

POLICY FOR THE HANDELSBANKEN GROUP ON MEASURES AGAINST FINANCIAL CRIME

adopted by the Central Board on 22 March 2023

Information class: Open

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. Introduction

This policy is based on applicable regulations concerning money laundering, terrorist financing, established international sanctions, including regulations on breaches of such sanctions, as well as regulations regarding obligations to combat fraud. Money laundering, terrorist financing, breaches of international sanctions, fraud, tax crimes and corruption are collectively referred to as financial crime.

The Handelsbanken Group's work to counter and combat financial crime is a fundamental principle for secure and sound banking operations.

The Handelsbanken Group must monitor and comply with decisions regarding international sanctions in accordance with decisions by the EU on international sanctions and the Swedish Act on Certain International Sanctions. Deficiencies in the handling of these matters could lead to sanctions, financial losses, or reduced confidence in the Handelsbanken Group's business operations.

2. Work methods

The Handelsbanken Group must continuously monitor and analyse criminal behaviour and how our business operations are affected by this from a risk-based approach, and must promptly develop measures that mitigate identified risks.

At Handelsbanken, the branch is responsible for the customer relationship. The basic principle is that the customer belongs to the branch situated closest to the customer's domicile. The customer meeting is at the very heart of the Bank's business model, as is the desire to get to know our customers and their basic needs. The branch's geographical customer responsibility and strong local presence contribute to a good knowledge of our customers and the local environment, which in turn helps maintain the Bank's low risk tolerance.

The Handelsbanken Group must adapt its measures aimed at combating financial crime through a number of controls and processes.

The Handelsbanken Group must be particularly vigilant when considering those segments and business operations that have been identified as entailing a high risk in the general risk assessment, which must be updated regularly and whenever necessary. For example, new or

modified products and services may not be offered until it has been established that there are risk mitigation measures in place to manage the risks identified in a manner that ensures compliance with current risk tolerance levels.

The Handelsbanken Group's measures to prevent financial crime vary depending on the requirements in applicable regulations that relate to the various categories covered by the concept of financial crime.

The Handelsbanken Group is to use reliable standards and methods to fight financial crime and prevent products, services and distribution channels from being used by customers or staff for the purpose of financial crime.

2.1 Money laundering and terrorist financing

The work to prevent money laundering and terrorist financing must take a risk-based approach whereby the measures are adapted to take into account the risk that the business operations may be used for money laundering or terrorist financing. A general risk assessment, which assesses the risk that the Handelsbanken Group may be used for money laundering and terrorist financing, must be carried out by the Bank and each of its subsidiaries and branches that are subject to regulations relating to money laundering and terrorist financing.

In the general risk assessment, relevant risk factors, such as which products and services are provided, which customers and distribution channels exist, and which geographical risk factors are present, must be identified and analysed. Consideration must also be given to information revealed in Handelsbanken's reporting of suspected activities and transactions, and also to information about the modus operandi for money laundering and terrorist financing and other relevant information provided by authorities.

The scope of the general risk assessment will be determined by taking into account the size and nature of the business operations, and the risk of money laundering or terrorist financing that can be presumed to exist.

The Handelsbanken Group's approach is based on having a good knowledge of its customers, and an understanding of its customers' business operations, as well as the purpose and nature of the business relationship. Customer due diligence must be performed and maintained for as long as the customer relationship exists.

All Handelsbanken's customers must be categorised in terms of the risk that they might use the Handelsbanken Group for money laundering and terrorist financing. The scope of the measures taken to prevent such crime will depend on the customer's risk class. The risk class shall be determined based on risks identified in the general risk assessment and on Handelsbanken's knowledge of the customer.

Handelsbanken must continually monitor ongoing business relationships and assess individual transactions by checking that the activities and transactions being carried out are consistent with, among other things, Handelsbanken's knowledge of the customer, in order to

discover any activities that could be suspected of being related to money laundering or terrorist financing, or otherwise arouse suspicion.

If Handelsbanken has reasonable grounds for suspecting money laundering or terrorist financing, or that property otherwise derives from criminal activity, details concerning all of the circumstances that may be indicative of this must immediately be reported to the competent authority.

2.2 International sanctions

The work to prevent the Handelsbanken Group from being an accessory to breaches of the regulations on financial sanctions is to be carried out by obtaining the customer due diligence required to determine whether the customer is subject to sanctions, and through sanctions-specific screening of customers, and of transactions to and from other countries. Decisions regarding the freezing of funds held by Svenska Handelsbanken AB as a result of international sanctions must be taken jointly by the specially appointed executive after consultation with the Head of Group Legal (CJ).

2.3 Fraud

The work to prevent customers from being exposed to fraud must be carried out in accordance with the requirements of the Swedish Payment Services Act and other laws and regulations that oblige Handelsbanken to protect customers from fraud linked to products and services at Handelsbanken. This work must proceed from a risk-based approach, which commences with an analysis of the threats to and vulnerabilities of Handelsbanken's products and services. The work to prevent Handelsbanken being exposed to fraud by external parties must be based on the same principle.

