	23 203	16 178	47 079	86 460	72 645	54 740		
Sustainability linked loans, granted but not paid loan commitments		307	27 705					

1) Qualified loans according to Swedbank's Sustainable Funding Framework.

2) EU Taxonomy criteria for DNSH have not been applied, as opposed to the bank's Taxonomy reporting for household loans, which are collateralised by residential real estate.

3) Total volume of Sustainable Asset Registry, Sustainable financing other and Sustainability linked loans.

Impact indicators, Sustainable Asset Register	2023	2022	2021
Impact indicators – Green assets			
Avoided emissions (tCO ₂ e) ¹	334 886	385 398	595 029
Renewable energy – energy generation (GWh)	851	1 154	1 805
Energy efficiency – energy storage capacity (MWh)	3		
Green buildings – energy savings (GWh)	110	78	21
Clean transportation – low-carbon vehicles (number)	16 174	16 173	
Pollution prevention and control – waste treated (tonnes)	325 650	150 000	150 000
Sustainable management of living natural resources and land use – FSC/PEFC certified forestry (hectares) ²	24 254	28 141	26 741
Sustainable water and wastewater management – wastewater treated (m ³)	30 000	30 000	
Social assets			
Employment generation – small and mid-sized enterprises in socioeconomically weak areas (number)	7 771	7 857	
Socioeconomic advancement and empowerment			
– female-owned small and midsized enterprises (number)	5 641	5 537	
– residents in socioeconomically weak areas (number) ³	409	392	
Affordable housing – residents in rental housing (number)	231		

1) Calculations are based on the categories green buildings, renewable energy and clean transport.

2) Restatement of historical figures as a result of changed calculation method based on financed share.

3) Population in a multi-family house located in a socioeconomically weak area.

ESG bonds ¹ , Swedbank arranger	2023	2022	2021
Transactions that Swedbank arranged during the year (number)	73	70	99
Total volume that Swedbank arranged during the year (SEK bn)	31.7	33.6	49.9
Share in relation to total volume that Swedbank arranged during the year (%)	32	21.4	23.7
Total volume that Swedbank arranged from the start (SEK bn)	206.4	174.7	141.1

1) ESG bonds (green, social, sustainability and sustainability linked bonds).

1.4 Financial health

Target

Our vision is a financially sound and sustainable society and we want to empower one million people to improve their financial health by 2030 in Sweden and the Baltic countries.

Business targets

- Number of assisted advisory meetings, Swedish Banking, 300 000 in 2025
- Number of private customers with long-term savings, Baltic Banking, 900 000 in 2030

Measures and activities

Through advice and education, customers have an opportunity to improve their financial situation and acquire the knowledge needed to feel secure in their everyday lives and believe in the future. The term used is financial health, and Swedbank added it as a target in 2023. With the UN's definition as a starting point, "feeling secure in your personal finances, having control, resilience and economic freedom", the aim is to give the bank's customers the right opportunities to achieve it.

New ways of working are being developed with tools to guide the bank's customers via branches and customer centres in parallel with the digital channels, enabling more of them to access the bank's advice. By continuing to provide financial literacy education in schools, social media, editorial media and through various societal initiatives, the level of knowledge is raised about payments, savings, loans, insurance and pensions, which in turn empowers customers to make long-term decisions and build financial security in a changing world. Here Swedbank also has an opportunity to raise the level of knowledge and awareness of the economy in general, as well as for the individual. Better-informed decisions and a stronger financial situation for the customer also make society more financially stable.

Financial literacy education

Swedbank's societal engagement is deeply rooted in its history and is just as important to work with today as it was in the past. The emphasis is on children and young people, and through various initiatives we provide a foundation to build on with regard to personal finance and entrepreneurship. In the case of children and young people, the bank hopes to spark interest in, and share knowledge about, personal finances and how various life choices can affect their future. This is primarily achieved through lectures in schools and local clubs in all four home markets: Sweden, Estonia, Latvia and Lithuania.

In Sweden, the Young Economy initiative, a collaboration with the Savings Banks and Savings Bank Foundations, 96 700 children and young people were educated in 2023. The education is provided both in person and virtually and reaches thousands of children and young people, regardless of background and prior knowledge. The Swedish magazine Lyckoslanten is also a collaborative effort with the Savings Banks to teach students in grades 4–6 about money and savings.

Mokonomika, Lithuania's largest online learning programme with more than 280 000 participants, was arranged in 2023 for the third year. Schools have access to 18 lessons, which in 2023 focused on topics ranging from innovation, artificial intelligence and robots to sustainability and financial literacy. Mokonomika is part of the World's Largest Lesson, which is arranged by UNICEF and UNESCO to create innovative tools to teach the UN sustainable development goals to children. In partnership with National Television (LRT), a special Mokonomika programme was broadcast, after which the number of visits to various social media reached approximately one million.

Swedbank arranges other educational initiatives in the form of lectures and instructional materials, e.g. Ready for Life in Latvia and Financial Laboratory in Latvia and Lithuania. Swedbank's employees in Estonia also have the opportunity during working hours to guest-lecture, online or in person, in schools via the digital platform Building Your Future. Similar initiatives during the year included Money Day in Latvia, which taught financial literacy to children in schools, and Swedbank Savings Diary's financial literacy summer festival in Tartu, Estland.

In Sweden, the Digital Economy initiative contributes to digital inclusion. This year, customer events were arranged in combination with the Swedish banking industry's campaign, "Scamaware!", to attract extra attention to how people can protect themselves against fraud.

Metrics

Result business targets, thousand	2023	2022	2021
Number of assisted advisory meetings, Swedish Banking ¹	265	240	
Number of private customers with long-term savings, Baltic Banking ²	480	440	

- 1) Physical or digital meetings with an advisor.
- 2) Customers with voluntary savings products which are linked to financial markets, e.g. pensions (P3P funds), stocks and funds.

Educational opportunities, financial literacy¹

Societal investment, SEKm	2023	2022	2021
Societal investment, total ¹	119	111	117
– of which Sweden	90	88	83
– of which Estonia	15	12	14
– of which Latvia	7	6	13
– of which Lithuania	7	5	7

- 1) Of which SEK 50m in Sweden consists of charitable donations by Swedbank Robur Humanfond.

S2

Environmental information

2.1 Reporting according to the EU Taxonomy regulation

A first step toward expanded Taxonomy reporting

Swedbank is subject to the EU Taxonomy regulation (the EU Taxonomy), a classification system that defines the criteria used to determine when economic activities can be considered environmentally sustainable. Since 2021, Swedbank has reported its share of assets related to Taxonomy-eligible economic activities. Starting with the year 2023, the reporting has been expanded to include information on Swedbank's customers and counterparties' assets, financial guarantees and assets under management related to environmentally sustainable economic activities, that is taxonomy-aligned economic activities. The Taxonomy reporting is based on Swedbank's consolidated situation as defined in Regulation (EU) nr 575/2013 of the European Parliament and the Council on prudential requirements for credit institutions. The consolidated situation differs from the IFRS-based consolidated financial statements on the consolidation of insurance companies, joint ventures and subsidiaries. Otherwise, the same principles are applied.

The EU Taxonomy is an important part of the EU's action plan on financing sustainable growth. It is a framework that makes it easier to identify environmentally sustainable investments. Taxonomy-aligned assets presumes that:

- underlying economic activities substantially contribute to at least one of the EU's six environmental objectives;
- do no significant harm to any other environmental objectives;
- fulfils the social minimum safeguards and
- the economic activities fulfils the technical screening criteria for a specific environmental objective.

The 2023 report is the first time Swedbank presents the main KPI – the share of green assets (GAR, Green Asset Ratio). It shows the share of Swedbank's assets that are taxonomy-aligned. Key definitions from the EU Taxonomy and the Standardised tables can be found on page 287.

A regulation under development

The reporting requirements in the EU Taxonomy are extensive and are constantly developing. On 21 December 2023, the EU published new guidance (FAQ) regarding the interpretation of the reporting requirements and introduced clarifications of reporting requirements and definitions. The guidance was published late in the year and Swedbank have therefore not fully implemented the new changes or included them in its 2023 report. In the Swedish Bankers' Association's working group interpretations of the new clarifications in the guidance are discussed, which will be addressed in the annual report for 2024. In addition, Swedbank has considered the report "Taxonomiinformation i årsredovisningar" from the Swedish Financial Supervisory Authority published on 25 January 2024.

The EU regulation is still in an early stage of implementation. Interpretations are still being made and determined best market practice is under development. As a result, Swedbank sees a continued investigating and implementing work.

KPIs

The main KPI for banks, GAR, aims to increase transparency and speed up the sustainable transition. As of 31 December 2023, GAR is 1.36 per cent with respect to turnover and 1.41 per cent with respect to capex. Swedbank's GAR is impacted mainly by the energy performance of Swedbank's mortgage portfolio and by the percentage of environmentally sustainable economic activities in companies that are covered by the Non-Financial Reporting Directive within Swedbank's corporate lending.

Green ratio for assets under management were 2.66 per cent with respect to turnover and 4.24 per cent with respect to capex as of 31 December 2023. They are affected by underlying holdings and the investment strategies of the funds and the discretionary portfolio management.

Economic activities in gas and nuclear power are reported in separate tables for the first time in this year's report. Swedbank's assets, financial guarantees and assets under management from economic activities in gas and nuclear power operations are limited and include minor amounts.

Implementation in the operation

The above mentioned KPIs have been introduced to Swedbank's business areas and will be followed up regularly going forward. By supporting our customers to improve the sustainability of their businesses and their homes as well as making more sustainable investments, the ambition is to improve these KPIs.

One of Swedbank's strategic targets is to increase the growth of the bank's Sustainable Asset Register, where Taxonomy-aligned mortgages is an important part. Increasing the share of environmentally sustainable assets is an important part of Swedbank's climate work. Swedbank has decided on science-based emissions reduction targets, in line with the Paris Agreement, for financed emissions by 2030 in several sectors, including commercial real estate and mortgages.

The EU Taxonomy is one of several tools used to identify customers' Paris-aligned activities that can help Swedbank reach its climate targets. The development of Taxonomy-aligned assets and assets under management is important to ensure that Swedbank's targets are being met.

Implementation of new sustainability-related information

During the year, Swedbank carried out several activities to further develop processes for reporting in accordance with the EU Taxonomy.

Swedbank has collected supplementary sustainability-related customer information for companies (that are subject to the Non-Financial Reporting Directive), to identify the extent to which Swedbank's assets are aligned with the EU Taxonomy criteria'. Furthermore, Swedbank collected data on the energy efficiency of residential properties in the form of energy performance certificates.

Currently, Swedbank do not have data for all the requested data points. For example, there have been difficulties in demonstrating the use of proceeds related to corporate loans and the financial companies to which Swedbank has exposures have not yet reported their Taxonomy-alignment. Furthermore, Swedbank has for now chosen not to contact specific counterparties to request data.

Swedish banks usually have limited direct lending to municipal companies. Swedbank's business model is not to any great extent based on financing of public housing given that only a small proportion of Swedbank's lending is to municipal companies, which is why these assets have not been reported.

As the regulations are gradually implemented, for example as financial companies also begin to report their alignment, the availability and quality of data is expected to improve over time.

Swedbank assesses that the following parameters affect Swedbank's share of Taxonomy-aligned assets, financial guarantees and assets under management:

Energy Performance Certificates

- 54 per cent of Swedbank's mortgage collateral does not have a valid energy performance certificate, which limits the ability to report Taxonomy-alignment.
- For the collateral in Sweden that has a valid energy performance certificate, the requirements for reaching a Taxonomy-aligned level are higher than in many other EU countries.

Taxonomy-eligibility

- Corporate lending accounts for 27 per cent of Swedbank's assets whereof 2 per cent are held by companies that report according to the EU Taxonomy.
- Assets under management in global portfolios as well as funds with an investment focus on small and medium enterprises and on companies outside Europe that do not report according to the EU Taxonomy, which limits Taxonomy-alignment.

Data availability and quality

- The absence of a central external database and lack of quality in external data makes it difficult to collect quality-assured data.
- Financial companies have only reported their share of Taxonomy-eligibility, and report their Taxonomy-alignment for financial year 2023, which means that Swedbank's potentially Taxonomy-aligned assets in financial companies will be reported for the first time for financial year 2024.
- There have been difficulties in collecting data regarding eligibility divided per climate objective for companies. Next year, eligibility will be reported per climate objective for companies.
- Reporting of flow with respect to assets under management has not been possible to report due to lack of available data.

Lack of best practice and systems

- The EU Taxonomy is a new regulation and there is a lack of guidance and best practice in many areas. Accordingly Swedbank is in the start-up phase of updating customer processes and developing new products.
- Swedbank's current systems are yet to be able to demonstrate and follow up on the use of proceeds of corporate loans, which adds difficulties.

Introduction of new standardised tables

Swedbank has previously reported the share of assets that are Taxonomy-eligible. As of financial year 2023, Swedbank for the first time report the share of assets that are aligned with the technical screening criteria within the EU Taxonomy. As a financial company, Swedbank bases its reporting on corporate customers and other counterparties as well as on energy data for properties used as collateral for mortgages.

For 2023 Swedbank reports how assets contribute to the EU's two climate objectives 1) Climate Change Mitigation and 2) Climate Change Adaptation. In case where household exposures are relevant to activities relating to several environmental objectives, Swedbank has chosen to allocate to the activities that are most material to Swedbank, all of these, are included in the climate objective Climate Change Mitigation.

Given that Swedbank has nothing to report for the other four environmental objectives, Swedbank has chosen to include only the parts of the templates that relate to the climate-related objectives for this year's report. The annual reports for companies that are subject to the Non-Financial Reporting Directive will, as of financial year 2023, include reporting for all six environmental objectives. Swedbank's Taxonomy reporting will thus include reporting for all six environmental objectives as of financial year 2024.

See the following background information, which support the information presented in the various tables below:

0. Summary of KPIs

The KPIs are presented in a summary as introduction to the tables that follows. Swedbank's KPIs are based on the companies' turnover KPI and capex KPI.

Swedbank has chosen to report the KPIs for the flow for the four columns:

- % coverage (over total assets);
- % of assets covered by the KPI over total assets;
- % of assets excluded from the numerator of the GAR;
- % of assets excluded from the denominator of the GAR.

This is despite that the quality of the information for the assets in the denominator is incomplete which means that the KPIs are inaccurate.

1. Assets for calculation of Green Asset Ratio (turnover and capex)

These tables provide an overview of the assets and off-balance sheet exposures that affect the GAR. The focus is on financial and non-financial companies as well as household assets and asset management as follows:

Customer's and counterpart's reporting

- Financial companies are highly dependent on their customers and counterparties reporting in accordance with the EU Taxonomy, so that they in turn will be able to fulfil their reporting obligation the subsequent year. Information on the reporting of non-financial companies was obtained through an external supplier.

Mortgages

- Households acquisition and ownership of immovable property is a Taxonomy-eligible economic activity. For Swedbank, mortgages (loans to households collateralised by residential immovable property), which represent the majority of the Swedbank's Taxonomy-eligible assets, are regarded as critical. Housing accounts for a large share of the EU's energy consumption and GHG emissions, which can be reduced by improving the energy efficiency of properties. Swedbank contribute to this objective by financing energy efficiencies, which makes high-quality energy data crucial.
- For a mortgage loan to be Taxonomy-aligned, the property's primary energy demand has to be in the top 15 per cent of the national housing stock or be energy class A. Regarding the energy requirement, Swedbank has used the thresholds developed on behalf of Fastighetsägarna for the Swedish mortgages. Corresponding information was used for mortgages and collateral in Estonia. In Latvia and Lithuania, only energy class A has been considered.
- To meet the do no significant harm requirements regarding the environmental objective Climate Change Adaptation, Swedbank carried out climate risk assessments for the properties used as collateral for the mortgages, according to the same method that is used in the Pillar 3 ESG risk report. Mortgages for which the property either falls into the top 15 per cent or is energy class A, and where the climate risk assessments indicates low risk, are reported as Taxonomyaligned. Data for the climate risk assessments are obtained through an external supplier and work is underway to develop these assessments in 2024.

0. Summary of KPIs

		Total environment-ally sustainable assets, based on the Turnover KPI of the counterparty, SEKm	KPI, based on the Turnover KPI of the counterparty	KPI, based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used	% coverage (over total assets), % of assets covered by the KPI over total assets	% of assets excluded from the numerator of the GAR	% of assets excluded from the denominator of the GAR
Main KPI	Green asset ratio (GAR) stock	25 470	1.36	1.41	74.42	25.83	25.58
Additional KPIs	Green asset ratio (GAR) flow	5 994	2.00	1.96	90.21	47.52	9.79
	Green ratio for financial guarantees	2	0.05	0.03			
	Green ratio for assets under management	19 515	2.66	4.24			

Vehicle loans

- Swedbank's vehicle loans are also Taxonomy-eligible. Swedbank has not been able to determine whether a percentage of the loans is Taxonomy-aligned, mainly because of difficulties meeting the do no significant harm requirements to other environmental objectives and due to a lack of data.

Assets under management

- Swedbank measures and continuously monitors the share of Taxonomy-aligned investments in its assets under management. In 2023, a number of funds in Swedbank's product range committed to a minimum percentage of Taxonomy-aligned investments. The EU Taxonomy will constitute one of several key tools for sustainability monitoring in asset management. Additionally, Swedbank see that investments in companies with Taxonomy-aligned activities will be a tool for Swedbank to meet our climate targets.

2. GAR sector information (turnover and capex)

A detailed breakdown of the row non-financial companies in table 1. The tables presents loans and advances based on loans to various companies, presented by their principal activity, broken down at the 4 NACE level, with information on the reported gross carrying amount and amounts that are environmentally sustainable within the various climate objectives.

3. GAR KPI stock (turnover and capex)

Detailed information on the different asset rows in relation to the percentages of all covered assets in the denominator.

4. GAR KPI flow (turnover and capex)

Detailed information on the various asset rows regarding the percentages in relation to the flow of all Taxonomy-eligible assets.

5. KPI off-balance sheet exposures (turnover and capex)

Detailed information on the various off-balance sheet exposures regarding the percentages in relation to all Taxonomy-eligible off-balance sheet assets.

Nuclear and fossil gas related activities (turnover and capex)

Five different tables with detailed information regarding the six identified economic activities within nuclear power and fossil gas-related activities included in the various tables regarding Share of green assets, Share of green assets under management and Share of green financial guarantees.

1. Assets for calculation of GAR

Turnover

SEKm	Total [gross] carrying amount	2023												
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Total				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling		
GAR – Covered assets in both numerator and denominator														
Loans and advances, debt securities and equity instruments not HTT eligible for GAR calculation	1 225 251	1 030 626	25 470	23 257	34	611		7		1 046 922	25 470	23 257	34	611
Financial undertakings	13 060		39			18				4 854	39			18
Credit institutions	2 912									955				
Loans and advances	145									40				
Debt securities, including UoP	1 442									317				
Equity instruments	1 326									598				
Other financial corporations	10 148		39			18				3 899	39			18
of which investment firms														
Loans and advances														
Debt securities, including UoP														
Equity instruments														
of which management companies	1									0				
Loans and advances	1									0				
Debt securities, including UoP														
Equity instruments														
of which insurance undertakings														
Loans and advances														
Debt securities, including UoP														
Equity instruments														
Non-financial undertakings	37 620		2 175		34	593		7		11 442	2 175		34	593
Loans and advances	37 620		2 175		34	593		7		11 442	2 175		34	593
Debt securities, including UoP														
Equity instruments														
Households	1 174 571	1 030 612	23 257	23 257						1 030 612	23 257	23 257		
of which loans collateralised by residential immovable property	1 029 187	1 029 187	23 257	23 257						1 029 187	23 257	23 257		
of which building renovation loans	624	312								312				
of which motor vehicle loans	10 967	1 113								1 113				
Local governments financing														
Housing financing														
Other local government financing														
Collateral obtained by taking possession: residential and commercial immovable properties	14	14								14				

1. Assets for calculation of GAR, cont.

Turnover

SEKm	Total [gross] carrying amount	2023													
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Total					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)		
		Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds		
Assets excluded from the numerator for GAR calculation (covered in the denominator)	651 450														
Financial and Non-financial undertakings	619 320														
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	559 713														
Loans and advances	547 569														
of which loans collateralised by commercial immovable property	183 318														
of which building renovation loans															
Debt securities	233														
Equity instruments	11 911														
Non-EU country counterparties not subject to NFRD disclosure obligations	59 607														
Loans and advances	51 304														
Debt securities	7 206														
Equity instruments	1 098														
Derivatives	1 606														
On demand interbank loans	2 685														
Cash and cash-related assets	3 915														
Other categories of assets (e.g. Goodwill, commodities etc.)	23 925														
Total GAR assets	1 876 715	25 470	23 257	34	611		7			1 046 922	25 470	23 257	34	611	
Assets not covered for GAR calculation	645 242														
Central governments and Supranational issuers	43 835														
Central banks exposure	409 072														
Trading book	192 335														
Total assets	2 521 956	1 030 626	25 470	23 257	34	611		7		1 046 922	25 470	23 257	34	611	
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations															
Financial guarantees	3 164		2							186	2		2		
Assets under management	733 854		19 515		1 062	12 255		203		132	205 469	19 515		1 062	12 255
Of which debt securities	214 422		2 291		40	956		76		10	75 700	2 291		40	956
Of which equity instruments	519 433		17 225		1 023	11 299		127		121	129 769	17 225		1 023	11 299

1. Assets for calculation of GAR**Capex**

SEKm	Total [gross] carrying amount	2023												
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Total				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Of which environmentally sustainable (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling		
GAR – Covered assets in both numerator and denominator														
Loans and advances, debt securities and equity instruments not HTT eligible for GAR calculation	1 225 251	1 030 626	26 505	23 257	1 142	1 147		32		1 048 935	26 505	23 257	1 142	1 147
Financial undertakings	13 060		287			283				5 607	287			283
Credit institutions	2 912									955				
Loans and advances	145									40				
Debt securities, including UoP	1 442									317				
Equity instruments	1 326									598				
Other financial corporations	10 148		287			283				4 652	287			283
of which investment firms														
Loans and advances														
Debt securities, including UoP														
Equity instruments														
of which management companies	1									1				
Loans and advances	1									1				
Debt securities, including UoP														
Equity instruments														
of which insurance undertakings														
Loans and advances														
Debt securities, including UoP														
Equity instruments														
Non-financial undertakings	37 620		2 960		1 142	864		32		13 702	2 960		1 142	864
Loans and advances	37 620		2 960		1 142	864		32		13 702	2 960		1 142	864
Debt securities, including UoP														
Equity instruments														
Households	1 174 571	1 030 612	23 257	23 257						1030 612	23 257	23 257		
of which loans collateralised by residential immovable property	1 029 187	1 029 187	23 257	23 257						1 029 187	23 257	23 257		
of which building renovation loans	624	312								312				
of which motor vehicle loans	10 967	1113								1 113				
Local governments financing		0												
Housing financing														
Other local government financing														
Collateral obtained by taking possession: residential and commercial immovable properties	14	14								14				

