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 $<sup>^{\</sup>rm 1}$  Subject for audit. The corporate governance report has been reviewed by the company's auditors in the form of a "statutory review.

# This is Nordnet.

Nordnet is a leading digital platform for savings and investments with operations in Sweden, Norway, Denmark and Finland. With user-friendliness, good availability, a broad offering and low prices, we give our customers the opportunity to take their savings to the next level.

The overarching purpose of Nordnet's business is to democratize savings and investments. By that, we mean giving private savers access to the same information and tools as professional investors. This purpose has driven us from the outset in 1996 and remains our direction to this day. At the beginning, it entailed offering easily accessible and inexpensive stock trading over the internet, and building a fund portal with products from a number of different distributors, where savers could easily compare returns, risk and fees. During the journey, we have simplified matters and put pressure on fees for services like pension savings, index funds and private banking. In recent years, we have democratized savings and investments through, for example, our stock lending program, cost-effective index funds as well as our flexible and digital investment insurance. We are always on the savers' side, and pursue issues of, for example, fair terms in pension savings free-of-charge and reasonable and predictable taxation of holdings of shares and mutual funds.

#### Vision.

Our vision is to become the Nordic private savers' first choice. To achieve this goal we always need to challenge and innovate, keeping user-friendliness and the benefit of savings at the top of the agenda and to succeed with the ambition of building a "one-stop shop" for savings and investments — a platform that can meet the needs of private savers in the Nordic region in managing their financial futures. Only then can we achieve the high level of customer satisfaction and brand strength required to become a leader in the Nordic region in terms of attracting new customers and producing loyal ambassadors for Nordnet.

#### Our product areas.

#### Savings and investments.

Nordnet's core business is saving and investments. Our customers can save and invest in shares, funds and other types of securities across several markets at low fees. We offer most account types that are available on the market, such as ISK and its Nordic equivalents, regular custody accounts, occupational pension, endowment insurance and accounts for private pension savings. At Nordnet, there are a number of different interfaces available including the web, the app and more advanced applications. The less-active savers can also use one of our digital guidance services or invest in our index funds. Nordnet operates the Nordic region's largest social investment network Shareville, with more than 300,000 members.

#### Pension.

In Sweden, Norway, Denmark and Finland, we offer pension savings with a wide range of investment opportunities.

#### Loans.

Nordnet offers three kinds of loans — margin lending, residential mortgages and unsecured loans. Margin lending with securities as collateral is available in all four of our markets and allows our customers to leverage their investments. Our residential mortgages are offered in Sweden and Norway. Personal loans, which cater to private individuals in Sweden, are offered both through Nordnet's own brand and under the trade name Konsumentkredit.

## Our markets.

Nordnet has operations in Sweden, Norway, Denmark and Finland. The head office is located in Stockholm, where Group-wide functions such as tech, product development and administration are located. Stockholm is also home to the customer service and sales organization for the Swedish market. There are also local offices in Oslo, Copenhagen and Helsinki with responsibility for customer service, sales and marketing in each market. We mainly communicate with our customers via digital and social channels and have no physical bank offices. Our platform handles all four markets, providing us with economies of scale and cost efficiency. In the Nordic countries, the savings markets are dominated by traditional banks and pension companies. Nordnet is the only pan-Nordic digital platform for savings and investments and is, together with one or two local competitors, a challenger in all four markets. At the same time, Nordnet has a leading position as a digital platform in Norway, Denmark and Finland and is a strong number two in the Swedish market.

#### Sweden.

In the Swedish market, we are one of several players challenging the traditional banks and pension companies with greater freedom, an improved customer experience and lower prices. We offer investments and pension savings in a broad range of various products and kinds of savings primarily for private savers. In the Swedish market, we also offer margin lending, mortgages and unsecured loans. Of the four Nordic countries in which we operate, Sweden is the largest market in terms of revenue. We differ from our competitors by offering a so-called "one-stop shop" for savings and investments, favourable loan terms and digital tools for smarter savings. We are the only actor that provides free-of-charge index funds in three Nordic markets. With our stock lending program, we can offer private savers in Sweden a third type of return, in addition to value growth and dividends. On our social investment network Shareville, our customers share their actual investments in real time.

#### Norway

In the Norwegian market, Nordnet offers investment and saving services and pension savings for private individuals and companies. We differ from traditional banks and pension companies by offering more choices and better conditions. We offer a stock lending program with an opportunity for a third type of return on shares, margin lending with securities as collateral on favourable terms, free-of-charge index funds, digital guidance tools for savings and the social investment network Shareville. Since 2022, Nordnet has also offered mortgages in Norway, at attractive interest rates and targeting Private Banking customers.

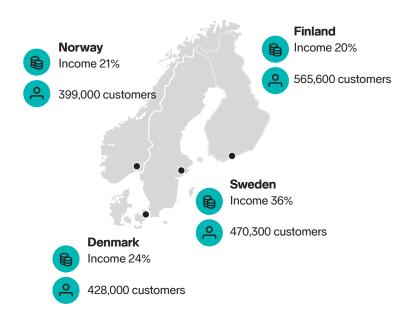
#### Denmark

In Denmark, Nordnet holds a leading position as a customer-focused bank with low fees and competitive tools for savings and investments. We compete primarily with the major banks in the market, as well as with pension companies. Our offering is distinguished by unique products including free-of-charge index funds, margin lending and the social investment network Shareville. Our pension offering, with no fixed charges, also stand outs in the market. Pen-

sion savings accounts for more than half of the savings in Denmark and many Danes choose to move their pensions to Nordnet.

#### Finland

Nordnet has a leading position in the Finnish savings market, and we are perceived as a more modern and customer-friendly bank than our competition. We offer Finland's largest range of funds, including our own free-of-charge index funds. Other unique products at Nordnet are Shareville and our dynamic margin lending. In Finland, we offer services for investments, savings and loans, as well as digital tools for savings on the customer's own terms. During 2023, we launched an endowment wrapper product that is unique in its category with its extensive investment offering, entirely digital customer experience and lower fees.





#### Nordnet's market share

Number of trades

2023	Sweden	Norway <sup>1</sup>	Denmark	Finland
Volume	3.80%	8.14%	4.82%	5.07%
Number of trades	6.26%	n/a	8.38%	11.08%
2022	Sweden	Norway	Denmark	Finland
Volume	3.96%	8.47%	5.22%	5.81%

5.34%

Table: Nordnet's market share in share trading on the Nordic exchanges.

Source: Market data from Nasdaq in Sweden, Denmark and Finland and from the Oslo Stock Exchange in Norway.

6.90%

9.70%

<sup>&</sup>lt;sup>1</sup> As of 2021, only Nordnet's share of the volume on the Oslo Stock Exchange is reported, since data on the number of transactions is not available.

## Financial targets.

#### Medium-term financial targets.

- Annual customer growth of 10–15 percent.
- Average savings capital per customer (defined as the average quarterly savings capital per customer over the past 12 months) amounting to about SEK 420,000.
- Income in relation to savings capital (defined as income adjusted for items affecting comparability over the past 12 months in relation to the average quarterly savings capital for the same period) amounting to about 0.55 percent.
- Annual increase of adjusted operating expenses by about 5 percent based on the adjusted operating expenses for 2021
  - Due to high inflation, adjusted expenses were expected to increase by about 7 percent in 2023.
  - To capitalize on our strong market position and growth opportunity, Nordnet will increase investment in marketing by up to SEK 80 million annually. This is in addition to the target for operating expenses stated above.
- Nordnet intends to distribute 70 percent of the annual profit in dividends.
- The leverage ratio shall be between 4.0 and 4.5 percent, and the risk-weighted capital level shall exceed the regulatory requirement by one percentage point.

#### Status as of 31 December 2023.

- Annual customer growth over the preceding 12 months to 9 percent (10¹).
- Average savings capital per customer amounted to SEK 436,600 (412,200).
- Adjusted operating income<sup>2</sup> in relation to savings capital for the past 12 months amounted to percent 0.59 (0.46).
- Adjusted operating expenses<sup>2</sup> increased by 7 percent over the past 12 months, amounting to SEK 1,300 million (1 210)
- Proposed dividend of SEK 7.20 (4.60) per share, corresponding to 70 percent of earnings for 2023.

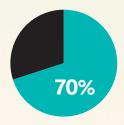
Savings capital = SEK 436 600

Operational income<sup>2</sup>
Savings capital

+9%

9

Annual customer growth.



Dividend of the profit for the year.

7%

Annual increase in operating expenses<sup>2</sup>

was 7 percent including the customer relationships that were terminated due to the customer documentation project.

parability, see page 69. The comparative rigures in parentheses refer to the corresponding period in 2022.

<sup>&</sup>lt;sup>1</sup> Customer growth in 2022 was <sup>2</sup> For items affecting comparabil

## Comments from the CEO.

In the end, 2023 turned out to be a good stock market year, after many ups and downs. For some time, continued high inflation, interest rate hikes, bank turbulence in the US, with the bankruptcy of Silicon Valley Bank and general concerns over what direction the economy would take caused a negative mood on the stock exchange and in the financial sector in general. However, the situation brightened considerably towards the end of the year when it appeared that the third quarter reports would be unexpectedly strong, with interest rates abating and inflation falling to lower levels. All in all, 2023 offered good returns and trading activity increased towards the end of the year due to the more positive stock market sentiment.

#### The year in figures.

In 2023, 154,000 new savers chose Nordnet, corresponding to annual growth of about 9 percent. At the end of the year, our customers' savings capital amounted to SEK 825 billion, a new record level. This record builds on continuous positive net savings, as well as rising Nordic stock markets. In this context, I would like to highlight the great savings capital trend in our funds operations, where the value of our customers' fund savings has risen by 28 percent over the past year, which is nearly double the growth rate of our savings capital as a whole.

The favourable trend in savings, trading activity and customer growth laid the foundation for positive financial results. Income in the savings and trading business is progressing in the right direction, and net interest income is benefiting from increased lending and higher returns in the liquidity portfolio. Adjusted operating expenses amounted to SEK 1.3 billion for the full year. This is an increase of 7 percent compared to 2022 which is in line with our financial targets. Profit before tax ended up at nearly SEK 3.2 billion for 2023. For the full year, Nordnet achieved a stronger result than ever, and I can affirm that our operations are developing favourably in terms of both customer-related and financial key figures.

## Praised product launches and appreciated innovations on the platform.

We had a productive year and launched several updates and products that were appreciated by the market. Our fund business saw good growth over the year, with funds under the Nordnet brand attracting a major share of the net savings. Our relatively recently initiated technology fund was among the funds generating the best yield by far in the Nordic fund market in 2023, and our most-recently launched fund "Nordnet Index Global 125" was praised by Privata Affärer's Bank of the Year jury, which, in particular, underscored the simplicity of the fund, its low cost and benefit to long-term savings.

Among the larger news items, I would like to highlight the endowment wrapper product that we launched in Finland in late September. The endowment wrapper is advantageous from a tax perspective when trading in shares and funds, and is not subject to capital gains tax when transferring to beneficiaries on the demise of the holder and is only subject to inheritance tax. Today, over half a million Finns hold insurance-related savings within the endowment wrapper framework and so-called CRCs. Nordnet's endowment wrapper differs from its competitors with its substantial range of investments, a completely digital customer experience and lower fees.

We launched a number of products on the platform over the year. One of our key strenght is our high release frequency, with a new version of the app every third day and a new version of the website every two hours. During the year, we entered into a collaboration with the software company Quartr, making us the first bank in the Nordics to be able to provide our customers access to report presentations from some 6,000 listed companies worldwide. We have also entered into a partnership with Trustly making it possible for our customers to make real-time money transfers from external banks to their Nordnet accounts. Another example is the new Freja login option, which increases accessibility and enables duality and freedom of choice when it comes to using Nordnet's website and app.

Over the year, we achieved 99.95 percent up-time on our platform. A contributing factor is our partnership with Google Cloud and, step by step, we are transferring our IT infrastructure to the cloud. Our migration to the cloud fosters security, scalability, automation and business development alike, supporting our ambition to build the world's best platform for savings and investments.

»The highly favourable trend in savings, trading activity and customer growth has laid the foundation for the positive financial outcome«

## Prestigious customer satisfaction and fund performance awards.

We are pleasede with the positive attention our products and brand attracted this year. The reputable Swedish Quality Index's customer satisfaction survey in the area of savings placed Nordnet second — our best position to date. It was particularly encouraging to have gained the top position in the product quality and value-for-money categories, and that we were the only Swedish bank to improve its score compared with the preceding year. In EPSI, the Danish equivalent of the Swedish Quality Index, Nordnet tops the list of savings actors in terms of customer satisfaction. In early January, similar news was announced in Finland (also in a survey conducted by EPSI) — Nordnet has the highest degree of customer satisfaction in the Finnish savings sector.

Our four Nordic index funds have been ranked in the gold category in Morningstar's new "Medalist Rating," and our technology index fund is a real outlier, both in absolute terms and relative to other funds with a similar focus.

#### Sustainability initiatives benefiting society.

An important milestone in our sustainability work over the year was the updating of our sustainability strategy, the focus of which is primarily on facilitating sustainable savings. We presented a number of new key ratios making it possible to monitor clearly our development in each area of sustainability. New regulations and guidelines for our sustainability work are being added continuously — for anyone seeking further insight into this work, we refer to our Sustainability Report.

One of our more visible initiatives helping democratize savings and investment is our new Nordnet Female Network that seeks to inspire more women to start saving and reduce the gap between men's and women's saved capital. At the time of writing, we have networks in both Norway and Sweden, with a total 3,700

members. In Denmark and Finland, we collaborate with a number of external networks focusing on women's savings.

Within the framework of our purpose to democratize savings and investment, we have pursued a series of issues concerning savers in Denmark, Finland, Norway and Sweden. In Sweden, savings economist Frida Bratt has pursued matters regarding a simplified pension transfer process, as well as the much-disputed ISK tax. In Finland, we participated in the process regarding a raised deposit limit over the year, and on 1 January 2024, a new law came into effect where the limit on equity savings accounts increased from EUR 50,000 to EUR 100,000.

Our commitment to creating the best savings tools for our customers continues into 2024. Thank you for following us at Nordnet. Together, we are building the world's best platform for savings and investments.

Lons. Ale Nunlig

Lars-Åke Norling, CEO

Sustainability Report.



## Sustainability.

Sustainability is integrated into Nordnet's overarching purpose to democratize savings and investments. As a digital savings platform, we can contribute to a positive societal development, primarily by helping our customers start saving and to shift capital towards sustainable investments. By offering tools for investing, increasing awareness about personal finances, acting for a better gender balance in savings, as well as making it easy to save sustainably, we promote socially beneficial objectives while simultaneously improving our long-term competitiveness.

Agenda 2030 and the UN's global goals are frameworks for sustainable development. Of the UN's 17 global sustainability goals, we have selected the six goals we consider closest to our areas of focus, thus linking our own sustainability work to the global challenges we face.

#### **Updating of the sustainability strategy.**

Nordnet's strategic sustainability focus should be directed towards the areas in which we have the most credibility and the greatest opportunities to influence favorable development. This entails a focus on areas and topics in line with our overarching business strategy of democratizing savings. In 2023, we updated our sustainability strategy to further clarify the focus of our efforts. The central change is that "sustainable savings," where we endeavor to make it easier for our customers to save sustainably, has been foregrounded as one the three main areas of the strategy.

## Our sustainability strategy encompasses three principal areas:

## Democratizing savings and investments.







Increase the general knowledge about personal finance

Develop user-friendly and inspirational services for saving and investments

A better gender distribution within savings and investments

#### Sustainable savings.







Offering a wide range of sustainable investment options.

Make it easier for customers to invest more sustainably by developing digital and user-friendly tools.

Inspiring and broadening awareness of sustainable savings.

## Responsible and sustainable business.







Practice transparency, regulatory compliance and strong ethical standards to maintain trust in Nordnet and in the industry as a whole.

Mitigate negative impacts on the climate and environment.

Build a workplace characterized by gender equality and diversity.

Promote a good work environment in terms of physical and mental health, development opportunities and an engaging culture.

## Sustainability in numbers.

	2023	2022
Democratizing savings and investments.		
Percentage of women among new customers	38 percent	38 percent
Customer satisfaction, ranking in savings industry <sup>1</sup>	2 1 1 1	2 1 1 1
Savings economists, mentions in the media	<b>5,800</b> times	<b>6,100</b> times
Sustainable savings.		
Investments in green <sup>2</sup> funds (31 Dec)	84% of fund capital	<b>75</b> % of fund capital
Sustainability-related watchlists	<b>505,000</b> views	_
C0 <sub>2</sub> -intensity for assets on platform (31 Dec)	<b>143 tonnes</b> CO <sub>2</sub> e/USDm	<b>124 tonnes</b> CO <sub>2</sub> e/USDm
	Same of the	
Responsible and sustainable business.		
Total greenhouse gas emissions	<b>703</b> <sup>3</sup> tonnes Co <sub>2</sub> e	<b>225</b> <sup>4</sup> tonnes Co <sub>2</sub> e
Employee satisfaction <sup>5</sup>	<b>45</b> eNPS	<b>35</b> eNPS
Gender-equal management team (31 Dec)	36 percent women	30 percent women

<sup>1</sup> We measure customer satisfaction in terms of Net Promoter Score (NPS). The ranking reflects an average value for the year in comparison with other actors in the

<sup>&</sup>lt;sup>2</sup> The EU's categorization of funds, Articles 8 and 9, or "light green" and "dark green" respectively.

<sup>&</sup>lt;sup>3</sup> For 2023, additional emissions categories are included in the calculations, meaning that the figures are not comparable between years. Applying the same method as in 2022, the emissions for 2023 amounted to 401 tonnes CO<sub>2</sub>e.

<sup>&</sup>lt;sup>4</sup>The figure for 2022 has been supplemented with the Scope 3 category "upstream transport and distribution" and has thus been adjusted upwards from the 2022 figure of 163 tonnes CO2e.

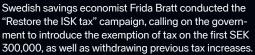
<sup>&</sup>lt;sup>5</sup>The figure refers to the average value over the year.

# Democratizing savings and investments.

The overarching purpose of Nordnet's business is to democratize savings and investments by offering private investors access to the same tools, information and services as professional investors. Increased accessibility and increased financial freedom have a positive impact on individuals, as well as on society.

We try to realize this ambition by educating and coaching our customers to better savings, involving ourselves in the public debate on topics related to personal finance, developing user-friendly digital products and services, as well as by promoting financial inclusion with a focus on gender-equal savings.







One of our educational initiatives is our ongoing collaboration with the Finnish NYT investor school where we arrange webinars to teach young people about savings.



#### **Education in investment and personal finance.**

Educating people around shares, funds and personal finance is a central part of our work to democratize savings and investments. Through internal and external channels, we seek to inspire and engage new and more experienced investors alike, as well as to enhance general awareness in savings and investments.

#### **Objectives Selection of activities Results** Increasing general 5,800 mentions Our savings economists awareness in savings and continue to educate and to be of our savings economists in the media. active in various topical matters. investments 790 million Several events and meetings potential interactions between were arranged aimed at different readers/listeners/viewers and target groups. savings economists. Several educational initiatives in 6.6 million each country. streams of our savings podcasts.



Per Hansen. and Helge Larsen, hosts of our Danish podcast Investeringspodcasten.

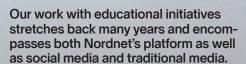
#### Our educational work includes our podcasts in each country, comprising a major source of knowledge and inspiration.

In 2023, we started reporting the number of streams of our savings podcasts, amounting to more than 6.6 million streams over the year. We also create videos focusing on general knowledge and content explaining current events. These videos are shared widely in several channels, such as Instagram, Tiktok and Nordnet's website. We believe that this increases the likelihood of reaching target groups that may not normally come into contact with financial news through traditional media, such as younger people. In 2023, for example, we published more than 180 Tiktok videos in Sweden alone, and we are now the largest financial player on Tiktok in Sweden.



## In 2023, we created the "Savings and investments profile of the year" award in

Norway. With the award, we seek to recognize people who, through their work, help spur interest in, inspire engagement in, and spread knowledge on savings and investments. In 2023, the award was given to influencer Else Sundfør for her work for women's savings. We also organize competitions in Finland, "Investor of the Year" and "Investment of the Year," where the aim is to highlight individuals and sources of inspiration working for a better savings market.



Through our eight savings economists and investment coaches, we strive to inspire and increase general knowledge in personal finance and investments. Their work includes participating in the social debate, commenting on current events, as well as lecturing on the subject, as well as writing blogs, newsletters and educational materials. One way to measure the scope of the savings economists' work is through the total number of times they are mentioned in editorial media — which amounted to 5,800 (6,100) mentions in 2023. Additionally, we measure the potential reach of these mentions¹, which amounted to 790 (870) million potential readers/listeners/viewers.

Investments in educational efforts, SEK thousands	2023	2022	2021
Expenses for Nordnet's training measures			
Savings economists	-7,523	-6,889	-6,347
Podcast	-1,772	-2,078	-1,461
Nordnet Live Stockholm	-137	-118	-144
Other	0	-136	-75
Total expenses for educational investments	-9,432	-9,221	-8,027

The table shows the cost of education efforts for our customers and the public. Podcast refers to production expenses and equipment for our podcasts.

<sup>&</sup>lt;sup>1</sup> Reach is an estimate of the number of readers of a publication or the number of viewers/listeners to a broadcast where the analyzed company was mentioned.

#### Selected educational initiatives in each country.

Sweden	Norway	Denmark	Finland
The annual Nordnet Live event was held for the tenth time, with e.g. Affärsvärlden's Chief Editor Peter Benson, Head of the Swedish National Debt Office Karolina Ekholm and Minister of Financial Markets Niklas Wykman guesting.	Educational films produced in collaboration with Film-konsulentene to reach out to upper-secondary school pupils with knowledge on savings and investments.	We cooperated with women's networks, such as PennySisters, holding events on the theme of women's savings.	We published our book "Trade Like a Pro" as an e-book to reach more listeners. Audio versions of our most read articles were also created to make them more accessible.
Nordnet's investment coach Ara Mustafa produced numerous videos in 2023, and Nordnet has the greatest number of Tiktok fol- lowers among the Swedish banks.	The new award "Savings and investments profile of the year" was created, and will be awarded annually.	A new series of webinars for be- ginners was launched, focused on "how to start saving" and is a quarterly event.	Partnership with NYT's Investor School, which educates young people in savings.
Educational initiatives together with Nasdaq and Unga Aktiesparare.	Investor evening in Oslo with fund managers Tor Svelland and Catherine Foyn.	More than 250 blog posts published over the year.	The "investors of the year" and "The Investment of the Year" were awarded once again.
Cooperation with Kodcentrum around savings.	The Nordnet Female Network was launched during the autumn.	Collaboration with female influ- encers and female role models in the areas of savings and investments.	Meetings such as "Moneyming- le" were carried out, in which we educate people on monthly savings and get people started with their savings.