2.4 Internal procedures to counteract financial crime

The work to prevent employees or other contractors from exposing customers or Handelsbanken to fraud, or to prevent employees and contractors from being accessories to customers' crimes in the areas of money laundering, terrorist financing, tax crimes and corruption, is to be carried out in the form of training activities, internal control measures, suitability assessments when hiring and at regular intervals during the employment, use of the four-eyes principle in important decision-making processes, and other appropriate measures. Handelsbanken must ensure that employees and other contractors are able to act as whistleblowers to report irregularities.

3. Organisation

3.1 Specially appointed executive

The Handelsbanken Group must have a *specially appointed executive* [in accordance with the Swedish Act on Money Laundering and Terrorist Financing (Prevention)] for the parent company and – where this is considered necessary, or where there are relevant requirements in local legislation – also for subsidiaries. This specially appointed executive reports to the Chief Executive Officer, and can also appoint persons to assist him or her.

For the parent company, the Head of Group Financial Crime Prevention (CX) is the *pecially appointed executive* with the task of ensuring that the Handelsbanken Group takes the measures required by laws and regulations to prevent money laundering and terrorist financing. This includes measures to prevent customers from using the Handelsbanken Group for money laundering that relates to or derives from, for example, tax crimes, corruption, fraud or other relevant predicate offences. The Head of CX is also responsible for ensuring that the Handelsbanken Group observes international sanctions, as well as laws and regulations that entail obligations to protect customers from fraud. This also involves checking and following up that the various measures, procedures or other methods decided upon by the Handelsbanken Group are implemented in the Bank's business operations.

Subsidiaries with their own *pecially appointed executive* are responsible for implementing the measures required to ensure compliance with laws and regulations within the area, and with the Group's policy and guidelines.

3.2 Appointed officer for controlling and reporting obligations

The Handelsbanken Group must appoint an *officer for controlling and reporting obligations* [in accordance with the applicable regulations to prevent money laundering and terrorist financing] for the parent company and – where this is deemed necessary or required by local legislation – also for subsidiaries.

The appointed officer for controlling and reporting obligations within the parent company is the Chief Compliance Officer (Head of CQ), or the person appointed by the Head of CQ. The task of the officer for controlling and reporting obligations is to monitor and regularly check that the Handelsbanken Group fulfils its obligations in compliance with the aforementioned law and the regulations issued on the basis of this law. This includes verifying and assessing the internal rules of the Handelsbanken Group, and providing advice and support to, as well as informing and training, the staff affected by regulations relating to money laundering and terrorist financing.

The *officer for controlling and reporting obligations* must submit regular reports to the Chief Executive Officer on matters concerning compliance and financial crime.

National organisations must, where deemed necessary, appoint a person with specific responsibility for matters relating to measures designed to prevent financial crime and the observance of international sanctions within operations, including responsibility for implementing the measures required to ensure compliance with laws and regulations in the area, and with the Group's policies and guidelines.

The Handelsbanken Group's Group Audit function has the overall responsibility, for example, for independently reviewing the internal guidelines, checks and procedures that aim to ensure that Handelsbanken fulfils its legal and regulatory obligations.

4. Risk tolerance

The Handelsbanken Group has a low risk tolerance for the risk of the Bank being exploited at any stage or in any form of financial crime. Accordingly, the Handelsbanken Group must not participate in transactions if its employees do not understand the implications, or in transactions which could be suspected of being linked to criminal activities.

The Handelsbanken Group may not hold anonymous accounts or issue anonymous passbooks.

The Handelsbanken Group may not initiate or engage in correspondence with shell banks, and must ensure that such links are not initiated or maintained with institutions that allow their accounts to be used by such banks.

The Chief Executive Officer is responsible for ensuring compliance with the risk tolerance set by the Central Board, and that guidelines on its application are established, including details of how risks are to be classified, mitigated and escalated.

5. Reporting and information to public authorities, etc.

In Sweden, including Swedish subsidiaries, the appointed officer for controlling and reporting obligations at each company must ensure that information regarding suspected money laundering, terrorist financing or property that might otherwise be derived from criminal activity is submitted promptly to the police authority. As a specially appointed executive, the Head of CX has operational responsibility for reporting to public authorities, including decisions taken to freeze funds as a result of international sanctions.

National organisations and subsidiaries outside Sweden must ensure that information regarding suspected money laundering and terrorist financing are submitted to a competent authority, and that decisions made on the freezing of funds as a result of international sanctions are submitted to a competent authority within the country. Reports of suspected cases of money laundering, terrorist financing or other financial crime to a competent authority that are deemed by the local manager to be of particular significance, must be reported to the Head of CX in their role as a specially appointed executive (in accordance with the applicable regulations on money laundering and terrorist financing), provided that this is permitted by the legislation and regulatory requirements of the country concerned.