1. Assets for calculation of GAR, cont.
Capex

SEKm	Total [gross] carrying amount	2023													
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Total					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
		Of which Use of Proceeds	Of which transi- tional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transi- tional	Of which enabling			
Assets excluded from the numerator for GAR calculation (covered in the denominator)	651 450														
Financial and Non-financial undertakings	619 320														
SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	559 713														
Loans and advances	547 569														
of which loans collateralised by commercial immovable property	183 318														
of which building renovation loans															
Debt securities	233														
Equity instruments	11 911														
Non-EU country counterparties not subject to NFRD disclosure obligations	59 607														
Loans and advances	51 304														
Debt securities	7 206														
Equity instruments	1 098														
Derivatives	1 606														
On demand interbank loans	2 685														
Cash and cash-related assets	3 915														
Other categories of assets (e.g. Goodwill, commodities etc.)	23 925														
Total GAR assets	1 876 715	1 030 626	26 505	23 257	1 142	1 147		32		1 048 935	26 505	23 257	1 142	1 147	
Assets not covered for GAR calculation	645 242														
Central governments and Supranational issuers	43 835														
Central banks exposure	409 072														
Trading book	192 335														
Total assets	2 521 956	1 030 626	26 505	23 257	1 142	1 147		32		1 048 935	26 505	23 257	1 142	1 147	
Off-balance sheet exposures – Undertakings subject to NFRD disclosure obligations															
Financial guarantees	3 164		1			1				812	1			1	
Assets under management	733 854		31 107		1 932	18 790		341		273	219 898	31 107		1 932	18 790
Of which debt securities	214 422		3 670		90	1 458		59		20	78 332	3 670		90	1 458
Of which equity instruments	519 433		27 437		1 842	17 332		281		252	141 566	27 437		1 842	17 332

2. GAR sector information**Turnover**

Breakdown by sector – NACE SEKm	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environ- mentally sustainable (CCM)	[Gross] carrying amount	Of which environ- mentally sustainable (CCA)	[Gross] carrying amount	Of which environ- mentally sustainable
01.47 – Raising of poultry	1				1	
02.10 – Silviculture and other forestry activities	73				73	
07.29 – Mining of other non-ferrous metal ores	26				26	
08.12 – Operation of gravel and sand pits; mining of clays and kaolin	28					
10.12 – Processing and preserving of poultry meat	8				8	
10.51 – Operation of dairies and cheese making	45				45	
10.86 – Manufacture of homogenised food preparations and dietetic food	9				9	
10.89 – Manufacture of other food products n.e.c.	10				10	
13.94 – Manufacture of cordage, rope, twine and netting	4	0			4	0
16.10 – Sawmilling and planing of wood	9	0			9	0
17.12 – Manufacture of paper and paperboard	25	1			25	1
17.29 – Manufacture of other articles of paper and paperboard	141				141	
20.13 – Manufacture of other inorganic basic chemicals	5	0			5	0
21.20 – Manufacture of pharmaceutical preparations	14				14	
22.19 – Manufacture of other rubber products	126				126	
22.21 – Manufacture of plastic plates, sheets, tubes and profiles	340				340	
22.29 – Manufacture of other plastic products	350				350	
24.10 – Manufacture of basic iron and steel and of ferro-alloys	37	34			37	34
24.20 – Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	1	0			1	0
24.33 – Cold forming or folding	1	1			1	1
24.42 – Aluminium production	12				12	
24.43 – Lead, zinc and tin production	2				2	
25.11 – Manufacture of metal structures and parts of structures	1 095	0			1 095	0
25.40 – Manufacture of weapons and ammunition	165	1			165	1
25.62 – Machining	0	0			0	0
25.99 – Manufacture of other fabricated metal products n.e.c.	182				182	
26.12 – Manufacture of loaded electronic boards	5				5	
26.20 – Manufacture of computers and peripheral equipment	1	0			1	0
26.30 – Manufacture of communication equipment	151				151	
26.51 – Manufacture of instruments and appliances for measuring, testing and navigation	1					
27.12 – Manufacture of electricity distribution and control apparatus	0	0			0	0
27.40 – Manufacture of electric lighting equipment	12	1			12	1
28.11 – Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	5	0			5	0
28.22 – Manufacture of lifting and handling equipment	897	0			897	0
28.24 – Manufacture of power-driven hand tools	55	13			55	13
28.25 – Manufacture of non-domestic cooling and ventilation equipment	276	102			276	102
28.92 – Manufacture of machinery for mining, quarrying and construction	24	0			24	0
28.99 – Manufacture of other special-purpose machinery n.e.c.	286	103			286	103

2. GAR sector information, cont.

Turnover

Breakdown by sector – NACE SEKm	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environ- mentally sustainable (CCM)	[Gross] carrying amount	Of which environ- mentally sustainable (CCA)	[Gross] carrying amount	Of which environ- mentally sustainable
29.10 – Manufacture of motor vehicles	105	0			105	0
29.20 – Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	27	0			27	0
30.20 – Manufacture of railway locomotives and rolling stock	652				652	
30.40 – Manufacture of military fighting vehicles	445	2			445	2
31.02 – Manufacture of kitchen furniture	14				14	
32.30 – Manufacture of sports goods	1 041				1 041	
32.50 – Manufacture of medical and dental instruments and supplies	1 723				1 723	
32.99 – Other manufacturing n.e.c.	0	0			0	0
33.12 – Repair of machinery	8				8	
33.17 – Repair and maintenance of other transport equipment	5	4			5	4
33.20 – Installation of industrial machinery and equipment	6				6	
35.11 – Production of electricity	3 986	9		7	3 986	9
35.12 – Transmission of electricity	0					
35.30 – Steam and air conditioning supply	40	0			40	0
37.00 – Sewerage	33					
38.11 – Collection of non-hazardous waste	19					
38.12 – Collection of hazardous waste	3				3	
41.10 – Development of building projects	760	64			760	64
41.20 – Construction of residential and non-residential buildings	1 476	252			1 476	252
42.11 – Construction of roads and motorways	60	0			60	0
42.13 – Construction of bridges and tunnels	384				384	
42.21 – Construction of utility projects for fluids	6				6	
42.99 – Construction of other civil engineering projects n.e.c.	8	1			8	1
43.12 – Site preparation	338	0			338	0
43.21 – Electrical installation	17	2			17	2
43.22 – Plumbing, heat and air-conditioning installation	167	15			167	15
43.29 – Other construction installation	1	1			1	1
43.32 – Joinery installation	29				29	
43.99 – Other specialised construction activities n.e.c.	204				204	
45.20 – Maintenance and repair of motor vehicles	1	0			1	0
45.31 – Wholesale trade of motor vehicle parts and accessories	1	0			1	0
46.18 – Agents specialised in the sale of other particular products	3				3	
46.39 – Non-specialised wholesale of food, beverages and tobacco	190				190	
46.42 – Wholesale of clothing and footwear	12				12	
46.43 – Wholesale of electrical household appliances	1				1	
46.46 – Wholesale of pharmaceutical goods	4				4	
46.49 – Wholesale of other household goods	0	0			0	0
46.51 – Wholesale of computers, computer peripheral equipment and software	1 205				1 205	
46.62 – Wholesale of machine tools	0				0	
46.69 – Wholesale of other machinery and equipment	11	2			11	2
46.72 – Wholesale of metals and metal ores	0				0	

2. GAR sector information, cont.**Turnover**

Breakdown by sector – NACE SEKm	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environmentally sustainable (CCM)	[Gross] carrying amount	Of which environmentally sustainable (CCA)	[Gross] carrying amount	Of which environmentally sustainable
46.73 – Wholesale of wood, construction materials and sanitary equipment	0				0	
46.74 – Wholesale of hardware, plumbing and heating equipment and supplies	2	0			2	0
46.90 – Non-specialised wholesale trade	0	0			0	0
47.11 – Retail sale in non-specialised stores with food, beverages or tobacco predominating	92				92	
47.19 – Other retail sale in non-specialised stores	3				3	
47.52 – Retail sale of hardware, paints and glass in specialised stores	1				1	
47.59 – Retail sale of furniture, lighting equipment and other household articles in specialised stores	0				0	
47.71 – Retail sale of clothing in specialised stores	3				3	
47.78 – Other retail sale of new goods in specialised stores	1 703				1 703	
49.50 – Transport via pipeline	198				198	
51.10 – Passenger air transport	1				1	
52.10 – Warehousing and storage	2				2	
52.23 – Service activities incidental to air transportation	3	0			3	0
52.29 – Other transportation support activities	1				1	
58.11 – Book publishing	412				412	
58.21 – Publishing of computer games	4 015				4 015	
58.29 – Other software publishing	1				1	
61.20 – Wireless telecommunications activities	216	0			216	0
61.90 – Other telecommunications activities	3				3	
62.01 – Computer programming activities	45				45	
62.02 – Computer consultancy activities	431				431	
62.09 – Other information technology and computer service activities	373				373	
63.11 – Data processing, hosting and related activities	1				1	
66.19 – Other activities auxiliary to financial services, except insurance and pension funding	1				1	
68.20 – Renting and operating of own or leased real estate	10 298	1 565			10 298	1 565
68.32 – Management of real estate on a fee or contract basis	2	1			2	1
69.20 – Accounting, bookkeeping and auditing activities; tax consultancy	10	0			10	0
70.10 – Activities of head offices	109	0			109	0
70.22 – Business and other management consultancy activities	151	0			151	0
71.12 – Engineering activities and related technical consultancy	289	0			289	0
71.20 – Technical testing and analysis	13	0			13	0
72.19 – Other research and experimental development on natural sciences and engineering	1				1	
77.11 – Renting and leasing of cars and light motor vehicles	186				186	
78.20 – Temporary employment agency activities	3				3	
79.12 – Tour operator activities	4				4	
80.10 – Private security activities	1				1	
80.20 – Security systems service activities	8	1			8	1
85.10 – Pre-primary education	1				1	
85.20 – Primary education	3				3	

2. GAR sector information, cont.

Turnover

Breakdown by sector – NACE SEKm	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environ-mentally sustainable (CCM)	[Gross] carrying amount	Of which environ-mentally sustainable (CCA)	[Gross] carrying amount	Of which environ-mentally sustainable
86.21 – General medical practice activities	0				0	
86.22 – Specialist medical practice activities	0				0	
86.90 – Other human health activities	1				1	
87.20 – Residential care activities for mental retardation, mental health and substance abuse	63				63	
87.30 – Residential care activities for the elderly and disabled	725				725	
87.90 – Other residential care activities	26				26	
88.10 – Social work activities without accommodation for the elderly and disabled	40				40	
88.99 – Other social work activities without accommodation n.e.c.	2				2	
92.00 – Gambling and betting activities	770				770	
93.29 – Other amusement and recreation activities	0				0	
TOTAL	37 620	2 175		7	37 620	2 175

2. GAR sector information**Capex**

Breakdown by sector – NACE SEKm	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environ-mentally sustainable (CCM)	[Gross] carrying amount	Of which environ-mentally sustainable (CCA)	[Gross] carrying amount	Of which environ-mentally sustainable
01.47 – Raising of poultry	1				1	
02.10 – Silviculture and other forestry activities	73				73	
07.29 – Mining of other non-ferrous metal ores	26				26	
08.12 – Operation of gravel and sand pits; mining of clays and kaolin	28				28	
10.12 – Processing and preserving of poultry meat	8				8	
10.51 – Operation of dairies and cheese making	45				45	
10.86 – Manufacture of homogenised food preparations and dietetic food	9				9	
10.89 – Manufacture of other food products n.e.c.	10				10	
13.94 – Manufacture of cordage, rope, twine and netting	4	0			4	0
16.10 – Sawmilling and planing of wood	9	0			9	0
17.12 – Manufacture of paper and paperboard	25	2			25	2
17.29 – Manufacture of other articles of paper and paperboard	141	55			141	55
20.13 – Manufacture of other inorganic basic chemicals	5				5	
21.20 – Manufacture of pharmaceutical preparations	14	0			14	0
22.19 – Manufacture of other rubber products	126				126	
22.21 – Manufacture of plastic plates, sheets, tubes and profiles	340	7			340	7
22.29 – Manufacture of other plastic products	350				350	
24.10 – Manufacture of basic iron and steel and of ferro-alloys	37	16			37	16
24.20 – Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	1	0			1	0
24.33 – Cold forming or folding	1	1			1	1
24.42 – Aluminium production	12				12	
24.43 – Lead, zinc and tin production	2				2	
25.11 – Manufacture of metal structures and parts of structures	1 095	0			1 095	0
25.40 – Manufacture of weapons and ammunition	165	0			165	0
25.62 – Machining	0	0			0	0
25.99 – Manufacture of other fabricated metal products n.e.c.	182				182	
26.12 – Manufacture of loaded electronic boards	5				5	
26.20 – Manufacture of computers and peripheral equipment	1	0			1	0
26.30 – Manufacture of communication equipment	151				151	
26.51 – Manufacture of instruments and appliances for measuring, testing and navigation	1				1	
27.12 – Manufacture of electricity distribution and control apparatus	0	0			0	0
27.40 – Manufacture of electric lighting equipment	12	1			12	1
28.11 – Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	5	0			5	0
28.22 – Manufacture of lifting and handling equipment	897	1			897	1
28.24 – Manufacture of power-driven hand tools	55	10			55	10
28.25 – Manufacture of non-domestic cooling and ventilation equipment	276	97			276	97
28.92 – Manufacture of machinery for mining, quarrying and construction	24	3			24	3

2. GAR sector information, cont.

Capex

SEKm	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environ-mentally sustainable (CCM)	[Gross] carrying amount	Of which environ-mentally sustainable (CCA)	[Gross] carrying amount	Of which environ-mentally sustainable
28.99 – Manufacture of other special-purpose machinery n.e.c.	286	98			286	98
29.10 – Manufacture of motor vehicles	105	4			105	4
29.20 – Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers and semi-trailers	27	4			27	4
30.20 – Manufacture of railway locomotives and rolling stock	652				652	
30.40 – Manufacture of military fighting vehicles	445	0			445	0
31.02 – Manufacture of kitchen furniture	14				14	
32.30 – Manufacture of sports goods	1 041	208			1 041	208
32.50 – Manufacture of medical and dental instruments and supplies	1 723				1 723	
32.99 – Other manufacturing n.e.c.	0	0			0	0
33.12 – Repair of machinery	8				8	
33.17 – Repair and maintenance of other transport equipment	5	4			5	4
33.20 – Installation of industrial machinery and equipment	6				6	
35.11 – Production of electricity	3 986	35		31	3 986	35
35.12 – Transmission of electricity	0				0	
35.30 – Steam and air conditioning supply	40	0			40	0
37.00 – Sewerage	33				33	
38.11 – Collection of non-hazardous waste	19				19	
38.12 – Collection of hazardous waste	3				3	
41.10 – Development of building projects	760	107			760	107
41.20 – Construction of residential and non-residential buildings	1 476	512			1 476	512
42.11 – Construction of roads and motorways	60	0			60	0
42.13 – Construction of bridges and tunnels	384				384	
42.21 – Construction of utility projects for fluids	6				6	
42.99 – Construction of other civil engineering projects n.e.c.	8	1			8	1
43.12 – Site preparation	338	0			338	0
43.21 – Electrical installation	17				17	
43.22 – Plumbing, heat and air-conditioning installation	167				167	
43.29 – Other construction installation	1	1			1	1
43.32 – Joinery installation	29				29	
43.99 – Other specialised construction activities n.e.c.	204				204	
45.20 – Maintenance and repair of motor vehicles	1	0			1	0
45.31 – Wholesale trade of motor vehicle parts and accessories	1	0			1	0
46.18 – Agents specialised in the sale of other particular products	3				3	
46.39 – Non-specialised wholesale of food, beverages and tobacco	190				190	
46.42 – Wholesale of clothing and footwear	12				12	
46.43 – Wholesale of electrical household appliances	1				1	
46.46 – Wholesale of pharmaceutical goods	4				4	
46.49 – Wholesale of other household goods	0	0			0	0
46.51 – Wholesale of computers, computer peripheral equipment and software	1 205				1 205	
46.62 – Wholesale of machine tools	0				0	
46.69 – Wholesale of other machinery and equipment	11	3			11	3
46.72 – Wholesale of metals and metal ores	0				0	

2. GAR sector information, cont.**Capex**

Breakdown by sector – NACE	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environmentally sustainable (CCM)	[Gross] carrying amount	Of which environmentally sustainable (CCA)	[Gross] carrying amount	Of which environmentally sustainable
SEKm						
46.73 – Wholesale of wood, construction materials and sanitary equipment	0				0	
46.74 – Wholesale of hardware, plumbing and heating equipment and supplies	2	0			2	0
46.90 – Non-specialised wholesale trade	0	0			0	0
47.11 – Retail sale in non-specialised stores with food, beverages or tobacco predominating	92	0			92	0
47.19 – Other retail sale in non-specialised stores	3				3	
47.52 – Retail sale of hardware, paints and glass in specialised stores	1	0			1	0
47.59 – Retail sale of furniture, lighting equipment and other household articles in specialised stores	0				0	
47.71 – Retail sale of clothing in specialised stores	3				3	
47.78 – Other retail sale of new goods in specialised stores	1 703				1 703	
49.50 – Transport via pipeline	198				198	
51.10 – Passenger air transport	1				1	
52.10 – Warehousing and storage	2				2	
52.23 – Service activities incidental to air transportation	3	0			3	0
52.29 – Other transportation support activities	1				1	
58.11 – Book publishing	412				412	
58.21 – Publishing of computer games	4 015				4 015	
58.29 – Other software publishing	1				1	
61.20 – Wireless telecommunications activities	216	0			216	0
61.90 – Other telecommunications activities	3				3	
62.01 – Computer programming activities	45	0			45	0
62.02 – Computer consultancy activities	431	1			431	1
62.09 – Other information technology and computer service activities	373				373	
63.11 – Data processing, hosting and related activities	1	0			1	0
66.19 – Other activities auxiliary to financial services, except insurance and pension funding	1				1	
68.20 – Renting and operating of own or leased real estate	10 298	1 782			10 298	1 782
68.32 – Management of real estate on a fee or contract basis	2	1			2	1
69.20 – Accounting, bookkeeping and auditing activities; tax consultancy	10	0			10	0
70.10 – Activities of head offices	109	1			109	1
70.22 – Business and other management consultancy activities	151	1		1	151	1
71.12 – Engineering activities and related technical consultancy	289	0			289	0
71.20 – Technical testing and analysis	13	0			13	0
72.19 – Other research and experimental development on natural sciences and engineering	1				1	
77.11 – Renting and leasing of cars and light motor vehicles	186				186	
78.20 – Temporary employment agency activities	3				3	
79.12 – Tour operator activities	4				4	
80.10 – Private security activities	1				1	
80.20 – Security systems service activities	8				8	
85.10 – Pre-primary education	1				1	
85.20 – Primary education	3				3	

2. GAR sector information, cont.

Capex

Breakdown by sector – NACE SEKm	Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)		Total	
	Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)		Non-Financial corporates (Subject to NFRD)	
	[Gross] carrying amount	Of which environ-mentally sustainable (CCM)	[Gross] carrying amount	Of which environ-mentally sustainable (CCA)	[Gross] carrying amount	Of which environ-mentally sustainable
86.21 – General medical practice activities	0				0	
86.22 – Specialist medical practice activities	0				0	
86.90 – Other human health activities	1				1	
87.20 – Residential care activities for mental retardation, mental health and substance abuse	63				63	
87.30 – Residential care activities for the elderly and disabled	725				725	
87.90 – Other residential care activities	26				26	
88.10 – Social work activities without accommodation for the elderly and disabled	40				40	
88.99 – Other social work activities without accommodation n.e.c.	2				2	
92.00 – Gambling and betting activities	770				770	
93.29 – Other amusement and recreation activities	0				0	
TOTAL	37 620	2 960		32	37 620	2 960

3. GAR KPI stock

Turnover

% (compared to total covered assets in the denominator)	2023											
	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Total					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
	Of which Use of Proceeds	Of which transi- tional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which Use of Proceeds	Of which transi- tional	Of which enabling	Of which Use of Proceeds	Of which transi- tional	Of which enabling
GAR – Covered assets in both numerator and denominator												
Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	54.86	1.36	1.24	0.00	0.03					55.73	1.36	1.24
Financial undertakings	0.00			0.00						0.26	0.00	
Credit institutions	0.00									0.05	0.00	
Loans and advances	0.00									0.00	0.00	
Debt securities, including UoP	0.00									0.02	0.00	
Equity instruments	0.00									0.03	0.00	
Other financial corporations										0.21		
of which investment firms												
Loans and advances												
Debt securities, including UoP												
Equity instruments												
of which management companies										0.00		
Loans and advances										0.00		
Debt securities, including UoP												
Equity instruments												
Non-financial undertakings	0.12			0.00	0.03					0.61	0.12	
Loans and advances	0.12			0.00	0.03					0.61	0.12	
Debt securities, including UoP										0.00	0.03	
Equity instruments												
Households	54.86	1.24	1.24							54.86	1.24	
of which loans collateralised by residential immovable property	54.84	1.24	1.24							54.84	1.24	
of which building renovation loans	0.02									0.02		
of which motor vehicle loans												
Local governments financing												
Housing financing												
Other local government financing												
Collateral obtained by taking possession: residential and commercial immovable properties												
Total GAR assets	54.86	1.36	1.24	0.00	0.03					55.73	1.36	1.24
										0.00	0.03	74.42

3. GAR KPI stock
Capex

% (compared to total covered assets in the denominator)	2023																
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Total					Proportion of total assets covered	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)						
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)						
	Of which	Use of	Of which	transi-	tional	Of which	Use of	Of which	enabling	Of which	Use of	Of which	transi-	tional	Of which		
GAR – Covered assets in both numerator and denominator																	
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	54.86	1.41	1.24	0.06	0.06			0.00			55.87	1.41	1.24	0.06	0.06	48.58	
Financial undertakings		0.02			0.02						0.30	0.02				0.52	
Credit institutions											0.05					0.12	
Loans and advances											0.00					0.01	
Debt securities, including UoP											0.02					0.06	
Equity instruments											0.03					0.05	
Other financial corporations	0.02			0.02							0.25	0.02				0.40	
of which investment firms																	
Loans and advances																	
Debt securities, including UoP																	
Equity instruments																	
of which management companies											0.00					0.00	
Loans and advances											0.00					0.00	
Debt securities, including UoP																	
Equity instruments																	
of which insurance under-takings																	
Loans and advances																	
Debt securities, including UoP																	
Equity instruments																	
Non-financial undertakings	0.16		0.06	0.05			0.00			0.73	0.16		0.06	0.05		1.49	
Loans and advances	0.16		0.06	0.05			0.00			0.73	0.16		0.06	0.05		1.49	
Debt securities, including UoP																	
Equity instruments																	
Households	54.86	1.24	1.24							54.86	1.24					46.57	
of which loans collateralised by residential immovable property	54.84	1.24	1.24							54.84	1.24					40.81	
of which building renovation loans	0.02									0.02						0.03	
of which motor vehicle loans																0.43	
Local governments financing																	
Housing financing																	
Other local government financing																	
Collateral obtained by taking possession: residential and commercial immovable properties										0.00							
Total GAR assets	54.86	1.41	1.24	0.06	0.06		0.00			55.89	1.41	1.24	0.06	0.06		74.42	

