

Nordea execution policy

The President of Nordea Bank AB (publ) and Chief Executive Officer of the Nordea Group (CEO) in Group Executive Management have approved this policy.

1. Scope

To ensure the best possible result in the execution and transmission of customer orders in financial instruments, Nordea Bank Denmark A/S, Nordea Bank Finland Plc, Nordea Bank Norway ASA and Nordea Bank AB (publ) (together “Nordea”) have adopted the following execution policy. This execution policy contains guidelines for execution, transmission, aggregation and allocation of orders. The policy applies in relation to retail (non-professional) customers and professional customers.

Nordea will follow this execution policy unless the client gives specific instructions as to how an order should be handled. Customers should be aware that such instructions might prevent Nordea from following the steps set out in this policy to obtain the best possible result. The trading rules for the relevant market may constitute an obstacle to certain instructions given by the customer.

2. Choice of trading venue

Nordea has access to a variety of different trading venues. Nordea regularly reviews which trading venues to use. An updated list of trading venues that Nordea uses for execution can be found at www.nordea.com. If Nordea does not have access to a trading venue relevant for the order, such order will be passed on to a broker (normally a credit institution, investment firm or similar intermediary, which may also be an entity within the Nordea Group), who will execute the order on such trading venue or pass the order on to another third party. When choosing the trading venue or – in case of transmission of orders – the broker for execution Nordea will, as a minimum, take into account:

- the size and nature of the order,
- the price at which it is likely to be executed and the costs that will be incurred by the customer (the total consideration),
- the speed and likelihood of both execution and settlement,
- the categorisation of the client, and
- any other circumstance which, in Nordea's opinion, is relevant to the execution of a particular order.

Normally, Nordea will regard the total consideration as the most important factor. However, in the case of e.g. orders that – because of their size or type – may have an impact on either the prevailing price of the financial instrument or the markets on which it could be executed, other factors may take precedence to ensure the prompt execution of the order. The speed or likelihood of execution or settlement may take precedence if there are significant differences in these, depending on the trading venue chosen.

Orders that are large compared to the total turnover in the market will, as a general rule, be directed to the market place with the best liquidity; i.e. the venue where a large order can be executed promptly with the least impact on the market price. Nordea or – in case of transmission of orders – the broker may execute an order outside a regulated market, against either its own account, another customer order, or another third party.

Brokers, to which Nordea transmits orders, will be carefully chosen, in a regular review, for their ability to provide best execution and their ability to enable Nordea to fulfil its obligations under relevant legislation, regulations and this policy. An updated list of brokers that Nordea uses for execution can be found at www.nordea.com. When choosing the broker Nordea will, in addition to the above mentioned factors, take into account other factors that Nordea deems important from time to time, such as Nordea's general assessment of and confidence in the broker and which trading venues the broker has access to.

3. Orders in financial instruments principally traded on trading venues

This section applies to orders in financial instruments that are traded on a regulated market, Multilateral Trading Facility (MTF) or other organised trading venue, such as:

- shares admitted to trading on a regulated market or MTF
- derivatives admitted to trading on a regulated market or MTF
- units in collective investment undertakings admitted to trading on a regulated market or MTF.

3.1 Orders at market price

If the customer wants the order to be executed at market price, the order will be passed on to the trading venue considered to provide the best execution, in accordance with section 2 above.

Orders can, at the discretion of Nordea, be split into multiple orders in the market place to limit the effect of market price movements that would adversely affect the price the customer trades at. The price will be calculated as the average volume weighted price.

Buy orders will be executed at the lowest possible ask price and sell orders will be executed at the highest possible bid price.

Nordea may also decide to execute all or part of the order against either Nordea's own account, another customer order, or another third party at a price that reflects prevailing market conditions.

3.2 Limit orders

Where the customer has attached a limit price to the order, the order will be handled as above, but the execution will not take place until all or part of the order can be executed at the limit price, or better. Where a customer limit order is not executed immediately, Nordea will make it public by transmitting it to the relevant trading venue, unless otherwise agreed with the customer.

3.3 Other type of orders

If customers use other types of orders, such as Market on Close or Volume-Weighted Average Price (VWAP), these orders are considered orders containing specific instructions and will be executed accordingly.

3.4 Indicative or firm quotes

In certain cases Nordea quotes indicative or fixed prices directly to the customer, e.g. a risk price. In such cases, the provisions of section 4.1 shall apply and, consequently, the

procedures set down elsewhere in this policy to ensure that orders are executed in the best interest of the customer do not apply to these transactions.

