

# POLICY AGAINST CORRUPTION IN THE HANDELSBANKEN GROUP

adopted by the Central Board on 22 March 2023

Information class: Open

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*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 a general term that encompasses the giving and taking of bribes, breach of trust, and abusing one's position to achieve an improper advantage for personal gain or another person's benefit.

That which is stated in the policy shall apply throughout the Handelsbanken Group, although this is subject to the fact that prevailing law or directives from public authorities, either within or outside Sweden, may require a different application.

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

It is the responsibility of each manager to make sure that this policy is observed in the day-to-day running of the business and in the internal instructions issued by each business area.

## 2. Management at Handelsbanken and the conduct of employees

### 2.1 Conduct of employees

Handelsbanken's success is dependent on the confidence of customers, employees, owners, public authorities and other stakeholders that the Group is acting in a responsible manner. Any instances of bribery or other improper influence would lead to confidence in Handelsbanken being adversely affected.

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 Handelsbanken Group employees never to attempt to gain an advantage through the use of bribery or other improper influence.

In addition to complying with this policy, employees must also comply with Handelsbanken's rules regarding bribery and other improper influence. In addition, the Code of Business Conduct is to be observed in day-to-day operations.

Employees must exercise caution in their actions with customers in conjunction with promotional activities, and must be on their guard with respect to gifts, benefits, etc. from customers. Several factors may be relevant when assessing whether the benefit is improper.

Handelsbanken does not apply any set value limits for what may be deemed permissible as regards gifts, discounts, hospitality or other benefits. What can be accepted depends upon the nature of the benefit and the context in which it occurs. A gift to or from Handelsbanken, with the aim of speeding up or in any other way influencing the processing of a matter with a public authority (in international contexts sometimes referred to as a ‘facilitation payment’) is to be regarded as a bribe. In all conference activities and corporate hospitality, moderation must be exercised and cost-awareness shown.

Gifts, rewards and other benefits that are given or received by employees of the Group as part of their employment should be reported to the head of unit or the line manager and, where necessary, be documented. Gifts in conjunction with work at the Bank should also be considered in this.

The local legal function 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.

## ***2.3 Intermediaries and other third parties***

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

Intermediaries that represent the Bank, such as consultants, must be selected carefully, so that there is no risk of them damaging the Bank’s reputation. The Bank must carry out the requisite control measures in order to acquire good knowledge of all the intermediaries with which the Bank will be collaborating. This also applies to third parties such as suppliers.

## ***2.4 Whistleblowing***

Handelsbanken ensures that employees and other contractors have the opportunity for whistleblowing if there is a suspicion of corruption.

# **3. Reporting and allocation of responsibilities**

When there is suspicion of a breach of this policy, or if the internal instructions drawn up 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.