4. GAR KPI flow

Turnover

% (compared to flow of total eligible assets)	2023											
	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Total					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total new assets covered	
	Of which Use of Proceeds	Of which transi- tional	Of which enabling	Of which Use of Proceeds	Of which transi- tional	Of which enabling	Of which Use of Proceeds	Of which transi- tional	Of which enabling	Of which Use of Proceeds	Of which transi- tional	Of which enabling
GAR – Covered assets in both numerator and denominator												
Loans and advances, debt securities and equity instruments not HTT eligible for GAR calculation	34.55	2.00	1.42	0.01	0.13		0.00			37.13	2.00	1.42
Financial undertakings		0.01		0.00	0.00					0.03	0.01	0.00
Credit institutions		0.00								0.02	0.00	
Loans and advances										0.01		
Debt securities, including UoP												0.04
Equity instruments												0.08
Other financial corporations		0.01								0.01	0.01	
of which investment firms												0.19
Loans and advances												
Debt securities, including UoP												
Equity instruments												
of which management companies										0.00		
Loans and advances										0.00		
Debt securities, including UoP												0.00
Equity instruments												
of which insurance undertakings												
Loans and advances												
Debt securities, including UoP												
Equity instruments												
Non-financial undertakings		0.57		0.01	0.13		0.00			2.55	0.57	
Loans and advances		0.57		0.01	0.13		0.00			2.55	0.57	
Debt securities, including UoP												5.00
Equity instruments												
Households	34.55	1.42	1.42							34.55	1.42	1.42
of which loans collateralised by residential immovable property	34.31	1.42	1.42							34.31	1.42	1.42
of which building renovation loans	0.04									0.04		
of which motor vehicle loans	0.20									0.20		
Local governments financing												
Housing financing												
Other local government financing												
Collateral obtained by taking possession: residential and commercial immovable properties												
Total GAR assets	34.55	2.00	1.42	0.01	0.13		0.00			37.13	2.00	1.42
										0.01	0.13	90.21

4. GAR KPI flow
Capex

% (compared to flow of total eligible assets)	2023														
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Total			Proportion of total new assets covered	
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds		
GAR – Covered assets in both numerator and denominator															
Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	34.55	1.96	1.42	0.23	0.16		0.01			37.33	1.96	1.42	0.23	0.16	42.69
Financial undertakings	0.00									0.03	0.00				0.31
Credit institutions										0.02					0.11
Loans and advances										0.01					0.04
Debt securities, including UoP															
Equity instruments															0.08
Other financial corporations	0.00									0.01	0.00				0.19
of which investment firms															
Loans and advances															
Debt securities, including UoP															
Equity instruments															
of which management companies										0.00					0.00
Loans and advances										0.00					0.00
Debt securities, including UoP															
Equity instruments															
of which insurance under-takings															
Loans and advances															
Debt securities, including UoP															
Equity instruments															
Non-financial undertakings	0.54			0.14	0.12		0.01			2.75	0.54		0.14	0.12	5.00
Loans and advances	0.54			0.14	0.12		0.01			2.75	0.54		0.14	0.12	5.00
Debt securities, including UoP															
Equity instruments															
Households	34.55	1.42	1.42							34.55	1.42	1.42			37.38
of which loans collateralised by residential immovable property	34.31	1.42	1.42							34.31	1.42	1.42			30.95
of which building renovation loans	0.04									0.04					0.07
of which motor vehicle loans	0.20									0.20					1.21
Local governments financing															
Housing financing															
Other local government financing															
Collateral obtained by taking possession: residential and commercial immovable properties															
Total GAR assets	34.55	1.96	1.42	0.23	0.16		0.01			37.33	1.96	1.42	0.23	0.16	90.21

5. KPI off-balance sheet exposures

Turnover

% (compared to total eligible off-balance sheet assets)	2023											
	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Total					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling
Financial guarantees (FinGuar KPI)	0.05	0.00	0.00	0.00	0.00	5.87	0.05	0.00	0.05	0.00	0.00	0.05
Assets under management (AuM KPI)	2.66	0.14	1.67	0.03	0.02	28.00	2.66	0.14	1.67	0.03	0.02	28.00

Capex

	2023								
	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Total		
% (compared to total eligible off-balance sheet assets)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling
Financial guarantees (FinGuar KPI)	0.03	0.00	0.03	0.00	0.00	25.68	0.03	0.00	0.03
Assets under management (Aum KPI)	4.24	0.26	2.56	0.05	0.04	29.96	4.24	0.26	2.56

Turnover, flow

Capex, flow

	2023									
	Climate Change Mitigation (CCM)			Climate Change Adaptation (CCA)			Total			
% (compared to total eligible off-balance sheet assets)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	
	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	
Financial guarantees (FinGuar KPI)	N/A		N/A	N/A		N/A	N/A	N/A	N/A	
Assets under management (Aum KPI)	N/A		N/A	N/A		N/A	N/A	N/A	N/A	

1. Nuclear and fossil gas related activities

Nuclear energy related activities		Fossil gas energy related activities	
The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

2. Taxonomy-aligned economic activities (denominator)

Turnover

Economic activities	2023																	
	Green Asset Ratio				Green ratio for Asset under Management				Green ratio for financial guarantees									
	(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation	
	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%
4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle							0	0.00	0	0.00								
4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies							5	0.00	5	0.00								
4.28 Electricity generation from nuclear energy in existing installations							150	0.02	150	0.02								
4.29 Electricity generation from fossil gaseous fuels							0	0.00	0	0.00								
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels							0	0.00	0	0.00								
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system							0	0.00	0	0.00								
Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	25 470	1.36	25 470	1.36	7	0.00	19 359	2.64	19 359	2.64				2	0.05	2	0.05	
Total applicable KPI	25 470	1.36	25 470	1.36	7.34	0.00	19 515	2.66	19 515	2.66				2	0.05	2	0.05	

2. Taxonomy-aligned economic activities (denominator)**Capex**

Economic activities	2023																	
			Green Asset Ratio			Green ratio for Asset under Management				Green ratio for financial guarantees								
	(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation	
	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%
4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle							2 0.00		2 0.00									
4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies							17 0.00		17 0.00									
4.28 Electricity generation from nuclear energy in existing installations							170 0.02		170 0.02									
4.29 Electricity generation from fossil gaseous fuels							0 0.00		0 0.00									
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels							1 0.00		1 0.00									
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system							0 0.00		0 0.00									
Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	26 505	1.41	26 505	1.41	32 0.00	30 917	4.21	30 917	4.21					1 0.03	1 0.03			
Total applicable KPI	26 505	1.41	26 505	1.41	32 0.00	31 107	4.24	31 107	4.24					1 0.00	1 0.00			

3. Taxonomy-aligned economic activities (numerator)

Turnover

Economic activities	2023															
	Green Asset Ratio								Green ratio for Asset under Management				Green ratio for financial guarantees			
	(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation	
	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%
4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle							0	0.00	0	0.00						
4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies							5	0.03	5	0.03						
4.28 Electricity generation from nuclear energy in existing installations							150	0.77	150	0.77						
4.29 Electricity generation from fossil gaseous fuels							0	0.00	0	0.00						
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels							0	0.00	0	0.00						
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system							0	0.00	0	0.00						
Other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	25 470	100.00	25 470	100.00	7	100.00	19 359	99.20	19 359	99.20			2	100.00	2	100.00
Total taxonomy-aligned economic activities in the numerator of the applicable KPI	25 470	100.00	25 470	100.00	7	100.00	19 515	100.00	19 515	100.00			2	100.00	2	100.00

3. Taxonomy-aligned economic activities (numerator)**Capex**

Economic activities	2023																
	Green Asset Ratio								Green ratio for Asset under Management				Green ratio for financial guarantees				
	(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		
	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	
4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle									2	0.01	2	0.01					
4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies									17	0.05	17	0.05					
4.28 Electricity generation from nuclear energy in existing installations									170	0.55	170	0.55					
4.29 Electricity generation from fossil gaseous fuels									0	0.00	0	0.00					
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels									1	0.00	1	0.00					
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system									0	0.00	0	0.00					
Other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	26 505	100.00	26 505	100.00	32	0.12	30 917	99.39	30 917	99.39				1	100.00	1	100.00
Total taxonomy-aligned economic activities in the numerator of the applicable KPI	26 505	100.00	26 505	100.00	32	0.12	31 107	100.00	31 107	100.00				1	100.00	1	100.00

4. Taxonomy-eligible but not taxonomy-aligned economic activities

Turnover

Economic activities	2023															
	Green Asset Ratio						Green ratio for Asset under Management						Green ratio for financial guarantees			
	(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation	
	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%
4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle							0	0.00	0	0.00						
4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies							0	0.00	0	0.00						
4.28 Electricity generation from nuclear energy in existing installations							1	0.00	1	0.00						
4.29 Electricity generation from fossil gaseous fuels							46	0.01	46	0.01						
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels							8	0.00	8	0.00						
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system							1	0.00	1	0.00						
Other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	1 020 026	54.35	1 020 026	54.35	0	0.00	185 897	25.33	185 897	25.33			184	5.82	184	5.82
Taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	1 020 026	54.35	1 020 026	54.35	0	0.00	185 954	25.34	185 954	25.34			184	5.82	184	5.82

4. Taxonomy-eligible but not taxonomy-aligned economic activities**Capex**

Economic activities	2023																	
	Green Asset Ratio				Green ratio for Asset under Management					Green ratio for financial guarantees								
	(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation		(CCM + CCA)		Climate change mitigation		Climate change adaptation	
	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%
4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle									0	0.00	0	0.00						
4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies									0	0.00	0	0.00						
4.28 Electricity generation from nuclear energy in existing installations									0	0.00	0	0.00						
4.29 Electricity generation from fossil gaseous fuels									19	0.00	19	0.00						
4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels									0	0.00	0	0.00						
4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system									0	0.00	0	0.00						
Other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	1 022 004	54.46	1 022 004	54.46	0	0.00	188 771	25.72	188 771	25.72			811	25.65	811	25.65		
Taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	1 022 004	54.46	1 022 004	54.46	0	0.00	188 791	25.73	188 791	25.73			811	25.65	811	25.65		

5. Taxonomy non-eligible economic activities

Economic activities	Green Asset Ratio, Turnover		Green Asset Ratio, Capex		Green Ratio Asset under Management, Turnover		Green Ratio for Asset under Management, Capex		Green Ratio for financial guarantees, Turnover		Green Ratio for financial guarantees, Capex	
	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%	Gross carrying amount	%
Economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 Pre-commercial stages of advanced technologies to produce energy from nuclear processes with minimal waste from the fuel cycle in the denominator of the applicable KPI												
Economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 Construction and safe operation of new nuclear power plants, for the generation of electricity or heat, including for hydrogen production, using best-available technologies in the denominator of the applicable KPI							122	0.02				
Economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 Electricity generation from nuclear energy in existing installations in the denominator of the applicable KPI					17	0.00	11	0.00				
Economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 Electricity generation from fossil gaseous fuels in the denominator of the applicable KPI												
Economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 High-efficiency co-generation of heat/cool and power from fossil gaseous fuels in the denominator of the applicable KPI												
Economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 Production of heat/cool from fossil gaseous fuels in an efficient district heating and cooling system in the denominator of the applicable KPI												
Other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	1 476 459	58.54	1 473 447	58.42	528 369	72.00	513 823	70.02	2 978	94.13	2 351	74.32
Taxonomy-non-eligible economic activities in the denominator of the applicable KPI	1 476 459	58.54	1 473 447	58.42	528 386	72.00	513 957	70.04	2 978	94.13	2 351	74.32

2.2 Climate change

Policies
● Sustainability Policy
● Environmental Policy
Other policy documents
● Position Statement Climate Change
● Directive on TCFD
Partnerships, memberships and networks
● Energy Efficient Mortgage Initiative (EEMI)
● Hagainitiativet in Sweden
● Science-Based Targets initiative (SBTi)
● Net-Zero Banking Alliance (NZBA)
● Partnership for Carbon Accounting Financials (PCAF)
● Task Force on Climate-related Financial Disclosures (TCFD)

Target

Achieve net-zero emissions by 2050 at the latest and adapt our lending and investment portfolios to the global 1.5° C target.

Energy consumption ¹	2023	2022	2021	Baseline year 2017
Reduce energy consumption (heating and electricity) by 15 per cent per m ² by 2025 (MWh/m ²)	0.19	0.21	0.21	0.25

1) This corresponds to consumption of 0.213 MWh/m² in 2025, which would achieve the target.

Climate-related targets	2023	2022	2021	Baseline year 2019
Direct emissions	19 777	14 559	9 201	25 014

1) 2019 was selected as the baseline year to reflect a year without the impact of Covid restrictions. The scope of the measurement has been developed since 2019 and includes emissions from the manufacture of employee IT equipment for 2022 and 2023. This is not included in the emissions for 2019. In 2023, emissions for IT equipment amounted to 8 397 tonnes of CO₂e.

Financed emissions targets for year 2019–2030 ¹	2022	2021	2020	Baseline year 2019
For mortgages, the target is to reduce financed emission intensity (kgCO ₂ e/m ²) by 39 per cent	8.7	9.1	9.0	9.2
For commercial real estate, the target is to reduce financed emission intensity (kgCO ₂ e/m ²) by 43 per cent	21.0	25.3	25.6	25.1
For power generation, the target is to reduce financed emission intensity (tCO ₂ e/MWh) by 59 per cent	0.15	0.15	0.15	0.17
For oil & gas (exploration, production and refining), the target is to reduce absolute financed emissions (million tCO ₂ e) by 50 per cent	2.9	4.6	5.7	6.4
For steel, the target is to reduce financed emission intensity (tCO ₂ e/tonne) by 29 per cent	0.84	0.80	1.09	0.89

1) Reporting for the years 2020, 2021 and 2022; underlying data is not yet available for 2023. The calculations for the baseline year were adjusted in 2023 as methodologies and the availability of data has improved.

Measures and activities

Internal environmental work

Swedbank's environmental work is based on the bank's Sustainability Policy, which is adopted annually by the Board of Directors. The policy's basis includes the bank's Environmental Policy and the UN Global Compact, which takes into account the precautionary principle.

The bank's facility management department works to improve energy efficiency by securing energy-efficient and space-saving properties and by encouraging property owners to adopt energy-conservation measures in the properties where we operate.

In 2023, the bank's direct emissions increased. The increase is in Scope 3 and is due mainly to increased emissions from the manufacture of employees' IT equipment following an equipment update in 2023.

The bank works actively to reduce the environmental impact from business travel. Internal air travel targets have been set for the Group. The focus is on increasing the share of virtual meetings and reducing the number of trips. In 2023, the target was to maintain the same travel volume as in 2022, which was exceeded slightly. Swedbank will evaluate planning tools to reduce emissions for business travel going forward. In 2023, the option to travel on flights using Sustainable Aviation Fuel (SAF) was introduced. SAF helps to reduce carbon emissions from air travel, while maintaining the necessary business travel volumes. For 2023, Swedbank avoided 21.2 tonnes of CO₂e emissions by using SAF.

Outcome: climate targets for Swedbank's loan portfolio

The majority of Swedbank's climate impact occurs through its customers. These indirect emissions arise in our customers' operations and activities. In 2023, Swedbank continued to support customers in their climate transition. The bank has set climate targets for the year 2030 for five sectors in its loan portfolio; the outcome for these is reported relative to the baseline year (2019) for the measurement period.

For the mortgage sector, the outcome was a decrease of approximately 6 per cent. We see that emission intensity has decreased in both the Baltic countries and Sweden. Going forward, various factors will continue to drive the transition of the real estate sector. Swedbank works actively to help real estate customers with solutions to increase their energy efficiency. One example is that, in 2023, we invested in the company Hemma, enabling Swedbank's private customers in Sweden to receive a free digital energy inspection of their home and then apply to finance improvements through Swedbank.

For the commercial real estate sector, emission intensity also decreased relative to the baseline year 2019. The decrease amounted to approximately 17 per cent.

For the power production and steel sectors, emission intensity has decreased by just over 10 per cent and 6 per cent, respectively, since 2019.

For the oil and gas sector, absolute financed emissions have decreased by approximately 55 per cent since 2019. This means that the target to reduce financed emissions by at least 50 per cent by 2030 has already been met. This is a consequence of Swedbank's strategy to greatly reduce its exposure to oil and gas extraction. Given that the oil and gas sector accounts for the largest share of Swedbank's estimated financed emissions, the reduction also significantly reduces total estimated financed emissions.

Various factors affect the outcome, including the customers' or property's emissions, the bank's exposure and the extent of the customers' total assets. Calculation methods and underlying data are described in detail on pages 246–248.

Climate reporting in accordance with the TCFD

The Task Force on Climate-Related Financial Disclosures (TCFD), which was created by the Financial Stability Board, is a framework that describes how companies can identify the financial impact of climate change on their operations.

Swedbank has chosen to report according to the recommendations in order to provide stakeholders with insight into how climate-related risks and opportunities are managed in the bank. Swedbank has performed scenario analyses to understand how different levels of global temperature rise could affect various sectors. The analysis and its outcome are described in the ESG risk note 3.6, on pages 113–115, which also reports on the bank's risk management and governance of climate risks. The scenario analyses also showed the opportunities that the green transition represents for Swedbank in the form of new business volumes. The results are listed below.

Opportunities in the short term (1–5 years)

- Increased financing need for investments in technology and distribution for the transition in the energy system in the energy sector.
- Expected growth in solar and wind power in both the energy and real estate sectors.
- Increased need for energy efficiency measures in the real estate sector.
- Established relationships with major players make direct climate adaptation possible in the agricultural and forestry sector.
- Develop advisory services focused on transition and integration of climate aspects, related products and issuance of debt and capital instruments in the financial sector.

Opportunities in the medium term (6–15 years)

- Increased investment needs for climate change adaptation to reduce physical risks, mainly in the agricultural, forestry and real estate sectors.
- The transition to more circular and resource-efficient processes could give customers a competitive edge in the real estate sector.
- Increased demand for ESG products and services in all sectors.
- Financing of new technologies, e.g. electrification, digitisation and automation, in all sectors.

Opportunities in the long term (16–25 years)

- Extended growing season in northern Europe due to higher temperatures and longer warm periods could result in increased food and lumber production, benefitting the agricultural and forestry sector.
- A growing bioeconomy could give customers access to new markets and customer segments thanks to increased demand for bioenergy as a renewable raw material in the agricultural and forestry sector.
- Lending to customers who have extensive insights into the impact of climate change and their sector-specific transition needs in the financial sector.

Financed emissions

Financed emissions represent a key element in the climate reporting for financial institutions. Swedbank has calculated financed emissions for the mortgage, commercial real estate, power production, oil and gas, and steel sectors. Accounting is provided for the year 2019–2022, given that underlying data is not yet available for 2023.

Swedbank has used a standardised methodology from the Partnership for Carbon Accounting Financials (PCAF) to measure and calculate its financed emissions. The calculations are based on the following formula:

- Financed emissions = Emissions x Attribution factor
- Emissions = The emissions from the underlying company or asset
- Attribution factor = The bank's financed portion of the total value of the company or asset

Recalculation of data

During 2023, the work to improve the methodology for financed emissions and the quality of underlying data continued. For Mortgages and Commercial Real Estate, the main changes include incorporating the new PCAF estimates published in August 2023; fixing the market value of the baseline year in the attribution factor calculation; and improving and clarifying some data management questions, including increased usage of Energy Performance Certificates (EPC) in the Baltics and updates on emission factors and occupant energy usage estimates in Sweden. For Power Generation slight changes in the outcome mainly due to improvement of the underlying data gathered from the corporates and clarification of scope.

Consequently, the figures are not directly comparable with those published in 2022. Therefore, the historical figures are restated for Mortgages, Commercial Real Estate, and Power Generation.

Mortgages and commercial real estate

Mortgages are defined as loans to consumers to purchase residential housing. Swedbank includes in the calculations all loans to consumers collateralised by buildings. Commercial Real Estate comprises loans to purchase commercial properties.

Swedbank includes all properties used for revenue-generating activities, such as retail, offices, industrial properties and multi-family housing.

Calculation methodology

Calculations of financed emissions for real estate consist of two parts: the attribution factor and the building's emissions.

The attribution factor is equal to the property's loan-to-value ratio fixed at the baseline's market value and for loans opened after 2019, the origination value.

The building's emissions are expressed as the amount of kgCO₂e per year that the building's energy usage generates. The methodology to calculate the building's emissions depends on data availability. In Sweden, for the highest data quality information on heated area, energy consumption, heating source and an emissions factor for each type of energy as well as an estimate on occupant energy usage is used. While in Baltics, information on heated area, the EPC and respective EPC and building type specific PCAF estimate is used.

When such data used in the calculations is lacking or incomplete, estimated figures for heating area and/ or estimates provided by PCAF based only on building type is used. The share of available EPCs for the real estate portfolio differs between Sweden and the three Baltic countries.

Other sectors, corporate lending

Financed emissions have been calculated for Power Generation, Oil & Gas, and Steel sectors. The segments have been chosen based on the sectors' contribution to climate change, the bank's portfolio exposure and data availability.

Calculation methodology

Financed emissions have been calculated by multiplying the company's total emissions by an attribution factor.

The attribution factor is Swedbank's lending to the company divided by the company's total assets. The company's emissions are its reported emission data. If reported data has been inadequate, estimated figures at the sector/portfolio level have been used. Estimated figures have been based on the value of the company's assets, revenue or activity values (e.g. MWh).

Next step

Swedbank continues to improve its calculations and reporting of financed emissions, including by improving data quality and expanding the calculations to include more sectors. As more primary data becomes available, the weighted data quality score according to the PCAF's methodology will improve. Swedbank is committed to continue to provide transparency and comparability in this area by showing its calculation methodologies and computations.

Auto leasing

Through AutoPlan, Swedbank offers fleet administration for businesses. AutoPlan works actively to reduce its climate impact by helping customers develop green car policies, providing support on sustainability issues, and measuring and monitoring their climate impact. In 2023, just over 74 per cent of all newly purchased vehicles were electrified: 48 per cent electric and 26 per cent plug-in hybrids. Of the total number of administered vehicles, 18.3 per cent were electric, compared to 5 per cent of the total market (source: Vroom). AutoPlan is working to increase the share of electrified vehicles in general and all-electric cars in particular, as part of AutoPlan Green Fleet, where a combination of advice, reporting and refinancing is offered. Since 2022, all vehicles that meet the requirements in the Swedbank Sustainable Funding Framework are included in Swedbank's Sustainable Asset Registry.

Company cars

In Sweden, Swedbank offers a leasing programme for employees in which company cars are treated as taxable benefits. Since the programme was introduced in 2006, Swedbank and the Savings Banks have expanded the fleet to more than 1 000 vehicles through various actions. Through the programme, Swedbank can use various incentives to encourage employees to drive more environmentally friendly vehicles. In 2023, more than 97 per cent of new leased vehicles in this programme were all-electric or plug-in hybrids.