4. Transactions in financial instruments not principally traded on trading venues

This section applies to transactions in financial instruments which are not traded on a regulated market or other marketplace, such as both standardised but non-exchange traded instruments and instruments created (whether by Nordea or another intermediary) from one or more components, , for example in order to provide an instrument designed to meet specific exposure requirements. These instruments are normally traded directly against a counterpart (OTC). Such instruments include, for example, certain:

- Bonds, treasury bills and other money market instruments
- OTC derivatives and other instruments issued by an entity within the Nordea Group or another investment firm
- Instruments in which the return is linked to the performance of a specific index or reference rate
- Instruments based on or involving contracts for difference
- Unquoted shares
- Fund units
- Other financial instruments not regularly traded on a regulated market or other market place

The pricing of these transactions will be based on the market value or the value of the underlying assets or other relevant market factors and will take into account the cost and risk of Nordea's business model in relation to the instrument, counterparty credit risk and operational risk as well as the utilisation of Nordea's own capital to support dealings with customers.

4.1 Quotes on request

When Nordea quotes prices in the instruments in question, an agreement between Nordea and the customer is concluded either by the customer accepting a firm quote or by Nordea confirming the price to the customer and the customer accepting this. In this procedure Nordea is entering into an agreement with the customer and is not executing an order on behalf of the customer. Hence the procedures set down elsewhere in this policy to ensure that orders are executed in the best interest of the customer do not apply to these transactions.

4.2 Order execution

When Nordea executes an order on behalf of the customer in these instruments, Nordea will execute the order against its own account. In relation to a specific deal, market information will be sought through the use of brokers, potential counterparts and other potential information sources.

5. Investment funds

Regarding subscription and redemption orders regarding collective investment undertakings received from customers, Nordea will execute or transmit such orders by placing the order with the fund management company or equivalent or with a broker or other intermediary for

execution in accordance with investment fund rules or equivalent. In the case of fund units being admitted to trading on a regulated market or MTF, see section 3 above.

6. Order handling, aggregation and allocation

6.1 Order handling

Nordea will execute customer orders promptly, fairly and expeditiously. Comparable customer orders will be executed in the sequence in which they are received, unless the characteristics of the order or prevailing market conditions make this impracticable, or the interest of the customer requires otherwise.

6.2 Order aggregation

Nordea may aggregate a customer order with another customer order or a transaction for own account if it is unlikely that the aggregation of orders and transactions will work overall to the disadvantage of any customer whose order is to be aggregated. The aggregation could be disadvantageous in relation to a specific order.

6.3 Allocation

An aggregated order that has been executed in its entirety will be allocated on the average price. An aggregation of customer order with a transaction for own account will not be allocated in a way that is detrimental to a customer. Where an aggregated customer order with another customer order has only been partly executed, the allocation will be proportionate to the average price. Where a customer order has been aggregated with a transaction for Nordea's own account and the aggregated order is only partially executed, the allocation will normally give priority to the customer. However, Nordea may allocate the customer order and the transaction for Nordea's own account proportionate to the average price in circumstances where it would not be able to execute the customer order equally favourable for the customer without aggregation or would not be able to execute it at all.

7. Code of conduct

Nordea is a member of the following organisations and complies with all recommended codes of conduct:

- Danish Securities Dealers Association
- Federation of Finnish Financial Services
- Norwegian Securities Dealers Association
- Swedish Securities Dealers Association
- ISDA
- ICMA
- ACI.

8. Reservations

In the event of system disruption, irregularities, breakdown or exceptional market conditions Nordea may execute orders at other trading venues, or transmit orders to other brokers, than those mentioned in the list published on www.nordea.com or execute or transmit orders subject to other considerations than set forth in this execution policy.

9. Review

To ensure the best possible result in execution and transmission of orders on a consistent basis, Nordea will review this execution policy, the methods and the trading venues used for execution, as well as brokers to whom Nordea transmits orders for execution, at least annually or if a material change occurs that affects Nordea's ability to obtain best possible result in execution and transmission of orders. Nordea will further, on a regular basis, monitor the execution quality of the brokers, and where appropriate, correct any deficiencies. Changes and updates will be published on Nordea's website, www.nordea.com. Such changes and updates will come into effect from the day that they are published on the website.