

Programme for the Bank's work against corruption and bribery 2022

Last revised	20.1.2022
Owner	Executive Vice President HR and Legal
Person responsible	Executive Vice President HR and Legal

The Bank's programme for work against corruption and bribery shall include the following key activities:

- Regular and documented risk assessment in the area of corruption and bribery
- Regular training and information for employees on what is considered corruption and bribery, current legislation and the Bank's guidelines in this area
- Annual confirmation from all employees that they are familiar with the Bank's code of conduct
- Annual confirmation from all employees that they are familiar with the Bank's anti-corruption policy
- Requirements for ongoing reporting of positions outside the Bank
- Requirements for ongoing reporting of gifts received
- Effective and appropriate channels for highlighting challenges and concerns, including whistleblowing channels with the possibility of anonymous notification via the Bank's whistleblowing channel
- Annual reporting to the Bank's Board of Directors

The Bank's other measures in its work against corruption and bribery:

- Code of conduct
- Appropriate, risk-based internal control measures to prevent, detect and if applicable, deal with cases of corruption and bribery
- Due diligence assessments in connection with lending and credit
- Information and awareness for customers and society at large