Metrics

Asset class	Financed emissions (tCO ₂ e) ¹			
	2022	2021	2020	2019
Mortgages (Sweden)	161 074	156 108	160 273	159 168
Mortgages (Baltics)	343 766	332 230	320 412	308 925
Commercial Real Estate (Sweden)	128 653	110 962	119 149	129 786
Commercial Real Estate (Baltics)	300 188	307 191	282 001	278 844
Oil and Gas	2 885 186	4 629 558	5 654 610	6 362 263
Power Generation	1 100 159	767 477	980 034	1 220 423
Steel	143 713	167 952	300 415	204 391
Total	5 062 739	6 471 478	7 816 895	8 663 799

1) Scope 1 and 2 financed emissions for Mortgages and Commercial Real Estate. Scope 1, 2 and 3 financed emissions for Oil and Gas, scope 1 for Power Generation, scope 1 and 2 for Steel.

Asset class	Physical emission intensity ¹			
	2022	2021	2020	2019
Mortgages (Sweden)	3.2	3.4	3.5	3.6
Mortgages (Baltics)	40.5	41.4	42.6	44.0
Commercial Real Estate (Sweden)	7.3	8.0	9.1	9.6
Commercial Real Estate (Baltics)	110.2	111.5	110.0	103.0
Oil and Gas				
Power Generation	0.15	0.15	0.15	0.17
Steel	0.84	0.80	1.09	0.89

1) For Mortgages and Commercial Real Estate - financed emissions per financed area (kgCO₂e/m²). For Oil and Gas, Power Generation and Steel – Financed emissions per financed activity (Mwh for Power Generation, tonnes for Steel. For Oil & Gas focus is on absolute emissions therefore no value neither for financed activity, nor for intensity).

Financed emissions by property type

Mortgages	Gross carrying amount (SEKm)	Financed emissions (tCO ₂ e) ¹	Financed area (1000m ²)	Physical emission intensity ²	Data quality ⁴
	2022	2022	2022	2022	2022
Mortgages (Sweden)	1 005 809	161 074	49 661	3.2	3.7
Multi-family house (MFH)	350 436	41 909	16 869	2.5	3.6
of which tenant owner rights	260 431	26 380	7 438	3.5	3.7
of which tenant owner associations	88 940	15 162	9 348	1.6	3.3
of which other multi-family house	1 066	367	83	4.4	3.7
Single-family house (SFH)	647 577	104 316	29 060	3.6	3.8
Other	7 796	14 850	3 732	4.0	4.3
Mortgages (Baltics)	110 512	343 766	8 483	40.5	3.5
Multi-family house (MFH)	67 387	167 256	4 053	41.3	3.4
Single-family house (SFH)	43 080	175 896	4 416	39.8	3.5
Other	45	614	13	45.9	3.8
Total	1 116 321	504 841	58 144	8.7	3.7

1) Scope 1 and 2 financed emissions.

2) Financed emissions per financed area (kgCO₂e/m²).

3) Gross carrying amount weighted. High quality = 1, low quality = 5

Commercial Real Estate	Gross carrying amount (SEKm)	Financed emissions (tCO ₂ e) ¹	Financed area (1000m ²)	Physical emission intensity ²	Data quality ³
	2022	2022	2022	2022	2022
Commercial Real Estate (Sweden)	236 831	128 653	17 725	7.3	3.8
Commercial Real Estate (Baltics)	23 145	300 188	2 723	110.2	3.6
Total	259 976	428 841	20 449	21.0	3.8

1) Scope 1 and 2 financed emissions.

2) Financed emissions per financed area (kgCO₂e/m²).

3) Gross carrying amount weighted. High quality = 1, low quality = 5

Other corporate sectors ¹	Total exposure (SEKm) ²	Total exposure (%) ³	Financed emissions (tCO ₂ e) ⁴	Financed activity ⁵	Physical emission intensity ⁶	Data quality ⁷
	2022	2022	2022	2022	2022	2022
Oil and gas	4 675	92	2 885 186			2.0
Power Generation	35 630	84	1 100 159	7 116 373	0.15	1.9
Steel	5 228	96	143 713	170 175	0.84	1.3
Total	45 534		4 129 057			

1) Includes only Large Customers. A Large Customer is defined as one who has: (1) Annual turnover > 500 mSEK (50 mEUR) or Assets > 1'000 mSEK (100 mEUR), (2) on and off-balance exposure > 8 mSEK (800 thEUR).

2) Gross carrying amount and off-balance exposure.

3) Against total exposure for the sector including small and medium enterprises based on sector codes.

4) Scope 1, 2 and 3 financed emissions for Oil & Gas, scope 1 for Power Generation, scope 1 and 2 for Steel.

5) MWh for Power Generation, tonnes for Steel. For Oil & Gas, the focus is on absolute emissions. Therefore, no value is provided for financed activity or for intensity.

6) Financed emissions per financed activity.

7) Total exposure weighted. High quality = 1, low quality = 5

Energy class, lending commercial real estate (SEK m)¹

	2023						2022					
	Sweden	Estonia	Latvia	Lithuania	Other	Total	Sweden	Estonia	Latvia	Lithuania	Other	Total
A	1 407	399	1 234	5 602		8 642	1 268					1 268
B	6 814	737	825	3 730		12 106	7 495					7 495
C	13 238	545	482	1 194	5	15 464	13 184				5	13 189
D	21 087	328	119	455		21 988	18 408					18 408
E	25 079	116	102	106		25 403	22 019					22 019
F	12 255	269	38	124	1	12 687	12 016				1	12 017
G	7 694	97	18	62	18	7 889	6 911				16	6 927
H						333						
Not classified	109 833	23 387	6 676	11 304	1 810	153 010	112 746	25 200	8 397	17 486	1 309	165 139
Total	197 408	26 210	9 494	22 576	1 834	257 523	194 048	25 200	8 397	17 486	1 331	246 462

1) Non-financial corporations with collateral in commercial properties.

Energy class, mortgage loans (SEK m)¹

	2023						2022					
	Sweden	Estonia	Latvia	Lithuania	Other	Total	Sweden	Estonia	Latvia	Lithuania	Other	Total
A	2 805	4 000	2 330	14 786	70	23 991	2 502	1 441	130	7 841	29	11 943
B	31 187	7 230	589	10 321	112	49 440	26 433	4 315	197	9 209	84	40 238
C	72 682	4 978	288	3 964	93	82 005	66 531	3 883	67	3 590	79	74 150
D	112 686	4 656	170	1 431	55	118 998	106 781	4 228	70	1 196	54	112 329
E	140 180	4 064	625	979	66	145 914	137 705	3 941	472	940	62	143 119
F	68 034	1 427	303	2 186	48	71 998	67 410	1 346	243	1 429	46	70 474
G	21 792	299	14	1 299	12	23 416	21 827	328		339	11	22 505
H					1	128		152				153
Not classified	556 595	21 773	16 689	15 334	1 161	611 552	582 887	26 640	18 997	23 324	1 328	653 176
Total	1 005 962	48 555	21 007	50 300	1 618	1 127 442	1 012 077	46 273	20 175	47 867	1 693	1 128 086

1) Households with loans in residential properties.

Auto leasing AutoPlan

	2023	2022	2021
Leasing of vehicles (tonnes CO ₂ e) ¹	145 906	162 333	169 158
Total number of leased cars	42 042	42 204	42 082
Average emissions, new cars CO ₂ (g/km) ²	23	46	71
Average emissions, total CO ₂ (g/km) ²	68	86	99
Average emissions, new company cars in Swedbank CO ₂ (g/km)	11	23	43

1) Emissions based on fuel consumption and fuel type per vehicle over one year.

2) Refers to company cars administered by Swedbank by Swedbank AutoPlan.

Greenhouse gas emissions¹, tonnes CO₂e

	2023	2022	2021
Total emissions	19 777	14 559	9 201
Emissions by scope			
Emissions scope 1 ²	692	622	466
Emissions scope 2 ³	3 678	5 065	4 787
Emissions scope 3 ⁴	15 407	8 872	3 948
Emissions by country			
Emissions, Sweden	9 902	7 670	3 842
Emissions, Estonia	3 415	2 782	2 146
Emissions, Latvia	2 718	1 713	1 594
Emissions, Lithuania	3 355	2 039	1 482
Emissions, other ⁵	387	355	137
Energy-related emissions according to Scope 2			
Market-based	3 678	5 065	4 787
Location-based	9 302	13 999	14 805

1) Included GHG: carbon dioxide, methane, nitrous oxide and chlorofluorocarbons (refrigerants). In all GHG calculations, Swedbank used Econometrica software through a system called Our Impact, administered by U&We, which annually revises emission factors. Emissions are reported in accordance with the Greenhouse Gas Protocol (World Resources Institute). The table does not include category 15 Investments.

2) Swedbank's direct emissions. Based on fuel consumption in company-owned cars and refrigerant gas loss. Emissions from cooling equipment are estimated using operational controls (based on weight and type of cooling medium). Emissions from Swedbank's company-owned cars are estimated with the help of the bank's financial control over the vehicles. None of Swedbank's Scope 1 emissions are biogenic.

3) Swedbank's indirect emissions in the form of electricity consumption and heating/cooling. Emissions are estimated based on operational controls in Swedbank's offices/buildings.

4) Swedbank's other indirect emissions from business travel, secure transports, paper consumption, water consumption and waste. None of Swedbank's emissions are biogenic. Emissions from the production of employees' IT equipment, such as computers, monitors, tablets and phones, are included as of 2022. Refers to categories 13 Downstream Leased Assets and Category 15 Investments.

5) Norway, Finland, China and U.S.

Emissions by category, tonnes CO ₂ e	2023	2022	2021
Sweden			
Office premises	1 299	2 252	1 890
Business travel	3 363	2 566	1 838
Other emissions ¹	5 240	2 852	114
Estonia			
Office premises	1 682	1 860	2 028
Business travel	653	547	112
Other emissions ¹	1 080	375	6
Latvia			
Office premises	1 111	1 192	1 245
Business travel	488	334	336
Other emissions ¹	1 119	187	13
Lithuania			
Office premises	775	900	1 057
Business travel	628	487	84
Other emissions ¹	1 952	652	341
Other countries			
Office premises	279	310	112
Business travel	107	45	24
Other emissions ¹	1	0	1

1) Secure transports and paper consumption, computers, monitors, tablets and phones.

Other environmental data	2023	2022	2021
Energy consumption in our offices (MWh)	68 071	80 555	79 213
– of which Sweden	34 340	43 731	39 183
– of which Estonia	14 893	15 964	16 993
– of which Latvia	8 740	9 631	10 316
– of which Lithuania	9 543	10 002	11 875
– of which Other	555	1 227	846
Electricity consumption in our offices (MWh)	33 148	43 173	40 790
Renewable electricity as a share of total electricity consumption (%) ¹	99.9	99.9	99.9
Paper consumption (tonnes)	591	647	714
Water consumption (m ³ /FTE) ⁴	4.7	7.5	4
Recycled waste (tonnes) ²	458	653	529
Incinerated waste (tonnes) ²	425	391	461
Landfill waste (tonnes) ²	99	161	183
Hazardous waste (tonnes) ³	4	3.6	2.2
Compostable waste (tonnes) ²	85	57	47

- 1) Renewable energy refers to solar, wind, biomass and hydroelectric.
- 2) Waste from offices.
- 3) Refers to a small amount of electrical scrap, batteries and lamps.
- 4) Swedish consumption is estimated based on the amount of office space in the HQ.

Internal energy consumption ¹	2023	2022	2021
Total emissions from energy consumption (tonnes CO ₂ e/MWh) ²	0.071	0.075	0.073
Energy consumption per employee (MWh/FTE)	4.1	5.0	5.0
Energy consumption per m ² (MWh/m ²)	0.19	0.21	0.21

- 1) Consumption of energy, heating, cooling and gas.
- 2) Revised calculation of emissions from included energy types for all years.

Comparative figures, tonnes CO ₂ e	2023	2022	2021
Total emissions per employee (tonnes/FTE)	1.19	0.91	0.59
Scope 1 and 2 emissions per employee (tonnes/FTE)	0.26	0.36	0.33
Total emissions per office space (tonnes/m ²)	0.055	0.038	0.024
Scope 1 and 2 emissions per office space (tonnes/m ²)	0.012	0.015	0.014
Emissions per income (tonnes/SEKm)	0.27	0.28	0.20
Scope 1 and 2 emissions per income (tonnes/SEKm)	0.06	0.11	0.11

2.3 Biodiversity

Policies

- Sustainability Policy
- Environmental Policy

Partnerships, memberships and networks

- Business@Biodiversity Sweden
- Finance for Biodiversity Pledge (Swedbank Robur)
- MISTRA Biopath
- Nature Action 100 (Swedbank Robur)
- PRB Biodiversity Community

Measures and activities

As a bank, Swedbank plays an important role in restoring and improving the status of biodiversity and ecosystems. By supporting investments that promote sustainable management of ecosystem services, the bank can play a part in protecting important natural resources. Given that the work is at an early stage, there are still few metrics in the area, and it is important to help in the development of concrete measurement methods and data to monitor impacts. In this way, the bank's efforts can be better tracked to ensure that they have the desired effect on the environment and society.

The area is important to Swedbank given that the businesses that the bank finances and in which it invests are dependent on nature for their production needs and supply chains. The loss of biodiversity and climate change are linked and affect each other. Swedbank's Environmental Policy states that the bank will contribute to sustainable use of the earth's resources and will protect nature and biodiversity.

The bank works to reduce its impact on biodiversity, e.g. in its financing for the forestry and agricultural sector. In 2023, a Group-level task force was formed to increase competence, support efforts to meet upcoming regulatory requirements, promote integration in the bank's processes and identify business opportunities. The task force reports to Swedbank's Sustainability Committee.

External collaborations and partnerships are important and create a common understanding of which tools, methodologies and strategies for implementation are available to strengthen biodiversity. Swedbank participates in various collaborations and research projects to support the development of processes, targets and KPIs.

For more information on how Swedbank Insurance and Swedbank Robur work with biodiversity and ecosystems, see pages 214–215.

Global biodiversity framework

In its work to develop processes for biodiversity and ecosystems, the bank receives guidance from the Kunming-Montreal Global Biodiversity Framework (GBF) and its international targets. Swedbank was one of the 154 financial institutions that advocated for the adoption of the framework in December 2022.

During the year, Swedbank, together with other international banks, helped to develop implementation guides for the GBF within the UN Environmental Programme for the Financial Sector (UNEP-FI).

Swedbank has also identified which of the GBF targets are most relevant to develop strategically important activities within, so that the greatest positive impact can be reached.

The bank's work with biodiversity is also based on the Task Force on Nature-Related Financial Disclosures (TNFD); Swedbank previously played a role in developing the TNFD. Impacts, dependencies and natural resources in forestry and agriculture are analysed using the Exploring Natural Capital Opportunities, Risks and Exposure (ENCORE) tool to better understand risks and opportunities. Potential impacts through forestry and agriculture lending include high water usage, habitat modification and pollutants. The analysis included Swedbank's home markets and resulted in an activity plan.

The bank's work with TNFD has shown that there are still shortcomings in important data for analysing lending. Another challenge is the bank's exposure to many different sectors and geographical locations, which makes it difficult to identify, measure and monitor its impact on biodiversity.

TNFD's final reporting framework was published in September 2023, and Swedbank will continue to analyse how the framework can be integrated in its operations.

Examples of potential risks and opportunities for Swedbank in the forestry and agricultural sector	
Potential risks	Potential opportunities
In the long term, future economic losses linked to the loss of biodiversity could impact the bank and its forestry and agricultural customers and contribute to financial risks.	Currently, there are few bank-related products within biodiversity and ecosystems in the bank's home markets. This could give Swedbank a first-mover advantage.
Physical risks, e.g. drought and extreme weather, could impact Swedbank indirectly.	Opportunities to increase market share through development of new insurance, savings and lending products.
Market risks could arise if customers and new regulations, primarily at the EU level, place new demands on how banks manage biodiversity and ecosystem services.	Increased lending to customers who are interested in reducing their biodiversity impact.

Methodology for estimating nature-related risks

Baltic Banking has developed a methodology to identify and assess risks with the help of the bank's sustainability analysis for corporate lending and the TNFD framework. It takes into account the sector in which the customer operates and assesses whether various nature-related factors can be considered material. In the future, geographical location will also be considered. The work is part of the process of adapting to the European Central Bank's guide on climate-related and environmental risks (2020).

Innovative ways to finance the protection of nature

In 2023, within Baltic Banking, Swedbank launched a loan to finance the conversion of non-forest land to forest. The afforestation loans enable our customers to manage forests more sustainable while simultaneously increasing the market value of land that is not being utilised to its full potential.

During the year, the bank participated in a research study by the Swedish University of Agricultural Sciences. The focus was on developing a method for calculating and quantifying biodiversity credits to preserve and promote biodiversity in Swedish forestry, and to develop biocredits. As part of the project, Swedbank acquired biodiversity credits from Orsa Besparingsskog, which were issued with the help of a biodiversity audit of an 11-hectare forest. There are 91 credits in all. The project will last 20 years, and a biodiversity audit of the area is planned to take place every five years. Through this project, Swedbank hopes to contribute to greater knowledge and a better understanding of how the bank, in collaboration with other parties, can develop various financial incentives to preserve and develop biodiversity.

The Swedbank Sustainable Funding Framework includes the category "Sustainable management of living natural resources", which is aimed at financing assets that support biodiversity and ecosystems on land and at sea. The total volume in this category in 2023 was SEK 1 122m.

S3

Social information

3.1 Own workforce

Policies

- Sustainability Policy
- Policy on Diversity and Inclusion
- Remuneration Policy
- Policy on Human Rights
- Swedbank's Code of Conduct

Other governing documents

- Work Environment Directive

Partnerships, memberships and networks

- Diversity Charters in Estonia, Latvia, Lithuania and Sweden
- WEP, UN Women's Empowerment Principles

Employee targets	2023	2022	2021
Index for sustainable employees >=80	86	85	85
Sickness rate below 2.8 per cent	2.9	3.4	3.2
Engagement index >=80	85	84	85
Recommendation index (eNPS) >=43	44	39	45
Achieve gender parity, 40/60, in upper management	45/55	42/58	40/60
Achieve gender parity, 40/60, at higher levels in the bank with a focus on succession in upper management	57/43	57/43	56/44
Maintain pay parity for equal work and reduce the gender pay gap (pay gap in percentage points)	1.5	1.8	

Measures and activities

Leadership and self-leadership

The role of a leader at Swedbank is to guide their team and employees in their work to realise the bank's Strategic Direction. As a leader at Swedbank, it is important to be able to adapt to changes, opportunities and challenges based on customers' needs, new ways of working and the performance and development of the business. It is also important to embody the bank's culture and values, and to build trust, inspire and show courage. Employees are offered opportunities to develop and find inspiration in pace with changes in the operating environment and are encouraged to take responsibility for their professional development and career. An important part of this development is self-leadership, which means taking ownership and responsibility for one's own development. This includes being a team player who works proactively to deliver results, welcomes change and strives to improve. This fosters innovative thinking and a learning culture that helps the bank to develop.

Sustainable employees

Employees are the foundation of Swedbank's culture and success. This is why the concept of sustainable employees is so important. For Swedbank, it means employees who thrive at work and are happy with their work environment, and who have a suitable work-life balance. Swedbank offers a workplace with scope for variation and flexibility during the workday and where inclusion, development and cooperation come naturally. To encourage sustainable employees, the bank works systemically across the entire Group to identify and manage all types of occupational health and safety issues that can arise as well as to build on our strengths. Extra focus is placed on prevention in relation to sick leave, employee turnover, conflicts and difficulties cooperating, as well as the work-life balance. Swedbank feels that sustainable employees are critical to both employee engagement and a positive customer experience.

Development and implementation of the Swedbank at Work concept is continuing in all of the bank's home markets and comprises both physical and digital work environments as well as the design of workspaces and offices. The concept creates healthy and functional workplaces for efficient workdays and to facilitate and encourage movement and variation during the workday. Swedbank at Work creates

open, flexible and inspiring workplaces that enable employees to work in cross-functional teams, to share knowledge and experience, and to develop both as individuals and together.

Diversity and inclusion (D&I)

Swedbank strives to offer an inclusive workplace that is characterised by diversity to reflect the markets where the bank operates and where differences between people are seen as a strength and an opportunity for the bank.

In May 2022, the new position of Chief Diversity Officer (CDO) was created, a rotating two-year responsibility held by a member of the Group Executive Committee. The CDO is responsible for accelerating the bank's proactive work with diversity and inclusion.

A competence development programme on diversity and inclusion was implemented during the year and will continue until 2024 for management. The initiative consists of a reverse mentorship programme and learning sessions with experts in the field.

Gender equality, diversity and inclusion in the bank's operations

To ensure a culture where everyone feels respected and can perform at their best, it is important that diversity and inclusion are integrated in every part of the operations. The aim of the policy for gender equality, diversity and inclusion, which applies to the Board of Directors and its work, is to contribute to sound corporate governance.

To achieve gender parity, the bank has established KPIs to measure wage gaps and the gender balance between managers at various levels, with a focus on successors at the highest executive level. The target is a 40/60 ratio at the highest executive level and in senior positions.

The bank's work with gender equality in recruiting, succession planning and performance development continued during the year. The recruitment process for managers now includes an analysis of diversity, and checkpoints have been added to the annual performance review form to check for unconscious biases.

Swedbank attaches great importance to equal pay for women and men with the same or similar jobs and works continuously to achieve this objective. For more information, see pages 253–254.

Swedbank as an inclusive workplace

The results of the bank's employee surveys, which are conducted several times a year, confirm that employees see Swedbank as an inclusive workplace. Preventing discrimination and harassment is a priority, and there is zero tolerance for all forms of discrimination and harassment. Communication and workshops for managers were implemented during the year for preventive and educational purposes. Whistleblowing and a process for handling reported cases of discrimination and harassment have been established and are carried out by trained investigators in the bank.

Flexibility is an important factor in the equality and diversity work and is a natural part of the bank's way of working. Employees who return from parental leave are offered flexible schedules and can work part-time.

Internal clubs and networks

Swedbank's networks and clubs give employees an opportunity to network and share experiences, which in turn can inspire development, innovation and competence development.

To increase the share of women in areas where they are clearly underrepresented, Swedbank Women in Tech was formed at the end of 2021. The network's aim is to inspire women to consider a future in tech, but it is also intended for women who already work in the field, and is open to everyone regardless of gender. A number of activities were arranged in 2023, including a mentorship programme and a week-long hackathon. The network grew to more than 900 members within the Swedbank Group.

During the year, Swedbank participated in Stockholm Pride, Riga Pride, and Baltic Pride in Tallinn. June was devoted to LGBTQ+ awareness-raising throughout the Group. The bank's Gay, Lesbian, Bi, Trans, Queer and Allies at Swedbank (GLaS) network celebrated its third anniversary in April and continues to work for the inclusion of LGBTQ+ topics in the bank through events, web seminars, and celebrations during Pride and the rest of the year. Since 2022, employees have had the option in anonymous employee surveys to self-identify as a third gender alternative, and signage in the bank's premises is gender-neutral.

External partnerships, memberships and networks

Swedbank participates in several third-party assessments and indexes to continuously evaluate its work with diversity and inclusion. These include the Bloomberg Gender Equality Index 2023 and Financial Times Diversity Leaders in Europe. The bank has signed the UN Women's Empowerment Principles and is one of the founders of the EU's diversity charters in the bank's home markets.