In 2023 we launched our new educational platform Nordnet Academy on Nordnet's website in each country. At Nordnet Academy, savers can find knowledge and inspiration — all to make it easier to get started with your savings or to become an even better investor. Information is provided here on how to get started with savings in, for example, shares, funds, pensions and ETFs, as well as in-depth themes, including sustainable investments.

In addition to our commitment to increase knowledge about private finances in channels that young people use, we work with specific activities aimed at young people as a part of democratizing savings and investments. An example of this is our far-reaching involvement in Unga Aktiesparare, NYT's Investor School, as well as the production of films for upper-secondary schools in collaboration with Filmkonsulentene.

In Sweden, Nordnet also has a long-standing collaboration with the non-profit organization Kodcentrum, which works to democratize coding and to give every child the opportunity and the ability to create with code. In 2023, we arranged a digital children's hackathon on the theme of savings and investments. More than 200 children from all over Sweden participated, gaining the opportunity to create their own "piggy banks" in which the value of their money increases over time, as well as a lecture on the meaning of savings with Nordnet volunteers.



6.6 million streams of our savings podcasts.

180 educational videos published only in Sweden.





5,800 mentions of our savings economists in different articles.



It is important that everyone has access to knowledge on private finances. With our efforts in education and advocacy, we seek to contribute to UN global goal 4, *Quality* education.

#### Advocacy in private financial matters.

Nordnet is active in the public debate on savings and investments in the markets where we conduct our operations. We are always on the side of the savers, working for the best interests of savers on matters involving shares, funds, pensions and private finances in general. The goal is to improve the savings market for private savers, and to be a clear voice in important matters for savers.

#### **Objectives**

#### **Results**

#### Selection of activities

Improving the savings market for private savers and being a clear voice on key issues for savers

#### Raising the deposit limit

in both Finnish share savings accounts and in Danish equity savings accounts.

#### Lowered tax on ISK

in Sweden through government proposals on tax exemption for the first SEK 300,000 in savings.

#### **Digital Annual Meetings**

introduced as a possible alternative to physical Annual General Meetings in Sweden.

Campaign to restore the tax on Swedish ISKs.

Various initiatives aimed at improving the pension market in Sweden through easier transfers of pension savings.

Advocacy on higher ceilings on equity savings accounts in Denmark and Finland.

Advocacy to introduce the possibility of holding digital Annual General Meetings.

On 1 January 2024, a new law entered came into effect raising the deposit limit in Finnish equity savings accounts from EUR 50,000 to EUR 100,000. Nordnet has been active in the public debate, trying to influence politicians on the issue through various initiatives. Nordnet has participated in the preparation of the law with data and insights, and we are pleased that this change has now been implemented.

In Sweden, we have for several years combated to achieve better terms for ISK and, in 2023, we continued this fight, requiring the previous tax increases on ISKs to be withdrawn. We continue to work for a better pensions market, and have, over the year, conducted activities aimed to remove the requirement for the signature of a former employer to be removed in connection with transfers of occupational pensions. On the same theme, we have advocated that it should be possible to sign pension transfers digitally. We have also engaged in the debate for the possibility of implementing digital Annual General Meetings, which we believe will increase accessibility and help shareholders attend meetings regardless of where they live in the country. Another issue we have been involved in is the proposal to create a "super register" of Swedish citizens' assets and liabilities. We are critical of the proposal given the negative aspects with regard to privacy and as it can be seen as a step towards the introduction of a general tax on the owning shares and funds.

In Denmark, we have advocated for a higher rate of deposits in equity savings accounts, as well as simpler and more beneficial taxation rules — two key matters contributing to a more savings-friendly climate. In Norway, we have been a strong voice on the matter of fees on earlier pension plans, with more than half a million Norwegians savers, in our view, having to pay far too high a price. We have also argued that the tax on profit from savings in shares should be reduced. Overall, it was a year of engagement that made an impact on the savings market, as well as for the individual saver.

### Nordnet's membership in various interest associations.

Nordnet is a party-politically neutral organization and we do not generally support individual parties or politicians. In our advocacy work, we only engage in topics affecting personal finances, savings and investments with a view to improving the terms for private savers. We hold no political views on subjects not involving savings, investments or personal finance in general, nor do we make any donations or financial contributions.

Beyond Nordnet's own advocacy work, Nordnet is a member of several organizations that conduct various advocacy efforts or work for shared industry standards. Nordnet is a member of the industry organizations Swesif and Norsif, two independent network forums for sustainable investments in Sweden and Norway. Nordnet is also a member of the Swedish Investment Fund Association, the Swedish Bankers' Association and the Swedish Securities Markets Association, which all work in different ways for to foster a healthier financial market in Sweden. We are also a member of some of their counterparts in the other Nordic countries: Finance Finland (Finanssiala) in Finland, the Norwegian Securities Dealers Association (VPFF) in Norway and Finance Denmark (FIDA) in Denmark. We are also a member of the Swedish-Finnish Chamber of Commerce, which nurtures business contacts between Sweden and Finland.





#### Digital and user-friendly tools.

Our objective is for Nordnet to be the natural choice for private savers in the Nordic region. To succeed with this, we must have the highest customer satisfaction in our industry in each market, which is enabled by a modern and user-friendly platform. Our customers should be able to find everything they need on Nordnet's platform, and we work to continuously simplify and improve the customer experience.

#### Product development and product quality.

Nordnet's core business is online securities trading where platform availability consequently is essential. Although digital access to Nordnet's interface during periods when trading is conducted on the exchanges is crucial, our customers also expect superior availability when the marketplaces are closed. Furthermore, we are also working constantly to improve our offering by developing new products and services.

Objectives	Results	Selection of activities
Build the best platform for savings and investments	Number of monthly active users at year end.  888,000  1,003,000  2022 2023	Launch of several sought-after savings products, including Finnish investment insurance.  Continued integration of Shareville into our Nordnet platform to generate an improved user experience.  Increased focus on digitalization to reduce administration and physical forms.
Platform accessible 99.9 percent of the time when the market is open	Accessibility during 2023.  99.95% (99.92%)	Continued migration of Nordnet to the cloud for increased flexibility and operational reliability.

In 2023, our work continued to build the world's best platform for savings and investments. During the year, we launched the new savings product sijoitusvakuutus, a Finnish investment insurance. which is unique in its category due to its affordability, flexibility and digital structure. The launch set a new standard for insurance-related savings in the Finnish market. Furthermore, our work to integrate Shareville into the Nordnet app is progressing at a fast pace. We are also working further with digitalization and automated flows to help minimize the risk of errors and enable faster handling times and more efficient development. Over the year, we have also improved the search function in our app and created better formatting of innovations. In collaboration with Freja, we launched e-identification to ensure that we have several different login methods and to reduce dependency on individual actors. To measure how well we are succeeding in building a good savings product, we track the number of monthly active users (MAU). In December, this key ratio exceeded 1 million users in a month for the first time and, compared with the end of 2022, the number increased by 13 percent.

To ensure high accessibility on the platform and to continuously deliver a better user experience, we strive to frequently launch new versions of our platform. We do this through small, iterative changes, which we believe reduce the risk of errors, increase customer benefit and enable us to launch products faster. As evidence that we work efficiently, we implemented 83 launches (65) of our app in 2023. Moreover, we target 99.9 percent accessibility during market opening hours. Our journey towards becoming more cloud-based continues, contributing to increased operational reliability and increased flexibility to develop new products. We are proud to have achieved 99.95 percent (99.92) accessibility on our platform in 2023.

## To improve financial inclusion, we work to get more people to start saving.

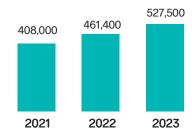
Many people find that savings and investments can be complicated. We continuously try to remove unnecessary obstacles and, by creating as simple and accessible a customer experience as possible, we endeavor to encourage more people to start saving.

To simplify savings, we work to digitalize and automate as large a part of the savings experience as possible. Today, the number of digitalized customer forms at Nordnet is 387 (313), an increase of 24 percent. In 2023, we achieved the milestone of having digitalized more than one million documents that would otherwise have had to be printed and signed physically.

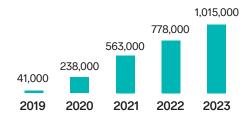
In 2023, we launched an updated new customer process with guidance on what you can do as a new customer on the platform to get started with your savings more easily. In addition, we have developed a new guidance service to help pension savers find and select funds. We work to increase the number of customers who save monthly as these often invest long-term and in their future, thereby increasing their financial freedom. We are also continuously

following up on this. Seen from a broader perspective, to save on a regular increases financial inclusion as this type of savings behavior reaches more groups in society. In 2023, the number of monthly savings plans amounted to 527,500, corresponding to an increase of 14 percent.

#### Number of monthly savings plans.



### The number of digitally signed customer forms that would otherwise have been physical.





Nordnet works to democratize savings and investments and give all private individuals in the Nordic region access to a user-friendly platform enabling them to take control of their finances, in line with goal 8, Decent work and economic growth.

#### We work to deliver increased customer benefit.

A high level of customer satisfaction is of decisive importance for Nordnet to succeed with the ambition to be the natural choice for savings and investments. Having the most satisfied customers is made possible by a state-of-the-art platform for all their savings and investments needs. We strive to work in a customer-focused way to ensure that we develop the best possible product and are able to achieve our goal of maintaining or improving our position in customer satisfaction.

#### Selection of activities **Objectives** Results Maintain or improve our New function in both the app and Customer satisfaction position position in customer satison the website with the possibiin each country. faction within the savings lity of giving direct feedback on 2023 services and functions. industry in each country Establishment of a customer panel for the increased incorpo-1 ration of customer comments. 2022

A high degree of customer satisfaction is crucial for our customers' activity, loyalty and likelihood to recommend us. We measure customer satisfaction as a Net Promoter Score (NPS) and our objective is to maintain or improve our customer satisfaction position within the savings industry in all of the countries where we have operations. The results are followed up by the CEO on a quarterly basis and by each Country Manager. We are proud to hold first place in Norway, Finland and Denmark. In Sweden, we are in second place, although we saw our underlying NPS improving and that we are reducing the gap between us and the competition. Over the year, we worked intensively to improve our customer satisfaction score and a testament to this can be seen in the good results we achieved in several rankings. We were the only player in Sweden to improve our rating in the Swedish Quality Index (SKI), climbing several positions. It is also gratifying that we are now the best player in both the product quality and pricing categories. In both Denmark and Finland, we were named the best actor in EPSI, these countries' equivalent to SKI. In Norway, we ended up in third place in the same survey, although our result improved more than the industry as a whole. In Denmark, we were also ranked as the best investment platform according to Wilke & Finanswatch.

We work closely with our customers to ensure we develop the best possible platform. We monitor customer behavior continuously to identify improvement measures, and we are applying user tests to ensure that new launches improve matters for our customers. In each product domain, we maintain an analyst who analyzes customer behaviors, ensuring that we continuously improve the product.

We also measure customer satisfaction, response times and the number of cases received in all parts of the company with direct customer contact. In all these departments, we have set targets linked to a response time, to streamline processes and meet the customer's needs and requests within a reasonable period. As an example, our Customer Service measures: the number of cases received, average response times, the total amount of time before we settle a case, as well as customer satisfaction among those having contacted us. This is then followed up in relevant forums.

Over the year, we took further steps to improve our efforts to integrate feedback from customers. We have launched a tool that allows for customers to submit feedback directly on our platform, with the responses being used as a starting point for future product development. This idea is that this feedback also should be used as one of the starting points for assessing how good our product is, new areas we should prioritize, as well as making specific customer issues visible in a clear forum. The feedback is then used by the relevant product team. We have also initiated a customer panel that customers can join voluntarily. They can then participate in various tests to facilitate more finely tuned customer surveys when developing new products and services.

#### Gender equality in savings and financial inclusion.

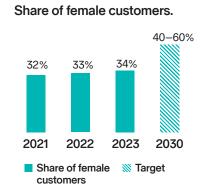
In order to fulfill our overall purpose of democratizing savings and investments, achieving equality is an important area in which Nordnet can make a difference. We educate, inspire and aspire to encourage more women to start saving in shares and funds and to take control of their financial futures.

#### **Objectives**

#### **Results**

#### Selection of activities

Women should account for 50 percent of customers, +/- 10 percent by 2030

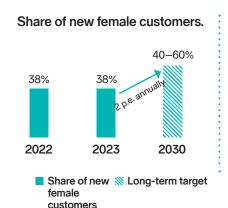


Launched the network Nordnet Female Network in Norway and Sweden.

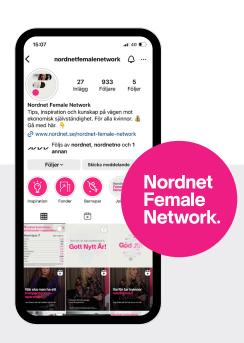
Arranged several educational sessions for women in all the countries in which we operate.

Created several social media campaigns such as highlighting then International Women's Day on March 8.

Increase the proportion of women among new customers by 2 percentage points annually by 2030







Key figures within gender equal savings	2023	2022
Women's average capital in relation to men	69%	69%
Number of members, Nordnet Female Network	3,700	-

Women's average capital is calculated based on Nordnet's customer base and excluding the Private Banking customer segment.

We have a target of achieving a customer base comprising 50 percent women by 2030 with an acceptance range of +/- 10 percentage points. To follow up on our long-term objective, we have set a short-term target of increasing the proportion of women among new customers by 2 percentage points annually. In 2023, 38 percent (38) of new customers were women, which was roughly four percentage points higher than the share of women in the overall customer base, and the same as the share of new customers in 2022. Accordingly, the target regarding percentage growth in new women customers was not achieved. During the year, we have started to measure women's average capital in relation to men as this measure supplements the view of equality in savings. In 2023, this figure was 69 percent (69).

Initiatives to increase women's savings.

To achieve our long-term target for gender equality in savings, we are primarily focusing on conducting activities aimed at increasing women's interest in savings and investments. In this effort, we arrange lectures, network meetings and courses highlighting female role models. This is also reflected in our communications where we highlight statistics and data on women's savings to pay attention to phenomena and trends in the external community affecting the issue of gender equality from a financial perspective. In 2023, we launched Nordnet Female Network, which is an initiative to increase women's savings and reduce the financial gap between women and men. The network aims to increase women's financial freedom and to inspire, encourage and support female savers. The network is active in Sweden and Norway and, at the end of the year, the network had 3,700 members. We also organize numerous events together

with various organizations in all of the countries where we conduct operations. In 2023, we organized the event "Fearless" in partnership with Feminvest, which took place in connection with the launch of Feminvest in Finland. In the same spirit, we organized a similar event together with the influencer network Frukostflickorna (the breakfast girls), targeting

Swedish-speaking Finns.

As in previous years, in 2023 too we chose to draw attention to International Women's Day in relation to private finances and savings. We conducted a survey together with YouGov to gain a view of the extent to which women and men feel that they have enough savings to allows them to change their life-situation.

In Sweden, our savings economist Frida Bratt marked the day with a blog post about the importance of women continuing to save even in harsher times. On the same day in Finland, we chose to highlight the importance of being able to afford to make lifestyle changes.



Promoting economic inclusion in society, in line with UN global goal 10, *Reduced inequalities*, goes hand in hand with our purpose of democratizing savings and investments. We want to inspire everyone, regardless of background, gender or age, to take control of their personal finances.





#### A broad range of sustainable savings products.

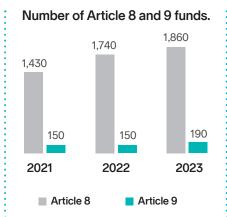
To enable more people to save and invest sustainably, it is necessary for Nordnet to offer a broad range of sustainable savings products. Nordnet's investment universe mainly includes shares, funds and ETFs, but also other types of investment instruments and savings products. The ambition is to offer a broad range of sustainable alternatives in all of the product categories we cover.

#### **Objectives**

#### **Results**

#### Selection of activities

Offer a broad range of sustainable savings products, enabling customers to always be able to choose a sustainable alternative



Dedicated watchlist with Article 9 funds.

Work initiated around expanded reporting regarding ETFs.

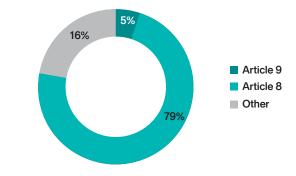
Started mapping the coverage of Article 8 and 9 funds within various investment themes.

#### **Fund offering**

We offer more than 2,400 different funds. The range consists of funds from both established players and smaller start-ups and spans different types of asset classes, regions, sectors and management styles. We offer customers the opportunity to independently select the investment options that suit them best, based on the tools and information provided in our interfaces. Each year, we report the extent to which our customers choose sustainable funds, and measure this following EU's definitions of Article 8 and 9 or "light green" and "dark green." This is also a key ratio that we follow up on in our quarterly reports.

At the end of the year, Nordnet offered savings in about 2,050 (1,890¹) funds categorized as Article 8 or 9, of which about 190 (150) are categorized as Article 9. An Article 8 fund promotes environmental and/or social objectives. To be categorized as Article 9, sustainability must be the objective of the fund. As of December, the share of fund savings in Article 8 or 9 amounted to 84 percent (75) of the total fund savings in Nordnet, of which 5 percentage points (5) was in Article 9. Of our fund customers, 96 percent (91) had investments in at least one fund categorized as Article 8 or Article 9. As a result of the regulations still being relatively new, fund companies are still working to find the suitable classification level, which is why we could experience that funds will be re-categorized over the upcoming years.

## Share of fund capital in respective category in 2023.



<sup>&</sup>lt;sup>1</sup> In 2022, this number was written as "Article 8 or 9." The figure referred only to funds with an Article 8 classification.



#### ETF offering.

Nordnet provides more than 1,600 exchange-traded funds, or ETFs, on our platforms. ETFs could also be classified in accordance with the EU's definitions as Article 8 or 9. Today, some 570 of the ETFs on the platform are classified as Article 8 and 40 are classified as Article 9. Among our customers, ETFs are a popular way of getting exposure to different themes with a sustainability focus, such as climate change, cyber security and biodiversity. As an example, our Swedish customers can choose between 40 different exchange-traded funds seeking to invest in companies working in line with the Paris Agreement.

#### Share offering.

Nordnet offers share trading in eight markets directly via our platform, and several more through our brokerage service. Our range of individual shares is a consequence of the marketplaces we offer, as we do not exclude any instruments of a given marketplace.

There are many different investment strategies for savers that seek to take sustainability into account when investing in shares. Consequently, we strive to educate and facilitate for customers by building functions for sustainable investment, as well as by educating and communicating with regard to sustainability. These areas

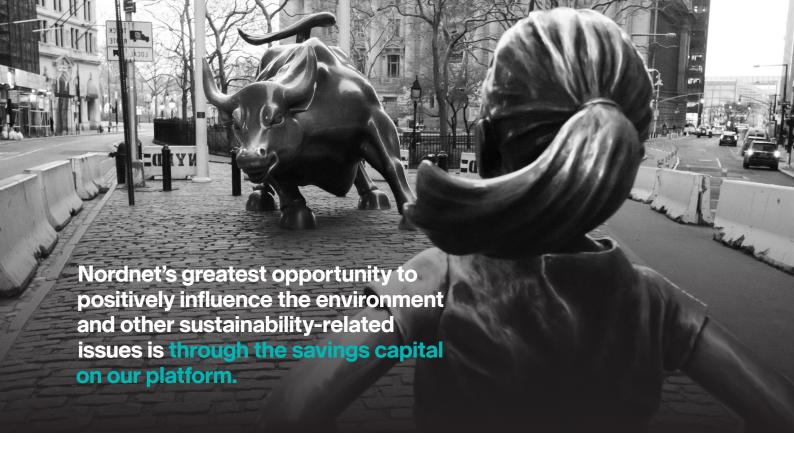
are central to our sustainability strategy and specific sections are therefore devoted to them in the sustainability report. Examples of activities we pursue in these areas include educating customers on the investment strategies that exist, as well as on how to invest in themes exposed to sustainability trends.

#### Nordnet Fonder.

In 2022, we started our own fund company Nordnet Fonder AB. The objective is to achieve qualitative and cost-effective asset management for long-term savers. Sustainability is at the same time an important component in the asset management process. The sustainability strategy applied in the funds is to exclude certain holdings, either by excluding sectors or specific companies that violate human rights. Nordnet Fonder manages both index funds and fund of funds and the fund company safeguards compliance in various ways with the applicable sustainability policy for these fund categories.

In the case of fund funds, the fund company shall, prior to an initial investment, ensure that each underlying fund meets Nordnet Fonder's environmental and social requirements. This means, among other things, that the fund may not hold shares in companies violating the UN Global Compact<sup>1</sup> or involved in significant contro-

<sup>&</sup>lt;sup>1</sup> The UN Global Compact is an initiative by the United Nations to develop accepted principles on human rights, labour law, the environment and anti-corruption.



versies. If a fund no longer meets the fund company's requirements, advocacy efforts shall be undertaken or the relevant assets are to be divested.

Nordnet Fonder's index funds replicates their benchmarks by investing directly in underlying shares. Accordingly, the underlying design of the relevant index of each index fund determines the companies in which the share index fund invests. Nordnet shall therefore choose an index that excludes companies violating the UN Global Compact. In addition, the index shall exclude companies not meeting demands on good corporate governance, as well as companies with exposure to controversial weapons. If a company no longer meets the fund company's requirements, advocacy shall be conducted vis-à-vis the index supplier.

Nordnet Fonder manages 12 funds, all of which have been categorized as Article 8 funds. Nordnet Fonder also manages four Nordic equity index funds, three of which have been categorized as Article 8. On the fund company's website and in the fund company's information brochure, additional information is provided on how the fund company's various funds foster environmentally related and/or social characteristics. As of 31 December, the share of capital in Nordnet Fonder invested in Article 8 funds amounted to 81 percent, and 19 percent in funds with no sustainability classification. These numbers refer only to the funds managed by Nordnet Fonder AB, and not the funds managed jointly.

