

POLICY AGAINST CORRUPTION

adopted by the Central Board on 25 March 2026

Information class: Open

Responsible owner: Handelsbanken Operations (HO)

The policy must be applied throughout the Handelsbanken Group, including to subsidiaries, where applicable, unless binding regulations outside Sweden, or relating to subsidiaries, make deviations necessary. Acceptance and backing for such deviations must be gained from the unit responsible at Group level.

1. Purpose and scope

Through this Policy, the Central Board establishes the importance of preventing and never accepting corruption, and of always taking action where there is suspicion of corruption.

Corruption is used as an umbrella term for any arrangement or series of actions that results in undue influence on processes or decisions. This involves using one's position to gain an improper advantage for oneself or others, and could be a matter of, for example, an exchange of favours, or giving/receiving bribes. Cronyism and nepotism are also considered forms of corruption.

All members of boards in the Group, employees and third parties acting on behalf of the Handelsbanken Group, must comply with this policy.

2. Conduct of employees and Handelsbanken's management thereof

2.1 Conduct of employees

Employees must carry out their responsibilities in all their activities within the Group and their external assignments in a manner that upholds confidence in Handelsbanken, and must therefore not participate in transactions that may involve bribery or any other improper influence. In a business relationship, it is self-evident for employees never to attempt to gain an advantage through the use of bribery or other improper influence.

Prudence must be applied in conjunction with promotion activities and when accepting gifts or benefits from customers.

Assessing what is permitted depends on the nature and context of the benefit, as specific value thresholds are not applied. Gifts or benefits intended to influence the processing of a case are considered bribes. In conference activities and corporate hospitality, moderation must be exercised and cost-awareness shown. Gifts and benefits within the framework of an employee's employment should be reported to their line manager and, where necessary, documented.

The local legal function or Handelsbanken Legal must be contacted if there are any doubts as to how a situation should be assessed.

2.2 Training

When they are first employed, all employees must complete the training course regarding financial crime, which includes a separate section on anti-corruption. Consultants must complete the training course before commencing their assignments. Employees and consultants must complete a knowledge update at least once a year.

Board members are also required to complete the training course once a year.

2.3 Third parties

Handelsbanken must never permit or encourage any person representing the Bank to give or receive bribes or to use any other corrupt methods on Handelsbanken's behalf.

Third parties acting on behalf of the Bank, including consultants, must be selected carefully, so that there is no risk of them damaging the Bank's reputation. The same applies to suppliers contracted by the Bank. The Bank must therefore carry out the requisite control measures in order to acquire good knowledge of all the third parties with which the Bank will be collaborating.

2.4 Whistleblowing

The Bank's whistleblower system can be used to report suspicions of corruption.

3. Reporting and allocation of responsibilities

When there is suspicion of a breach of this policy, or if the internal instructions prepared by the respective business areas have not been observed, employees must contact their line manager or a senior manager within their own or another unit.

The Central Board must be informed, in accordance with the Policy for operational risks and the Policy for compliance.