Measures to reduce pay gaps	
Gender pay gap	Equal pay
Salary differences between women and men are measured in gross salary per hour worked. At Swedbank the differences have steadily decreased each year, from 38 per cent at the end of 2019 to 29 per cent at the end of 2023, as shown on pages 253–254.	Equal pay for women and men who do the same work is another way to measure wage gaps. At the end of 2023, the pay gap for the Swedbank Group was 1.5 percentage points. For more information on equal pay between women and men at Swedbank, see pages 253–254.
Activities in 2023 to reduce the gender pay gap	
<ul style="list-style-type: none"> The target of a 40/60 gender ratio is monitored at the levels of the Group Executive Committee, business area/Group Function management teams, subsidiary management teams, all managers and certain higher positions that do not have managerial responsibility. Long-term work is carried out on recruiting, succession planning, equal access to competence development, and targeted development programmes in areas where one gender is underrepresented. Ongoing review of all HR processes, e.g. the performance development process, to ensure gender neutrality and draw attention to potential gender discrimination where relevant. Focus on gender in all remuneration processes. Open salary range in the home markets to increase transparency and awareness. Special initiatives to encourage women to pursue careers in tech. 	<ul style="list-style-type: none"> Make managers aware of equal pay in all remuneration processes. Continuous monitoring through monthly calculations is used to determine whether actions need to be taken in the bank's units. Equal pay in salary-setting in external and internal recruitments. Potential pay gaps are monitored during the annual salary review process to prevent them from arising. Salary reviews for employees on parental leave in Sweden and those who return from parental leave in Estonia, Latvia and Lithuania. Where gaps are identified, the reasons are documented. If the gap is due to gender, appropriate measures will be taken. Salary analysis in Sweden has been completed. In order to maintain and reduce the gap, among other things, a work linked to Equal Pay has been carried out together with Finansförbundet.

Employee surveys and employee engagement

Engaged and proud employees are critical to the bank's success and contribute to a better customer experience, more satisfied customers and more business.

The People Pulse employee survey was conducted twice in 2023 to understand how employees are feeling and find out how well they understand and how they behave in relation to the bank's strategically important areas. The aim of the survey is to track and drive changes in day-to-day behaviour and to foster a continuous dialogue and open feedback culture in all units. The questions relate to nine areas: engagement, loyalty/interest, strategic direction, compensation, work culture, performance development, leadership, sustainable employees, and unequal treatment.

The results show a stable level of engagement and that employees feel good at work. The surveys conducted during the year had high response rates, and the results remained strong.

Donations and volunteer work

In Estonia, the donation portal "I love to help" was established by Swedbank in partnership with the Good Deed Foundation in 2008. It brings together customers and various Estonian charitable organisations to provide assistance to vulnerable areas. Many employees in Estonia, Latvia and Lithuania are involved in various types of volunteer work, such as Summer of Good Deeds, Let's Do It Together, and We Care.

Calculation methodology for collecting employee data

Information is obtained from the bank's HR system and training data from the internal training portal. HR data refers to the headcount as of 31 December 2023.

Metrics

Employee surveys, index	2023	2022	2021
Sustainable Employee Index¹	86	85	85
Engagement index¹	85	84	85
– Sweden	83	81	82
– Estonia	88	88	89
– Latvia	87	87	88
– Lithuania	90	90	89
Recommendation index (eNPS)^{1,2}	44	39	45
Leadership index	87	86	86

1) Survey sent to all employees.

2) Shows the likelihood of recommending Swedbank as an employer (eNPS). Responses are given on a scale of 0–10, where the share of negative responses (0–6) is subtracted from the share of positive responses (9–10). The score can range anywhere between -100 and 100.

Internal training	2023	2022	2021
Total number of training hours ^{1,2}	543 885	452 216	497 490
Training costs per FTE (SEK)	6 488	5 461	4 784
– of which mandatory	1 217	1 243	1 149
– of which non-mandatory	5 271	4 218	3 635
– of which women	7 432	6 214	5 498
– of which men	5 033	4 293	3 660
Training hours per FTE ¹	30	29	32
– of which men	24	23	24
– of which women	33	33	38
– of which managers	34	34	44
– of which specialists	29	28	30
Completed training			
– ethics (number) ³	17 281	16 650	16 593
– sustainability incl. climate (number)	4 819	4 647	7 636
– anti-money laundering and counter-terrorist financing (number)	17 861	17 039	17 625
Number of advisors with Swedsec license ⁴	4 222	3 952	3 976
Number of employees who completed the annual knowledge update (ÅKU) ⁴	6 170	5 934	6 298

1 The number of training hours measures only the percentage of skills building that takes place through traditional training (e-training and classroom training). The table also includes the savings banks.

2) Share of mandatory training 2023: 19%. Sustainability-related mandatory training for all the bank's employees includes training in sustainability, security, anti-corruption, combating money laundering and terrorism, financial sanctions, work environment, fire safety, privacy issues and climate.

3) Contains a section on anti-corruption policies and procedures.

4) Refers to Sweden.

Employees who have received training in anti-money laundering and counter-terrorist financing, by region (%)	2023	2022	2021
Sweden	98	96	96
Estonia	97	96	99
Latvia	96	96	99
Lithuania	96	96	99
Group total	97	96	98

Employees who have received training in anti-money laundering and counter-terrorist financing, by category (%)

	2023	2022	2021
Managers	99	99	99
Specialists	97	95	97

Employees who received anti-corruption training

	Number of employees		Percentage of total	
	2023	2022	2023	2022
Estonia	2 661	2 545	95	92
Managers	281	255	99	93
Specialists	2 380	2 290	94	91
Latvia	2 026	1 932	93	91
Managers	221	211	100	95
Specialists	1 805	1 721	93	90
Lithuania	2 684	2 705	99	96
Managers	268	266	99	100
Specialists	2 416	2 439	93	95
Sweden	9 941	9 102	94	91
Managers	1 041	988	98	93
Specialists	8 900	8 114	94	90
Total	17 312	16 284	94	92

Total number of employees by employment contract, by gender¹

	Women	Men	Total
Full-time	10 281	6 510	16 791
Part-time	1 107	531	1 638
Temporary employment with hourly wage	319	306	625
Permanent	10 684	6 598	17 282
Temporary	704	443	1 147

1) The variation in the number of employees during the year is fairly constant.

Total number of employees by employment contract, by region ¹	Sweden	Estonia	Latvia	Lithuania	Total
Full-time	9 115	2 706	2 144	2 826	16 791
Part-time	1 461	99	27	51	1 638
Temporary employment with hourly wage	623	0	0	2	625
Permanent	9 849	2 685	2 029	2 719	17 282
Temporary	727	120	142	158	1 147

1) The share of employees who are not employed by the bank is very low. The variation in the number of employees during the year is fairly constant.

Total number ¹ and share of new employees by gender, age group and country, %	2023	2022	2021
Women	57	59	58
Men	43	41	42
Under 30 years	49	48	52
30–50	47	47	43
50+	4	5	5
Sweden	54	47	48
Estonia	14	19	14
Latvia	15	14	17
Lithuania	17	20	21

1) Number of new employees: 2023: 2 290, 2022: 2 499, 2021: 2 178.

Total number¹ and rate of employee turnover by gender, age group and country, %

	2023	2022	2021
Women	10	12	9.7
Men	11	13	11.5
Under 30 years	14	20	16.6
30–50	9	11	8.4
50+	10	11	8.9
Sweden	9	12	8.8
Estonia	9	14	10.4
Latvia	13	14	11.2
Lithuania	12	14	14.9
Group total	10	14	10.3

1) Number of employees who left the bank during the year: 2 269.

Number of employees who are not employed by Swedbank¹

	2023	2022	2021
Sweden	973	797	
Estonia	25	1	
Latvia	11	4	
Lithuania	18	0	
Total	1 027	802	

1) Includes employees who work as consultants who provide services such as administration, IT, organisation and legal affairs.

Wage difference CEO compared with employees¹, %

	2023	2022	2021
Swedbank Sweden	22.12	22.65	
Swedbank Group	26.54	27.77	

1) Calculated as median salary for Swedbank's employees.

Wage difference women vs. men, managers¹ by country, %

	2023	2022	2021
Sweden	-20	-21	-20
Estonia	-25	-25	-27
Latvia	-27	-29	-35
Lithuania	-27	-28	-29
Total	-27	-30	-29

1) Includes managers at every level. HR responsibility is the common denominator for this category.

Wage difference women vs. men, level 1–3 managers by country, %

	2023	2022	2021
Sweden	-23	-23	-26
Estonia	-36	-37	-35
Latvia	-14	-11	-17
Lithuania	50	33	27
Total	-22	-26	-27

Wage difference women vs. men, specialists by country, %

	2023	2022	2021
Sweden	-18	-18	-20
Estonia	-30	-31	-33
Latvia	-28	-29	-28
Lithuania	-31	-32	-33
Total	-28	-30	-31

Wage difference women vs. men, all employees by country, %

	2023	2022	2021
Sweden	-19	-20	-21
Estonia	-30	-30	-33
Latvia	-29	-30	-32
Lithuania	-33	-34	-36
Total	-29	-31	-32

Equal pay gap, %

Sweden	Estonia	Latvia	Lithuania	Total
1.9	1.1	0.9	0	1.5

Level of education, %

	2023	2022	2021
Sweden			
University degree	41	41	41
Other university education	10	10	10
Upper secondary school	49	49	48
Other education	0	0	1
Estonia			
University degree	64	65	64
Other university education	10	10	11
Upper secondary school	17	19	19
Other education	9	6	6
Latvia			
University degree	67	66	66
Other university education	16	17	17
Upper secondary school	17	17	17
Other education	0	0	0
Lithuania			
University degree	85	85	84
Other university education	5	5	6
Upper secondary school	5	5	5
Other education	5	5	5

	Number of employees who received performance review ¹			Number of employees who approved performance review ²			Percentage of employees who received performance review ¹			Percentage of employees who approved performance review ²		
	2023	2022	2021	2023	2022	2021	2023	2022	2021	2023	2022	2021
Men	6 427	6 070	5 987	6 168	3 486	5 163	91	91	100	96	95	86
Managers	781	778	799	729	326	641	99	99	100	93	89	80
Specialists	5 646	5 292	5 188	5 439	3 160	4 522	90	90	100	96	95	87
Women	10 260	9 808	9 185	9 940	5 825	8 594	90	88	100	97	96	94
Managers	1 034	1 014	984	985	479	867	99	98	100	95	91	88
Specialists	9 226	8 794	8 201	8 955	5 346	7 727	89	87	100	97	97	94
Total	16 687	15 878	15 172	16 108	9 311	13 757	91	89	100	97	95	91

1) In a performance review, the manager and employee evaluate the year's performance. Evaluation and assessment of total performance are documented by the manager and approved by the employee.

2) Approval per 240131

Labour/management relations	2023	2022	2021
Percentage of employees with collective or local agreement or covered by labour law – Sweden ¹	100	100	100
Percentage of employees covered by collective bargaining agreements ^{2,3}	58	57	58
1) The members of the Group Executive Committee are not covered by collective agreements and the Act on Employment Protection.			
2) The share (%) for 2021 and 2022 has been recalculated due to new information.			
3) Swedbank has established a Group-level European works council with participants from the various countries where it operates.			
Age distribution management and Board of Directors, %	2023	2022	2021
Group Executive Committee			
Under 30 years	0	0	0
30–50	13	13	13
50+	87	87	87
Board of Directors¹			
Under 30 years	0	0	0
30–50	0	15	18
50+	100	85	82

1) Excluding employee representatives.

Age distribution by country, %	2023	2022	2021
Sweden			
Under 30 years	23	21	21
30–50	52	52	51
50+	25	27	28
Estonia			
Under 30 years	18	19	19
30–50	65	65	66
50+	17	16	15
Latvia			
Under 30 years	19	20	22
30–50	72	72	71
50+	9	8	7
Lithuania			
Under 30 years	22	25	27
30–50	63	61	60
50+	15	14	13

3.2 Human rights

Policies

- Sustainability Policy
- Policy on Human Rights
- Swedbank's Code of Conduct

Other governing documents

- Position Statement Defence Equipment

Measures and activities

The Group Policy on Human Rights serves as the foundation for Swedbank's work on human rights. It is based on the UN Guiding Principles on Business and Human Rights and on the UN Global Compact, which stipulates that Swedbank must act with due diligence. The policy is updated annually and is adopted by the Board of Directors.

Swedbank operates on the premise that the bank, its suppliers, the customers it finances and the companies in which it invests shall respect universal human rights and take precautions and prevent human rights violations. The bank's Policy on Human Rights states that vulnerable groups such as children, seniors, the disabled and minorities must be given special consideration. It complements Swedbank's Sustainability Policy.

Swedbank's Code of Conduct clarifies the bank's values and describes how Swedbank's employees should act with a focus on respecting everyone's equal value. Gender equality and diversity are important to the work environment and corporate culture at Swedbank. In that same spirit, Swedbank strives to ensure representation of people with different backgrounds, ethnicities and ages in its internal and external communication and marketing. For more information on Swedbank's work with gender equality, diversity and inclusion, see page 251.

Sustainability analyses within the core processes of investing, lending and procurement include human rights as a key aspect for assessment. These core processes are defined as material and, as a result, are central to the assessment of human rights risks. The following sections of the Notes describe how these core processes practice due diligence in the bank's operations.

Human rights in financing and investing

In connection with corporate loans, a sustainability analysis is conducted where human rights are taken into consideration. For example, when the analysis is performed, the bank may discuss human rights risks associated with the company's production chain and how the customer manages these risks. The bank also has sector guidelines that its advisors can use which address material sustainability risks, including human rights risks, to facilitate dialogue and risk assessment.

For more information on the sustainability analysis in Swedbank's lending, see page 216.

Swedbank Robur's investment process includes an analysis of all its holdings in terms of how well they live up to international conventions such as the Universal Declaration of Human Rights. The analysis also covers the OECD Guidelines for Multinational Enterprises, the ILO's core conventions and the UN Guiding Principles on Business and Human Rights. Every investment is also preceded by a risk assessment that includes human rights. This assessment is based on the risks associated with factors such as the industry, geographic location or the companies' level of maturity with regard to identifying, preventing and managing social, environmental and corporate governance issues.

To prevent and reduce serious consequences involving human rights, Swedbank Robur engages with companies that have especially high risks and are on Swedbank Robur's watch list. Dialogues can take place in response to an incident, to evaluate the company's sustainability work, including with respect to human rights, or specifically on one or more issues linked to human rights. One example is the risk of enabling or reinforcing human rights violations through the use of internet and telecom services in connection with wars and conflicts, which is therefore a topic brought up in discussions with companies. Another area is children's rights. Children are an especially vulnerable group, and Swedbank Robur has developed a position statement that clarifies children's rights and which it uses to influence companies. A collaboration has been established with Global Child Forum, where Swedbank Robur has combined knowledge and experience with a broad network of contacts in the business community to reach out to companies around the world with a message on the importance of working actively to protect children's rights. Swedbank Robur also conducts stakeholder dialogues with companies in which its funds are major owners.

To address human rights risks in the defence industry, the Group has an overarching position statement on the sector. This statement sets the conditions for the bank's financial services to the sector and is a safeguard against human rights violations. For example, Swedbank has zero tolerance for nuclear weapons and controversial weapons, which means entails that it does not invest in or provide financial services to companies that produce, maintain or trade these weapons.

Supply-chain evaluations

Swedbank assesses risks related to human rights in its procurement process. The scope of the assessment depends on where the supplier is located geographically, which is determined through an initial screening. If the supplier is considered high risk with respect to human rights, a more thorough assessment is conducted. In addition, all suppliers that are part of the bank's central procurement unit must sign Swedbank's Code of Conduct for Suppliers, where respect for human rights is a critical element. Existing suppliers are monitored, mainly through dialogue, to determine whether established demands are being met. For more information on Swedbank's work in this area, see pages 258–259. The monitoring also gives Swedbank an opportunity to consider any changes by the suppliers.

Swedbank's Code of Conduct for Suppliers requires due diligence on human rights. If irregularities are detected, the bank will decide on suitable actions together with the supplier. This could, for example, entail demands to modify operating processes without delay.

S4

Governance information

4.1 Business Conduct

Policies

- Sustainability Policy
- Anti-Bribery and Corruption Policy
- Group Policy On Conflicts Of Interest
- Customer Complaint Policy
- Policy for Customer Protection Risk
- Swedbank's Code of Conduct
- Personal Account Dealing
- The Board of Directors' Remuneration and Sustainability Committee (RSC)
- The Board of Directors' Audit Committee (AC)

Other governing documents

- Group Instruction on Conflicts of Interest
- Group Instruction on Internal Alerts (Whistleblowing)
- Group Instruction on Anti-Bribery and Corruption
- Group Instruction on Financial Sanctions

Partnerships, memberships and networks

- UN Principles for Responsible Banking
- UN Global Compact
- UN Environmental Programme Finance Initiative
- ICC Business Charter for Sustainable Development
- Swedish Bankers' Association's Sustainability Council and Committee
- Committees and task forces within European Savings and Retail Banking Group (ESBG) and European Banking Federation (EBF)
- Institute for Sustainability and Corporate Social Responsibility in Latvia
- Lithuanian Association of Responsible Business
- Nordic CEOs for a Sustainable Future
- Nordic Circular Hotspot

Swedbank supports

- UN Paris Agreement
- UN Sustainable Development Goals (SDG)
- UN Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights

The above are a selection and constitute guiding principles for implementation of sustainability in the bank.

Target

Through strong, efficient internal governance and control, ensure that operations are conducted according to the highest ethical standards.*

Measures and activities

Code of Conduct

Being part of Swedbank and sharing its values means that employees are expected to behave in accordance with Swedbank's Code of Conduct. The Code of Conduct describes how employees are expected to handle business and relationships, and serves as Swedbank's ethics policy. Swedbank conducts its business openly, with integrity and in a way that instils trust. Swedbank's operations are built on the trust of customers, owners, employees, business relations and society as a whole, which is critical for the bank's operations. Decisions must uphold the highest ethical standards. This means that when making a decision, Swedbank places higher demands on decision-making than merely abstaining from improprieties. The requirements placed on decision-making are monitored through various processes, policy documents and KPIs to ensure that the bank maintains a safe distance from improprieties.

To ensure that all employees, including consultants, have received and understood the Code of Conduct, they are annually asked to sign a confirmation. All employees also undergo annual ethics training.

* The bank has processes and other mechanisms to monitor and control that this target is achieved. Comprehensive training is also an important factor for performance.

Customer complaints

The Swedbank Group's overarching process for customer complaints allows all employees to register incoming complaints and opinions from the bank's customers. Improvements are continuously made within Swedbank based on incoming complaints. Swedbank's management regularly receives reports from the complaint coordinator. The bank monitors that customer complaints are handled within the allotted time. The Board of Directors is provided with the bank's complaint report in connection with the Annual Report and quarterly reports.

Anti-corruption

On an overarching level, corruption, financial crime and other similar activities constitute a threat to a sustainable society and to the financial system's integrity and stability. Swedbank has absolute zero tolerance for bribes, corruption and other financial crime and activities that represent a threat to the bank's operations and customers, and works to protect the Group against these.

Swedbank's anti-corruption policy is adopted by the Board of Directors. Swedbank has clearly defined processes to assess the risk of bribes and corruption as well as deficiencies in controls. All units within the bank are responsible for conducting an anti-corruption risk assessment, which is then used as a basis for implementing preventive measures. Being employed in the financial sector requires paying close attention to the risk of bribes, corruption and other improper behaviour.

Each unit and subsidiary is responsible for identifying, evaluating and implementing measures to manage and reduce the actual and potential corruption risks they face. To ensure that both employees and consultants have the right competence to manage these risks, annual mandatory ethics training is undertaken and includes anti-corruption. Functions that are considered to have a higher risk of exposure to corruption also conduct specialised anti-corruption training on a more frequent basis.

Whistleblowing ensures compliance

The Group's overarching process for whistleblowing encourages all employees and other stakeholders to report suspicions of potential or actual violations of the Code of Conduct, failure to comply with legislation or noncompliance with Swedbank's policies. The Board of Directors is informed of whistleblower cases in connection with the quarterly reports, and cases that concern Group Compliance, the CEO or any employee in the Group Executive Committee are also addressed by the Board's Audit Committee.

The bank's whistleblower service is available in every native language used in the bank's home markets, as well as in English. Messages are encrypted, allowing the whistleblower to openly or anonymously submit reports and to remain anonymous when in dialogue with the bank. All reports and messages are handled with strict confidentiality, and investigations are conducted with the utmost care while protecting integrity by restricting access to those with clearly defined roles and responsibilities.

In 2023, the bank received 126 reports, 46 of which were assessed as whistleblower cases in accordance with Swedbank's definition of whistleblowing.

Personal information and the General Data Protection Regulation (GDPR)

Swedbank's customers should feel secure in the way the bank handles their personal information. Swedbank uses personal information to provide services, issue payments, and assess credit applications and risks, but also to improve products and quality through customer surveys and market analyses. Personal information is also handled as part of the bank's work to prevent money laundering and terrorism financing, and to prevent and investigate criminal activity. Swedbank has processes in place for using personal information which ensure compliance with the GDPR. Swedbank's Data Protection Officers monitor the bank's compliance with data protection regulations.

Metrics

Compliance ¹	2023	2022	2021
Number of cases	2	0	1
Fines paid (SEKm)	887	0	46.6

1) Refers to cases where Swedbank received a sanction due to non-compliance, which were announced within the framework of the Group's interim reporting.

Transaction monitoring according to MAR	2023 ²	2022	2021
Number of suspicious orders and transactions (MAR) ¹ reported	202	57	63
– of which Sweden	37	17	38
– of which Estonia	43	14	3
– of which Latvia	93	9	11
– of which Lithuania	29	17	11

- 1) Market Abuse Regulation (MAR). Banks are obligated to report suspicions of market abuse: insider trading, market manipulation and unlawful disclosure of inside information (MAR).
 2) The number of reported transactions in 2023 is higher than the previous year's level due to the focus of certain local Baltic authorities on reporting unusual trading patterns.

Whistleblowing	2023	2022	2021
Number of reports	126	110	122

Processing of personal data	2023	2022	2021
Number of queries/complaints from registered parties to data protection officer, total ¹	41	40	8
– of which Sweden	31	17	0
– of which Estonia	1	4	1
– of which Latvia	1	18	4
– of which Lithuania	8	1	3
Number of queries/complaints from data protection authority, total	9	11	19
– of which Sweden	2	0	6
– of which Estonia	1	2	1
– of which Latvia	0	5	3
– of which Lithuania	6	4	9

- 1) Registered parties that have submitted queries or complaints through correspondence by mail or email to the data protection authority.