Nordnet Fonder AB in figures	2023
Number of Article 8 funds	15
Number of funds without sustainability classification	1
Share of capital in Article 8 funds	81%
Share of capital in funds without sustainability classification	19%

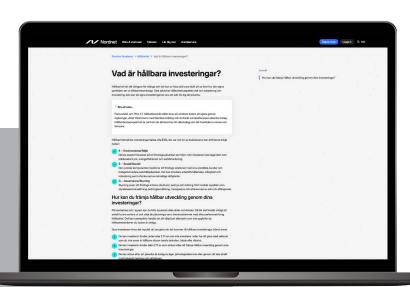
#### Tools for investing sustainably.

On Nordnet's platform, features are provided to facilitate savers' sustainable investments. It is in our DNA to develop digital and user-friendly tools that simplify life for our customers, which also includes functions for sustainable investments. Our objective is to make it simple for customers to save sustainably by building innovative features, as well as by providing a broad range of sustainability data.

# Objectives Results Selection of activities Facilitating customers' sustainable savings by building tools, functions and providing data Selection of activities Publication of several sustainability-related lists within, for example, the categories health, equality and the environment.

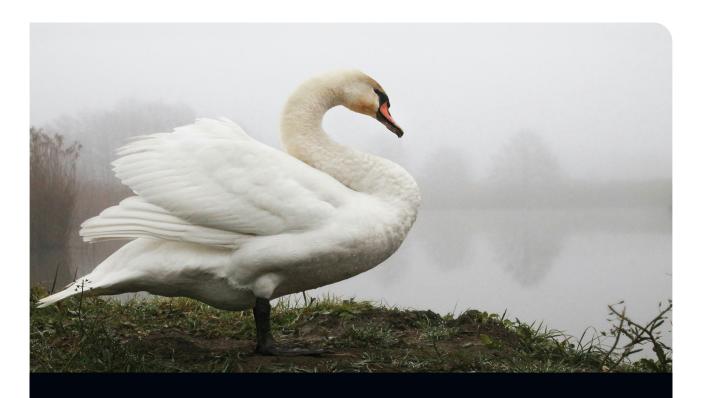
In 2023, we developed new ways in order to facilitate our customers' sustainable investments. One of our focus areas has involved watch lists enabling customers to identify new investments in the area of sustainability. This function is one of the most popular among our customers and therefore important to prioritize also for the sustainability work. In addition to inspiration about sustainability-related shares, these lists also include funds and ETFs. The lists are constantly evolving and, at the end of the year, there were lists within, for example, energy efficiency, renewable energy and equality. At the end of the year, the number of sustainability-related lists amounted to 27 (5) where several of the sustainability-themed lists are particularly popular among our customers. For example, the list titled "renewable energy" is one of the popular lists that was viewed almost 100,000 times in 2023. In total, sustainability-related lists were viewed 505,000 times during the year. As the list function was launched in December 2022, no comparison figures are available.



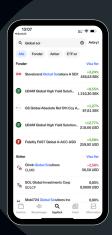




Selection of functions and digital solutions in the area of sustainability on Nordnet's platforms.



We offer a broad range of sustainability-related data and information about our funds. Funds are labeled with the appropriate SFDR categorization, allowing customers to see easily if they are Article 8 or Article 9 funds. We also provide key ratios on issues regarding the climate, the environment, corporate governance and social aspects. Additional sustainability-labelled funds are Swan-labelled funds that the customer can find through a watch list. A filtering function is also available allowing customers to opt out of unsought holdings in industries such as weapons and tobacco. Nordnet provides similar data also for ETFs.





## Views of the largest sustainability-related lists in 2023.

Renewable energy	97,400
Solar energy	41,300
25 most sustainable	37,600
The green alternative	37,300
Cars of the future	35 100



Building digital tools is in our DNA and allows more people to start saving sustainably, in line with Goal 8 *Decent work and economic growth.* 

#### Communication around sustainable investments.

The third sub-area within our strategy to facilitate customers' sustainable savings, involves communications about sustainability. Nordnet seeks to inspire and to contribute knowledge in sustainable savings and investments and achieves this both by providing information in our interfaces and through our work in education and advocacy.

#### **Objectives**

#### **Results**

#### Selection of activities

Nordnet shall inspire and contribute to increased knowledge on sustainable savings and investments

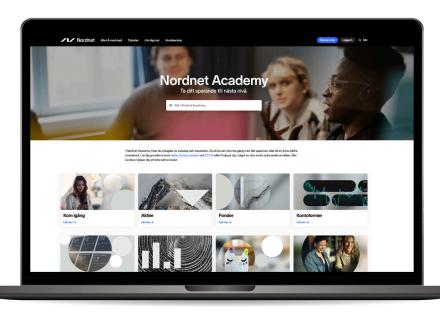
#### Sustainability section

in Nordnet Academy with edicatopn around sustainable savings in shares, funds and ETFs.

#### Podcast episodes

focusing on sustainability in several countries.

Development of sustainabilityrelated educational material in several media formats.



Sustainability is included as a dedicated section of our new educational initiative, Nordnet Academy.

In 2023, we added sustainability as a section covered by the Nordnet Academy with the purpose of educating existing and potential customers about sustainable savings. Nordnet Academy is updated continuously with information around, for example, different investment strategies and data points that can be used to identify investments focusing on sustainability.

Most of our podcasts over the year had episodes covering topics within sustainable savings. Examples of themes during the year included episodes on the solar cell industry, cyber security, investments to combat climate change, gender equality in the financial sector, as well as the benefits and disadvantages of sustainability-oriented funds.

We also participated in several external events to disseminate awareness of sustainable savings. For example, our Head of Sustainability, Marja Carlsson, participated in PwC's Finance Day, where she talked about the importance of education within sustainability-related issues. We also participated in Nasdaq's event regarding green shares, presenting our view on the benefits and disadvantages of a sustainability classification for shares.



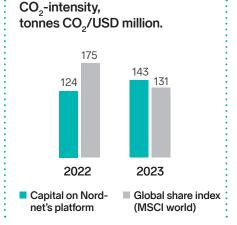
By educating and inspiring our customers in sustainable savings, we can contribute to Goal 4 *Quality education*, by inspiring increased knowledge while also contributing to a more sustainable society.

#### Climate impact of our customers' investments.

Nordnet stands behind the Paris Agreement to limit global warming well below  $2^{\circ}$ C and striving to limit it to  $1.5^{\circ}$ C. In line with this ambition, Nordnet's overarching target is for the  $CO_2$  footprint from savings capital on Nordnet's platform to decrease in accordance with the Paris Agreement. The Board of Directors adopted the objective of reducing the  $CO_2$  footprint from the savings capital as the overarching objective within the strategic ambition "A sustainable business" which is a cornerstone of Nordnet's strategy.

#### Objectives Results Selection of activities

Halve the emissions from customers' investments between 2023 and 2033



Created a large number of watch lists for sustainable investments, with several focused specifically on the climate issue.

Provided education in the area of sustainability, through podcasts for example.

Sustainability as a category within education initiative Nordnet Academy.

On Nordnet's platform, our customers make their own investment decisions, which means that Nordnet as a company has no direct opportunity to control the degree to which the target is met. We can, however, influence the  $\mathrm{CO_2}$  footprint by inspiring and informing our customers on green investments, developing tools to make it easier to find data and understand one's portfolio from a climate perspective and maintaining a broad range of sustainable investment options on the platform. For that reason, we have increased our educational initiatives on sustainability, generating inspiration for assets with a low carbon footprint.

Against the background of our ambition to reduce emissions from our customers' portfolios in line with the Paris Agreement, we have formulated a target in-line with the "Carbon Law" principle developed by climate researcher Johan Rockström. This means that, within ten years, Nordnet shall have decreased its CO<sub>2</sub>-intensity by 50 percent, or to an intensity of 71 tonnes. This target involves assets in which our customers invest on our platform, which is Nordnet's greatest opportunity to influence the climate. If we are successful in helping customers transfer their capital to more sustainable alternatives, we can achieve a significant impact.

#### Carbon Law.

In Science Magazine, Johan Rockström et al. published the article *A road map for rapid decarbonization* — *Emissions inevitably approach zero with a "carbon law"* (2017). The article set out a rule of thumb applicable to companies, countries and individuals alike, based on halving emissions every tenth year to be able to keep global warming wellbelow 2°C. This rule of thumb was named "Carbon Law".

CO2-intensity, tonnes CO <sub>2</sub> e/USD million	2023	2022
Shares	152	121
Funds	120	106
ETFs	145	167
Total CO <sub>2</sub> -intensity	143	124
Share of market value for which emissions data are available	78%	78%
Global share index (MSCI world)	131	175





As of 31 December 2023,  $CO_2$ -intensity amounted to 143 tonnes  $CO_2$ e/USD million in sales of the underlying assets. This can be compared with a broad global share index (MSCI World) with a  $CO_2$ -intensity of 131 tonnes (175)  $CO_2$ e/USD million in sales. We currently measure the intensity of shares, funds and ETFs, and for those asset classes there was available data for 78 percent (78) of the capital at the end of 2023. We are also following up on this key ratio in our quarterly reports to increase our awareness of this metric.

The change in intensity may partly be due to changed allocations in customers' portfolios, and partly to the companies in which our customers have invested increasing or reducing their emissions. The measure is also affected by exchange rate fluctuations as



By helping our customers to invest more sustainably, we can facilitate access to financing for companies fighting climate change and thus contribute to Goal 13 *Climate action*.

the companies' revenues are translated into USD. One specific explanation for the difference in development between the assets on Nordnet's platform and the comparable index is that US-based technology companies with low emission intensity became a larger proportion of the world index during the year, and this change is was not reflected to an equally high extent in our customers' investments. Another reason is that the Nordics are home to many freight and shipping companies with substantial carbon dioxide intensity, and our customers have allocated capital towards these companies in 2023.

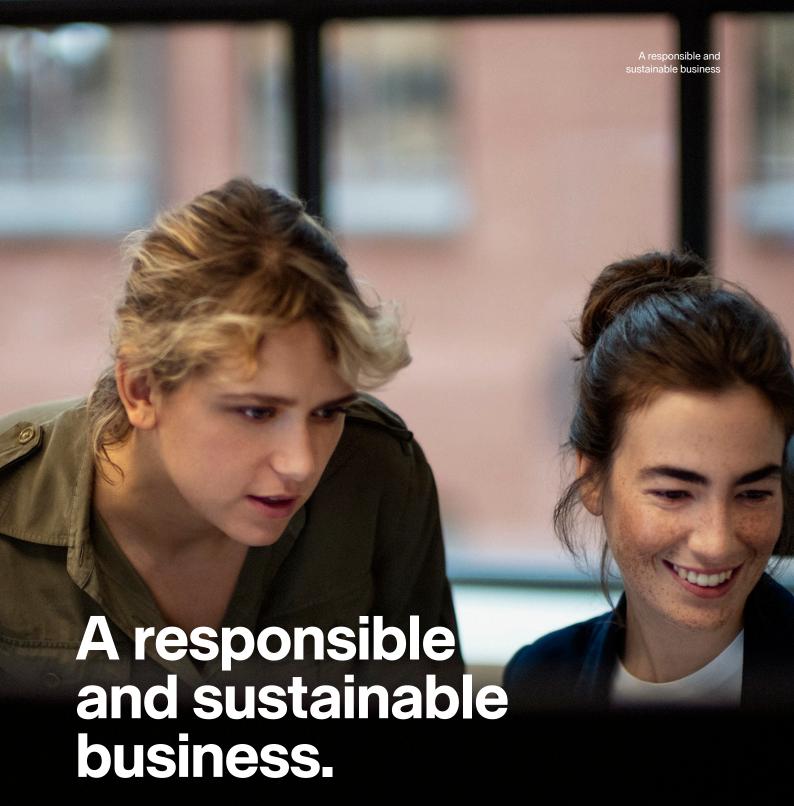
Nordnet measures  $\mathrm{CO}_2$ -footprint as portfolio-weighted  $\mathrm{CO}_2$ -intensity in accordance with the Task Force on Climate-related Financial Disclosures (TCFD). The  $\mathrm{CO}_2$ -intensity of the companies in the portfolio is calculated as emissions divided by income. Adding up the intensity at the portfolio level, the companies' intensities are weighted with the proportion of the portfolio that the companies represent. This makes portfolios comparable with one another regardless of the scale of the investment. Thus, the intensity is not affected by a change in the total savings capital on Nordnet's platform.

#### CO<sub>2</sub>-intensity.

 ${
m CO}_2$ -intensity is calculated as a company's emissions of  ${
m CO}_2$  equivalents ( ${
m CO}_2$  and other greenhouse gases) divided by the company's sales. The units reported by Nordnet are emissions in terms of tonnes of  ${
m CO}_2$ e annually, divided by annual sales in USD millions. The  ${
m CO}_2$ -intensity of the savings capital as a whole is calculated by multiplying the individual intensity of the underlying companies by the percentage of the savings capital as a whole that the investment in each company represents. The products are then added up.

Portfolio weighted carbon intensity = 
$$\sum_{k=0}^{n}$$
 Portfolio weight<sub>k</sub> Emissions<sub>k</sub> Revenues<sub>k</sub> is companies the portfolio is invested in.





Nordnet conducts banking, securities, fund and insurance operations and it is important to always act ethically and responsibly. We also need to safeguard good governance and regulatory compliance, as well as working actively with controls and addressing risks. This means, among other things, that we must maintain good business ethics and a high level of awareness of regulatory compliance issues. Responsibility also means that we must limit our own environmental impact and ensure that Nordnet is an attractive workplace, achieved by both gender equality and diversity.

#### Business ethics and regulatory compliance.

Nordnet shall conduct responsible operations and to leave as positive an impression as possible in the markets in which we operate. Our guiding principles are transparency, superior ethical standards and benefit for savers in all parts of our offering.

	Objectives	Results	Selection of activities
	Conducting responsible and transparent operations	More than ten mandatory courses for employees in key areas, such as cyber security, anti-corruption and money laundering.	Publication of several policies on our external website.  Mandatory courses were conducted on an ongoing basis during the year.
••••	Zero tolerance of corruption	Zero reported cases of suspected corruption in 2023.	Our work with anti-corruption is essential and we train all staff on an annual basis.
	All of Nordnet's key¹ suppliers shall sign Nordnet's Code of Conduct or apply a similar code of their own	Signing of the Code of Conduct for suppliers classified as critical  Share that signed or have a similar code  Share having yet to sign  Share of outsourcing suppliers that have signed amounted to 100 percent (100).	Extended requirements regarding the Code of Conduct for suppliers classified as critical.  Reporting to the Board of Directors introduced regarding the share of suppliers having signed the Code of Conduct.  Code of Conduct for suppliers published on our external website.

<sup>&</sup>lt;sup>1</sup>This includes our two supplier categories "outsourcing" and "critical." Outsourcing suppliers are defined according to the applicable internal rules in accordance with the outsourcing policy, or where there is a mutual strategic interest. Critical suppliers are long-term suppliers with a high business value and/or included in any of Nordnet's critical processes or serving as personal data assistants.

#### Internal guidelines.

Since Nordnet conducts banking, securities, fund and insurance operations, we believe it is important to always act ethically and responsibly, safeguarding good governance and regulatory compliance and to work actively with controls and addressing risks. To ensure this, Nordnet has established internal rules that all employees have undertaken to adhere to. These internal rules are updated annually. The overarching internal rules are determined by the Board of Directors of each Group company at least once annually. Nordnet's control functions work actively to review the operations regularly. Among other things, the purpose is to identify risks to be able to remedy any deficiencies in regulatory compliance.

To foster trust in Nordnet's operations, it is important that all employees are familiar with our internal rules. Accordingly, our employees sign Nordnet's Code of Conduct, which informs employees about our guidelines, both during onboarding and then annually. To ensure good compliance with the internal rules, Nordnet also conducts annual training courses within, for example, ethics, banking confidentiality, IT security and combating money laundering. Courses on providing information, handling complaints and market abuse are also provided for relevant employees.

All employees have undertaken to comply with the internal anti-corruption rules. Nordnet has zero tolerance of corruption and conducts annual courses on the matter to ensure that all employees are familiar with the company's rules and policies. The number of corruption incidents reported during the year, or revealed through Nordnet's controls, amounted to zero (0).

Some employees in the Swedish operations, such as stockbrokers, require a Swedsec license. To increase expertise and to enhance the quality of our contacts with customers, other employees are also encouraged to undergo training to meet the licensing requirements. Corresponding licensing requirements also exist for certain roles in Nordnet's Danish, Finnish and Norwegian operations. At the end of 2023, 136 (124) of our employees were Swedsec-licenced, corresponding to about a fifth of our employees in Sweden.

#### Promoting good business ethics.

For Nordnet's operations, the confidence of customers, supervisory authorities and other stakeholders is of the utmost importance. Circumstances that may damage this trust can also potentially harm Nordnet's operations. Accordingly, Nordnet works long-term to ensure good business ethics and transparency, to uphold confidence in relations with customers, employees, owners, suppliers and other stakeholders. As part of this work, Nordnet works to identify

and manage potential conflicts of interest — an area in which we conduct annual workshops and courses for all Nordnet employees.

In order to identify potential or actual events that violate Nordnet's internal regulations, Nordnet has, in addition to clear internal escalation and reporting processes, a whistle-blower function with which employees can anonymously report violations 24 hours a day. In 2023, two (0) potential violations were reported through this function. All violations are investigated and handled in accordance with Nordnet's internal rules, with feedback always being provided to those reporting such violations.

#### Combating financial crime.

Financial sector players are always at risk of being exploited by criminals for financial crimes such as money laundering, fraud, unfair market impact or insider trading. The occurrence of any such crimes and violations could harm Nordnet as a company, as well as harming customers and investors.

To comply with the requirements set by applicable laws and regulations regarding measures to counteract money laundering and terrorism, Nordnet maintains accurate customer awareness. We also monitor the transactions made on the platform continuously to detect any transactions suspected of being linked to money laundering, financing of terrorism, market manipulation or other crimes. Nordnet has systems and procedures in place to detect deviating and suspected transactions and to report these to the relevant authority. We also continually perform risk assessments of our customers, products and services. In addition, all employees undergo mandatory annual training in matters relating to money laundering and financing of terrorism. Annual suitability assessments and background checks are also performed for relevant employees. Nordnet has a specific department devoted to combating money laundering and financial crime and reporting directly to the CEO.

#### Sustainable supply chain.

Nordnet safeguards high standards in sustainability, good business ethics in general, as well as respect for human rights, justice and safe working conditions also among suppliers. One way in which our suppliers can demonstrate that they share our aspirations in this regard is to sign Nordnet's Supplier Code of Conduct, which is based on the UN Global Compact's principles regarding the environment, human rights, anti-corruption and labor law. Nordnet expects all major suppliers to understand and adhere to our Code, or to have their own, equivalent Code of Conduct. We strive for all suppliers to market these standards throughout their supply chains. In 2023, 100 percent (100) of our "outsourcing" suppliers

Selection of courses for Nordnet employees	Target group	Frequency
Incident reporting	All employees	Annual
Code of Conduct	All employees	Annual
Anti-money laundering and anti-terrorist financing	All employees	Annual
Customer complaints	All employees with customer contact	Annual
SWIFT security training	All SWIFT users	Annual
Anti-corruption	All employees	Annual
Banking secrecy	All employees	During on-boarding
GDPR and data security	All employees	During on-boarding
Ethical guidelines	All employees	During on-boarding
Introduction to IT and data security	All employees	During on-boarding

had signed our Code of Code of Conduct or maintained their own equivalent codes. We also work to get our "critical" suppliers to meet the same requirements. In 2023, 74 percent of these had signed Nordnet's Code of Conduct or maintained a similar Code of Conduct — and efforts are ongoing to achieve our objective of 100 percent. The process of getting suppliers to sign Nordnets code of conduct is a work in progress. We expect that this proportion will increase during 2024.

#### Personal integrity.

Nordnet respects the integrity of its customers and employees alike and therefore places considerable focus on the handling of personal data. Based on the data protection regulation (GDPR), we work actively with how personal data are processed within Nordnet. We have appointed a Data Protection Officer to monitor the handling of personal data in the operations. Internal regulations have also been drawn up and these are updated continuously with regard to legal developments in the area, and the development of praxis and recommendations, as well as guidelines from relevant authorities at the national and EU levels.

We always perform relevant impact assessments regarding the handling of personal data, such as when developing new products or services. We also have processes to consider and integerate data protection when developing new systems. When it comes to suppliers and partners, we perform a thorough review based on security and data protection perspectives, in which strict demands are placed on suppliers regarding aspects such as contractual obligations, organizational procedures and technical security measures, and followed by adequate reviews.

All registered individuals, like our customers and employees, are entitled to receive details of their personal data that we process and of how and why we use this data. Where an individual wishes to assert his/her rights under the GDPR, we have clear processes in place. More information about how we handle personal data can be found at nordnet.se, the corresponding sites in the countries in which we operate, as well as at nordnetab.com.

Zero (0) complaints regarding privacy or privacy violations were received from customers or public authorities in 2023. The total number of personal data incidents in the Group reported to the supervisory authority amounted to 15 (16) for 2023. A personal data incident could entail an unauthorized party gaining access to certain personal data, for example. Over the year, no (0) personal data incidents were deemed to entail a high risk for the rights and freedoms of physical individuals.

#### Information and IT security.

For Nordnet, proper and secure information management is crucial in maintaining trust from customers, authorities, owners and partners. In an increasingly digitalized world, structured data and IT security efforts are required, such as those integrated throughout our operations. On the next page, we explain in greater detail how we safeguard superior standards in our IT work. Through our governance structures, based on best practices and various standards for cyber security management and by being aware of regulatory risks around user data, we are able to ensure and safeguard that our security work is proactive, adapted to our business needs and in line with current regulations. This is crucial in maintaining trust among our stakeholders and in benefiting from the advantages offered by digital transformation.

