



Nordea

NORDEA OCCUPATIONAL HEALTH & SAFETY GUIDELINE SUMMARY



1. Purpose and Scope

The Nordea Group ("Nordea") is committed to conduct business responsibly and to integrate environmental, social and governance (ESG) criteria into every decision-making process.

The Occupational Health and Safety (OH&S) guidelines describe how Nordea continuously works to secure a safe and inclusive workplace by promoting health and wellbeing, ensuring a great working environment and managing illness and work ability. All employees at Nordea contribute to a safe and inclusive working environment, supporting great performance.

The aim is:

- To provide an inclusive, healthy and safe working environment for all employees
- To promote health and wellbeing
- To communicate available means for wellbeing and encourage stakeholder participation
- To assess the risks related to health and safety at work
- To fulfil the legal and regulatory reporting needs related to OH&S

These guidelines apply to Nordea Bank Abp for six main operating countries (Denmark, Estonia, Finland, Norway, Poland and Sweden) and are subject to local regulations, to all subsidiaries within the Nordea Group in said countries unless legal or supervisory requirements or proportionality considerations determine otherwise.

The ambition is aligned with legal responsibilities, our [Code of Conduct](#) and [purpose and values](#). Assessments are embedded across Nordea and backed by measurable targets and strong governance.

2. Definitions

At Nordea, a common taxonomy and vocabulary related to the area of OH&S has been established. Nordea is aware of minor local differences in wordings related to the definitions of the country specific working environment authorities.

3. Roles & Responsibilities

At Nordea, the responsibilities related to OH&S vary according to the roles, which are described below:

3.1. Group

- The Chief People Office is assigned to act as a Group Accountable Executive for Nordea's key risk area People risk and physical security risk.

- Group People have the operational responsibility for ensuring that Nordea follows present laws and regulations and provides relevant and professional services and support to the organisation.

3.2. Country and Business Area/ Group Function (aggregated level)

- Standard Operating Procedures are in place for Country and Business Areas/ Group Functions detailing roles and responsibilities and tasks that shall be performed in order to maintain the OH&S risk assessments.
- Responsibility is also anchored at this level to decide on necessary mitigating actions, in respective units, and ensure that leaders have the mandate and budget to take action.

3.3. Team and individual

- Leaders ensure that they have sufficient knowledge, mandate and resources to maintain their OH&S responsibilities for their team and team members.
- Employees participate in and contribute to the implementation of the measures needed. Employees are responsible for applying the safety instructions and to report any identified risks.
- OH&S Committees are established to support and coordinate the OH&S activities.
- OH&S representatives represent employees in work environment-related matters by monitoring that the employer fulfils applicable OH&S management. Together with employer they contribute to ensuring a great working environment.

4. OH&S management system

An OH&S management system provides the frame for the identification of any working environment risk that could affect employees' safety and wellbeing in Nordea. At Nordea, we are obliged to use this method on all organizational levels; Business Areas, Group Functions, Country, Team/unit and individual level.

The OH&S systems has four phases, which are run frequently: Investigation, Risk assessment, Actions and Follow up.

Within the OH&S management system a number of common instructions and tools have been implemented to strengthen the OH&S agenda, these include OH&S risk taxonomy and OH&S risk assessment template.

5. Performance indicators

The following indicators are connected to employee Health & Wellbeing and are reported according to specific timetables.

5.1. Proactive & preventive measures:

- Group Key Performance Indicator for Employee Engagement (KPI)
- Key Risk Indicator for Employee Engagement (KRI)
- Performance Indicator for completion of OH&S leader training (PI)
- Overtime rate (to be noted: there are different collective agreement on registration of overtime per country/ role)

5.2. Reactive measures:

- Number of work-related injuries per country (PI)
- Sick leave rate per country (PI)

6. Reporting

Group level reporting on OH&S takes place on an annual basis. The report includes the relevant measures on OH&S for Group level report, and People risk report.

Business area, group function (BA/GF) and country specific reporting (dashboard) is created twice a year based on available performance indicators and identified people risks and measures.