4.2 Financial crime

Policies

- Sustainability Policy
- Group Policy on Anti Money Laundering and Countering Terrorist Financing
- Group Policy on Financial Sanctions
- Group Policy on Anti-Bribery and Corruption Policy
- Policy on Anti-Tax Evasion and Aggressive Tax Planning

Other governing documents

- Group Instruction on Anti-Money Laundering and Countering Terrorist Financing
- Group Instruction on Financial Sanctions
- Group Instruction on Anti-Bribery and Corruption
- Group Instruction on Anti-Fraud Governance

Partnerships, memberships and networks

- SAMLIT
- Various partnerships with support of Anti-Money Laundering Act

Target

Prevent the business and its customers from being exploited by or exposed to financial crime.*

Measures and activities

Combating financial crime

Swedbank works actively to combat all forms of financial crime, to prevent fraud and to prevent the bank from being used for illegal transactions with the proceeds of criminal activity as well as transfers intended to finance terrorism.

Compliance with the Group's regulations in this area is monitored through overarching processes to identify and manage financial crime. To achieve its targets, in 2021 Swedbank established various programmes to develop and improve its processes and risk management.

Swedbank continuously improves its routines for reporting suspected cases of money laundering, terrorism financing, fraud and violations of financial sanctions, based on new regulatory requirements and the risks to which the bank is exposed. In 2023, the bank continued to improve its processes for general risk assessment, KYC, customer risk assessment, transaction monitoring, sanctions screening, fraud identification and reporting. Swedbank invests in new technology, recruits additional expertise to protect and assist customers, and impedes criminal elements from using the bank for financial crime.

During the year, the collaboration between the Swedish police, government authorities and banks continued to expand through information-sharing that helps to limit fraud and the illicit gains that drive the criminal economy. In Sweden, Swedbank actively participates in SAMLIT, a collaboration between the police and the banks. Swedbank also takes part in several exchanges of information among private parties; this information-sharing was recently facilitated through legislation. The bank has established a number of mechanisms to monitor and control its exposure to financial crime. Beyond a detailed set of regulations, a number of KPIs are used on a regular basis to measure whether the bank is remaining within its low risk appetite.

Russia's expanded invasion of Ukraine has caused the EU to issue more sanctions than previously, and the bank fills an important societal role by implementing these financial sanctions. Structural projects have been initiated to manage the more stringent requirements placed on the bank's technical systems and processes. In recent years, Swedbank has worked to improve its ability to combat financial sanctions violations by strengthening its legal expertise and through new technical solutions to screen transactions and customer relations.

Swedbank's work relating to fraud and cybersecurity

Fraud remains a large and growing societal problem that feeds organised crime and that affects many individuals every year. In 2023, telephone fraud carried out through social manipulation known as vishing/smishing increased dramatically and is affecting more and more people. Swedbank invests in and continuously improves its resilience and capacity to detect, prevent and investigate these crimes.

The process for issuing BankIDs has been strengthened, which has reduced the number of counterfeit BankIDs. Swedbank has also strengthened its continuous monitoring to identify fraudulent transactions, which has also produced positive results. Together with the Swedish Bankers' Association, the bank has undertaken a campaign to increase awareness of the risk of fraud and has also launched a number of its own information campaigns through its own channels.

In autumn 2023, Swedbank participated in the annual European Cyber Security Month, an initiative established by the European Union Agency for Cyber Security (ENISA) to raise cybersecurity awareness among EU citizens and organisations. During the month, an internal programme was arranged with a number of activities, including lectures open to all of the bank's employees as well as presentations and information campaigns.

Metrics

Transaction monitoring according to SAR	2023	2022	2021
Number of suspicious transactions involving money laundering/terrorist financing (SAR) ¹ reported	9 722	11 000	8 598
– of which Sweden	6 927	8 478	6 851
– of which Estonia	933	1 003	608
– of which Latvia	1 379	1 053	748
– of which Lithuania	483	466	391

- 1) Suspicious Activity Report (SAR). According to the Anti-Money Laundering Act, Swedbank is also obligated, without delay, to report suspicions of money laundering or terrorist financing (SAR) to the Financial Intelligence Unit of the Swedish Police.

* The bank has processes and other mechanisms to monitor and control that this target is achieved. Comprehensive training is also an important factor for performance.

4.3 IT systems and information security

Policies

- Risk Appetite Statement Policy
- Enterprise Risk Management Policy
- Policy for Operational Risk

Other governing documents

- Instruction on Information Security
- IT Instruction

Partnerships, memberships and networks

- The Banks Security Committee of the Swedish Bankers' Association
- National Cyber Security Centre (NCSC) and NCSC's financial forum
- FS-ISAC
- Swedish CERT forum
- Trusted Introducer

Capabilities

- Maintain and improve trust in Swedbank's security work among customers, partners and authorities
- Improved security through simplified security work
- Empower all employees to contribute to greater security

Measures and activities

Strategy for and governance of information security

The security situation in the region neighbouring Sweden and the Baltic countries continues to result in an elevated threat assessment for information security and an increased risk of cyberattacks. The importance of cybersecurity also increases as more financial services are digitised. The purpose of the EU's new Digital Operational Resilience Act (DORA), which will enter into force in January 2025, is to further strengthen the ability of financial organisations to manage various types of disruptions that affect functions that are critical to society.

Swedbank has a strategy for security in which the vision is to be "One step ahead", which requires the bank to have a good overall understanding of the threat assessment and to work proactively to reduce the risk of successful attacks against the bank and our customers. An annual update ensures that the strategy is aligned with the bank's Strategic Direction, the changing threat and risk landscape, and new requirements. Planned measures are designed to strengthen the bank's digital and operational resilience, not least with respect to cyberattacks. Swedbank continuously monitors technological developments and capitalises on new opportunities such as artificial intelligence to better identify discrepancies that could be a sign of potential information security incidents.

Organisation and management

The bank's Chief Information Security Officer (CISO) leads and coordinates Swedbank's information security work. A central function supports the CISO in maintaining and developing the bank's information security system, which is based on the international ISO 27001 standard. The system is comprised of processes, internal regulations and tools to steer, monitor, evaluate and continuously improve the bank's information security work so that information belonging to the bank and its customers is protected. In addition to the central CISO function, designated Information Security Managers and the subsidiaries' own Chief Information Security Officers support the organisation's information security work.

Security testing of IT systems is an important preventive measure. Several different types of tests are conducted, including penetration testing of critical and new or modified IT systems. Red-teaming tests, which involve simulations of advanced cyberattacks against selected IT systems, are conducted as well. Deficiencies identified during the tests are analysed and mitigated. Greater resources have been allocated for testing as threat scenarios intensify. Testing is also carried out annually by external auditors and through third-party certification. The bank's process to continuously scan the IT environment to identify and manage vulnerabilities is also central to its preventive information security work. Customers who are affected by IT incidents and subsequent problems are able to contact the bank regarding their cases. Customers are compensated for actual late fees, but each case is evaluated individually.

Certification

Swedbank's Cyber Defence Center is an accredited Security Incident Response Team (SIRT) and in 2023 it was also certified by Trusted Introducer. The certification is an international recognition of the SIRT's maturity. Swedbank has a comprehensive framework for managing information security risks linked to the use of external suppliers for outsourcing operations and assignments. Compliance with Swedbank's information security requirements is evaluated continuously throughout the life of each contract.

Security-conscious employees

Security-conscious employees are essential to successful security work. The bank's employees and consultants undergo annual training in information security. People in specific roles, such as developers, undergo more in-depth training. The central CISO function's Awareness unit conducts continuous simulated phishing tests to maintain employee awareness of security concerns. Information sessions on current security issues are also arranged, in the form of lectures, webinars or articles on the intranet.

Metrics

Employees who have received training in information security, by country (%)	2023	2022	2021
Sweden	98.6	98.5	94
Estonia	99.7	99.7	96.3
Latvia	99.7	99.2	94.7
Lithuania	99.7	99.6	96.8

4.4 Procurement

Policies

- Sustainability Policy

Other governing documents

- Swedbank Supplier Code of Conduct
- Group Purchasing Instruction
- Outsourcing Instruction

Measures and activities

Swedbank has approximately 3 600 suppliers and annual procurement expenses of approx. SEK 11.6bn for IT and digital banking services, shared internal services, and financial products and services for private and corporate customers.

The goal is to be best in class in sustainable procurement compared to other major Nordic banks. To achieve this goal, the bank works actively to reduce risk in the supply chain while also contributing to innovation and having a positive impact.

Code of Conduct for Suppliers

Swedbank's procurement has an impact on the environment and society, so the bank has established policies and guidelines to encourage more sustainable procurement. Swedbank's Purchasing Instruction, which encompasses the entire bank, states that sustainability demands will be applied for all suppliers before signing a contract and that risks will be investigated and managed effectively.

All new suppliers must sign Swedbank's Code of Conduct for Suppliers to ensure that they comply with the sustainability demands. Noncompliance with the Code of Conduct is managed on an ongoing basis to reduce risks in the supply chain. Noncompliance is escalated to the Procurement Sustainability Committee for approval or denial. In 2023, approximately 40 cases were escalated.

Supplier evaluations

Guidelines are in place to set out how the bank should evaluate and manage risks in the procurement process. Swedbank's digitised procurement process supports the work of monitoring that the correct supplier controls are performed and evaluated systematically.

When potential suppliers are identified during procurement, relevant data is obtained on the supplier, including information on any reputational risks or negative publicity. The supplier also has to answer a questionnaire on sustainability, provided that they are not classified as low-risk suppliers. Swedbank's suppliers are mainly in Europe and more than 99 per cent of them are in markets assessed as low risk. In cases where the supplier has operations or subcontractors in high-risk countries, a more extensive questionnaire is sent out.

Sustainability assessment

In addition to risk, Swedbank's general sustainability questionnaire assesses the extent to which suppliers have developed their sustainability work. For example, suppliers must describe their climate ambitions, their work with circular products and services, and how well their sustainability work is integrated in their operations. This enables Swedbank to choose the top suppliers and products in the field.

During the year, Swedbank conducted process work which resulted in sustainability issues being discussed at an earlier stage as well as being included in the bank's strategies and established plans for future procurement needs in various categories.

One example was the year's procurement of IT services, where category-specific sustainability criteria were evaluated for hardware and data centres. Suppliers with the best overall results advanced to the next step in the procurement process.

To further strengthen IT competence, all purchasing agents received Green IT Procurement training and the bank always reuses IT equipment such as computers and monitors.

Swedbank's Code of Conduct for Suppliers is divided into mandatory requirements and voluntary measures. In 2023, approximately 45 supplier dialogues were held with a focus on compliance with the requirements and the voluntary commitments. For example, Swedbank investigated the climate ambitions of its 50 largest suppliers. The purpose was to influence and increase the share of suppliers who commit to science-based climate targets in accordance with the Paris Agreement. The results of the dialogues showed that 29 had decided on targets aligned with the Paris Agreement.

Metrics

Evaluation of suppliers	2023	2022	2021
Procurement value (SEKm)	11 584	9 473	9 593
Number of active suppliers	3 592	3 653	3 785
Percentage of suppliers registered in countries with low environmental risk ¹	99	99	99
Percentage of suppliers registered in countries with low social risk ²	99	99	99
Number of supplier dialogues ³	45	43	46
Number of sustainability evaluations ⁴	250	289	129

- 1) Based on the Environmental Performance Index. All suppliers with risk scores over 50 are considered low risk.
- 2) Based on the Amfori BSCI index. All suppliers with risk scores over 60 are considered low risk.
- 3) Supplier dialogues are structured meetings with sustainability agenda managed by Swedbank.
- 4) Sustainability evaluation conducted on contracted suppliers.

4.5 Taxes**Policies**

- Policy for Tax Management
- Sustainability Policy
- Group Policy on Anti-Tax Evasion and Aggressive Tax Planning

Other governing documents

- Tax Transfer Pricing Directive

Measures and activities

Being a good taxpayer and contributing to the community in which it operates is a fundamental part of a company's sustainability work. In accordance with Swedbank's vision of a financially sound and sustainable society, and its values – open, simple and caring – it is important to address tax issues responsibly, ethically and transparently. This responsibility applies to tax issues that affect both the bank and its customers. The loss of tax revenues can cause serious damage to society and adversely impact the functions of the public sector.

Taxes are an important sustainability issue for Swedbank. Since 2008, Swedbank has had a Group-wide Tax Policy adopted by the Board of Directors (available

on swedbank.com/sustainability). The policy is updated annually. Swedbank follows Swedish and international tax laws, regulations and standards, but also strives to abide by the intentions of these laws. Swedbank openly reports operating profits, assets and tax costs in the countries where it operates. Swedbank acts transparently in all communication with tax authorities in all these countries and works to maintain strong, long-term relationships based on openness and trust. In situations where there may be alternative interpretations of case law, Swedbank relies on internal and/or external expertise to ensure appropriate and accurate tax interpretations. When needed, Swedbank enters into dialogue with the tax authorities.

Swedbank as a taxpayer

In 2023, Swedbank incurred expenses of SEK 7bn for corporate tax. Swedbank contributes to society by providing jobs and paying SEK 3bn in social security fees for its approximately 17 000 employees. As a financial company, Swedbank incurs costs for non-deductible value-added tax (VAT) of SEK 3bn. Since 1 January 2022, Sweden is also one of approximately ten taxpayers subject to a special bank tax (risk tax for credit institutions) in Sweden of SEK 1bn. In 2023, a bank tax (solidarity tax) was also introduced in Lithuania, which in Swedbank's case amounted to SEK 1.5bn. A portion of the corporate tax that Swedbank pays can be attributed to elevated tax rates that certain countries apply to financial entities. Swedbank's aggregate cost for taxes and social security fees was more than SEK 15bn for 2023. Swedbank's net profit for 2023 amounted to SEK 34bn.

Operating taxes

The sustainability analysis conducted in connection with corporate loan applications requires the borrower to report taxes transparently. Swedbank has internal processes in place to reduce the risk that its operations will be exploited for tax evasion purposes.

Swedbank does not provide tax advice or facilitate arrangements whose purpose is aggressive tax planning. Transactions that include elements that could typically be interpreted as tax-driven receive extra scrutiny. Cases involving difficult assessments can be escalated to the Swedbank Sustainability Committee.

Swedbank withholds, pays and reports the taxes that its private customers owe for interest, dividends and various types of savings.

To fulfil its tax commitments within the Group, Swedbank, in addition to its Tax Policy, has an internal policy covering tax avoidance and aggressive tax planning. This policy has been adopted specifically to ensure that Swedbank's products are not used for tax avoidance purposes or for aggressive tax planning. The Group also works with additional position statements on tax issues, e.g. in Swedbank's sector guidelines and in public positions on investments and asset management.

Internal tax management

Ultimate responsibility for tax management and tax policy rests with the Board of Directors. Swedbank's CEO shall ensure that the tax policy is followed and that the right resources and competence are available to the organisation to manage tax issues. The Group Corporate Tax and Group Operational Tax departments monitor tax compliance, including by annually reviewing the tax statements of large Group companies, questioning any discrepancies between the subsidiaries' effective tax rates and the standard tax rate, and examining the Group's internal pricing. Further, the bank's control functions perform risk-based compliance reviews of documentation, reporting and tax deductions for customers. In addition, externally performed controls are conducted by the tax authorities in the bank's home markets and by US tax authorities with respect to specific US requirements. Swedbank's external auditors review the tax expense and the sustainability report.

Taxes are an area in constant change. Swedbank works continuously to improve the Group's tax management processes and procedures. All activities at Swedbank should be characterised by high ethical standards, where every transaction, relationship and activity is assessed based on the bank's ethical norms and positions. Swedbank shall not pursue aggressive tax planning whose main purpose is to reduce tax costs. Swedbank has a whistleblower process for employees and other stakeholders to report suspicions of misconduct in contravention of the bank's values, policies or ethical norms, including Swedbank's Tax Policy.

Tax issues that entail a material financial risk and/or reputational risk for the Swedbank Group are reported to Swedbank's CEO and Board of Directors. Through an annual materiality analysis, Swedbank evaluates the significance of external tax reporting by its stakeholders.

Swedbank is an active member of the Swedish Bankers' Association's tax committee, which in turn is a consultative committee on new tax legislation.

The Swedish Surtax Act applies as of 1 January 2024. For more information, see Note G3, page 86.

Metrics

2023	Sweden	Estonia	Latvia	Lithuania	Norway	USA	Finland	Denmark	Luxembourg	China	Spain	Total
Primary activities of the organisation ¹	RB, WB, AM, Other	RB, WB, AM, Other	RB, WB, AM	RB, WB, AM	WB, Other	WB, Other	WB, Other	Business being phased out, Other ⁴	Business being phased out	WB	Other	
Number of employees ²	9 831	2 604	1 978	2 600	164	14	50	15		18	1	17 275
Revenues from third-party sales (SEKm) ³	48 222	7 339	4 232	7 931	3 601	-4 857	6 378	139	2	61	10	73 057
Revenues from intra-group transactions (SEKm) ³	2 065	1 181	1 047	1 477	-2 013	5 078	-5 724	-6		-21		3 083
Operating profit (SEKm) ³	26 867	5 777	3 253	5 305	1 651	197	530	18	1	19	4	43 622
Tangible assets (SEKm)	3 773	346	335	782	225	25	26			31		5 544
Tax expense – paid (SEKm)	3 970	761	108	498		1	89	5		11	0	5 443
Current tax expense – accrued (SEKm)	4 223	826	684	961	452	43	107	-11	0	3	1	7 289
Non-deductible VAT (SEKm)	1 665	215	130	248	9		11					2 278
Social security contributions (SEKm)	1 980	359	159	18	42	2	2	3		4		2 569
Bank tax (SEKm)	1 170			1 505								2 675
Effective tax rate, excl. temp differences/tax previous years (%) ⁵	15.7	14.3	21.0	18.1	27.3	21.9	20.3	-61.1	6.1	17.5	26.9	16.7
Statutory tax rate (%)	20.6	20.0	20.0	20.0	25.0	25.0	20.0	22.0	25.0	25.0	25.0	
Difference current/statutory tax rate (%)	-4.9	-5.7	1.0	-1.9	2.3	-3.1	0.3	-83.1	-18.9	-7.5	1.9	
Difference current/statutory tax (SEKm)	-1 312	-329	33	-100	39	-6	1	-15	0	-1	0	-1 690
Explanation difference current/statutory tax (SEKm)												
Special tax rate for insurance business	-171											-171
Associated companies reported after tax	-142				-8			-15				-165
Non-deductible interest on subordinated loans	372											372
Non-deductible administrative fine from Swedish SFA	175											175
Temporary differences (current tax on other date)	-1 626	-219	34	-48	2	0	0	0		-1		-1 858
Variable tax rate within jurisdiction				-14	-2							-16
Other	79	-110	-1	-37	47	-6	1	1	0	-1	0	-27

1) RB-Retail banking, WB-Wholesales banking, AM-Asset management.

2) Number of Group employees at year-end excluding long-term absentees in relation to hours worked expressed as full-time positions.

3) Amounts are based on consolidated financial statements. Intra-group transactions within each jurisdiction have been eliminated.

4) Swedbank's Danish branch office is deregistered as of 31 December 2023; remaining are the operations of other subsidiaries and associated companies.

5) This reporting is in line with GRI's framework, which is why only current tax may be used when calculating the effective tax rate, compare note G19.

List with names of tax resident entities per jurisdiction can be found at swedbank.com/investor-relations/risk-and-capital-adequacy.html

GRI Index 2023

Swedbank reports according to the GRI Standards (GRI 1: Foundation 2021). Shown below are the GRI indicators associated with the key topics that have been defined based on the bank's materiality analysis and impact analysis. For each

material sustainability area one or more of GRI's relevant disclosures are presented below with GRI's designations. For material topics that lack GRI disclosures, the bank's own disclosures, which lack GRI designations, have been used.

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
General disclosures					
GRI 2: General Disclosures 2021	2-1 Organizational details	76			
	2-2 Entities included in the organization's sustainability reporting	192–193, 209			
	2-3 Reporting period, frequency and contact point	76, 209, 289–290			
	2-4 Restatements of information	22, 209, 215–217, 245–246, 249, 254			
	2-5 External assurance	1, 209, 279			
	2-6 Activities, value chain and other business relationships	9–16, 95–96, 124, 192–193, 258–259	2-6 b	Information unavailable/incomplete	Reporting on the value chain will be developed in the coming years with a focus on boundaries and downstream activities.
	2-7 Employees	251–254, 270			
	2-8 Workers who are not employees	253			
	2-9 Governance structure and composition	48–68, 210	2-9 c.vi. Underrepresented groups	Information unavailable/incomplete	Underrepresented groups are a KPI that Swedbank does not apply today. Data consolidation is scheduled to be evaluated in the coming years.
	2-10 Nomination and selection of the highest governance body	51–56, 251			
	2-11 Chair of the highest governance body	51–52, 62, 67			
	2-12 Role of the highest governance body in overseeing the management of impacts	48–68, 210, 255			
	2-13 Delegation of responsibility for managing impacts	48–68, 210			
	2-14 Role of the highest governance body in sustainability reporting	210			
	2-15 Conflicts of interest	48–49, 51–53, 62–66			
	2-16 Communication of critical concerns	56, 210, 256–257			
	2-17 Collective knowledge of the highest governance body	53–54, 56, 210			
	2-18 Evaluation of the performance of the highest governance body	52, 210			
	2-19 Remuneration policies	56, 131–134, 210			
	2-20 Process to determine remuneration	32, 50–51, 56, 131–134, 267			
	2-21 Annual total compensation ratio	253			
	2-22 Statement on sustainable development strategy	5–7			
	2-23 Policy commitments	49, 210, 245, 255			
	2-24 Embedding policy commitments	49, 210, 252–253, 256			

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GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
	2-25 Processes to remediate negative impacts	210, 256–257			
	2-26 Mechanisms for seeking advice and raising concerns	210, 216, 256–257			
	2-27 Compliance with laws and regulations	256–257			
	2-28 Membership associations	214, 216, 245, 249, 251, 255–258			
	2-29 Approach to stakeholder engagement	25, 211, 213, 267			
	2-30 Collective bargaining agreements	254			
Material topics					
GRI 3: Material Topics 2021	3-1 Process to determine material topics	25, 211–213, 267			
	3-2 List of material topics	25, 211–212			
Sustainable advice, products and services					
GRI 3: Material topics 2021	3-3 Management of material topics	210, 214			
G4-FS10	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues	214–215			
G4-FS6	Percentage of corporate portfolio by region, size and sector	95–96			
G4-FS7	Monetary value of products and services that have positive social effects indicated by business area and purpose	216–218			
G4-FS8	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose	26, 31, 216–217			
Climate change					
GRI 3: Material topics 2021	3-3 Management of Material topics	22, 210, 113–115, 210, 245			
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	245–249			
	305-2 Energy indirect (Scope 2) GHG emissions	245–249			
	305-3 Other indirect (Scope 3) GHG emissions	245–249			
	305-4 GHG emissions intensity	245–249			

GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Biodiversity and ecosystems					
GRI 3: Material topics 2021	3-3 Management of Material topics	210, 249–250	3-3 e, f	Information unavailable/incomplete	Swedbank is developing processes and methods to assess risks. Data collection is also a priority, where external collaborations and partnerships are important. The work is still in the early stages and there are still few metrics in the area. It is important in the coming years to continue to develop concrete measurement methods to monitor impacts.
GRI 304: Biodiversity 2016	304-2	249–250	304-2 b	Information unavailable/incomplete	Same as above
Own workforce					
GRI 3: Material topics 2021	3-3 Management of Material topics	21, 29, 210, 251–254, 255, 268			
GRI 401: Employment 2016	404-1 Average hours of training per year per employee	253			
GRI 3: Material topics 2021	3-3 Management of Material topics	21, 29, 210, 251–254, 255, 268			
GRI 404: Training and Education 2016	404-1 Average hours of training per year per employee	252			
	404-3 Percentage of employees receiving regular performance and career development reviews	254			
GRI 3: Material topics 2021	3-3 Management of Material topics	21, 29, 210, 251–254, 255, 268			
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	251–254	405-1 a iii	Not applicable.	Strong limits on storing data on many different diversity indicators. Survey on opportunities for self-identification in the coming years.
	405-2 Ratio of basic salary and remuneration of women to men	252–254			
Business conduct					
GRI 3: Material topics 2021	3-3 Management of Material topics	210			
GRI 201: Economic performance 2016	201-3 Defined benefit plan obligations and other retirement plans	131–134, 153–154			
GRI 3: Material topics 2021	3-3 Management of Material topics	210			
GRI 207: Tax 2019	207-1 Approach to tax	259–260			
	207-2 Tax governance, control, and risk management	259–260			
	207-3 Stakeholder engagement and management of concerns related to tax	259–260			
	207-4 Country-by-country reporting	259–260			
GRI 3: Material topics 2021	3-3 Management of Material topics	210, 256–257			
Business conduct: Own indicator	Number of suspicious orders and transactions reported	257			

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GRI standard/ other source	Disclosure	Location	Omission		
			Requirement(s) omitted	Reason	Explanation
Business conduct: Own indicator	Number of complaints from registered parties to data protection officer	257			
Business conduct: Own indicator	Number of complaints from Swedish Data Protection Authority	257			
Financial crime					
GRI 3: Material topics 2021	3-3 Management of Material topics	5, 7, 57, 210, 257			
GRI 205: Anti-corruption 2016	205-1 Operations assessed for risks related to corruption	257	205-1	Information unavailable/incomplete	The percentage, type of corruption risk identified through the risk assessment in each core process, total number analysed based on corruption risks measured for certain activities, and KPIs for the Group as a whole therefore cannot be presented. Swedbank is working actively to develop its risk assessments.
Financial crime: Own indicator	Number of corporate customers risk assessed based on business ethics aspects	216			
Financial crime: Own indicator	Number of transactions involving suspected money laundering/terrorism financing reported	257			

PRB Self-Assessment

The following table shows page references in Swedbank's Annual and Sustainability Report where PRB reporting is presented. Swedbank's PRB Self-Assessment follows the Principles of Responsible Banking's requirements. Areas 2.1, 2.2, 2.3 and 5.1 have been reviewed by PwC (limited assurance) in accordance with the assurance report on page 279.