#### Responsible tax management.

Nordnet considers responsible handling of tax matters to be an important contribution to society's development and works continuously with tax matters to ensure that we act in line with current regulations and expectations. Nordnet's basic approach is to pay its taxes in accordance with the tax laws applicable in the countries in which the company operates, as is stated in Nordnet's Sustainability Policy. Furthermore, Nordnet shall not provide products or services to customers where the main purpose, or one of the main purposes, is to obtain taxation benefits in violation of the purposes and objectives of the tax regulations. See Note 17 for further information.



By combating financial crime and corruption and by contributing to a safer society, Nordnet is able to influence UN global goal 16 *Peace, justice and strong institutions.* 

#### In an increasingly digitalized world, structured and rigid data and IT security efforts are required, such as those integrated throughout our operations.

We ensure this through:



### 1. Management and the Board of Directors engage in security strategy:

The management and Board of Directors are actively involved in the design and maintenance of the company's security strategy. Their commitment shows that security is a priority issue and an integral part of our overall business strategy work.

#### 2. Security strategy that supports the business strategy:

The security strategy has the overall objective of supporting Nordnet's business strategy. It is based on a careful analysis of our existing capabilities, the current threat scenario, identified risks and applicable regulatory requirements. This ensures that our security efforts are aligned with our business needs and business objectives.

### 3. Clear governance structures based on best practices and accepted standards:

A management system has been established in which roles and responsibilities for security is clearly stated, and our Head of Security is responsible for ensuring that these structures follow best practices and various standards for cyber security management.

#### 4. Proactive security work, every day:

We have established an organization, processes and technical solutions for proactive security work. This structure is in accordance with the security strategy and focuses in particular on cyber security. This means that we work actively with preventing and managing cyber security risks.

#### 5. Regulatory risks regarding user data:

We are well aware of the regulatory risks concerning user data. For this reason, we work hard to ensure that our processes and systems are compliant with all relevant data protection regulations and requirements to protect users' privacy and data.

#### 6. Security audits and monitoring:

Our systems, products and processes undergo recurring, at least annual, both internal and external security audits, penetration tests and vulnerability assessments. In addition, our IT systems are monitored around the clock and every day of the year to quickly reveal and manage potential security incidents.

#### 7. Cooperation in security forums:

We collaborate with other actors in the financial market via various security forums. In this way, we help protect the financial system as a whole and exchange best practices in managing security risks.

#### 8. Ongoing security and safety training:

All employees in the Nordnet Group undergo ongoing training in IT security issues. This aims to raise awareness of security issues and to improve employees' capacity to identify and manage security risks

#### **Environmental and climate work at Nordnet and among suppliers.**

Nordnet's business model is digital, and we have no physical bank offices or similar. With a scalable digital platform and with automated and digital processes, we have limited direct impact on the environment. We nonetheless work extensively to limit the emissions we have and seek to limit our other environmental impacts and we climate-compensate our greenhouse gas emissions.

#### **Objectives** Selection of activities Results Reducing emissions from Total emissions, tCO<sub>2</sub>e. Expanded Scope 3 reporting our operations and our with new categories. 703 supply chain in accordance with the 1.5-degree Continued migration to Java, 302 target and the Paris Agrewhich is an energy-efficient ement programming language. 225 Transferring code to energyefficient cloud services. 2022 2023 Mapping energy efficiency among suppliers of cloud Emissions, Emissions, comparable new services and data centers. categories categories 100-percent renewable At our new office in Norway, we Share of renewable energy in energy in our electricity have signed an agreement with electricity consumption 2023. our supplier for electricity from consumption Offices renewable energy sources. We are conducting a dialogue with the external data center that does not currently have renewa-External data centers ble energy for its electricity to

45%

Only renewable 
Other

#### Nordnet's climate impact.

Nordnet stands behind the Paris Agreement and keeping global warming well below 2°C and striving to limit it to 1.5°C. Nordnet's overarching objective of reducing its emissions is therefore in accordance with the Paris Agreement. To concretize this, we have applied the "Carbon Law" principle, requiring emissions to be halved every ten years. For us, this means that we must halve our emissions by 2033, or in other words, our emissions must be reduced by at least 352 tonnes CO<sub>2</sub>e from the current level of 703 tonnes.

With a digital business model, Nordnet is fundamentally a company with limited direct impact on the environment. Despite an increase in comparable emissions and an expanded reporting of emission categories in 2023, Nordnet is one of the companies in the Nordics with the lowest carbon intensity in relation to its revenues.<sup>2</sup>

rectify this.



Nordnet can contribute to Goal 13 *Climate Action* by limiting both Nordnet's own emissions as well emissions throughout its value chain.

<sup>&</sup>lt;sup>1</sup> See fact box on page 30.

<sup>&</sup>lt;sup>2</sup> Calculated by comparing Nordnet's emission intensity for 2023 with all listed companies on the main markets in the Nordic region. For comparison companies, 2022 figures are used.

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Emissions per Scope in accordance with the GHG Protocol, tonnes CO₂e	2023	2022	Change %
Scope 1			
Company cars	0	0	-
Total scope 1	0	0	-
Scope 2 – market-based			
Electricity	6	0	-
District heating	50	29	72%
District cooling	3	2	50%
Total scope 2 – market-based	58	31	87%
Scope 3			
Purchased goods and services <sup>1</sup>	236	-	-
Fuel- and energy-related activities	66	-	-
Upstream transport and distribution	85	63	35%
Business travel	189	69	174%
Employees' commuting	69	63	10%
Total scope 3	645	195	N/A
Total emissions scopes 1, 2 and 3, market-based	703	225	N/A
Total emissions scopes 1, 2 and 3, location-based	728	253	N/A
Emission intensity, tCO <sub>2</sub> e / SEK million in sales, scopes 1+2	0.013	0.009	44%
Emission intensity, tCO <sub>2</sub> e / SEK million in sales, scopes 1+2+3	0.155	0.067	N/A

The table details Nordnet's greenhouse gas emissions by Scope in accordance with the Greenhouse Gas Protocol for market-based emissions. Nordnet's Scope 2 CO<sub>2</sub> emissions for energy consumption, applying the location-based method was instead 83 (58<sup>2</sup>) tonnes CO<sub>2</sub>e.

We report our emissions of greenhouse gases annually in accordance with the established standard Greenhouse Gas Protocol. For 2023, our total emissions of greenhouse gases amounted to 703 (225) tonnes CO<sub>2</sub>e. The change in 2023 is mainly explained by the fact that we expanded our reporting on emissions at the supplier level during the year, Scope 3 categories, in accordance with the ambition of achieving comprehensive reporting of our Scope 3 emissions in 2023. Over the year we therefore mapped all categories in the GHG protocol, and for all categories deemed material, we have now reported the emissions.

The largest additional category in 2023 was "Purchased goods and services." This category includes emissions that arise in the supply chain for products and services Nordnet has purchased. We have aimed for our reporting in this category to be comprehensive and cover all of our purchases. The figures have been broken down into purchased goods, based on the type of goods. In addition, we have calculated the emissions from purchased services, which account for most of our purchases, based on the types of services purchased. For 2023, emissions from this category amounted to 236 tCO $_{\rm 2}$ e, and is thus the largest emissions category. Another category of emissions that was added in 2023 is "Fuel and energy-related activities." This category mainly includes emissions originating from the transfer and distribution of electricity, district heating and cooling to Nordnet. Emissions for this category amounted to 66 tCO $_{\rm 2}$ e in

2023. Overall, categories for which there are no comparable figures from 2022 amounted to 302 tCO<sub>2</sub>e.

Beginning this year, we have calculated emissions from "Upstream transport and distribution." Calculations were made both for 2023 and 2022. This category includes emissions when Nordnet buys a transport service such as when moving offices or furniture. Emissions in this category were 85 and 63 tCO $_2$ e for 2023 and 2022 respectively.

For comparable figures emissions increased from 225 to 401 tonnes  $\mathrm{CO}_2\mathrm{e}$ , which is an increase of 78 percent. The biggest explanation for the increase is that emissions from business travel increased by 174 percent in 2023. The increase is largely an effect of the large conference we organized in 2023 for all employees, which contributed to increased travel and can be considered a one-time event. Emissions attributable to electricity, district heating and district cooling amounted to 58 tonnes (31)  $\mathrm{CO}_2\mathrm{e}$ , and is our scope 2 emissions. In total, 8 percent (14) of our emissions originated from Scope 2. The absolute majority, approximately 92 percent, of Nordnet's emissions are instead attributable to our supply chain in Scope 3.

<sup>&</sup>lt;sup>1</sup> The category covers all purchased goods and services within the Nordnet Group and thus also includes the emissions category "capital goods". Calculations include purchased hardware in the form of mobile phones, laptops and computer screens. In addition, purchased items included services, which, in total, represent the larger part of our purchases. for services we have calculated the emissions for our largest purchase categories separately – IT and data related services and systems, financial services, as well as cloud services, which together are our three largest purchasing categories. For other purchases, standard calculations were applied.

<sup>&</sup>lt;sup>2</sup> Last the year, the location-based emissions in Scope 2 were reported incorrectly a 50. The correct number is 58.

#### Initiatives to reduce climate impact.

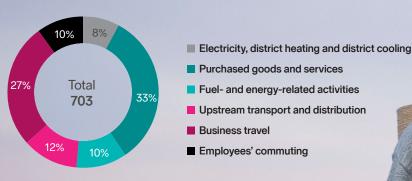
We are working in various ways to reduce our impact on the climate, both in our operations as well as in our supply chain.

In 2023, we initiated a dialogue on, and collected data on, energy efficiency among the outsourcing providers and suppliers classified as critical, delivering cloud services or services related to data centers to Nordnet. The aim is to make our suppliers aware that we want them to work to increase their energy efficiency and that we must have an opportunity to follow up on how well they succeed. We strive for all suppliers who deliver services related to data centers to have a so-called PUE¹ number (which measures energy efficiency in data centers) of at most 1.3, target becoming climate-neutral, as well as having 100-percent renewable energy sources for production of the electricity they consume. The collection of data has shown that several of the suppliers do not yet meet these requirements. Five out of 11 suppliers were able to state their PUE numbers and had an average PUE of 1.3.

During 2023, we also collaborated with the Royal Institute of Technology (KTH) in Stockholm to draw attention to how the tech industry in general affects the climate, and how developers can design code for saving energy. Our developers have received information and presentations on digital technology, "green programming" and sustainability. We have continued the process of migrating to Java as our principal programming language. We save energy by doing that because Java is an energy-efficient programming language compared with many others. We are also gradually migrating our programming code to energy-efficient cloud services. In addition, in 2023 we adopted a car policy stipulating that both company cars and employees' leased cars must be hybrid cars or fully electric.

Each year, we measure and compensate for our greenhouse gas emissions, including parts of Scope 3 emissions, such as

Nordnet's emissions per category in 2023.



Nordnet's Greenhouse gas emissions derive to 8 percent from Scope 2, which corresponds to the category "electricity, district heating and district cooling." The remaining 92 percent of the emissions were attributable to Scope 3, which encompasses the remaining categories.

employee commuting. Our policy is to compensate for 110 percent of our emissions in the categories for which we compensate. For 2023, we compensated through a Plan Vivo-certified project in central Kenya. In an area that has been exposed to deforestation, the project aims to help farmers both cultivate better and prevent climate change. The area is exposed to erosion and, helped by planting vegetation and smarter irrigation, it can both absorb CO<sub>2</sub> and, at the same time, improve agriculture and life for local citizens.

#### Energy consumption.

Nordnet's energy consumption derives mostly from the operation of our offices and data centers. In 2023, we consumed a total of about 2,515 MWh (2,490), which included the operation of our IT infrastructure and for our consumption of electricity, heating and cooling at our offices. We target 100 percent of the energy consumed to produce electricity and cooling for our office premises and IT servers to be renewable. For our heating, we are dependent on the suppliers of district heating operating in each of the municipalities where we have properties.



<sup>&</sup>lt;sup>1</sup> PUE stands for "Power Usage Effectivenes" and is the ratio between the total amount of energy used by a data center facility and the energy supplied to computer equipment. An ideal PUE is 1.0.

Nordnet's energy consumption, office premises	2023	2022	2021
Electricity consumption, office premises (MWh)			
Sweden	740	735	537
Norway	47	46	50
Denmark	62	79	39
Finland	100	50¹	97
Electricity consumption, office premises	949	910	723
Of which, renewable	100%	100%	57%
Electricity consumption, external data centers (MWh)	447	472	450
Of which, renewable	55%	-	-
Total electricity consumption (MWh)	1,396	1,382	1,173
District heating (MWh), total	784	613	536
Of which, renewable	72%	82%	87%
District cooling (MWh), total	335	495	266
Of which, renewable	100%	100%	100%
Total consumption (MWh)	2,515	2,490	1,976
Of which, renewable	83%	-	-

The table shows the energy consumed for electricity, as well as for heating and cooling our premises and in generating the electricity used to operate our equipment. For the properties where we have lacked data, standard amounts have been used.

The figure for Sweden refers to our offices in Stockholm's Kungsholmen district and our premises on the street Biblioteksgatan in central Stockholm.

In 2023, 100 percent (100) of the electricity at our office premises was derived from renewable sources and consumption amounted to 949 MWh (910). We also consume energy attributable to the external data centers that we rent. In 2023, this consumption amounted to 447 MWh (472), of which 55 percent was renewable. During the year, we were in contact with our supplier for these services to demand that they be adjusted to 100 percent renewable energy sources for electricity and cooling. The total consumption of electricity amounted to 1,396 MWh (1,382), an increase of 1 percent. This means that consumption fell in relation to both turnover and the number of employees. In 2023, 72 percent (82) of the district heating derived from renewable sources, amounting to 784 MWh (613). In 2023, 100 percent (100) of the district cooling was derived from renewable sources, amounting to 335 MWh (495). Of Nordnet's total energy consumption, 83 percent was from renewable energy sources. The energy intensity per exchange trade was 0.05 kWh (0.04).

#### Water and waste.

Nordnet strives to reduce water consumption and to sort waste for recycling. In 2022, we began collecting data on water consumption and waste management for our properties in this regard. This work continued in 2023 and, beyond statistics for our premises

in Stockholm, we are now also able to present partial data for our offices in Oslo and Copenhagen.

For waste, we have access to statistics for three of our offices, which corresponds to premises where about 95 percent of our employees have their workplaces. In Oslo, we switched office premises in 2023, with the move resulting in significantly higher waste than for a normal year. In 2023, waste sorted for recycling amounted to 10,855 kg (5,864) and other waste to 13,107 kg (2,417). Household waste is not included in the calculation. The figures for 2023 are not comparable with 2022 when previous figures represented only the Stockholm office.

We are able to present the water consumption data for our offices in Stockholm and Copenhagen, where a total of 90 percent of our employees have their workplaces. Consumption at these offices amounted to 4,227 m³ in 2023. For 2022, we could only show water consumption at the Stockholm office (about 85 percent of our employees). For 2023, the Stockholm office's consumption was 3,918 m³, meaning that we have reduced our water consumption by slightly more than 16 percent, from 4,692 m³.

Water and waste	2023	2022
Waste		
Recycled waste (kg)	10,855	5,864
Percentage recycled waste (%)	45%	71%
Other waste (kg)	13,107	2,417
Percentage other waste (%)	55%	29%
Total waste	23,962	8,281
Water		
Total water consumption (m³)	4,227	4,692

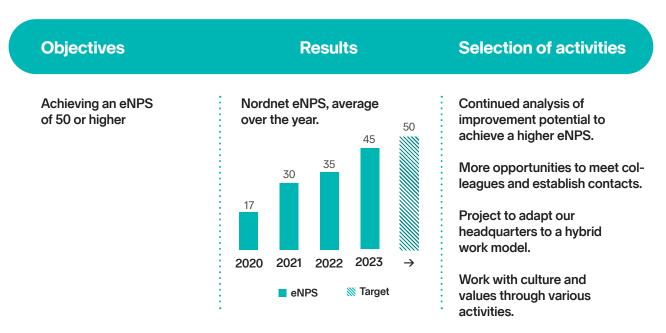
In Finland, data was lacking for 2022 and a standard amount was reported based on consumption in our other office premises.

#### Overview of all targets within Nordnet's environmental- and climate-related work.

Scope	Objectives in environmental and climate impact	Follow-up 2023
Overarching scope	In line with the Paris Agreement Reducing our total emissions in accordance with the 1.5- degree target and the Paris Agreement. Our emissions must therefore be halved and reduced by at least 352 tonnes CO <sub>2</sub> e by 2033 from the current level of 703 tonnes.	For comparable data, emissions increased by 78 percent.  In 2023, all the Scope 3 categories deemed significant were calculated and reported.
Overarching Scope	Climate compensation  Nordnet shall compensate for its climate emissions in accordance with the company's sustainability policy, meaning all Scope 1 and 2 emissions, as well as employees' commuting and other Scope 3 categories, with allowances being made for reasonableness and data quality.	110 percent of climate compensation has been implemented in accordance with the sustainability policy.  Compensation implemented through a project certified by Plan Vivo in Kenya.
Scope 1	Company-owned cars All company-owned cars should be hybrid or fully electric.	100 percent of the company cars meet the target. In 2023, Nordnet owned one (1) car.
	Electricity, office premises 100 percent renewable energy in our electricity consumption in office premises.	For 2023, 100 percent (100) of electricity was from renewable sources.
Scope 2	Electricity, data centers We strive for 100 percent of energy for electricity and cooling to be from renewable sources.	For 2023, 55 percent of electricity was from renewable sources.
	District heating and cooling We strive for 100 percent of district heating and cooling to come from renewable energy.	For 2023, 72 percent (82) of district heating was from renewable sources.  For 2023, 100 percent (100) of district
		cooling was from renewable sources.  The target was set in 2023 and will be
	Energy efficiency, data centers All new agreements with data suppliers must meet the requirements for energy efficiency, PUE*1.3.	followed up for 2024.  Mapping of existing agreements was performed in 2023.
	Renewable energy among data suppliers All new agreements with data suppliers	The target was set in 2023 and will be followed up for 2024.
	shall have 100 percent renewable energy for electricity.	Mapping of existing agreements was performed in 2023.
	Climate-neutral data suppliers All new agreements with data suppliers shall	The target was set in 2023 and will be followed up for 2024.
Scope 3	have targets to become climate-neutral.	Mapping of existing agreements was performed in 2023.
	Company-leased cars All cars that the company offers for leasing should be either semi- or fully electric.	At the end of 2023, 33 percent of leased cars were fully electric and 55 percent semi-electric.
Recycling and water consumption	Recycling and water consumption Nordnet strives to recycle as much as possible. Nordnet	The proportion of recycled waste amounted to 45 percent (71).  Water consumption for the Stockholm
	Nordnet strives to recycle as much as possible. Nordnet strives to reduce its consumption of water.	

#### **Employees.**

Our employees are our most important asset and satisfied employees is the key to our success. To ensure employees are happy, we actively work to create an engaging workplace, that prioritizes health and well-being. We value the diversity of our employees as an opportunity that generates creativity and innovation, and fosters a committed and dynamic culture.



#### A values-driven culture.

Our values of passion, simplicity and transparency permeate everything we do, from contact with customers to product innovation and collaboration between departments internally. With a positive attitude and strong engagement, we make a little extra effort to engender satisfied and loyal colleagues and customers. We believe that direct and straightforward communications, as well as modern ways of working and user-friendly products foster engagement and results. By saying it as it is and by being open, accessible and honest, both internally and externally, we build trust and foster an inclusive culture. In order for us to achieve our vision and live up to our values, we seek to create a workplace in which each individual perceives great potential for personal development.

#### Attractive workplace.

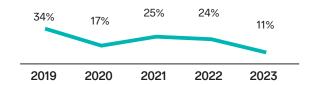
Since the inception in 1996, Nordnet has been a challenger in the industry and our aim to democratize savings and investments is as strong now as it was then. Our role as challenger and our overarching purpose has enabled a strong culture in which our employees have considerable scope for influencing the operations, regardless of what they work with. Nordnet is dependent on attracting, developing and retaining talent to achieve our goals as an organization. To measure our work to be an attractive workplace. we measure employee satisfaction as eNPS. We conduct quarterly employee surveys to capture feedback and indications of areas on which we need to focus. Across 2023 as a whole, our eNPS amounted to 45 (35). HR works specifically with departments with a low eNPS to gain an understanding of the result and to take concrete measures alongside the manager/employees. It is gratifying that Nordnet placed eighth in the Universum Awards for most attractive workplace among students in the business category in Finland.

We want to offer our employees good opportunities for inspiration and social cohesion. In 2023, a number of activities with social characteristics were carried out in these areas, for examples, sports events and outdoor activities. We also organized a Nordic conference for all employees during a weekend in Stockholm. The focus during the Nordic conference was on team-building, training and exchange of experiences.

#### Personal development.

Nordnet works long-term to establish an attractive work environment by offering exciting tasks and individual development opportunities for our employees. At least three times a year, all our employees have talks with their immediate manager to review their performance and discuss their development. Alongside personal performance targets, Nordnet's values summarize our conduct objectives and are at the core of all assessments and feedback. To enhance the spread of skills, we offer opportunities for all employees to visit other departments to learn more about their work. We also work continuously with leadership development throughout the organization. Safeguarding career opportunities within the company and our managers' development are afforded high priority. We have also launched an internal mentoring program, in which all employees within the organization have been invited to participate. Nordnet also offers training for its employees, partly in the form of mandatory courses given that we operate in a regulated environment, partly in the form of courses designed to inspire and develop expertise. Courses that have been conducted include brand-awareness training and courses in new technologies, such as artificial intelligence.

#### Personnel turnover.



## Mental and physical well-being throughout the organization.

We have applied a hybrid and flexible work model for many years which takes the form of various health promotion activities for maintaining a healthy workplace and reducing sick-leave among our employees. Once a year, we distribute a work environment survey in which all employees can express their opinions regarding the workplace anonymously. We also have work environment representatives who coordinate with HR in our work environment committee. Employees can contact their work environment representative with proposals on improving aspects of the work environment. The Committee meets once a quarter, and its work is ongoing. Nordnet targets incurring zero cases of injuries resulting from workplace accidents and, in 2023, the number was 0 (0).

Nordnet offers all employees in Sweden Skandia's health insurance plan to prevent sick leave and stress. The insurance plan includes preventive measures such as conversational therapy, physiotherapy and occupational therapy, ergonomics, professional life planning and access to specialist doctors. Employees who want to may use it anonymously. Similar health insurance plans are available to employees in Norway, Denmark and Finland. Nordnet also has a work environment committee that works systematically with health promotion, prevention and aftercare activities. We also partner with Ljung & Sjöberg, a service provider specializing in alcohol, drug and gambling-related problems, as well as co-dependency in the workplace. The partnership includes free advice over the telephone for employees.

