

As a client you have the right by law to receive information about the bank's policy on conflicts of interest.

Conflicts of interest mean that you and the bank may have differing interests on the outcome of an assignment performed by the bank on your account. Conflicts of interest may also arise between yourself and another client when the bank shall safeguard the interests of both.

It is common business practice for parties to have differing interests. An example of this is the differing interests between buyer and seller, between producer and consumer or between a company and its employees. However, conflicts of interest can be a problem when one party has several different interests to safeguard at the same time and the conflicts of interest are not managed in an appropriate manner.

Your confidence in Swedbank is of utmost importance to us. Our diverse range of activities means that sometimes it may be difficult to ascertain the conflicts of interest that may arise between you and the bank. For your own peace of mind and knowledge that the bank manages any conflicts of interest with your interests in mind, we describe below how we deal with these issues.

INTERNAL RULES AND COMPLIANCE CONTROL

Swedbank takes all reasonable measures to identify, document and manage conflicts of interest arising in its business activities. Important factors for managing conflicts of interest include the following:

- we have an organizational and physical barrier between the various functions and units,
- we are clear and open in describing the various functions or units,
- we ensure and maintain internal confidentiality between the various functions and units,
- we work to prevent biased interests from arising in our business activities,
- we carry out independent control of compliance.

Apart from a conflicts of interest policy and ethical guidelines Swedbank also have a number of internal instructions stipulating how conflicts of interest shall be managed with the focus on client interests. Examples include the bank's regulations:

- governing employees dealing on own account,
- governing employees external assignments,
- governing financial instrument advice procedure,
- governing the bank's conduct in the securities and currency markets,
- governing the measures the bank should take when executing a buy or sell order for securities in order to achieve the best possible results for its clients as regards price, cost, speed and so on,
- governing that the bank's independence and objectivity is upheld when producing investment research,
- governing the bank's conduct as an issuing institution or when participating in company acquisitions.

TRAINING AND PROCEDURES

The bank's relevant employees undergo continuous training in issues relating to conflicts of interest and ethics. We also have special procedures to ensure that external and internal regulations are observed and yearly review our conflicts of interests.

FURTHER INFORMATION

If our measures are not sufficient to prevent your interests from becoming adversely affected, you will be notified of the conflict of interest prior to us undertaking your particular assignment to the bank.

If you require further information on conflicts of interest, please contact your local bank.