Principle 1: Alignment	Principle 2: Impact and Target Setting
<p>1.1 Description of business model</p> <p>With around seven million private customers and 550 000 corporate customers, Swedbank is one of the leading banks for the many households and companies in our four home markets: Sweden, Estonia, Latvia and Lithuania. The bank's main customer segments are private customers, corporate customers, tenant owner associations, the public sector and financial institutions. Based on largest sector exposure, Swedbank's corporate lending comprises property management, agriculture, forestry and fishing, manufacturing, and the retail and wholesale trade.</p> <p>Links and references Swedbank Annual and Sustainability Report 2023, pages 12–13, 15–16 Factbook 2023, page 2</p> <p>1.2 Strategy alignment</p> <p>Does your corporate strategy identify and reflect sustainability as a strategic priority for your bank?</p> <p><input checked="" type="radio"/> Yes <input type="radio"/> No</p> <p>Does your bank reference any of the following frameworks or sustainability regulatory reporting requirements in its strategic priorities or policies to implement these?</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> UN Guiding Principles on Business and Human Rights <input checked="" type="radio"/> International Labour Organization fundamental conventions <input checked="" type="radio"/> UN Global Compact <input type="radio"/> UN Declaration on the Rights of Indigenous Peoples <input checked="" type="radio"/> Any applicable regulatory reporting requirements on environmental risk assessments, e.g. on climate risk – please specify which ones: – Task Force on Climate-related Financial Disclosures, TCFD, Finance for Biodiversity Pledge (Swedbank Robur), Principles for Responsible Investments, PRI (Swedbank Robur), EU Taxonomy, ECB's Expectations on Climate related and environmental risks, Pillar 3 <input type="radio"/> Any applicable regulatory reporting requirements on social risk assessments, e.g. on modern slavery – please specify which ones: <input type="radio"/> None of the above <p>Swedbank has committed to adapt to the Paris Agreement and the Sustainable Development Goals.</p> <p>Swedbank will reach net zero by 2050 and align its lending and investment portfolios. Swedbank has set emissions reduction targets for parts of the loan portfolio to help limit global warming to 1.5°C. Swedbank Robur has set targets to align its aggregate AUM with the Paris Agreement's goal to limit global warming to 1.5°C and to be net zero by 2040.</p> <p>Links and references Swedbank Annual and Sustainability Report 2023, pages 9–13, 22, 214, 245, 249, 255–256 https://swedbank.com/sustainability/environment/environmental-targets/climate-targets.html https://swedbankrobur.se/en/</p>	<p>Swedbank will continuously increase its positive impacts while reducing the negative impacts on, and managing the risks to, people and environment resulting from the bank's activities, products and services. To this end, Swedbank will set and publish targets for areas where the bank has the most significant impacts.</p> <p>2.1 Impact analysis (Step 1)</p> <p>a) Scope The impact analysis was completed using UNEP-FI's Portfolio Impact Analysis Tool v.2 in 2021. Products and services were analysed for the private and corporate business in Sweden, Estonia, Latvia, Lithuania and Norway. Asset management, insurance and capital market products were not included in the analysis.</p> <p>Links and references https://swedbank.com/sustainability/reporting-monitoring.html</p> <p>b) Portfolio composition Swedbank considered the composition of the portfolio (in %) in the analysis. Products and services and the corporate sector were analysed in Sweden, Estonia, Latvia, Lithuania and Norway. The corporate portfolio was divided up at NACE-sector level two. See the bank's current composition at a sector level on pages 95–96.</p> <p>Links and references Swedbank Annual and Sustainability Report 2023, pages 95–96</p> <p>c) The bank's portfolio impacts in the context of society's needs UNEP FI has integrated country risks for each country in the analysis tool, which affects which areas end up as priorities, both positive and negative. According to the impact analysis, some of Swedbank's most important priority areas are, based on a positive impact, the following: inclusive and sound economies as well as employment. Swedbank's primary negative impact is in the areas of climate change and resource efficiency. For Swedbank's target setting, the areas of climate change mitigation, climate change adaptation, resource efficiency, inclusive and sound economies, and employment have been prioritised. The areas are defined by the UN.</p> <p>Links and references Swedbank Annual and Sustainability Report 2023, pages 95–96 https://swedbank.com/sustainability/reporting-monitoring.html</p>

d) Result:

The results of the analysis show that Swedbank, through its business, plays an important role in society and its development. This is mainly in the areas of housing, inclusive sound economies, and employment, where Swedbank has the biggest impact in a positive direction. Particularly in sectors such as real estate and manufacturing. The bank's positive impact in the area of housing is based on increased access to housing opportunities, e.g. in the form of financing for individuals as well as construction and real estate companies. The bank also contributes positively to inclusive sound economies by contributing to increased availability of secure financial services.

This in turn generates a positive impact on SDG 8 Decent work and economic growth and SDG 11 Sustainable cities and communities.

The results also show that Swedbank, through his business, has an important commitment to limit its negative impacts, especially in environmentally related areas such as climate change, biodiversity, waste and resource efficiency. In these areas the bank also has a positive impact e.g. on food accessibility and livelihoods, but at the same time potential for improvement in the property management, manufacturing, agriculture, forestry and fishing sectors as well as certain parts of the energy sector.

Resource efficiency and climate change mitigation are key areas that for example impact SDG 12 Responsible consumption and production and SDG 13 Climate action.

Links and references

<https://swedbank.com/sustainability/reporting-monitoring.html>

Which of the following components of the impact analysis has your bank completed in order to identify the areas in which your bank has its most significant (potential) positive and negative impacts?

- | | | | |
|------------------------|--------------------------------------|-----------------------------------|--------------------------|
| Scope: | <input checked="" type="radio"/> Yes | <input type="radio"/> In progress | <input type="radio"/> No |
| Portfolio composition: | <input checked="" type="radio"/> Yes | <input type="radio"/> In progress | <input type="radio"/> No |
| Context: | <input checked="" type="radio"/> Yes | <input type="radio"/> In progress | <input type="radio"/> No |
| Result: | <input checked="" type="radio"/> Yes | <input type="radio"/> In progress | <input type="radio"/> No |

Which areas have you identified as most significant for your bank, as a result of the impact analysis?

Climate change mitigation, climate change adaptation, resource efficiency, inclusive and sound economies, and employment.

How recent is the data used in the impact analysis?

- Longer than 18 months prior to publication

2.2 Target Setting (Step 2)

Swedbank's climate targets align with the Science Based Targets initiative and Net-Zero Banking Alliance, and with the goal to limit global warming to 1.5°C.

Swedbank's financial health target is to empower one million people to improve their financial health by 2030. The term financial health is based on the UN's definition, "feeling secure in your personal finances, having control, resilience and economic freedom". Swedbank's financial health target is supported by several of the SDG's, including SDG 1 Eradicate poverty, SDG 5 Gender equality and SDG 10 Reduce inequalities.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 22, 218, 245–249

b) Baseline year:

The baseline year for the climate targets for the credit portfolio is 2019. The baseline year for the target on financial health is 2022.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 22, 245

c) "SMART" targets:

Target 1

The 2019-2030 climate targets for the credit portfolio align with the global 1.5°C target and comprise the following sectors: mortgages, commercial real estate, power generation, oil and gas, and steel.

- For mortgages, the target is to reduce financed emissions intensity ($\text{kgCO}_2\text{e/m}^2$) by 39 per cent.
- For commercial real estate, the target is to reduce financed emissions intensity ($\text{kgCO}_2\text{e/m}^2$) by 43 per cent.
- For power generation, the target is to reduce financed emissions intensity ($\text{tCO}_2\text{e/MWh}$) by 59 per cent.
- For oil & gas (exploration, production and refining), the target is to reduce absolute financed emissions (tCO_2e) by 50 per cent.
- For the steel sector, the target is to reduce financed emissions intensity ($\text{tCO}_2\text{e/tonne}$) by 29 per cent.

Target 2

To empower one million people to improve their financial health by 2030.

Business targets to meet the financial health target:

- Number of assisted advisory meetings, Swedish Banking, 300,000 by 2025
- Number of private customers with long-term savings, Baltic Banking, 900,000 by 2030

Links and references

Swedbank Annual and Sustainability Report 2023, pages 17, 22, 218

d) Action plan:

Swedbank will continue to develop products and advisory services that facilitate the transition towards the 2030 targets. Swedbank is also working to improve internal systems to store and access relevant data as a way to facilitate effective governance. Data quality and calculations will be improved as both the target-setting methodology and research in the field develop over time. The same applies to SDG 2, where the bank supports customers and contribute to the transition by channelising capital flows to responsible investments. Both targets are integrated in the bank's governance structure with relevant monitoring.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 22, 218, 245–249

	First area of most significant impact: Climate change mitigation and climate change adaptation	Second area of most significant impact: Resource efficiency, inclusive sound economies and employment
Alignment:	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No
Baseline year:	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No
SMART targets:	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No
Action plan:	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No	<input checked="" type="radio"/> Yes <input type="radio"/> In progress <input type="radio"/> No

2.3 Target implementation and monitoring (Step 2)

Swedbank worked during the year to implement climate targets in the loan portfolio, including by continuing to develop products and services to support our customers in their green transition. For example, Swedbank is working actively to help our real estate customers with solutions to improve energy efficiency. One example of this is that we in 2023 invested in the company Hemma, where Swedbank's private customers in Sweden can receive a free digital energy inspection of their home and then apply to finance improvements through Swedbank.

Swedbank's focus on financial health affects several areas in the bank, such as technological platforms, the bank's routines, advisory services and pricing. Development will unfold in stages, where small cornerstones are tested and then can be scaled up.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 218, 245–249

Principle 3: Clients and Customers

Swedbank will work responsibly with its clients and customers to encourage sustainable practices and enable economic activities that create shared prosperity for current and future generations.

3.1 Client engagement

Does your bank have a policy or engagement process with clients and customers in place to encourage sustainable practices?

Yes In progress No

Does your bank have a policy for sectors in which you have identified the highest (potential) negative impacts?

Yes In progress No

During the year, Swedbank worked on developing and strengthening sustainability-oriented products and services to help customers become more sustainable. Swedbank's governing sustainability framework is also applied to our customers via policies (adopted by the Board), instructions/position statements (adopted by the CEO) and sector guidelines.

Swedbank's ESG analysis for large corporates was further refined in 2022 and is an important part of the lending process. The bank's sector guidelines are also used to analyse corporate clients' sustainability risks.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 214–215

3.2 Business opportunities

Swedbank's vision is a financially sound and sustainable society. To promote sustainable growth, it is essential that Swedbank allocate capital to firms whose business models contribute to the needed transition. Engagement and interest in sustainability are rapidly increasing. Swedbank therefore intensified its efforts to develop and strengthen sustainability-oriented products and services. Swedbank Robur offers sustainability funds.

Other products are green, social and sustainable bonds, products and services in connection with energy transition, sustainability linked loans, green loans, green mortgages and solar energy loans.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 214–218

Principle 4: Stakeholders

Swedbank will proactively and responsibly consult, engage and partner with relevant stakeholders to contribute to the SDGs.

4.1 Stakeholder identification and consultation

Does your bank have a process to identify and regularly consult, engage, collaborate and partner with stakeholders you have identified as relevant in relation to the impact analysis and target setting process?

Yes In progress No

A continuous dialogue is maintained with many different groups in society. Swedbank's main stakeholder groups are customers, employees, owners and society as a whole. Issues that have been addressed and which the bank partnered with stakeholders on during the year are reported on page 213.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 211–213

Principle 5: Governance & Culture

Swedbank will implement its commitment to these Principles through effective governance and a culture of responsible banking.

5.1 Governance structure for implementation of the principles

Does your bank have a governance process in place that incorporates the PRB?

Yes In progress No

Swedbank implements the principles through effective governance and a culture of responsible banking. The bank's governance structure includes sustainability and enables long-term value creation for the bank's owners and other stakeholders. For more information on governance of sustainability, see page 210. The bank's specific PRB targets are part of its overarching governance structure.

Swedbank integrates sustainability in its business decisions, activities and business development. With Swedbank's Performance Development process, individual performance criteria are set in order to contribute to and support Swedbank's overarching strategic direction, of which sustainability is an important part. Furthermore, sustainability risks are integrated in Swedbank's remuneration practices by including qualitative and individual performance criteria as the basis for awarding variable remuneration to all employees, e.g. compliance with Swedbank's values, and by applying deferral periods and the payment of variable remuneration in the form of financial instruments for the majority of employees. No external remuneration consultants have been hired.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 46–61, 210

5.2 Promoting a culture of responsible banking

Swedbank has implemented a number of initiatives and measures to monitor and support the integration of sustainability in its business.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 210, 256–257

5.3 Policies and due diligence processes

Swedbank has a governance system that facilitates an effective governance structure. Swedbank's policies, position statements and guidelines in the area serve as the basis for governance of Swedbank's sustainability work. The bank has a Sustainability Committee whose purpose is to support effective governance in the area of sustainability. The role of the Sustainability Committee is to guide the organisation to minimise sustainability risks and any negative impacts by and for the bank. There is also a system for whistleblowing, both internally and externally. For the bank's employees processes are in place to ensure a good corporate culture.

Links and references

Swedbank Annual and Sustainability Report 2023, pages 46–61, 210, 256–257

Does the CEO or other C-suite officers have regular oversight over the implementation of the Principles through the bank's governance system?

- Yes
- In progress
- No

Does the governance system entail structures to oversee PRB implementation?

- Yes
- In progress
- No

Does your bank have measures in place to promote a culture of sustainability among employees?

- Yes
- In progress
- No

Principle 6: Transparency and accountability

Swedbank will periodically review its individual and collective implementation of these Principles and be transparent about and accountable for its positive and negative impacts and its contribution to the SDGs.

6.1 Assurance

Has this publicly disclosed information on your PRB commitments been assured by an independent assurer?

- Yes
- Partially
- No

Pricewaterhouse Coopers AB (PWC) has reviewed Swedbank AB's sustainability report and paragraphs 2.1, 2.2, 2.3 and 5.1 in Swedbank AB's self-assessment of the PRB for 2023.

Links and references

Swedbank Annual and Sustainability Report 2023, page 279

6.2 Reporting on other frameworks

Does your bank disclose sustainability information in any of the listed below standards and frameworks?

- GRI
- SASB
- CDP
- IFRS Sustainability Disclosure Standards (to be published)
- TCFD
- Other: SBTi, Net Zero Banking, UN Global Compact

Links and references

Swedbank Annual and Sustainability Report 2023, pages 261–264, 269–270

6.3 Outlook

What are the next steps your bank will undertake in next 12 month-reporting period (particularly on impact analysis, target setting and governance structure for implementing the PRB)? Please describe briefly.

The Swedbank Group has adopted an overarching position statement on climate change, and our position is clear. We want to actively contribute to a more sustainable society and focus on transitioning our operations so that we can meet the demands that climate change and its impacts entail. As part of this, Swedbank has adopted climate targets for the credit portfolio in line with the latest climate science. In 2024, Swedbank will continue to support customers in the transition and implement measures to reach the climate targets. Furthermore, the bank will continue to develop calculations for financed emissions in 2024 and in that way further improve the assessment of the bank's climate impact.

A materiality assessment of both consequential and financial materiality was carried out in 2023 and will continue to be developed and expanded over time

Links and references

Swedbank Annual and Sustainability Report 2023, pages 22–31

TCFD Index

The following table shows page references in Swedbank's Annual and Sustainability Report where TCFD reporting is presented.

Reference	Page
Governance	
a) Describe the board's oversight of climate-related risks and opportunities.	50, 61, 85–86, 210
b) Describe management's role in assessing and managing climate-related risks and opportunities.	56–57, 85–86, 210
Strategy	
a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term.	27–28, 113–115, 245–249
b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning.	27–28, 85–86, 113–115, 245–249
c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	113–115, 245–249
Risk management	
a) Describe the organisation's processes for identifying and assessing climate-related risks.	85–86, 113–115, 245–249
b) Describe the organisation's processes for managing climate-related risks.	85–86, 113–115, 245–249
c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management.	61, 85–86, 113–115
Targets and metrics	
a) Describe the metrics used by the organisation to assess climate-related risks and opportunities aligned with its strategy and risk management process.	22, 219–249
b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks.	113–115, 245–249
c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets.	22, 245–249

Sustainability report according to the Annual Accounts Act

In 2017 sustainability reporting requirements were introduced in the Swedish Annual Accounts Act (chapter 6, paragraph 12). The requirements state that sustainability reports must contain the sustainability disclosures needed to understand the company's development, financial position and results and the conse-

quences of its activities, including disclosures on the environment, social conditions, HR, respect for human rights and anti-corruption. The following table with page references to the report is provided to show how Swedbank meets the legal requirements. Swedbank's taxonomy report is found on pages 219–244.

Page reference by area	Environment	Employees and Social conditions	Human rights	Anti-corruption
Business model	12–13, 16	12–13, 16	12–13, 16	12–13, 16
Material risks	23–31, 113–115, 210–213, 245–250	23–31, 113–115, 210–213, 251–254	23–31, 113–115, 210–213, 255, 258–259	23–31, 113–115, 210–213, 256–257
Policy, results and indicators ¹	113–115, 210–212, 245–250 ● Environmental Policy ● Position Statement Climate Change ● Sustainability Policy ● Swedbank's Code of Conduct ● Swedbank Supplier Code of Conduct ● Swedbank Robur's Policy for responsible investments	210–213, 251–254 ● Policy on Diversity and Inclusion ● Policy on Human Rights ● Sustainability Policy ● Swedbank's Code of Conduct	210–213, 255, 258–259 ● Human Rights Policy ● Policy on Diversity and Inclusion ● Position Statement Defence Equipment ● Sustainability Policy ● Swedbank's Code of Conduct ● Swedbank Supplier Code of Conduct ● Swedbank Robur's Policy for responsible investments	210–213, 256–257 ● Anti-Bribery and Corruption Policy ● Group Policy on Anti Money Laundering and Countering Terrorist Financing ● Sustainability Policy ● Swedbank's Code of Conduct ● Swedbank Supplier Code of Conduct ● Policy for Tax Management ● Group Instruction on Internal Alerts (Whistleblowing)
Management of risks	23–31, 113–115, 210–213, 245–250	23–31, 113–115, 210–213, 251–254	23–31, 113–115, 210–213, 255, 258–259	23–31, 113–115, 210–213, 256–257

1) All policies are available at swedbank.com/sustainability

Signatures of the Board of Directors and the CEO

The Board of Directors and the President hereby affirm that the annual report has been prepared in accordance with the Act on Annual Accounts in Credit Institutions and Securities Companies (ÅRKL), the instructions and general guidelines of the Swedish Financial Supervisory Authority (FFFS 2008:25) and the Swedish Financial Accounting Standards Council's recommendation RFR 2 Accounting for Legal Entities, and provides an accurate portrayal of the Parent Company's position and earnings and that the Board of Directors' Report provides an accurate review of trends in the company's operations, position and earnings, as well as describes significant risks and instability factors faced by the company.

The Board of Directors and the President hereby affirm that the consolidated accounts have been prepared in accordance with the International Financial Reporting Standards (IFRS), as adopted by the EU, and provide an accurate portrayal of the Group's position and earnings and that the Board of Directors' report for the Group provides an accurate review of trends in the Group's operations, position and earnings, as well as describes significant risks and instability factors faced by the Group.

Stockholm 21 February 2024

Göran Persson
Chair

Biörn Riese
Vice Chair

Göran Bengtsson
Board member

Annika Creutzer
Board member

Hans Eckerström
Board member

Kerstin Hermansson
Board member

Helena Liljedahl
Board member

Bengt Erik Lindgren
Board member

Anna Mossberg
Board member

Per Olof Nyman
Board member

Biljana Pehrsson
Board member

Roger Ljung
Employee representative

Åke Skoglund
Employee representative

Jens Henriksson
President and CEO

Our auditors' report was submitted on 22 February 2024
PricewaterhouseCoopers AB

Anneli Granqvist
Authorised Public Accountant
Auditor in charge

Martin By
Authorised Public Accountant

Auditors' report

To the general meeting of the shareholders of Swedbank AB (publ), corporate identity number 502017-7753

Report on the annual accounts and consolidated accounts

Opinions

We have audited the annual accounts and consolidated accounts of Swedbank AB (publ) for the year 2023, except for the corporate governance statement on pages 46–68.

The annual accounts and consolidated accounts of the company are included on pages 34–207 in this document.