Nordnet fosters a flexible working model in terms of working from home and the office and, against that background, we have chosen to start a project to adapt our headquarters to better meet the needs of different employees and thereby inspire our employees.

Employees covered by collective bargaining agreements (%)	2023	2022	2021
Percentage of employees with collective agreements	96%	95%	93%

All employees in Sweden, Denmark and Finland are covered by collective bargaining agreements, including employment categories such as temporary employees and substitutes.

Employee sick leave by country (%)	2023	2022	2021
Sweden	1.9%	1.8%	2.0%
Norway	1.1%	1.6%	1.8%
Denmark	2.9%	3.2%	4.8%
Finland	1.2%	1.6%	1.9%
Nordnet average	1.8%	1.9%	2.1%

The table shows our employees' absenteeism due to illness Sick leave has been relatively low since 2019 when sick leave was 3.6 percent. One explanation could be that more people are working from home than previously.

#### Better through diversity and gender equality.

For us, it is vital to have an equal workplace and to provide equal opportunities within the company. We consider an equal organization pervaded by diversity and an inclusive culture as an asset that is essential for innovation, creativity and productivity. The overarching target is for Nordnet to be a workplace characterized by equality and diversity.

#### **Objectives**

#### **Results**

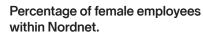
#### Selection of activities

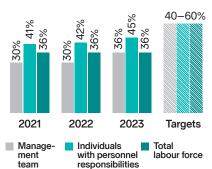
The proportion of women on the Board of Directors shall be 50 percent +/- 10 percentage points before 2027



Although the Board of Directors seeks a 50/50 balance, this may vary considerably as individual members join or leave the board.

The proportion of women at all levels within Nordnet shall be 50 percent +/- 10 percentage points. This should be achieved by 2027 for the management team and other managers and by 2030 for the overall labour force





Power Women in Tech event to increase the base of potential future candidates.

We urge all employees, regardless of gender, to use the parental leave to which they are entitled.

Flexible working model that makes it possible to combine work with family life.

In 2023, work continued the work to become a more gender-equal workplace. To further highlight our ambitions, we have adopted several new targets in the area of gender-equal workplaces. By 2027 at the latest, we shall achieve a 50/50 balance +/- 10 percentage points with regard to women on the Board of Directors and management team, as well as among employees with managerial responsibilities. The share of women in the total workforce must reach the same level latest by 2030.

The proportion of women in management positions at Nordnet is steadily increasing. As of December 2023, 45 percent of our employees with personnel responsibilities were women, compared with 42 percent in 2022 and 41 percent in 2021. The share of women in the management team increased in 2023 to 36 percent (30), while the composition of the Board of Directors improved to 43 percent (38), with the target now having been met. As of 31 December 2023, 36 percent (36) of employees were women. The gender distribution varies between different employee categories. Administrative functions have a higher proportion of women, while the proportion of men is higher among, for example, IT personnel. Among recruits, the proportion of women improved by 5 percenta-

ge points over 2023 as a whole, compared with 2022. The increase is partly explained by Nordnet's long-term work to improve the gender distribution in general and of change in the composition of the roles recruited. We strive to have a larger proportion of the under-represented gender in the various stages of the recruitment process — ranging from the first selection to the final candidates. Our procedures help us avoid unconscious decisions linked to both gender and cultural background. We continue to believe that an increased proportion of women in recruiting positions promotes long-term improvement in gender equality.



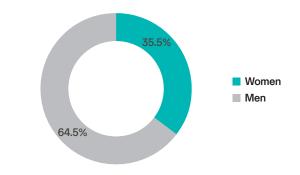
For us, it is important to develop a workplace characterized by both gender equality and diversity. We work actively to recruit more women to all decision-making levels, in line with UN global goal 5 *Gender equality*.

Nordnet is a relatively young Group with an average age of 37 years (37). Most of the employees, 65 percent (60), are in the age range of 30–50 years. In our recruitment processes, we strive to employ a mix of both junior and senior candidates. Many of our employees are at the beginning of their careers and Nordnet is a workplace where young talented individuals get a chance to develop and grow, meaning that our employees are sought after. Many choose to evolve into new roles within the company and others move on to new challenges outside Nordnet. Our HR function holds departure interviews with employees who leave Nordnet, with the results being used to make us a more attractive employer. Personnel turnover was 11 percent (24) for the Group in 2023. The major change is mainly attributable to the changed economic situation in society at large and the reduced mobility in the labor market.

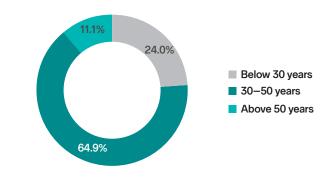
#### More women to a career in fintech.

In 2018, we founded the Power Women in Tech career network, a forum for women in the tech industry, where they can gain inspiration, network and exchange experiences. Today we have more than 3,000 members who visit our events, both digitally and in person, as well as listening to our newly-started podcast, Power Women in Tech. Leading women in the industry share personal experiences, their career journeys and their best tips for succeeding in the industry. Power Women in Tech is a way for Nordnet to support and inspire women in the industry and to encourage more people to choose a career at Nordnet. We believe in the strength of having industry role models who lead the way for a future in tech in a male-dominated industry.

#### Gender balance at Nordnet.



#### Age distribution at Nordnet.



Gender balance (%)	2023	2022	2021	2020	2019
Board of Directors					
Percentage of women	43%	38%	38%	25%	14%
Percentage of men	57%	62%	62%	75%	86%
Management team <sup>1</sup>					
Percentage of women	36%	30%	30%	33%	38%
Percentage of men	64%	70%	70%	67%	62%
Employees with personnel responsibilities					
Percentage of women	45%	42%	41%	38%	34%
Percentage of men	55%	58%	59%	62%	66%
Total labour force					
Percentage of women	36%	36%	36%	36%	36%
Percentage of men	64%	64%	64%	64%	64%

<sup>&</sup>lt;sup>1</sup>The table shows the number of employees excluding consultants.

Gender pay gap at Nordnet, women's average salary as a share of men's	2023	2022	2021
Management excl. CEO	86%	100%	97%
Employees excl. management	94%	90%	94%
All employees	94%	92%	91%
Median salary, all employees	84%	84%	82%

The table shows women's average salary as a percentage of the average wage of men in different personnel categories as at 31 December 2023 (unless otherwise stated). The calculation includes severance pay. We actively apply our gender equality plan and Gender Equality Policy to reduce differences.

#### A company with equal opportunities for all.

At Nordnet, all employees shall have the same opportunities, rights and obligations. We continue to work with diversity and gender equality in a goal-oriented and deliberate manner. We review the wage differences from a gender equality perspective at every salary review and place specific emphasis on equal salaries for equal work. In 2023, the overall wage gap at Nordnet improved from 92 percent to 94 percent, where 100 percent indicate gender pay parity. This was driven by the wage gap among all employees excluding the management team improving by four percentage points.

Nordnet's Gender Equality Policy clearly states that all employees have the right to be treated with respect and that everyone's integrity and right to privacy are protected. Unwelcome advances of a sexual nature, discrimination and other forms of harassment are prohibited in the workplace. No (0) cases of discrimination were reported in 2023.

Personnel turnover	2023		2022		2021	
	Employees (no.)	Women (%)	Employees (no.)	Women (%)	Employees (no.)	Women (%)
New hires during the year						
Below 30 years	56	43%	75	35%	169	41%
30 – 50 years	85	35%	93	33%	95	37%
Above 50 years	5	80%	8	50%	13	54%
Total new hires	146	40%	176	35%	277	40%
Rate of new employee hires	20%		26%		35%	
Departures during the year						
Below 30 years	30	40%	60	40%	114	46%
30 – 50 years	43	28%	87	30%	81	36%
Above 50 years	11	82%	10	20%	6	67%
Total departures	84	39%	157	33%	201	42%
Rate of employee turnover	11%		24%		25%	

# Risk and governance within sustainability.

Nordnet works continuously with risk management and corporate governance. An important part of this work occurs in the area of sustainability. The increased number of regulations, combined with increasing risk, makes this a priority area for Nordnet, where, over the past year, we implemented major updates to our processes and governance documents to keep up with developments within the sustainability area.

# Corporate governance in the area of sustainability.

Favourable corporate governance is essential in achieving good sustainability work, as it lays the foundation for how sustainability work should be conducted. Nordnet's ongoing sustainability work is therefore based on the governing documents adopted by the Board of Directors, and these are updated annually. To promote transparency in our work, we have, over the year, published a selection of our policies, including our Environmental and Sustainability Policy, on our company website nordnetab.com.

In 2023, we implemented changes to our internal processes associated with the sustainability work, with the aim of more efficiently coordinating the work throughout the Group.

Each year, the Board of Directors adopts Nordnet's sustainability strategy through our Environmental and Sustainability Policy. The Board of Directors is then kept continuously updated about the work by the Head of Sustainability. Since the autumn of 2023, the Audit Committee assesses and follows up the implementation of the sustainability strategy at each committee meeting. The Risk and Compliance Committee also monitors sustainability-related risks by including these in the overarching risk reporting. Sustainability-related risks are also discussed in the "Regulatory Forum" which is led by Nordnet's Head of Risk and also includes the CEO, the CFO and the General Counsel alongside the management team. The Head of Sustainability is responsible for developing and following up on the sustainability strategy and reports back to the Audit Committee through a "dashboard" covering all areas of Nordnet's sustainability work which is recurring at each meeting. The respective department heads are responsible for implementing the sustainability strategy in their areas of operations. Each company within the Nordnet Group maintains its own Sustainability Policy, which regulates its operations.

#### Work over the year.

In 2023, considerable focus was devoted to preparatory measures for the reporting process in accordance with the EU's Corporate Sustainability Reporting Directive (CSRD), which is expected to be incorporated into Swedish law in 2024. The Board of Directors has also adopted a new sustainability strategy. During 2023, the Board of Directors was educated in sustainability-related issues by Nordnet's sustainability department, as well as by Nordnet's external auditor.

In addition to the Audit Committee, the sustainability department also reports to the full Board of Directors from time to time, when deemed necessary by either the sustainability department or the board. In addition, sustainability is also recurring on the agenda for the meetings of the Boards of Group companies. The sustainability department and the different boards, the CEO or the CFO may take the initiative to participate in the meetings of all boards. The Head of Sustainability reports back, informs and is responsible for producing materials on which management can base decisions.

#### Internal control within the area of sustainability.

Nordnet works with internal control in accordance with the principle of the three lines of defense, where the business operations constitute the first line of defense, the risk control and compliance function, and where applicable, the actuarial function constitutes the second line of defense. The internal audit is the third line of defence, which on the assignment of the Board of Directors monitors the first and second lines of defense. This internal control also applies to Nordnet's regulatory compliance vis-à-vis sustainability-related regulations and sustainability-related risks. Read more about Nordnet's corporate governance in the Corporate Governance Report, which can be found at Nordnet's website nordnetab.com.

Within the framework of the first line of defense, a forum has been set up to monitor regulatory developments in the area of sustainability. The "Sustainability Regulatory Monitoring Forum" is chaired by the Head of Sustainability and both the legal function and the

Participation of sustainability department at Board and committee meetings	2023
Audit Committee of Nordnet AB/Nordnet Bank AB	6
Risk and Compliance Committee of Nordnet AB/Nordnet Bank AB	3
Board of Directors of Nordnet AB/Nordnet Bank AB	3
Subsidiaries' Boards of Directors and their committees	4
Total participations at meeting of Group Boards and committees	16

Participation of Head of Sustainability at different management forums	2023
Regulatory Forum	4
Revenue Forum	0
Nordnet Management Forum	3
Total number of participations in management forums	7

finance department are represented in the group that meets every third week or when deemed necessary. The purpose of the forum is, among other things, to capture regulatory changes and notify the relevant risk owner of necessary changes. The compliance function can also participate in the forum, the purpose being to exchange information and obtain insight into the work of the first line.

# Sustainability as a part of the general risk work at Nordnet

Sustainability is an integral part of Nordnet's overall risk work. As for other risks, the identification of sustainability-related risks takes both "Top Down" and "Bottom Up" approaches in which Management, as well as each unit and its employees, participates. The processes for monitoring and handling sustainability-related risks continues to be developed and improved within all risk categories. As of 2024, the risk work also incorporates the material topics described on pages 51-52.

# Sustainability-related risks and opportunities incorporated into products- and business development.

Nordnet works in several ways to integrate sustainability-related risks and opportunities into products and business development. Our Chief Product Officer is responsible for designing an efficient process for the management of operational risk in relation to the products that Nordnet offers. Each product area also has an appointed area manager responsible for all operational risk (including, among others, legal risk, compliance risk and business risk) at the product level. This also includes managing such risks for all products within the manager's area of responsibility. Accordingly, this responsibility also includes the sustainability risks that have been identified. Additional examples of how we work with sustainability-related risks are through our approval process for products and processes and our forum for initiatives regarding new funds.

Nordnet has an approval process (NPAP, New Product Approval Process) for new and amended services, products and processes to ensure that, for example, we do not introduce processes or launch products entailing unintended forms of risk or risks that are not immediately managed and controlled by the organization in a professional and appropriate manner. Sustainability-related risks are taken into consideration in the approval process. We shall, for example, explain whether the new product or process is in line with Nordnet's sustainability strategy and whether any environmental matters, human rights matters, work-related social issues or corruption risks are affected.

In its product development, Nordnet Fonder AB is supported by the Fund Initiative Forum. The Head of Sustainability is represented there to capture sustainability-related issues. The Head of Sustainability is also represented at the product department's annual strategy workshop where the year's roadmap is set regarding the development of our technical platform.

# Consideration of sustainability in Nordnet's lending operations.

Sustainability-related issues can impact Nordnet's lending in many

different ways. The direct risk is primarily managed through continuous follow-up and analysis of collateral and customer behaviors. Sustainability issues are incorporated into a number of different processes within the bank's lending operations. Nordnet monitors concentration risks, for example, against physical climate risks in the form of areas of geographical risk for rockfalls, landslides, erosion and flooding linked to the collateral in Nordnet's mortgage portfolio. Sustainability issues are also taken into account in Nordnet's work to establish loan-to-value ratios on financial instruments, determining how much of the granted credit limit customers may make use of in margin lending. Among other things, the assessment is based on the underlying company's sustainability-related risk, which is obtained from a third party, where a high sustainability-related risk could affect the loan-to-value ratio negatively. In addition, in 2024 Nordnet will investigate the possibility of incorporating climate risks into the bank's credit assessments for mortgages.

Nordnet does not conduct traditional corporate lending — instead, margin lending is the only lending provided to companies and then primarily to sole-proprietorships and closed companies whose main purpose is to conduct investments. Nordnet does not conduct project financing.

With regard to loans to private individuals, Nordnet strives to be a responsible lender, meaning that loans are only provided to those whose repayment capacity is in accordance with Nordnet's credit assessment. Nordnet's credit assessment must include an evaluation of the individual's debt as a whole with the objective of actively preventing over-indebtedness. Nordnet must also be transparent with conditions, interests and fees associated with Nordnet's product offering so that Nordnet's customers can make well-informed decisions.

#### Sustainability risks in the liquidity portfolio.

The sustainability-related risks in Nordnet's liquidity portfolio are considered low as most of the portfolio comprises exposure against Nordic municipalities and Nordic credit institutions. In addition, the sustainability-related risk in the liquidity portfolio is assessed as low based on the portfolio having low risk and short duration, giving good opportunities for the adjustment of a given exposure without significant expenses being incurred.

#### Sustainability risks in the insurance operations.

Nordnet's insurance operations' exposure to sustainability-related risks is deemed minor. With regard to risks associated with climate change, there is an indirect exposure, from both transition risk, as well as physical risk, against reduced future income since the income of the insurance business is largely related to assets under management. In both the short and long term, climate change can constitute a driver of the market risk associated with Nordnet's insurance business model where the customers themselves bear the investment risk and determine their investments. This risk is analyzed continuously and is included in various types of stress tests.

## Integration of sustainability-related risks at Nordnet Fonder.

Nordnet Fonder AB works with sustainability-related risks in its respective funds. The EU's regulation regarding sustainability-related disclosures (SFDR') defines a sustainability risk as an environmentally-related, social or governance-related event or circumstance that could, should they occur, have an actual or potential significant negative impact on the value of the investment. Presented below is a description of how the integration is carried out in Nordnet Fonder's various funds.

Nordnet Indexfond Sverige ESG, Nordnet Indeksfond Danmark ESG, Nordnet Indeksirahasto Suomi ESG

For other index funds, sustainability risks are limited by excluding certain companies. There are criteria for exclusion from the index's selection process based on exposures against certain industries, as well as exposures against companies violating the UN Global Compact or having a high degree of controversy in accordance with Sustainalytics' assessment. The criteria are determined by the index provider and are assessed continuously by Nordnet Fonder.

#### Nordnet Indeksfond Norge (Norway)

Nordnet Indeksfond Norge is an index fund with the objective of tracking its benchmark, which has no sustainability-related criteria for inclusion or exclusion. Since, in accordance with its fund regulations, the fund does not have the opportunity to deviate from its index, sustainability risks have not been integrated into the investment decision process.

#### Funds of funds

For our funds of funds, sustainability risks are limited by a majority of investments in underlying funds having to meet reporting requirements in accordance with SFDR Article 8 or 9. Prior to any investment taking place and subsequently at least annually, all external fund companies undergo a due diligence process carried out by Nordnet Fonder in which the fund companies' sustainability work and the product's sustainability orientation are assessed. In addition to this, the funds integrate criteria for exclusion to avoid companies with exposure against controversial weapons, companies with deficient compliance with international standards and conventions, as well as companies involved in significant controversies.

<sup>&</sup>lt;sup>1</sup> The Disclosure Regulation, Sustainable Finance Disclosures Regulation.

# Regulations within sustainability

In recent years, a number of regulations associated with increased transparency on sustainability in the finance markets have come into force. These regulations form part of the EU's plan of action for the financing of sustainable growth. The EU's purpose with the regulations is to increase capital flows towards sustainable investments, to integrate sustainability risk into risk management and that foster transparency and a long-term approach. Three regulations affecting Nordnet are the taxonomy regulation, the disclosure regulation (SFDR) and the Corporate Sustainability Reporting Directive (CSRD).

#### **Disclosure Regulation (SFDR).**

The disclosure regulation determines how financial actors must inform their customers and investors regarding sustainability factors. In 2023, the process continued of reviewing policies as well as making information regarding the Remuneration Policy, the negative sustainability impacts of investment decisions, and information regarding how we integrate sustainability risks into investment decisions and insurance advice available on our website.

# Corporate Sustainability Reporting Directive (CSRD).

In 2023, considerable focus was devoted to preparatory measures for the reporting process in accordance with the EU's Corporate Sustainability Reporting Directive (CSRD), which is expected to be incorporated into Swedish law in 2024. We have completed a double materiality analysis to identify Nordnet's material impacts, risks and opportunities related to sustainability. The result of this analysis determines the areas of sustainability on which we will report in the 2024 Sustainability Report, and is described briefly below

## Description of the method for the materiality analysis.

Described below is the method used to determine Nordnet's material topics on which we will consequently on report in accordance with CSRD. These areas may be material either because of Nordnet's impacts on the environment and/or society and defined as impacts, or effects, or based on how Nordnet is affected by sustainability factors, which are defined as risks and opportunities. It is these two perspectives that comprise the "double" materiality analysis. The method used to determine the material topics can be summarized in four stages: identification, prioritization, validation and review. The double materiality analysis has included both

#### Double materiality.

Double materiality is a process comprising two dimensions to identify the most important sustainability areas for Nordnet. "Impact materiality" refers to how the operations affects the external world, including the environment and society. "Financial materiality" refers to how sustainability issues can affect the company's finances and financial results.

impacts, risks and opportunities in Nordnet's own operations, as well as a mapping of impacts, risks and opportunities in Nordnet's value chain.

#### Identification.

The first stage in the materiality analysis involves identifying potential areas of materiality. Five sources was to as a basis of this work. The first one our stakeholder analysis, which can be found on page 180. Nordnet's current work, including existing policies, targets and KPIs, Nordnet's risk identification process, analysis of the supply chain as well as external sources in the form of the Sustainability Accounting Standards Board (SASB). SASB is a non-profit organization that develops industry-specific standards to provide guidance, predominantly regarding sustainability risks and opportunities.

#### Prioritization.

The next stage in the analysis links the identified impacts, risks and opportunities to the topical areas in CSRD, as well as to any area identified as material in Nordnet's previous work. A materiality assessment was then performed, both at the topic level and for sub-topics. For actual negative impacts, the assessment was based on a scale, scope and remediability, while likelihood was also assessed for potential impacts. For the risks and opportunities identified, the assessment was based on the likelihood and magnitude of the economic effects. The same scale was used for assessing financial materiality as the one Nordnet applies in its general risk work. The topics with no identified impacts, risks or opportunities were assessed as not being material.

#### Validation.

The method and the assessments made during the course of the work have been validated through, icontinuous dialogue with the steering group for CSRD which has comprised the CFO, CRO, General Counsel, CCO and the Head of Sustainability. This work was complemented with continuous dialogue with Nordnet's management team and the Audit Committee of Nordnet. The topics deemed material for Nordnet are areas E1 Climate change, area S1

Topic	Materiality
E1 – Climate change	Material
S1 – Own workforce	Material
S4 – Consumers and end-users	Material
G1 – Business conduct	Material

Own workforce, area S4 Consumers and end-users, and area G1 Business Conduct.

#### Follow-up.

The materiality analysis will be revised annually. Adjustments to material impacts, risks and opportunities could be made, as well as assessments of, for example, likelihood and scope. The result may be updates in the areas of materiality and consequently the scope of reporting can change. Furthermore, we continuously monitor the implementation of CSRD in Swedish law to analyze whether any of our preparations or interpretations of the regulations need to be adjusted.

#### Implementation of CSRD.

In 2024, the focus is on implementing the measures that the expected national incorporation of CSRD will require. These measures include mapping and gathering the information required to meet the disclosure requirements for the material areas as defined in the directive.

