

Code of Conduct

1. Introduction

This Code of Conduct sets out the general guidelines for Sydbank's business conduct. It applies to management, employees, business partners and suppliers.

The Code of Conduct will be made public so that customers, suppliers, authorities and other stakeholders can see what they can expect from Sydbank.

The guidelines of the Code of Conduct are described in general terms and are dealt with more specifically and exhaustively in the Bank's internal documents, policies and business procedures.

The conduct of employees and management must be in accordance with Sydbank's core values where the Bank attaches great importance to excellence, relationships and value. This means that the Bank's conduct must be characterised by responsibility, decency and respect for others.

2. Sydbank in society at large

Sydbank takes part in the surrounding community and is conscious of its role in society as a financial undertaking.

Sydbank will be respectful of the environment in all aspects of its business and make a positive difference in order to reach its own, national and global climate targets. Sydbank optimises energy efficiency on an ongoing basis to reduce the Bank's energy consumption and high priority is given to ensuring transparent reporting of our consumption.

Sydbank respects laws and rules and complies with legislation in force from time to time governing areas in which the Bank operates. By doing so, the Bank not only meets the expectations of the outside world but also engenders confidence and protects the Bank's integrity and reputation.

The Danish model of society is based on a welfare society where individuals and businesses contribute via tax payments. Sydbank takes its responsibility in this respect very seriously, both as regards its own tax payment as well as that of its customers. Providing advice on or assisting in tax evasion is not part of the Bank's services.

Financial undertakings face a significant task in preventing the financial system from being used for money laundering and terrorist financing. Sydbank takes this task seriously and takes corrective action in compliance with regulations and in order to effectively prevent the Bank from being used for the purposes of money laundering and terrorist financing.

The Danish society is characterised by very little corruption. Sydbank disapproves of any form of corruption and bribery and does not tolerate its existence in its relationship with public authorities or business partners.

Vast amounts are traded on securities markets and it is important that markets are protected against abuse. The Bank takes an active part in preventing market abuse, both as regards illegal use of inside information as well as market manipulation. This

applies to handling of inside information within the Bank, by management and employees as well as to customers' use of the Bank.

3. Sydbank's relationships

Sydbank has relationships with many people, incl. customers, employees and business partners.

All people must be treated with respect and decency regardless of whether we do business or decline business with customers or business partners. The Bank does not accept discrimination on the grounds of gender, ethnic background, sexual orientation, religion or age, and harassment is not tolerated. This applies to employees, customers, suppliers, business partners and other relationships.

Being the bank for the backbone of the Danish corporate sector and for retail clients who value professional advice represents an integral part of the foundation on which Sydbank rests. Sydbank wishes to do business with its customers on the basis of long-term customer relationships as well as on a reciprocal basis and on transparent terms. Through professional relationships we provide service and advice to existing and potential customers.

Customer satisfaction is a high priority for the Bank and a constant area of focus. Should the Bank fail to come to an acceptable agreement with a customer, it is easy to make a complaint.

Consequently the Bank deals with complaints from existing and former customers promptly and fairly.

Through its customer relationships the Bank gains considerable insight into customers' private affairs. Personal data is processed in compliance with legislation and all information about customers' affairs is treated in the strictest confidence.

The Bank's employees are its most important asset. They form the foundation for the Bank's success and help to create and nurture professional relationships with customers. As a result the Bank strives to be a workplace with a good physical and mental working environment.

The Bank values an environment that encourages openness. But even when this is not sufficient the Bank does not want critical information to be withheld. For this purpose the Bank has set up a whistleblower scheme to help employees to report serious violations that come to their attention. The Bank protects employees who report violations and ensures that they are treated with respect. Retaliation against employees who report violations is not tolerated.

External stakeholders can report a suspicion of violation of financial regulation to the Bank's whistleblower scheme.

Specifically as regards business partners and suppliers they must:

- respect and comply with fundamental and international human rights
- uphold the freedom of association and recognise the right to collective bargaining

- ensure that their business does not contribute to forced labour or child labour
- support environmental responsibility and undertake initiatives to encourage sustainable development
- work against all forms of corruption, including bribery and extortion

If the supplier or business partner learns of non-compliance with the Code of Conduct, the supplier or business partner must inform Sydbank about the lack of compliance.

4. Sydbank in the marketplace

The Bank is subject to supervision by public authorities. Sydbank is open and cooperative with public authorities when supervision is conducted.

Financial undertakings compete to provide financial services to customers. Sydbank's participation in this respect is in compliance with competition law. The Bank's products and advisory services are of premium quality and build on long-term relationships with customers.

Conflicts of interest are avoided as they could cast doubt on the Bank's integrity and the qualifications and conduct of its employees.

A conflict of interest could arise in any of the Bank's business units when customers receive a service that also benefits the Bank or has an adverse effect on other customers.

All employees exercise great care when offered entertainment or gifts from customers or when giving gifts to customers, suppliers or other business partners. Particular care must be taken when receiving gifts or inheritances from older customers. The Bank's employees do not receive gifts from customers to any excessive degree.

5. Approval and updating

This Code of Conduct has been approved by Sydbank's Board of Directors.

The Code of Conduct is reviewed and, where necessary, updated on a regular basis and at least once a year.