In our opinion, the annual accounts have been prepared in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies and present fairly, in all material respects, the financial position of parent company as of 31 December 2023 and its financial performance and cash flow for the year then ended in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies. The consolidated accounts have been prepared in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies and present fairly, in all material respects, the financial position of the group as of 31 December 2023 and their financial performance and cash flow for the year then ended in accordance with International Financial Reporting Standards (IFRS), as adopted by the EU, and the Annual Accounts Act for Credit Institutions and Securities Companies. Our opinions do not cover the corporate governance statement on pages 46–68.

The statutory administration report is consistent with the other parts of the annual accounts and consolidated accounts.

We therefore recommend that the general meeting of shareholders adopts the income statement and balance sheet for the parent company and the group.

Our opinions in this report on the annual accounts and consolidated accounts are consistent with the content of the additional report that has been submitted to the parent company's audit committee in accordance with the Audit Regulation (537/2014) Article 11.

Basis for Opinions

We conducted our audit in accordance with International Standards on Auditing (ISA) and generally accepted auditing standards in Sweden. Our responsibilities under those standards are further described in

the Auditor's Responsibilities section. We are independent of the parent company and the group in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements. This includes that, based on the best of our knowledge and belief, no prohibited services referred to in the Audit Regulation (537/2014) Article 5.1 have been provided to the audited company or, where applicable, its parent company or its controlled companies within the EU.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinions.

Our audit approach

Audit scope

We designed our audit by determining materiality and assessing the risks of material misstatement in the consolidated financial statements. We considered where management and the Board of Directors made subjective judgements; for example, in respect of significant accounting estimates that involved making assumptions and considering future events that are inherently uncertain. As in all our audits, we also addressed the risk of management override of internal controls, including among other matters consideration of whether there was evidence of bias that represented a risk of material misstatement due to fraud.

We tailored the scope of our audit to perform sufficient work to enable us to provide an opinion on the consolidated financial statements, considering the structure of the Group, the accounting processes and controls, and the industry in which the group operates.

Swedbank's banking activities in all countries are audited by local PwC audit teams. The Swedbank group has centralized service centers, systems, and processes for several processes. We have organized the audit work by having our central audit team to carry out the testing of all centralized systems and processes. Local audit teams carry out additional testing based on our instructions.

Full scope audit and reporting is performed at entities with high significance and risk to the group. The audit is carried out in accordance with ISA and local audit requirements. The procedures applied generally include an assessment and testing of controls over

key business processes, analytical procedures of individual account balances, tests of accounting records through inspection, observation, or confirmation, and obtaining corroborating evidential matter in response to inquiries.

For some entities, even though not considered to have high significance or risk, it is required from a group audit perspective to obtain assurance on certain accounting areas. In these cases, local audit teams are instructed to perform certain procedures and report back to us. The procedures applied generally include a detailed analytical review, reconciliation to underlying sub-ledgers, substantive testing for specific processes, areas and accounts, discussion with management regarding accounting, tax, and internal control as well as follow-ups on known issues from previous periods.

As part of our audit, we place reliance on internal controls for the business processes, applications/systems and related platforms that support Swedbank's accounting and financial reporting. Therefore, we perform audit procedures to determine that systems and processes are designed, maintained, operated, and kept secure in such a way as to provide assurance that the risk of error is minimized. The audit procedures include walk-throughs of processes and evaluation of design and test of effectiveness of controls. Substantive testing has also been performed.

Our audit is carried out continuously during the year with special attention at each quarter end. In connection with the Swedbank group's issuance of interim reports, we report our observations to the audit committee of the Board of Directors and issue interim

review reports. Twice a year, we also report our main observations to the Board of Directors.

Materiality

The scope of our audit was influenced by our application of materiality. An audit is designed to obtain reasonable assurance whether the financial statements are free from material misstatement. Misstatements may arise due to fraud or mistakes. They are considered material if individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the consolidated financial statements.

Based on our professional judgement, we determined certain quantitative thresholds for materiality, including the overall group materiality for the consolidated financial statements as a whole. These, together with qualitative considerations, helped us to determine the scope of our audit and the nature, timing, and extent of our audit procedures and to evaluate the effect of misstatements, both individually and in aggregate on the financial statements as a whole.

Key audit matters

Key audit matters of the audit are those matters that, in our professional judgement, were of most significance in our audit of the annual accounts and consolidated accounts of the current period. These matters were addressed in the context of our audit of, and in forming our opinion thereon, the annual accounts and consolidated accounts as a whole, but we do not provide a separate opinion on these matters.

Auditors' report

Key audit matter	How our audit addressed the Key audit matter
<p>Credit Impairment allowances on loans</p> <p>Accounting for impairment of loans to customers requires subjective judgement over both timing and size of any such impairment.</p> <p>Swedbank makes provisions for expected credit losses (ECL) in accordance with accounting standard IFRS 9 which categorise loans into three stages depending on the level of credit risk or changes in credit risk for each individual loan.</p> <p>Stage 1 representing a probable 12 month Expected Credit Loss (ECL) applies to all loans performing as originally intended. For loans where there is deemed to be a significant increase in credit risk since initial recognition, stage 2, or loans in default, stage 3, a lifetime ECL is calculated. The ECL is calculated as a function of the probability of default, the exposure at default and the loss given default, as well as the timing of the loss. IFRS 9 also allows for post model expert credit judgement to be applied to loan loss provisioning.</p> <p>The key areas where we identified greater levels of management judgement and therefore increased levels of audit focus in the Group's estimation of ECLs are:</p> <p>Model estimations - inherently judgmental modelling is used to estimate ECLs which involves determining Probabilities of Default ("PD"), Loss Given Default ("LGD") and Exposures at Default ("EAD"). The PD models are the key drivers of the ECLs and impact the staging of assets. As a result, the PD models are considered the most significant judgmental aspect of the Group's ECL modelling approach.</p> <p>Macroeconomic factors - IFRS 9 requires the Group to measure ECLs on an unbiased forward-looking basis reflecting a range of future economic conditions.</p> <p>Post model expert credit adjustment – Adjustments to the model-driven ECL results are raised by management to address known impairment model limitations or emerging trends. Such adjustments are inherently uncertain and significant management judgement is involved in estimating these amounts.</p> <p>Refer to Annual Report note G2 and P1 Accounting policies for critical judgements and estimates, G3 and P2 Risks for credit risk disclosures and note G17 and P13 Credit Impairments.</p>	<p>In our audit we perform a variety of procedures over the credit impairments.</p> <p>Controls testing: We performed end to end process walk-throughs to identify the key systems, applications and controls used in the ECL processes. We tested the IT environment for key systems and applications used in the ECL process.</p> <p>Our testing included testing the design and operating effectiveness of the controls covering input data. We also evaluated controls over models as well as the calculation and authorisation of year end post model expert credit adjustments.</p> <p>Model estimations: We have reviewed key assumptions and estimates used in the models and performed recalculations for a sample of loans for us to obtain comfort that the ECL is calculated correctly and that it is in line with our expectations. These recalculations were performed on the most significant models used in the loan portfolio.</p> <p>Macro economic factors: We have assessed the reasonability of the assumptions Swedbank uses in their assessment of macroeconomic factors. This included analysis of Gross Domestic Product, property price increase and unemployment rate projections against other independent sources as well as our own professional judgement.</p> <p>Tests of details: We have performed tests of details in a number of areas including the individually assessed credits and the calculation of post model expert credit adjustments.</p> <p>Disclosures: We have assessed whether the disclosures in the annual report are appropriate.</p>

Key audit matter	How our audit addressed the Key audit matter
<p>Valuation of complex or illiquid financial instruments held at fair value</p> <p>When accounting for financial instruments held at fair value, these are divided into three levels in accordance with IFRS 9. Level 1 are actively traded instruments where the value can be derived from a marketplace. Level 2 are instruments where the value is calculated using a model, but the model inputs can be derived from an actively traded marketplace such as foreign exchange rates or interest rates. Level 3 are instruments where the value is calculated using a model that is to a large extent dependent on estimates and judgements made by Swedbank.</p> <p>Valuation of Level 2 and Level 3 financial instruments held at fair value was an area of audit focus due to the degree of complexity involved in valuing these positions, the judgements and estimates made by management and their significance in presenting both financial position and performance in the financial statements.</p> <p>Determining the fair value of Level 2 and Level 3 financial instruments is inherently complex due to several factors including the structure of the instrument. The value of level 3 instruments is also based on inputs which are not observable in active markets and the use of valuation models to calculate the fair value. Because of these factors, the valuation of level 3 instruments is subject to significant estimation uncertainty and therefore involves significant judgement and estimates made by management.</p> <p>Refer to the Annual Report note G2 and P1 Accounting policies for critical judgments and estimates, note G3 and P2 Risks for related market risk disclosures, note G47 Valuation categories of financial instruments, note G47 and P41 Fair value of financial instruments.</p>	<p>In our audit, we perform a variety of procedures over valuation of financial instruments held at fair value.</p> <p>Controls testing: We performed end to end process walk-throughs to identify the key systems, applications and controls used in the valuation processes. We tested the IT environment for key systems and applications used in the valuation of financial instruments held at fair value.</p> <p>We have tested the design and operating effectiveness of key controls supporting the identification and measurement, and oversight of valuation of financial instruments.</p> <p>Test of details: We have performed tests of details for all three levels of financial instruments. For valuations dependent on unobservable inputs or models which involved a higher degree of judgement, we used our valuation experts to perform independent valuations for a sample of positions.</p> <p>Disclosures: We have assessed whether the disclosures in the annual report are appropriate.</p>
<p>Financial effects from regulatory investigations of money laundering</p> <p>As disclosed in the Board of Directors' report, authorities' investigations into anti money laundering and counter terrorist financing (AML/CTF) related matters continue. These investigations could potentially lead to significant consequences in the form of fines, withdrawn licenses, restrictions on currency trading and others ("the sanctions").</p> <p>Due to ongoing investigations, Swedbank have considered whether possible sanction fees should be accounted for as a provision or a contingent liability. The criteria to be evaluated are:</p> <ul style="list-style-type: none"> ● if it is more likely than not that an economic outflow because of ongoing investigations will occur, and ● if the amount of the sanction can be reliably estimated. <p>At present, Swedbank considers that it is not yet possible to reliably estimate the timing or amount of any potential settlement or fines, which could be material.</p> <p>Please refer to the Annual Report, Board of Directors' report, note G2 and P1 Accounting policies for critical judgments and estimates and G52 and P45 Assets pledged, contingent liabilities and commitments.</p>	<p>In our audit, we perform a variety of procedures over financial effects from regulatory investigations of money laundering.</p> <p>We have considered the extent to which regulatory investigations may affect the financial statements of the annual report. This includes accounting of and disclosures regarding provisioning and contingent liabilities. We have received Swedbank's own assessments in relation to accounting and reviewed these.</p> <p>We have performed this through the following activities</p> <ul style="list-style-type: none"> ● Review of Swedbanks documentation of correspondence and legal assessment in relation to regulatory investigations. ● Inquiries and meetings with responsible parties including Swedbank's legal counsel. ● Review of legal opinions from Swedbank's internal and external legal counsel. <p>We have assessed whether the disclosures in the annual report are appropriate.</p>

Other Information than the annual accounts and consolidated accounts

This document also contains other information than the annual accounts and consolidated accounts and is found on pages 1–33 and 209–290. The other information also includes the Remuneration Report which we received before the signing date of this Auditor's report. The Board of Directors and the Managing Director are responsible for this other information.

Our opinion on the annual accounts and consolidated accounts does not cover this other information and we do not express any form of assurance conclusion regarding this other information.

In connection with our audit of the annual accounts and consolidated accounts, our responsibility is to read the information identified above and consider whether the information is materially inconsistent with the annual accounts and consolidated accounts. In this procedure we also consider our knowledge otherwise obtained in the audit and assess whether the information otherwise appears to be materially misstated.

If we, based on the work performed concerning this information, conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director are responsible for the preparation of the annual accounts and consolidated accounts and that they give a fair presentation in accordance with the Annual Accounts Act or Credit Institutions and Securities Companies and, concerning the consolidated accounts, in accordance with IFRS as adopted by the EU. The Board of Directors and the Managing Director are also responsible for such internal control as they determine is necessary to enable the preparation of annual accounts and consolidated accounts that are free from material misstatement, whether due to fraud or mistakes.

In preparing the annual accounts and consolidated accounts, The Board of Directors and the Managing Director are responsible for the assessment of the company's and the group's ability to continue as a going concern. They disclose, as applicable, matters related to going concern and using the going concern basis of accounting. The going concern basis of accounting is however not applied if the Board of Directors and the Managing Director intend to liquidate the company, to cease operations, or has no realistic alternative but to do so.

The Audit Committee shall, without prejudice to the Board of Director's responsibilities and tasks in general, among other things oversee the company's financial reporting process.

Auditor's responsibility

Our objectives are to obtain reasonable assurance about whether the annual accounts and consolidated accounts, as a whole, are free from material misstatement, whether due to fraud or mistakes, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with ISAs and generally accepted auditing standards in Sweden will always detect a material misstatement when it exists. Misstatements can arise from fraud or mistakes and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken based on these annual accounts and consolidated accounts.

A further description of our responsibility for the audit of the annual accounts and consolidated accounts is available on Revisorsinspektionen's website www.revisorsinspektionen.se/revisoransansvar. This description is part of the auditor's report.

Report on other legal and regulatory requirements

Opinions

In addition to our audit of the annual accounts and consolidated accounts, we have also audited the administration of the Board of Director's and the Managing Director of Swedbank AB (publ) for the year 2023 and the proposed appropriations of the company's profit or loss.

We recommend to the general meeting of shareholders that the profit be appropriated in accordance with the proposal in the statutory administration report and that the members of the Board of Director's and the Managing Director be discharged from liability for the financial year.

Basis for Opinions

We conducted the audit in accordance with generally accepted auditing standards in Sweden. Our responsibilities under those standards are further described in the Auditor's Responsibilities section. We are independent of the parent company and the group in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinions.

Responsibilities of the Board of Directors and the Managing Director

The Board of Directors is responsible for the proposal for appropriations of the company's profit or loss. At the proposal of a dividend, this includes an assessment of whether the dividend is justifiable considering the requirements which the company's and the group's type of operations, size, and risks place on the size of the parent company's and the group' equity, consolidation requirements, liquidity, and position in general.

The Board of Directors is responsible for the company's organization and the administration of the company's affairs. This includes among other things continuous assessment of the company's and the group's financial situation and ensuring that the company's organization is designed so that the accounting, management of assets and the company's financial affairs otherwise are controlled in a reassuring manner. The Managing Director shall manage the ongoing administration according to the Board of Directors' guidelines and instructions and among other matters take measures that are necessary to fulfil the company's accounting in accordance with law and handle the management of assets in a reassuring manner.

Auditor's responsibility

Our objective concerning the audit of the administration, and thereby our opinion about discharge from liability, is to obtain audit evidence to assess with a reasonable degree of assurance whether any member of the Board of Directors or the Managing Director in any material respect:

- has undertaken any action or been guilty of any omission which can give rise to liability to the company, or
- in any other way has acted in contravention of the Companies Act, the Annual Accounts Act or the Articles of Association.

Our objective concerning the audit of the proposed appropriations of the company's profit or loss, and thereby our opinion about this, is to assess with reasonable degree of assurance whether the proposal is in accordance with the Companies Act.

Reasonable assurance is a high level of assurance but is not a guarantee that an audit conducted in accordance with generally accepted auditing standards in Sweden will always detect actions or omissions that can give rise to liability to the company, or that the proposed appropriations of the company's profit or loss are not in accordance with the Companies Act.

A further description of our responsibility for the audit of the administration is available on Revisorsinspektionen's website: www.revisorsinspektionen.se/revisornsansvar. This description is part of the auditor's report.

The auditor's examination of the ESEF report

Opinion

In addition to our audit of the annual accounts and consolidated accounts, we have also examined that the Board of Directors and the Managing Director have prepared the annual accounts and consolidated accounts in a format that enables uniform electronic reporting (the Esef report) pursuant to Chapter 16, Section 4(a) of the Swedish Securities Market Act (2007:528) for Swedbank AB (publ) for the financial year 2023.

Our examination and our opinion relate only to the statutory requirements.

In our opinion, the Esef report has been prepared in a format that, in all material respects, enables uniform electronic reporting.

Basis for the opinion

We have performed the examination in accordance with FAR's recommendation RevR 18 Examination of the Esef report.

Our responsibility under this recommendation is described in more detail in the Auditors' responsibility section. We are independent of Swedbank AB (publ) in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director are responsible for ensuring that the Esef report has been prepared in accordance with the Chapter 16, Section 4(a) of the Swedish Securities Market Act (2007:528), and for such internal control that the Board of Directors and the Managing Director determine is necessary to prepare the Esef report without material misstatements, whether due to fraud or mistakes.

Auditor's responsibilities

Our responsibility is to form an opinion with reasonable assurance whether the Esef report is in all material respects prepared in a format that meets the requirements of Chapter 16, Section 4(a) of the Swedish Securities Market Act (2007:528), based on the procedures performed.

RevR 18 requires us to plan and execute procedures to achieve reasonable assurance that the Esef report is prepared in a format that meets these requirements.

Auditors' report

Reasonable assurance is a high level of assurance, but it is not a guarantee that an engagement carried out according to RevR 18 and generally accepted auditing standards in Sweden will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Esef report.

The audit firm applies ISQM 1 Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and other Assurance and Related Services Engagements and accordingly maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with professional ethical requirements, professional standards and legal and regulatory requirements.

The reasonable assurance engagement involves obtaining evidence, through various procedures, that the Esef report has been prepared in a format that enables uniform electronic reporting of the annual accounts.

The procedures selected depend on the auditor's judgement, including the assessment of the risks of material misstatement in the report, whether due to fraud or error. In carrying out this risk assessment, and in order to design procedures that are appropriate in the circumstances, the auditor considers those elements of internal control that are relevant to the preparation of the Esef report by the Board of Directors and the Managing Director, but not for the purpose of expressing an opinion on the effectiveness of those internal controls. The reasonable assurance engagement also includes an evaluation of the appropriateness and reasonableness of assumptions made by the Board of Directors and the Managing Director.

The procedures mainly include a technical validation of the Esef report, i.e., if the file containing the Esef report meets the technical specification set out in the Commission's Delegated Regulation (EU) 2019/815 and a reconciliation of the Esef report with the audited annual accounts and consolidated accounts.

Furthermore, the procedures also include an assessment of whether the Esef report has been marked with iXBRL which enables a fair and complete machine-readable version of the consolidated statement of financial performance, statement of financial position, statement of changes in equity and the statement of cash flow.

The auditor's examination of the corporate governance statement

The Board of Directors is responsible for that the corporate governance statement on pages 46–68 has been prepared in accordance with the Annual Accounts Act.

Our examination of the corporate governance statement is conducted in accordance with FAR's auditing standard RevU 16. The auditor's examination of the corporate governance statement. This means that our examination of the corporate governance statement is different and substantially less in scope than an audit conducted in accordance with ISA and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinions.

A corporate governance statement has been prepared. Disclosures in accordance with chapter 6 section 6 the second paragraph points 2–6 of the Annual Accounts Act and chapter 7 section 31 the second paragraph the same law are consistent with the other parts of the annual accounts and consolidated accounts and are in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies.

PricewaterhouseCoopers AB was appointed auditor of Swedbank AB (publ) by the general meeting of the shareholders on the 30 March 2023 and has been the company's auditor since 2019.

Stockholm 22 February 2024

PricewaterhouseCoopers AB

Anneli Granqvist
Authorised Public
Accountant
Partner in charge

Martin By
Authorised Public
Accountant

Auditor's Limited Assurance Report on Swedbank AB's Sustainability Report, self-assessment of the Principles for Responsible Banking and statement on the Statutory Sustainability Report

To the annual general meeting of Swedbank AB (publ.), corporate identity number 502017-7753

This is a translation of the original report in Swedish.

Introduction

We have been engaged by the Board of Directors and the Chief Executive Officer of Swedbank AB to undertake a limited assurance of Swedbank AB's Sustainability Report and Swedbank AB's self-assessments/assertions of its fulfillment of its commitments as a signatory of the Principles for Responsible Banking for the year 2023. The company has defined the scope of its sustainability report on page 1. The self-assessment/assertions are defined on page 265. The statutory sustainability report is defined on page 270.

Responsibilities of the Board and Group Management

The Board of Directors and Group Management are responsible for the preparation of the Sustainability Report, and the self-assessment of the Principles for Responsible Banking and the statutory sustainability report, in accordance with the applicable criteria and the Annual Accounts Act. The criteria for the Sustainability Report are described on page 1 of the Sustainability Report, and consists of the parts of the GRI Sustainability Reporting Standards which are applicable to the Sustainability Report, as well as the accounting and calculation principles that Swedbank has developed. The criteria for Swedbank AB's self-assessment of its fulfilments of its commitments as signatory of the Principles for Responsible Banking are described on page 265 and cover the Principle for Responsible Banking assessment areas including 2.1 Impact Analysis, 2.2 Target Setting, 2.3 Target Implementation and Monitoring and 5.1 Governance Structure for Implementation of the Principles. This responsibility also includes the internal control which is deemed necessary to establish a sustainability report that does not contain material misstatement, whether due to fraud or error.

Responsibilities of the Auditor

Our responsibility is to express a conclusion on the Sustainability Report and self-assessment of the Principles for Responsible Banking based on the limited assurance procedures we have performed and to provide a statement on the statutory sustainability report. The work for Principles for Responsible Banking has been carried out in accordance with the requirements laid out in the Assurance Guidance to undertake limited assurance on Principles reporting, issued by UNEP FI. Our assignment is limited to the historical information that is presented and thus does not include future-oriented information.

We conducted our limited assurance engagement in accordance with ISAE 3000 (revised) Assurance Engagements Other than Audits or Reviews of Historical Financial Information. A limited assurance engagement consists of making inquiries,

primarily of persons responsible for the preparation of the Sustainability Report and applying analytical and other limited assurance procedures. We have conducted our examination regarding the statutory sustainability report in accordance with FAR's recommendation RevR 12, the Auditor's Opinion on the Statutory Sustainability Report. A limited assurance engagement and an examination according to RevR 12 have a different focus and a considerably smaller scope compared to the focus and scope of an audit in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden.

The audit firm applies ISQM 1 (International Standard on Quality Management and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We are independent in relation to Swedbank according to generally accepted auditing standards in Sweden and have fulfilled our professional ethics responsibility according to these requirements.

The procedures performed in a limited assurance engagement and an examination according to RevR 12 do not allow us to obtain such assurance that we become aware of all significant matters that could have been identified if an audit was performed. The conclusion based on a limited assurance engagement and an examination in accordance with RevR 12, therefore, does not provide the same level of assurance as a conclusion based on an audit has.

Our procedures are based on the criteria defined by the Board of Directors and the Group Management as described above. We consider these criteria as suitable for the preparation of the Sustainability Report and self-assessment of the Principles for Responsible Banking.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion below.

Conclusion

Based on the limited assurance procedures we have performed, nothing has come to our attention that causes us to believe that the Sustainability Report and the self-assessment of the Principles for Responsible Banking is not prepared, in all material respects, in accordance with the criteria defined by the Board of Directors and Group Management.

A Statutory Sustainability Report has been prepared.

Stockholm, 21 February 2024

PricewaterhouseCoopers AB

Anneli Granqvist
Authorised Public Accountant