#### **Taxonomy regulation.**

The EU taxonomy regulation includes criteria as to how economic activities are defined as environmentally sustainable. The criteria include substantially contributing to one or more of the EU's six environmental targets, no significant harm to the EU's five other environmental targets, as well as minimum social requirements.

The regulation is implemeted different depending on the type of organization required to report. Nordnet reports for its balance sheet exposures as a financial institution and in accordance with the templates for credit institutions.

Nordnet's reporting refers to the consolidated situation. The consolidated situation includes Nordnet AB and Nordnet Bank AB, but not Nordnet Pensionsförsäkring AB, Nordnet Livsforsikring or Nordnet Fonder AB.

Nordnet's business model, unlike that of many other banks, is not based on lending but on the customers' savings and investments. The balance sheet is primarily a function of customers' deposits and their current liquidity of their savings to be able to invest in shares or funds. A limited share of these deposits is used for lending, among other things in margin lending where customers are given the opportunity to mortgage their assets to achieve greater efficiency in their savings. Even the extremely limited corporate lending comprises margin lending and does not give rise to exposures to either

#### EU's environmental targets

- 1. Climate change mitigation
- 2. Climate change adaptation
- 3. Water and marine resources
- 4. Transition to circular economy
- 5. Pollution prevention and control
- 6. Biological diversity and ecosystems

"green" assets or to so-called "brown" assets.

Nordnet places most of its customers' deposits at central banks, in sovereign securities or similar, as well as in covered bonds with the purpose of ensuring a good liquidity readiness, as well as meeting various regulatory requirements. This too entailed limited opportunities for exposures to "green" assets, while simultaneously not generating any exposures to "brown" assets.

#### Share of green assets.

For 2023, Nordnet presents data on the share of the assets in the balance sheet that are environmentally sustainable (taxonomy-aligned). On 31 December, assets financing environmentally sustainable activities amounted to SEK 1,604 million, meaning that *Green Asset Ratio* ("GAR") was 2.5 percent.

The proportion of assets that are relevant to the taxonomy (taxonomy-eligible) comprises mortgages, exposures in the liquidity portfolio and loans to financial institutions. As of 31 December 2023, the exposure to taxonomy-eligible activities corresponded to 21.8 percent of total assets. Of these, the environmentally sustainable (taxonomy-aligned) assets amounted to 2.2 percentage points.

Over the year, acquired assets (see footnote for definition), in environmentally sustainable assets totalled SEK 178 million. the green asset ratio flow was 1.3 percent and, in relation to the total flow, the share was 1.1 percent. This can be compared with the proportion of the flow in taxonomy-eligible assets which was 20.1 and 17.2 percent respectively for 2023. The assets taken into account in the credit portfolio are newly raised loans and newly acquired assets over the year (decreased assets, such as refunded loans, are not included).

Balance sheet items 31 December 2023	SEK million	Share of assets in items covered by the taxonomy	Share of total assets
Environmentally sustainable assets (taxonomy-aligned)	1,604	2.5%	2.2%
Assets in sectors relevant to the taxonomy (taxonomy-eligible)	15,847	24.4%	21.8%
Assets in items covered by the taxonomy	64,862	100.0%	89.2%
Total assets	72,675		100.0%
Acquired assets 2023 <sup>1</sup>			
Environmentally sustainable assets (taxonomy-aligned)	178	1.3%	1.1%
Assets in sectors relevant to the taxonomy (taxonomy-eligible)	2,846	20.1%	17.2%
Assets in items covered by the taxonomy	14,166	100.0%	85.4%
Total assets	16,586		100.0%

<sup>&</sup>lt;sup>1</sup> This section covers assets in the form of new loans in the credit portfolio, investments made during the year in the liquidity portfolio and remaining in the portfolio at year end, as well as net loans to credit institutions (net at year end compared with the end of the preceding year).

See the section Other sustainability disclosures for reporting in accordance with Annex VI of the Commission Delegated Regulation (EU) 2021/2178. This table is not mandatory.

#### **Exposures included in Nordnet's taxonomy reporting**

Balance sheet items 31 December 2023	SEK million	Share of total assets comprising this item	Share of assets in sectors relevant to the taxonomy (tax- onomy-eligible)	Environmentally sustainable assets (taxo- nomy-aligned)	Comment
Mortgages	11,341	16%	100.0%	8.1%	Data was available for 23 percent of total the mortgage portfolio, of which, 36 percent was enironmentally sustainable.
Interest bearing securities	31,725	44%	12.8%	2.1%	The interest bearing securities predominantly comprises securities with a high credit rating, such as bonds issued by credit institutions or municipalities. The purpose of the portfolio is to safeguard favourable liquidity preparedness, as well as to meet various regulatory requirements. This entails limited opportunities for exposures to "green" assets, while simultaneously not generating any exposures to "brown" assets.
Loans to credit institutions	3,788	5%	12.0%	0.1%	This item comprises cash and cash equivalents invested with credit institutions. Loans to credit institutions (bank deposits) only include investments with a maturity of less than three months.
Remainder	25,821	36%	NA	NA	The remaining items on Nordnet's balance sheet do not include any taxonomy-eligible assets.
Total assets	72,675	100%	21.8%	2.2%	

See the section Other sustainability disclosures for reporting in accordance with Annex VI of the Commission Delegated Regulation (EU) 2021/2178. This table is not mandatory.

#### Assets not covered by the taxonomy.

Assets financing sectors not relevant for the taxonomy (non-eligible), and therefore not covered, comprise other types of loans to households, interest bearing securities, as well lending to credit institutions.

Balance sheet items not to be included in the taxonomy, and therefore not covered, predominantly constitute Nordnet's exposures to central banks and states.

Nordnet's lending to companies comprises margin lending and none of those customers had more than 500 employees as of 31 December 2023. Nordnet's lending is therefore classified as exposures not covered by taxonomy since the corporatesare assumed not reporting according to the Non-Financial Reporting Directive, "NFRD." Accordingly, no assessment of whether the assets are environmentally sustainable is made.

#### Nordnet's business model linked to the taxonomy.

Although our clients' investments are not included in our taxo-

#### Green Asset Ratio (GAR).

The proportion of green assets in the portfolio (Green Asset Ratio "GAR") comprises the share of environmentally sustainable assets ("Taxonomy aligned") among the total assets covered, where the total assets covered are stated at their gross carrying amount among total assets excluding exposures to sovereigns, central banks, supranational issuers and trading books.

nomy reporting, this is an area that could have a significant impact. However, we only have a limited opportunity to influence what our customers invest in, since our customers make their own investment decisions. We are, however, able to facilitate for our customers, in various ways, to choose sustainable investment alternatives, such as informing investors about sustainable investments and inspiring them in various ways. In an initial stage, we have previously made it possible for our customers to see if a fund is categorized as Article 8 or 9. Read more about how we work with Sustainable savings in the Group, as well in Nordnet Fonder AB in the "Sustainable savings" section.

Nordnet's full taxonomy reporting can be found in the section "Other sustainability disclosures" on pages 186-190.



# The year in figures.

For the full year, Nordnet achieved a stronger outcome than ever, and I can affirm that our operations are developing favourably in terms of both customer-related and financial key figures.

Lars-Åke Norling, CEO Nordnet

# Customer growth in the last 12 months<sup>1</sup>: 9% (101%)

Adjusted operating profit<sup>3</sup> SEK 3 160 (2 115) million

Proposed dividend 7,20 (4,60) SEK per aktie Adjusted operating expenses<sup>3</sup> SEK -1 300 (-1 210) million

Operating income SEK 4 550 (3 382) million Earnings per share after dilution SEK 9,83 (6,33)

Net savings SEK 34,7 (36,2) billion

Savings capital, 31 december 825 (715) billion

Lending<sup>2</sup> 31 december 29,5 (27,3) billion

MSEK	2023	2022	Change %
Operating income	4,550.3	3,382.1	35%
Operating expenses	-1,299.7	-1,291.5	1%
Credit losses	-79.6	-43.4	83%
Resolution fee	-10.6	-13.1	-19%
Operating profit	3,160.4	2,034.1	55%
Profit after tax	2,578.7	1,652.5	56%
Earnings per share before dilution (SEK)	9.83	6.35	55%
Earnings per share after dilution (SEK)	9.83	6.35	55%
Income in relation to savings capital	0.59%	0.46%	0.12%
Operating margin %	69%	60%	9%
Adjusted operating expenses <sup>3</sup>	-1,299.7	-1,210.3	7%
Adjusted operating profit <sup>3</sup>	3,160.4	2,115.3	49%
Adjusted operating margin <sup>3</sup>	69%	63%	7%
Adjusted earnings per share after dilution (SEK)	9.83	6.67	55%
Total number of employees	1,862,900	1,707,800	9%
Net savings (SEK billion)	34.7	36.2	-4%
Savings capital at end of period (SEK million)	824.8	714.8	15%
Average savings capital per customer (SEK)	434,800	443,800	-2%

<sup>&</sup>lt;sup>1</sup>The annual customer growth for 2022, including customer relationships terminated as part of a previously communicated project regarding customer documentation, amounted to 7 percent.

<sup>&</sup>lt;sup>2</sup> Loans to the public less pledged cash and cash equivalents, see Note 21.

<sup>&</sup>lt;sup>3</sup> For items affecting comparability, see page 68. For definitions of key performance indicators, refer to pages 176-177.

#### Significant events during the year.

- We achieved an adjusted operating profit of SEK 3.2 billion for 2023 – our highest full-year profit to date.
- Higher interest rates contributed to net interest income of SEK 2.6 billion, an increase of 106 percent compared with 2022.
- We added 155,100 new customers over the year and total the customer base now comprises more than 1.8 million Nordic savers
- Nordnet's customers had net savings of more than SEK 35 billion and made 58.9 million trades.
- Nordnet's own fund company achieved considerable success in 2023. The "Nordnet Index Global 125" fund, launched during the year, was praised by Privata Affärer's bank of the year jury and Nordnet's technology fund was among the absolute best performing funds in the Nordic fund market in 2023.
- At the end of 2023, total savings capital in funds under the Nordnet brand amounted to SEK 43.3 billion. This was an increase of 37 percent, compared with 15 percent for total savings capital.
- Nordnet retained its leading ranking in Denmark and Finland in EPSI's customer satisfaction survey in the area of savings and climbed to second place in the equivalent Swedish survey by SKI.
- Nordnet extended its sustainability reporting over the year and, in addition to the key figures previously launched, we also now monitor the percentage of women customers, as well as the CO<sub>2</sub>-intensity of our customers' investments on a quarterly basis.
- Endowment wrapper launched in Finland a key step towards a full-scale offering in all markets.
- A large number of products were launched during the year, including digital pension transfers in Sweden, easier transfers via Trustly in Norway and Finland, a partnership with Quartr and further integration of the Shareville app.

- In the fourth quarter, a strategic review of the unsecured loans business area was initiated.
- In February 2023, Nordnet issued Tier 1 capital (AT1) and Level 2 Tier 1 capital in accordance with Solvens II amounting to SEK 300 million, with the purpose of optimizing the capital structure.



# Our markets 2023.

#### Sweden.

In 2023, transaction-related income decreased by 21 percent to SEK 290 million (367) as a result of lower trading activity as the uncertain macro situation, combined with low volatility in the market affected customers' willingness to invest. The income from fund fees increased by 8 percent to SEK 252 million (233), where fund capital growth offset a lower income margin, that is, fund income in relation to fund capital. The income margin decreased due to a higher share of fund capital being invested in funds with lower charges. Increased return on liquidity, combined with higher lending volumes for mortgages and margin lending, as well as higher interest rates in the loan portfolio resulted in a 61-percent increase in net interest income, amounting to SEK 1,083 (674) million. Total operating income increased by 26 percent to SEK 1,617 (1,282) million compared with 2022. Operating profit amounted to SEK 1,080 (680) million, an increase of 59 percent compared with 2022, which is partly explained by a provision of a negative SEK 100 million related to a regulatory fine in 2022. For further information, see page 68.

The number of transactions amounted to 19.4 (21.6) million, a decline of 10 percent compared with January-December 2022. Trades per day decreased by 10 percent and the proportion of cross-border trades amounted to 14 percent, which is an increase compared with 2022 when the proportion was 13 percent. At the end of December, the savings capital was SEK 313 (271) billion, an increase of 15 percent due to the rising stock market, as well as positive net savings. Net savings amounted to SEK 10.2 (7.5) billion.

Within margin lending, the volume increased by 14 percent compared with the preceding year, amounting to SEK 4.1 (4.6) billion on 31 December 2022. The mortgage lending volume decreased by 2 percent over the year, amounting to SEK 10.5 (10.7) billion at the end of the year. In unsecured loans, there were 26,631 customers (27,247) and the lending volume was SEK 3.9 (4.1) billion on 31 December 2023.

At the end of the year, the customer base in Sweden amounted to 470,300 (449,900) customers, a 5-percent increase compared with 2022. When Swedish Quality Index (SKI) presented its customer satisfaction survey in the area of savings, it was evident that Nordnet was the sole actor to go against the flow, increasing its customer sa-

tisfaction. With a second place in the survey, we reached our highest ranking ever and were also ranked highest in the value-for-money and product-quality categories.

Over the year, we were the first actor to offer a completely digital process for transfers of pension savings, through a collaboration with Swedish insurtech company Insurely. For our Private Banking and Active Trading customers, we began offering Börsdata (stock market data), which is a powerful analysis platform for share investors, containing extensive company information, historical data, technical analysis tools, key ratios and opportunities to analyze and compare companies. We have also initiated a collaboration with the Finwire news agency, providing all of our customers with the latest news about Swedish and American companies.

Over the year, we held several popular events to teach and inspire customers. Among other things, we arranged the tenth version of our flagship event Nordnet Live — a morning of insights and inspiration from leading names in the financial industry, including Niklas Wykman (Financial Markets Minister), Karolina Ekholm (Head of the National Debt Office), George Ganev (CEO of Kinnevik), and Fredrik Ekström (CEO of Nasdaq).

In 2023, we launched the women's network Nordnet Female Network. The network seeks, in an inspiring and educational way, to share knowledge in savings with women, regardless of previous experience. Our savings economist Frida Bratt is the face of this initiative, as well as for our initiatives to foster smoother pension transfers and reduced tax on ISK accounts.

The website and the app have seen a rapid pace of development and we presented a range of innovations over the year. Specific innovations in Sweden include a function enabling daily changes of brokerage class — a function suited to customers with a flexible strategy.

In the third quarter, we proudly presented the opportunity for new customers having yet to reach SEK 50,000 in total savings capital on our platform to buy shares for free on the Nasdaq Stockholm Exchange and to be refunded all fund fees, in line with our purpose of democratizing savings and investments.

Key figures Sweden	2023	2022
Income, SEK million	1,617.2	1,282.4
Operating profit, SEK million	1,079.6	680.5
Operating margin	67%	53%
Number of customers	470,300	449,900
Savings capital, SEK billion	313.4	271.5
Net savings, SEK billion	10.2	7.5
Trades	19,423,700	21,648,800
Lending, SEK billion <sup>1</sup>	19.1	18.9

<sup>&</sup>lt;sup>1</sup> Lending excluding pledged cash and equivalents, see Note 21.

During the quarter, Nordnet's own Nordic index funds were included in the gold category in Morningstar's new "Medalist Rating" – a qualitative and algorithmic forecast assessment of opportunities for generating favourable returns. At the end of the year, we could also celebrate that our Nordnet Global Index 125 fund received the Turbofond of the Year award from Privata Affärer's Bank of the Year jury, with the jury praising the fund's straightforward and inexpensive format.

#### Norway.

In 2023, income in Nordnet Norway rose by 10 percent compared with the preceding year. Net commission income amounted to SEK 403 (476) million. The number of trades decreased by 15 percent to 10.6 (12.5) million and the proportion of cross-border trades amounted to 27 percent — a decrease compared with 2022 when the proportion was 29 percent. Net interest income increased by 47 percent to SEK 546 (371) million. The increase is attributable to increased margins in both the lending portfolio and the liquidity portfolio as a result of higher interest rates and increased lending volumes.

On 31 December 2023, the number of active customers in Norway amounted to 399,000 (363,500), corresponding to customer growth of 10 percent over the past 12-month period. Net savings for the period January — December amounted to SEK 5.0 (6.0) billion. As of 31 December 2023, savings capital amounted to SEK 140.0 (125.6) billion. The lending volume increased by 33 percent compared with the preceding year, to SEK 3.8 (2.9). The lending volume in Nordnet's mortgage product, which was launched in the fall of 2022, increased by 485 percent over the year, amounting to SEK 0.8 (0.1) billion at the end of the year.

As in Sweden, we launched the Nordnet Female Network in Norway, to encourage more women to take the step to start investing. Nordnet's new Country Manager for Norway, Mari Rindal Øyen, invited the new network members to an evening for women with inspiring lectures on, for example, saving habits and how the current financial gap between the sexes can be changed.

Nordnet's fund offering drew considerable interest in Norway over the year, and funds are a generally popular savings format. Norwegian customers have purchased funds for a total SEK 5.2 billion, with the Nordnet Technologi Indeks fund achieving the Norwegian Market's best return over the year. In the fourth quarter, we launched Nordnet Global Index 125 in all countries where we have operations, with Norwegian savers not least showing great interest in the fund.

At the end of 2022, we launched the mortgage product in Norway, and development over the past year has been positive. A large share

of our private banking customers has chosen to move their mortgages to Nordnet and today the mortgage volume amounts to over SEK 800 million in Norway. For this customer group, we have also launched a new savings account with high interest for those seeking a temporary alternative to the stock market.

In Norway, we launched the 2023 Savings and Investment Profile of the Year to elevate profiles in the sector working to increase interest, to inspire and to spread knowledge on savings and investments. The winner was Else Sundfør, who is a hobby investor and influencer in the financial sector. She chose to donate her prize money to the non-profit organization Matsentralen.

Nordnet's Norwegian pension offering has several unique features including the new risk profile assessment that simplifies customers' pension transfer into Nordnet funds. We have also integrated our service into Norsk Pensjon, increasing transparency by making information about Nordnet's pension accounts available on their platform.

Key figures Norway	2023	2022
Income, SEK million	954.4	864.2
Operating profit, SEK million	643.4	587.8
Operating margin	67%	68%
Number of customers	399,000	363,500
Savings capital, SEK billion	140.0	125.6
Net savings, SEK billion	5.0	6.0
Trades	10,649,500	12,540,500
Lending, SEK billion <sup>1</sup>	3.8	2.9

<sup>&</sup>lt;sup>1</sup> Lending excluding pledged cash and equivalents, see Note 21.

#### Denmark.

In 2023, income in Nordnet Denmark rose by 68 percent compared with the preceding year. Denmark is the only Nordnet market to have increased both its net commission income and net interest income in 2023. Net commission income increased over the year, amounting to SEK 526 (490) million. Net interest income amounted to SEK 542 (137) million, an increase of 295 percent compared with 2022, driven by higher margins in both the lending portfolio and the liquidity portfolio as a result of higher interest rates and increased lending volume.

In 2023, Denmark accounted for the greatest customer growth among Nordnet's markets. On 31 December 2023, the number of active customers in Denmark amounted to 428,000 (372,100), corresponding to customer growth of 15 percent over the past 12-month period. Savings capital at the end of the year amounted to SEK 206 (169) billion. Net savings for the period January—December 2023 amounted to SEK 10.6 (12.4) billion. The number of trades during the period January—December 2023 increased by 8 percent compared with the corresponding period in the preceding year and amounted to 9.5 (10.3) million. As of 31 December 2023, margin lending amounted to SEK 2.6 (2.5) billion.

In 2023, we reached the milestone of 400,000 active customers in Denmark. We are proud that so many Danish savers have chosen Nordnet as their financial partner. Further proof of our success is the study by the consumer research company EPSI, where we are ranked highest of all banks. The survey is based on customer ratings submitted on their investment platform, where we distinguish ourselves with our user-friendly platform and transparency. We were also ranked highest of all Danish banks in a Danish brand survey conducted by media platform Finanswatch and analysis company Wilke regarding image, and are ranked number three among all financial institutions in Denmark.

We have also announced that we will establish an insurance branch in Denmark ahead of an upcoming launch of the annuity product. In 2023, we entered into a three-year collaboration with insurance company Tryg/Trygg Hansa, enabling their 6,500 employees worldwide to participate in their option program.

Key figures Denmark	2023	2022
Income, SEK million	1,089.6	647.5
Operating profit, SEK million	812.1	410.1
Operating margin	75%	63%
Number of customers	428,000	372,100
Savings capital, SEK billion	205.5	168.6
Net savings, SEK billion	10.6	12.4
Trades	9,486,800	10,362,400
Lending, SEK billion <sup>1</sup>	2.6	2.5

<sup>&</sup>lt;sup>1</sup> Lending excluding pledged cash and equivalents, see Note 21.

#### Finland.

In 2023, income in Nordnet Finland increased by 51 percent compared with the preceding year. Net commission income decreased over the year, amounting to SEK 382 (453) million. Net interest income amounted to SEK 469 (98) million, an increase of 377 percent compared with 2022. The increase is attributable to increased margins in both the lending portfolio and the liquidity portfolio as a result of higher interest rates and increased lending volume.

At the end of the year, the number of customers amounted to 565,600 (522,300), which corresponds to 8 percent customer growth over the past 12-month period. Savings capital at the end of the year amounted to SEK 166 (149) billion. Net savings for the period January—December 2023 amounted to SEK 8.9 (10.3) billion. The number of trades during the period January—December 2023 increased by 20 percent compared with the corresponding period in the preceding year. Margin lending increased by 32 percent compared with the previous year, amounting to SEK 4.1 (3.1) billion at the end of December.

An important milestone in Finland in 2023 was the launch of our endowment wrapper, which is unique in the Finnish market. Within the endowment wrapper account type, capital gains and dividends can be reinvested tax-free, and the account type is also favourable in the event of the holder's demise as, unlike other Finnish account types, the product is not subject to capital gains tax on transfer to beneficiaries, only inheritance tax.

We also embarked on a collaboration with Handelsbanken, entailing Handelsbanken's securities brokerage and custody customers moving over to Nordnet, since Handelsbanken is discontinuing its services in this segment.

Over the past year, the number of fund savers rose faster than the number of share investors among Nordnet's Finnish customers. The number of monthly savings agreements now exceeds 200,000. Our Nordnet Indexirahasto Suomi ESG fund is now the most popular fund in Finland.

As in previous years, we also organized the Investor of the Year and the Investment Act of the Year events in 2023. In the sixth edition, investor and blogger Esa Juntunen and social media channel Sijoituskästi with Kevin van Dessel and Teemu Liila were the winners.

Key figures Finland	2023	2022
Income, SEK million	889.1	588.0
Operating profit, SEK million	625.2	355.7
Operating margin	70%	61%
Number of customers	565,600	522,300
Savings capital, SEK billion	165.8	149.1
Net savings, SEK billion	8.9	10.3
Trades	9,301,700	11,627,900
Lending, SEK billion <sup>1</sup>	4.1	3.1

<sup>&</sup>lt;sup>1</sup> Lending excluding pledged cash and equivalents, see Note 21.

#### Profits and financial review, Group.

The uncertain macro situation during the year contributed to reduced trading volume in all markets. This resulted in a 12-percent decline in transaction-related income compared with 2022.

Fund-related income increased by 8 percent in 2023 compared with 2022. The increase is explained by a higher value of the fund capital, both from net buying and increased value of the underlying assets. Income in relation to fund capital decreased somewhat, which is mainly explained by an increased share of the fund capital being invested in funds with lower fees.

Since the increase in fund-related income did not fully offset the decline in transaction-related income, net commission income fell by 8 percent compared with 2022, amounting to SEK 1,868 (2,029) million in 2023.

Increased policy rates in Nordnet's markets are contributed to an increased return on the liquidity portfolio. Combined with higher lending volumes for mortgages and margin lending, as well as higher interest levels in the loan portfolio, this resulted in an increase of 106 percent in net interest income compared with 2022, amounting to SEK 2,639 (1,281) million for 2023.

Other operating income amounted to SEK 50 (81) million for the year, a decline of 38 percent compared with 2022. The decline can be attributed to lower income associated with Nordnet's IPO operations, as well as income from fees associated with the closure of inactive accounts during 2022.

Operating income for the full year 2023 increased by 35 percent to SEK 4,550 (3,382) million compared with full year 2022, as the increase in net interest income fully offset the decline in net commission income.

The adjusted operating expenses for full year amounted to SEK 1,300 (1,210) million, an increase of 7 percent compared with 2022. The increase, which is in line with Nordnet's financial targets, is mainly attributed to there being more employees in Tech and Product, as well as elevated inflation. Including items affecting comparability of SEK -81 million in 2022, operating expenses increased by 1 percent compared with the preceding year. For more information on items affecting comparability, see page 68.

Net credit losses amounted to SEK 80 million (43), an increase of 83 percent compared with 2022. The increase is partly due to reinforced provisions for unsecured loans as a result of a somewhat higher proportion of late payments, and partly to a new agreement for sales of past-due receivables. Real credit losses remain relatively low, although they are at a slightly higher level compared with 2022. For further information, see Note 21.

The adjusted operating profit increased by 49 percent over 2023 and amounted to SEK 3,160 (2,115) million, with an adjusted operating margin of 69 (63) percent. Operating profit, which includes items affecting comparability of SEK 0 (-81) million, increased by 55 percent compared with the 2022 full year. For more information on items affecting comparability, see page 68.

Other comprehensive income in 2023 amounted to SEK 29 (-100) million, which is an increase of SEK 129 million compared with the preceding year. The increase is mainly attributable to positive changes in the value of the financial assets measured at fair value in the liquidity portfolio.

Group	2023	2022	2021	2020	2019
Income statements, SEK million					
Net commission income	1,868.2	2,029.2	2,729.6	2,020.7	939.9
Net interest income	2,639.4	1,281.0	727.3	613.3	513.6
Net result of financial transactions	-7.6	-8.8	18.0	-14.2	66.1
Other income	50.4	80.7	163.7	68.7	,69.7
Total operating income	4,550.3	3,382.1	3,638.6	2,688.7	1,589.3
Operating expenses	-1,299.7	-1,291.5	-1,140.9	-1,193.4	-1,162.3
Credit losses	-79.6	-43.4	-36.3	-38.7	-33.7
Imposed levies	-10.6	-13.1	-10.1	-9.8	-15.9
Operating profit	3,160.4	2,034.1	2,451.2	1,446.6	,377.4
Tax	-581.6	-381.7	-466.5	-273.9	-37.9
Profit for the year	2,578.7	1,652.5	1,984.7	1,172.7	,339.5
Balance sheets, SEK million					
Interest-bearing securities	36,097.2	50,178.7	44,681.0	32,616.0	,23,599.5
Lending to credit institutions	481.7	485.1	644.8	603.5	,505.2
Loans to the general public	30,199.8	28,527.4	26,326.1	20,311.9	,16,127.8
Assests for which customers bear the investment risk	147,056.7	119,974.7	152,165.5	102,691.4	,70,089.2
Other assests	8,414.3	7,741.9	8,7268	11,770.3	,5,281.6
Total assets	222,249.7	206,907.8	232,544.2	167,993.1	,115,603.3
Deposits and borrowing from the general public	56,679.9	70,084.1	64,286.7	52,552.8	,38,572.1
Liabilities for which customers bear the investment risk	147,061.4	119,979.6	152,168.3	102,693.3	,70,091.1
Other liabilities	7,806.0	10,794.0	10,099.1	8,535.3	,3,882.3
Total liabilities	214,547.3	200,857.7	226,554.1	163,781.4	,112,545.5
Total equity	7,702.4	6,050.1	5,990.1	4,211.7	,3,057.8
Total equity and liabilities	222,249.7	206,907.8	232,544.2	167,993.1	,115,603.3

#### Financial position.

Nordnet's total assets amounted to SEK 222.3 billion (206.9), an increase of 7 percent compared with the preceding year. Of total assets, SEK 147,1 billion (120.0) comprised assets in Nordnet's pensions company (Nordnet Pensionsförsäkringar AB) for which the customers bear the risk. The value of these assets increased by SEK 27.1 billion over the year. These assets have a corresponding item on the liability side, meaning that a change in the value of the assets causes a corresponding change in the liability item and therefore have no effect on net profit or equity. At the same time, customers' deposits in Nordnet Bank AB decreased as a result of customers investing parts of their liquidity in shares and funds, which limited the effect that the increase in the value of the assets in the pensions company had on total assets.

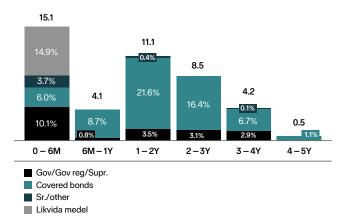
Deposits from the public are Nordnet's main source of funding. Only a limited share of deposits is loaned out and the remaining liquidity is invested in interest-bearing securities ("the liquidity portfolio") of high credit quality and high liquidity, to safeguard strong liquidity preparedness. The currency distribution among lending and investments in the liquidity portfolio corresponds to the currency distribution among deposits.

Lending¹ has increased by SEK 1.7 billion since 31 December 2022, corresponding to an increase of 6 percent. The increased lending can mainly be attributed to margin lending but also to some extent to mortgages. The credit quality of the lending portfolio is assessed as good and has only been affected marginally by the prevailing external situation with increased inflation and higher interest rates. For more information, see Note 21.

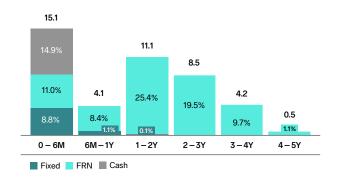
The liquidity portfolio amounts to SEK 43.4 (57.6) billion, corresponding to 64 percent of deposits, thereby providing good liquidity preparedness. The liquidity portfolio has decreased by 25 percent since 31 December 2022 as a result of customers' investments during period exceeding net savings. The maturity structure for the group's investments in bonds and certificates is shown in the graphs on the right, broken down by security category and interest duration.

Nordnet primarily invests with the intention of retaining holdings to maturity and reports them either as Hold to Collect (HTC) or Hold to Collect and Sell (HTC&S). Unrealized losses reflected neither in net profit nor equity via other total comprehensive income (the HTC portfolio) amounted to SEK 7.4 (36.3 gains) million. For securities classified as HTC&S, unrealized gains or losses are reflected in other total comprehensive income and in equity. This corresponded to a net loss of SEK 40.7 (122.4) million. See the graph on the right for the distribution between HTC and HTC&S, fixed and variable interest and by maturity structure for each category.

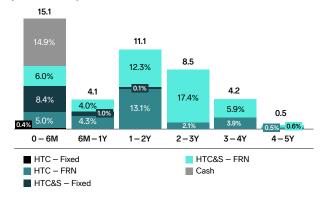
## Maturity structure by credit category (SEK billion) 31 December 2023



## Maturity structure by fixed or floating rate (SEK billion) 31 December 2023



## Maturity structure by reported category (SEK billion) 31 December 2023



Nordnet has a strong and stable capital structure. Shareholders' equity amounted to SEK 7.7 (6.1) billion (see table below for Financial position and Own funds), which, together with low risk in both lending and investments in the liquidity portfolio, provides the conditions for maintaining a dividend level of 70 percent of net profit and also to assess the possibility of repurchasing shares.

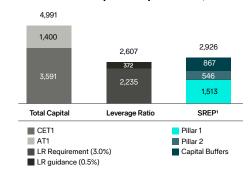
The regulatory capital requirements for the bank operations comprise two parts: the risk-weighted part capital requirement (capital adequacy) and the non-risk-weighted capital requirement (leverage ratio). The risk-weighted capital ratio of the consolidated situation amounted to 26.4 (20.9) percent compared with a risk-weighted capital requirement of 15.5 (18.2) percent and the leverage ratio amounted to 6.7 (4.6) percent compared with the requirement of 3.5 percent.

The risk-weighted capital requirement can be divided into three components: Pillar 1, Pillar 2 and the combined buffer requirement. The Pillar 1 requirement largely comprises credit risk and operational risk, for which Nordnet applies the standard methods. The Pillar 2 requirement is largely attributable to credit spread and interest rate risk in the bank book, which is largely a function of the interest rate and maturity structure among the investments in the liquidity portfolio. For Nordnet's consolidated situation, the Swedish Financial Supervisory Authority has imposed a capital requirement of 2.89 percent as a minimum for risks within Pillar 2. Nordnet also makes an internal assessment of the capital requirement on an ongoing basis and the diagram to the right illustrates both the regulatory requirements and the internally calculated needs within Pillar 2. For Nordnet, the combined buffer requirement comprises a capital conservation buffer and a counter-cyclical capital buffer.

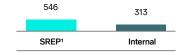
Both the capital adequacy and leverage ratios were reinforced in 2023, mainly as a result of positive net profit and issued Tier 1 capital contributions of SEK 300 million, but also as a consequence of lower total assets and lower risk-taking in the liquidity portfolio. At the same time as the capital ratios were strengthened over the year, the regulatory requirements on Nordnet's capital ratio were lowered, which meant that, at the close of the year, Nordnet held own funds exceeding the total capital requirement by SEK 2.1 billion, the Core Tier 1 capital requirement by SEK 1.6 billion and the leverage ratio, including Pillar 2 guidance, by SEK 2.4 billion.

A decision was taken in March 2024 to conduct an early redemption of outstanding Tier 1 capital instruments (AT1) for a total outstanding nominal amount of SEK 500 million. Had these SEK 500 million in Tier 1 capital been redeemed as of 31 December 2023, the consolidated situation's risk-weighted capital ratio would have amounted to 23.8 percent and the leverage ratio would have been 6.0 percent.

#### Own funds and capital requirement, SEK million



#### Capital requirement Pillar 2, SEK million (RWE%)



#### Own funds

SEK million	31/12/2023	31/12/2022
Consolidated shareholders' equity	7,702	6,050
of which: Additional Tier <sup>1</sup> capital (AT1)	1,400	1,100
Shareholders' equity excluding Additional Tier 1 capital	6,307	4,695
Forseeable dividend	-1,808	-1,163
Core Tier 1 capital before regulatory adjustments	4,499	3,532
Additional value adjustments	-21	-25
Intangible fixed assets and deferred tax receivables	-704	-708
Significant holdings of CET1 instruments in financial sector companies	-183	0
Aggregate regulatory adjustments of Core Tier 1 capital	-908	-734
Tier 1 capital	1,400	1,100
Tier 2 capital	0	0
Total own funds	4,991	3,898

<sup>&</sup>lt;sup>1</sup> Supervisory Review and Evaluation Process. For more information, see Pillar 3 report.

#### Financial position

	Q4 23	Q3 23	Q2 23	Q1 23	Q4 22	Q3 22	Q2 22	Q1 22
Total capital ratio (%)	26.4%	26.4%	25.3%	24.0%	20.9%	19.4%	20.9%	21.6%
Total capital requirement (%)	15.5%	15.5%	19.1%	18.4%	18.2%	17.2%	17.1%	17.1%
Total own funds (SEK million)	4,991.0	4,799.8	4,704.5	4,442.5	3,898.3	3,650.4	3,719.2	3,755.9
Total capital requirement (SEK million)	2,926.8	2,813.4	3,554.8	3,399.0	3,398.3	3,239.7	3,050.0	2,978.7
Core Tier 1 ratio (%)	19.0%	18.7%	17.7%	16.5%	15.0%	13.5%	14.7%	15.3%
Core Tier 1 capital requirement (%)	10.7%	10.7%	12.7%	12.1%	11.9%	10.9%	10.8%	10.8%
Core Tier 1 capital (SEK million)	3,591.0	3,399.8	3,304.5	3,042.5	2,798.3	2,550.4	2,619.2	2,655.9
Core Tier 1 capital requirement (SEK million)	2,026.5	1,947.9	2,374.8	2,229.4	2,218.7	2,046.9	1,923.0	1,876.9
Leverage ratio (%)	6.7%	6.3%	6.1%	5.6%	4.6%	4.2%	4.4%	4.8%
Leverage ratio requirement, incl. guidance (%)	3.5%	3.5%	3.9%	3.9%	3.9%	3.9%	3.9%	3.9%
Tier 1 capital (SEK million)	4,991.0	4,799.8	4,704.5	4,442.5	3,898.3	3,650.4	3,719.2	3,755.9
Leverage ratio requirement, incl. guidance (SEK million)	2,607.1	2,662.0	3,019.2	3,089.8	3,296.2	3,367.1	3,273.8	3,078.1

# Profits and financial review, Parent Company.

Nordnet AB (publ) is a holding company and conducts no operations beyond its role as the owner of Nordnet Bank AB and Nordnet Incentive AB. Operating income for January—December 2023 amounted to SEK 20.1 (18.2) million and relates to intra-Group administrative services. The Parent Company's profit after financial items for the period January—December 2023 amounted to SEK 1,808.3 (2,525.2) million. The Parent Company's cash and cash equivalents amounted to SEK 20.8 (7.3 as of 31 December 2022) million, and shareholders' equity to SEK 4,329.9 (3,477.6 as of 31 December 2022) million.

#### **Employees.**

The average number of employees during the year was 745 (704). In addition to the number of full-time positions, the number of employees also includes staff on parental leave and leaves of absence. The increase is mainly attributed to increased numbers of employees in Tech, Product and the newly launched subsidiary in Finland. At the end of the year, the number of full-time positions was 735 (666), broken down between 618 (560) in Sweden, 35 (34) in Norway, 44 (39) in Denmark and 38 (33) in Finland.

Nordnet strives for balanced gender distribution. At the end of 2023, the proportion of women in the Group was 36 (36) percent, and the proportion of women in management was 45 (42) percent. The proportion of women in Group Management is currently 36 (30) percent. Employees' commitment and satisfaction with Nordnet as their employer is measured continuously. We use net promoter score (eNPS) to measure our overall attractiveness as an employer. The Sustainability Report contains additional information about employees on pages 43–44. See also Note 13 for more information.

#### **Future prospects.**

Nordnet has an efficient and scalable business model, and holds a strong position in all of the markets in which we operate. We use a shared technology and administration platform to provide a pan-Nordic offering in the area of savings and investments. Our customer base is growing at a rapid pace with the large number of savers

having chosen Nordnet, combined with a high inclination to recommend, serving as an engine for continued growth.

The Nordic region is a well-developed market for savings where holding shares and funds is widespread among private individuals, and is also growing over time. A number of underlying macro trends and structural drivers are expected to continue supporting market growth over time. Growth is driven by expected increases in household income in line with the GDP forecast, a stable level of savings and a future market trend in line with the historical average return. All four Nordic countries in which Nordnet operates are open and stable economies with high per-capita GDP.

One reason contributing strongly to the market growth is the ongoing restructuring of the pension system, whereby the individual is expected to assume greater responsibility for his/her pension. Within the EU, there is a clear trend whereby pension systems are shifting from defined-benefit pension plans to defined-contribution pension plans. The Nordic countries are at different phases of this transition.

Development is also underway in private savings, driven by the insight that individuals must be afforded opportunities to take greater responsibility for their financial futures. We are seeing a trend in which the equity culture continues to grow, while legislation regarding, for example, taxation, deposits, amount limits and capital transfers are simplified, fostering continued growth in private savings.

The long-term trends favour our business model. The increasing awareness among consumers results in savers, to a large extent, choosing actors like Nordnet with transparent, affordable and digital offerings, at the expense of large banks and traditional pension companies. Digital technology combined with social media enables rapid sharing of consumer experiences and reviews, and we believe that the key to success is to ensure a world-class user experience and take advantage of the power for growth found in the hundreds of thousands of satisfied customers who recommend Nordnet as a savings platform.

#### Risks and uncertainty factors.

The core of Nordnet's operations is to offer customers in Sweden, Norway, Denmark and Finland products and services for savings and investments. Customers' trading activity and savings are affected by a number of factors associated with customers' personal finances. The macroeconomic trend remains uncertain and may affect our customers' finances. If the economic situation with high inflation and high interest rates persists or worsens, it can have a negative impact on Nordnet's operations and net profit. Over the year, the Nordic stock exchanges, except the Finnish one, recovered and rose, following falling prices in 2022, although trading volumes continued to decline, resulting in decreasing brokerage income. The loss of income has been offset by higher interest income due to higher interest rates. Demand for digital trading and interest rate levels may change in the future, there is a risk that demand will decrease without rising net interest income offsetting the loss of income.

The markets for savings and investments, and for lending to consumers in the Nordic region are, and will continue to be, exposed to competition. There is a risk that local competitors in Sweden, Norway, Denmark and Finland will expand their operations to other Nordic countries or that non-Nordic players will choose to expand into one or more of the Nordic countries and that new products or price models will be launched that could exert pressure on prices. There is also a risk that Nordnet will not succeed in developing at a sufficiently fast pace in relation to the rapid development in the industry, or will fail to develop and to introduce new, attractive and innovative solutions.

As Nordnet's digital platform forms the core of its operations, Nordnet is exposed to risks related to its information and communication technology ("ICT"), such as system errors, delays in performing services, catastrophic events and interruptions to access to Nordnet's products or services, and loss or leakage of customer data. Such incidents could damage Nordnet's operations and brand, and entail liability for damages and sanctions.

In general, the cyber threat to the digital financial sector is extensive and Nordnet's operations are thus exposed to cyber attacks and fraud. An incident related to such attacks or fraud may materially disrupt Nordnet's operations, damage Nordnet's reputation, expose Nordnet to the risk of loss, sanctions or legal proceedings and a potential exposure to liability for losses affecting customers.

Nordnet is exposed to risks related to human error, incorrect or inadequate performance of services by employees, lack of fully efficient processes for internal control and deficiencies in the knowledge and experience of employees. Improper measures or incorrect handling by Nordnet's personnel could lead to financial losses for customers, legal proceedings and sanctions, thereby damaging confidence in Nordnet.

Nordnet is dependent on services, licenses and agreements with partners for a number of Nordnet's services and products and these parties' failure to perform these services, provide these licenses and fulfil these agreements could have a negative impact on Nordnet's operations. Nordnet has also previously experienced such shortcomings in certain partners, some of which have caused significant interruptions in Nordnet's provision of services.

If the development of the funds that Nordnet offers under its own brand is not satisfactory, such as in relation to the relevant index, Nordnet's brand and reputation may be negatively affected, resulting in decreased compensation, which would, in turn, affect Nordnet's growth. Nordnet also risks being exposed to negative publicity in newspapers and on social media about, for example, products and services. Such publicity exposes Nordnet to a reputation risk not only with regard to the criticized products and services but also in relation to Nordnet as a brand. Poor publicity of this kind could have an adverse effect on Nordnet's earnings and future growth.

Nordnet is subject to capital and liquidity requirements including the leverage ratio requirements and must maintain adequate capital and liquidity buffers. If Nordnet fails to meet capital requirements or other requirements that are introduced, this may lead to interventions, such as sanctions being issued, which could adversely affect Nordnet's earnings and financial position. Uncertainty in the market may mean that Nordnet's financing expenses increase and limit the company's access to the capital markets, which may have a material adverse effect on Nordnet's operations, earnings and financial position.

The operations that Nordnet conducts are supervised, in relation to, for example, solvency and capital adequacy rules and rules regarding internal governance and control. As a result of the activities conducted by Nordnet's subsidiaries in various countries, consumer authorities, financial supervisory authorities and other authorities in these countries have jurisdiction over several parts of Nordnet's operations, including marketing and sales methods, remuneration models, general business terms and reminders and debt collection. Nordnet is also subject to directly applicable EU regulations and EU directives implemented through local legislation. In the event of significant deficiencies in compliance with regulations applicable to operations requiring permits, the permits granted by the Swedish Financial Supervisory Authority and its Norwegian equivalent, the Norwegian Financial Supervisory Authority (Finanstilsynet) to Nordnet's subsidiaries may be revoked, which would lead to the subsidiaries being forced to cease operations.

Operating in a tightly regulated environment not only exposes Nordnet to the risk of sanction fees and other sanctions, but also entails significant expenses and resource requirements for implementing, adapting, monitoring and otherwise conducting operations in accordance with current rules.

Nordnet's operations are covered by laws and other rules regarding money laundering and terrorist financing in each Nordic country in which the company operates. Deficiencies in compliance with such rules may lead to sanctions, in the form of remarks or warnings, penalty fees and other interventions and may ultimately lead to the revocation of Nordnet's subsidiaries' licenses. There is also a risk that business relationships and Nordnet's reputation could be significantly damaged.

Nordnet processes large amounts of personal data on a daily basis and failure to comply with the Data Protection Regulation (GDPR) can lead to high financial penalties and Nordnet's reputation can be negatively affected to a significant extent.

Nordnet's operations are influenced by a number of environmental factors, the effects of which on the Group's profit and financial position can be controlled to varying degrees. When assessing the Group's future development, it is important to take into account the risk factors alongside any opportunities for profit growth. For a detailed description of risks and the handling of these, please see Note 7.

#### Official supervision.

Nordnet's operations are supervised by the Swedish Financial Supervisory Authority in Sweden and the corresponding authorities in Norway, Finland and Denmark. Operations are largely regulated by laws, instructions, industry agreements, as well as regulation by European supervisory authorities. Within the Group, compliance with regulations is therefore of the utmost importance and is subject to regular review and follow-up, in part by the Board of Directors and in part by the control functions. Among other things, Nordnet's compliance function reviews whether the policies and instructions developed by the operations are appropriate and effective. The compliance function is also tasked with ensuring that Group's employees, including the Board of Directors, receive regular information regarding the regulations applicable to the operations conducted. This occurs, for example through training courses on new and changing business rules and information on the intranet.

#### Permits obtained.

The subsidiary, Nordnet Bank AB, which is subject to supervision by the Swedish Financial Supervisory Authority, is licensed to conduct banking operations in accordance with the Banking and Financing Business Act (2004:297), licensed to conduct securities operations in accordance with the Securities Market Act (2007:528), licensed to conduct insurance distribution in accordance with the Insurance Distribution Act (2018:1231) and licensed to conduct pension savings operations in accordance with the Individual Pension Savings Act (1993:931). The subsidiary, Nordnet Pensionsförsäkring AB, which is also subject to supervision by the Swedish Financial Supervisory Authority, is licensed to run insurance operations in accordance with the insurance operations Act (2010:2043). Nordnet Livsforsikring AS is a wholly owned subsidiary of Nordnet Pensionsförsäkring AB and is subject to the supervision of the Financial Supervisory Authority of Norway. Nordnet Livsforsikring AS is licensed to conduct insurance operations in accordance with the Norwegian Insurance Act (10 June 2005 no. 44). Since 7 April 2022, the subsidiary Nordnet Fonder AB, which is under the supervision of the Financial Supervisory Authority, holds a permit to conduct fund operations in accordance with the Securities Funds Act (2004:46).

#### Share-based incentive programs.

At the Annual General Meeting on 18 April 2023, a decision was made to establish a new incentive program 2023/2026 for all Nordnet Group employees. A total of 413,639 warrants were issued. The subscription and transfer of warrants to those employees in the Nordnet Group who wished to participate in the program was conducted through Nordnet Incentive AB, a wholly owned subsidiary of Nordnet. The subsidiary subscribed for the warrants free-of-charge and transferred them to the program participants at market prices. The number of warrants issued to each participant depended on the participant's function in the Group. The program will be in effect for about three (3) years, with each warrant entitling the holder to subscribe for one (1) share in Nordnet AB (publ). For the warrants, the subscription price per share amounted to 120 percent of the closing price for Nordnet's share on Nasdaq Stockholm on 25 April 2023. The warrants are transferred on market terms at a fair value determined applying the Black & Scholes valuation model. The program may cause a maximum dilution effect of less than 0.5 percent of the company's share capital. A corresponding warrant program 2021/2024 already exists,

comprising 862,695 warrants, as well as a corresponding warrant program 2022/2025 comprising 974,988 warrants. For further information, see Note 13.

#### Sustainability.

Sustainability is integrated into Nordnet's overarching purpose to democratize savings and investment. As a digital savings platform, we can contribute to the healthy development of society, primarily by helping our customers start saving and to shift capital towards sustainable investments. By offering tools for investing, increasing awareness on personal finances, acting for a more even gender balance in savings, as well as making it easy to save sustainably, we promote socially beneficial objectives while improving our long-term competitiveness.

We aim to become a leader in sustainable savings in the Nordic region, which primarily means helping customers invest sustainably by developing digital tools, making knowledge available and offering a wide range of sustainable investment options.

We have as objectives to reduce the climate footprint in accordance with the Paris Agreement for our customers' placements on our platform. We are also working to limit our own emissions and those of our suppliers in accordance with the Paris Agreement and seek to limit our other impacts on the environment.

Nordnet's business model is digital, and we have no physical bank offices, for example. With a scalable digital platform, as well as automated and digital processes, we have limited direct impact on the environment. Nordnet does not conduct any traditional corporate lending, which is why our exposure to the environment and climate-related sectors is low.

Nordnet has prepared a Sustainability Report referring to the GRI Standards. In accordance with Chapter 6, Section 11 of the Annual Accounts Act, Nordnet has chosen to prepare the Statutory Sustainability Report separately from the Annual Report. Nordnet reports the share of environmentally sustainable assets in accordance with the taxonomy regulation. As of 2024, Nordnet reports in accordance with the CSRD. The Sustainability Report is included on pages 10–53 and pages 178–190 of this document.

#### **Events after 31 December 2023.**

The Board of Directors proposes that the Annual General Meeting approve a dividend of SEK 7.20 per share, corresponding to 70 percent of profit after tax for 2023.

On 30 January, Nordnet announced that it would implement a premature redemption of all outstanding Tier 1 capital instruments (AT1) issued on 21 March 2019, with a total outstanding nominal amount of SEK 500 million. The date for early redemption is 21 March 2024.

In February, Nordnet sent notification to Finanstilsynet (the Norwegian financial supervisory authority) that it sought to set up an insurance branch in Denmark. The branch will belong to Nordnet's Norwegian insurance company Nordnet Livsforsikring AS — a wholly owned subsidiary of Nordnet Pensionsförsäkring AB.

In May 2022, the Swedish Financial Supervisory Authority fined Nordnet a fine of SEK 100 million due to violations of the regulations regarding short selling of equities.. Although Nordnet appealed the decision, both the Swedish Financial Supervisory Authority and the

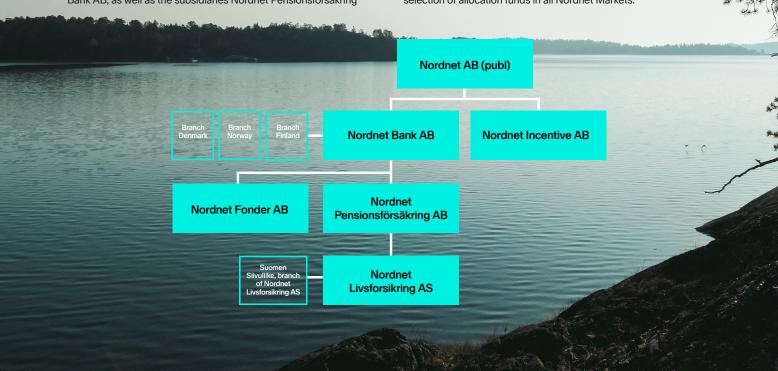
Administrative Court of Appeal assessed the appeal as having been submitted too late. Nordnet applied to the Administrative Court of Appeal for restoration of forfeited time, and the Court announced its decision in line with Nordnet's application in December 2023. The Swedish Financial Supervisory Authority appealed the Administrative Court of Appeal's decision to the Supreme Administrative Court, which, however, rejected the appeal in February 2024. Accordingly, the Swedish Financial Supervisory Authority has processed Nordnet's appeal from June 2022, which arrived on time. A judicial review of the underlying matter, the scale of fines imposed, can now commence.

At the end of February, Gustaf Unger resigned from the Board of Directors at his own request.

#### **Group overview.**

Illustrated below is Nordnet's Group structure as of 31 December 2023. Operations are conducted via the subsidiary Nordnet Bank AB, as well as the subsidiaries Nordnet Pensionsförsäkring

AB, Nordnet Livforsikring AS and Nordnet Fonder AB. Nordnet Incentive AB is a wholly-owned subsidiary of Nordnet AB (publ) that manages subscriptions and transfers of warrants within share-based incentive programs for employees, commencing with the 2021 program. Nordnet Bank AB, offers a broad range of services for savings and investments, margin lending with securities as collateral, mortgages with Swedish and Norwegian homes as collateral, and unsecured loans. In addition, a large number of information services and digital tools are offered for smarter savings. In Norway, Denmark and Finland, bank operations are conducted via branch offices. Through the subsidiary Konsumentkredit in Sweden, unsecured loans are provided to private individuals in the Swedish market. Nordnet Pensionsförsäkring AB conducts life insurance operations focused on pension savings. The Norwegian pension operations are conducted through Nordnet Livsforsikring AS, a subsidiary of Nordnet Pensionsförsäkring AB. In Finland, Nordnet provides investment insurance through a branch of Nordnet Livsforsikring AS. Through Nordnet Fonder AB, Nordnet also offers a selection of allocation funds in all Nordnet Markets.



#### Items affecting comparability

SEK million	2023	2022	2021	2020	2019
Acquisition of Netfonds					-35
Deduction right VAT		38		-20	-30
AML/KYC project		-19			
Sanction from SFSA		-100			
Expenses related to the IPO				-109	
Revaluation of the shareholdings in Tink AB					66
Total	-	-82	-	-129	1

Financial overview, SEK million	2023	2022	2021	2020	2019
Consolidated income statement  Net comission income	1 868	2,029	2,730	2,021	940
Net Interest income	2 639	1,281	727	613	514
Net result of financial transactions	-8	-9	18	-14	66
	50	81	164	69	70
Other operating income	4 <b>550</b>				
Operating income		<b>3,382</b>	3,639	<b>2,689</b> -992	<b>1,589</b> -948
General administrative expenses	-1 072	-1,065	-918		
Depreciation, amortization and impairments	-180	-172	-163	-158	-174
Other operating expenses	-48	-54	-61	-44	-40
Operating expenses	-1 300	-1,291	-1,141	-1,193	-1,162
Net credit losses	-80	-43	-36	-39	-34
Imposed levies	-11	-13	-10	-10	-16
Operating profit	3 160	2,034	2,451	1,447	377
Tax	-582	-382	-467	-274	-38
Operating profit after tax	2 579	1,652	1,985	1,173	339
Earnings per share before dilution, (SEK)	9,83	6.35	7.79	4.55	1.25
Earnings per share after dilution, (SEK)	9,83	6.33	7.75	4.55	1.25
Items affecting comparability, income	-	-	-	-	66
Items affecting comparability, expenses	-	-81	-	-129	-65
Adjusted operating expenses before credit losses	-1 300	-1,210	-1,141	-1,064	-1,097
Adjusted operating profit	2 579	2,115	2,451	1,576	377
Adjusted earnings per share pre amortization of intangible assets due to PPA after dilution (SEK)	9,83	6.77	7.86	5.10	1.37
Key figures					
Adjusted operating income in relation to savings capital - rolling 12 months %	0,59%	0.46%	0.53%	0.60%	0.44%
Adjusted operating expenses in relation to savings capital - rolling 12 months $\%$	0,17%	0.17%	0.17%	0.24%	0.32%
Operating margin %	69%	60%	67%	54%	24%
Adjusted operating margin %	69%	63%	67%	59%	25%
Cost/income %	29%	38%	31%	45%	74%
Adjusted cost/income %	29%	36%	31%	40%	73%
Profit margin %	57%	49%	55%	44%	22%
Return on equity (annulized) %	45%	34%	44%	37%	13%
Adjusted return on equity (annulized) %	45%	36%	44%	40%	13%
Customers	1862900	1,707.800	1,601,000	1,221,500	913,600
Annual customer growth %	9%	10%1	31%	34%	19%
Net savings (SEK billion)	9,8	36.2	83.4	82.2	20.9
Savings ratio %	5%	5%	15%	21%	7%
Savings capital (SEK billion)	824	715	802	565	395
of which shares/derivatives/bonds	573	490	573	404	268
of which funds	184	144	154	100	82
of which deposits	67	81	74	60	45
Average savings capital per customer - 12 months rolling (SEK)	434 800	443,800	477,000	415,900	409,100
Lending (SEK billion)	29,5	27.3	25.4	19.7	15.6
of which margin lending <sup>2</sup>	14,3	12.3	12.4	9.2	7.1
of which mortgages	11,3	10.9	8.9	6.5	4.5
of which personal loans	3,9	4.1	4.1	4.0	4.1
Investments in tangible assets (SEK million)	37	24	46	12	46
Investments in tangible assets excl. company acquisitions (SEK million)	180	137	121	93	91
Number of full-time equivalents at end of period	735	666	648	571	494
rvumber of run-time equivalents at end of period	755	000	040	3/1	494

<sup>&</sup>lt;sup>1</sup> Customer growth over the past 12 months is 7 percent, the corresponding comparative figure for the preceding quarter amounted to 10 percent, including the customer relationships that were terminated within the framework of the previously communicated project on customer documenta-

# Shareholder information.

Nordnet AB (publ) has been listed on the Nasdaq Stockholm Large Cap list under the ticker SAVE since 25 November 2020.

#### **Share price trend**

Nordnet's share price increased by 13 percent in 2023 from SEK 151 to SEK 171, while the OMX Stockholm 30 index increased by 17 percent and Nordnet's comparison group<sup>3</sup> showed an average increase of 4 percent. The highest closing price in 2023 was SEK 189 on 20 February and the lowest was SEK 137 on 6 July. The average closing price was SEK 161. The total return for Nordnet's share was 16 percent in 2023.

#### **Turnover and trade**

The turnover rate in Nordnet's shares in 2023 amounted to 112 percent, meaning that 282 million shares out of a total of 252 million registered shares were traded during the year. This corresponds to a total value of approximately SEK 46 billion. On average, approximately 1.1 million Nordnet shares were traded each trading day, which corresponds to a value of approximately SEK 182 million.

#### **Dividend**

Nordnet AB has only one class of shares. As of 31 December 2023, the number of registered shares amounted to 252 million (of which 375,000 were held as treasury shares). Each share has a quota value of SEK 0.005 and total share capital amounts to SEK 1,259 thousand.

#### **Share capital**

Nordnet intends to distribute 70 percent of the annual reported profit to shareholders via cash dividends. In 2023, Nordnet distributed SEK 1,148 million to shareholders in the form of a cash dividend of SEK 4.60 per share. For the 2023 financial year, the Board of Directors has decided to recommend to the Annual General Meeting on 29 April 2024 that a cash dividend of SEK 7.20 per share be paid. The dividend is expected to be paid out on 6 May 2024.

#### **Shareholders**

As of 31 December 2023, Nordnet had 24,791 identified shareholders and the company's market capitalization was SEK 43 billion. As of 31 December, Öhman Intressenter and Premiefinans held 22 percent and 10 percent of the share capital and votes respectively. No other shareholder holds, directly or indirectly, more than 10 percent of the shares in Nordnet. The ten largest individual shareholders represent 58 percent of the share capital and votes. Foreign shareholders hold 24 percent of the share capital and votes.

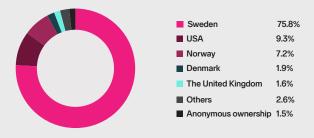
### Share price development for Nordnet, index of peers and market index for 2023 (indexed to 100)<sup>1</sup>



Nordnet
 Peer Group<sup>3</sup>

■ OMXS30

#### Ownership by country based on capital<sup>2</sup>



#### Top 10 shareholders<sup>1</sup>

As of 31 December 2023	Capital	Votes
Öhman Intressenter	21.9%	21.9%
Premiefinans	10.2%	10.2%
Norges Bank	5.3%	5.3%
Swedbank Robur Fonder	4.8%	4.8%
Didner & Gerge Fonder	3.4%	3.4%
Första AP-fonden	2.9%	2.9%
Handelsbanken Fonder	2.9%	2.9%
Vanguard	2.6%	2.6%
AMF Pension & Fonder	2.1%	2.1%
Catharina Versteegh	2.1%	2.1%
Total top 10	58.0%	58.0%

<sup>&</sup>lt;sup>1</sup>Source: Modular Finance

# Corporate Governance Report.

#### Introduction.

The company's governance in 2023 was based on, among other things, the Articles of Association, the Swedish Companies Act, the Nasdaq Nordic Main Market Rulebook for Issuers of Shares, the Swedish Code of Corporate Governance (the "Code") and internal governing documents. This Corporate Governance Report has been prepared in accordance with the Annual Accounts Act and the Code. Nordnet's ambition is to comply with the Code.

#### **Bodies and regulations.**

#### **Annual General Meeting.**

Resolutions concerning Nordnet are taken by the Annual General Meeting, which is the company's highest decision-making body. Some of the obligatory tasks of the Annual General Meeting include approving and adopting the company's balance sheet and income statement, deciding on the distribution of earnings, the remuneration principles for the company's senior executives and on discharge from liability for the Board Members and CEO. The Annual General Meeting also elects Board Members and auditors for the period until the end of the ensuing Annual General Meeting. All shareholders registered in the shareholders' register and who have announced their intent to participate in time have the right to participate at the meeting and vote according to their shareholding. One share entitles the holder to one vote.

#### Nomination Committee.

The Nomination Committee shall safeguard the interests of all shareholders and is tasked with submitting proposals to the Annual General Meeting regarding, among other things, the number of Board Members and the composition of the Board of Directors, including the Chairman of the Board, as well as submitting proposals regarding Board fees, specified for the Chairman of the Board and other Board Members. The composition of the Board of Directors shall be in accordance with applicable laws and regulations, as well as with the policy of fostering diversity on the Board adopted by Nordnet's Board of Directors. An important principle is that the Board of Directors should be of the size and composition most appropriate for the company's needs. Nordnet strives for its Board of Directors to have an equal gender distribution, composed of members of varying ages, with varied education, experience, expertise and with varying geographical backgrounds. The Nomination Committee shall also submit proposals for chairman at the Annual General Meeting and for the election of auditors and their remuneration, as well as proposals for any new instructions regarding the appointment of the Nomination Committee and its work. All shareholders are entitled to propose Board Members to the Nomination Committee.

The Nomination Committee shall comprise the Chairman of the Board and three members appointed by the three largest share-holders in Nordnet, by number of votes, as of 31 July 2023. If any of the three largest shareholders in terms of votes does not exercise the right to appoint a member, the right to appoint a member of

the Nomination Committee passes to the next-largest shareholder by number of votes. The individual representing the largest shareholder in terms of voting rights shall be appointed chairman of the election committee, unless the election committee decides otherwise.

#### **Board of Directors.**

#### Responsibilities of the Board of Directors in 2023.

Nordnet's Board of Directors is the company's second-highest decision-making body. The tasks of the Board of Directors are stated in the Swedish Companies Act, the Articles of Association and the Code. In addition, the work of the Board of Directors is governed by the Board's rules of procedure, as adopted annually by the Board of Directors.

The Board of Directors bears the overarching responsibility for the company's organization and management of the company's affairs and is responsible for safeguarding a well-functioning reporting system. The Board is responsible for the company's long-term operations and significant issues, for reviewing the company's operations including procedures, resolutions on issues concerning policies, financial targets, strategies, the business plan and budget, and continuously monitoring the company's development and financial situation. The Board is responsible for the Group's financial statements being prepared in compliance with legislation and applicable accounting principles, and for quality assuring the Company's financial reporting. The Board also has the task of ensuring that there is satisfactory control of the company's compliance with laws and regulations and that necessary ethical guidelines are established for the company's and the Group's conduct, including appointing an internal auditor, whose work is evaluated annually. The Board of Directors also ensures that the company's management and follow-up of risks are satisfactory. It is also the task of the Board of Directors to appoint the CEO - and, where applicable, a Deputy CEO, to adopt instructions to the CEO and to supervise the work of the CEO.

#### Chairman of the Board.

The Chairman manages the work of the Board to ensure that this is done efficiently and that the Board of Directors fulfils its undertakings in accordance with applicable legislation and other regulations. The Chairman monitors the operations in dialogue with the CEO. The Chairman ensures that the Board Members, through efforts by the CEO, continuously receive sufficient information and background data for their work, and encourages an open and constructive discussion to foster optimum conditions for the work of the Board of Directors.

The Chairman ensures that the Board's work is evaluated annually and verifies that the Board's decisions are implemented effectively. The Chairman shall also receive points of view from the owners and convey these within the Board of Directors.

Nomination Committee prior to AGM			
Name	Shareholding 31/12/2023	Appointed by	Shareholding 31/12/2023
Johan Malm	600	E. Öhman J:or Intressenter Aktiebolag	55,101,392
Catharina Versteeg	5,208,697	Premiefinans K. Bolin Aktiebolag	25,546,261
Frank Larsson	0	Handelsbanken Fonder AB	7,202,713
Tom Dinkelspiel, Chairman of the Board	4,312,389		

#### Composition of the Board.

At the 2023 Annual General Meeting it was decided that the Board would consist of eight regular members and no deputies. In accordance with Nordnet's Articles of Association, the Board of Directors shall comprise at least three and at most ten Board Members. The CEO does not sit on the Board but presents the reports. The company's General Counsel acts as secretary at Board meetings. Where necessary, other company officials also present reports. The table on the next page shows the composition of the Board of Directors as of 31 December 2023 and includes the Board's dependence in relation to Nordnet, Group Management and major shareholders. In accordance with the Articles of Association, Board Members are elected annually by the Annual General Meeting.

#### Promoting diversity in the Board.

Diversity entails a variety of characteristics and skills among individuals. This may apply, for example, to formal skills in the form of education, experience in different sectors, experience from activities in different countries or other background factors such as gender, ethnicity or age. Nordnet strives for equal gender distribution on the Board of Directors, and to have members of varying age, education, experience and expertise, as well as geographical background. Nordnet's Board currently has a diversified composition in terms of expertise, experience and specialist areas, and it is well-adapted in this respect to Nordnet's priority development areas. The gender distribution of the Board is relatively even and, as of the 2023 Annual General Meeting, three Board Members are women.

#### The Board's rules of procedure.

The rules of procedure are set annually at the Board meeting following election. The rules of procedure are reviewed when necessary. The rules of procedure include the Board's responsibilities, tasks and division of labour, the duties of the Chairman, Board meeting agendas, and audit issues. They also state what reports and financial information are to be received by the Board in preparation for each ordinary Board meeting. Furthermore, the rules of procedure include instructions to the CEO complemented by CEO terms of reference. The rules of procedure also stipulate that Remuneration, Audit, Risk, Compliance and IT Committees are to be established and what their tasks will be. The Board's rules of procedure were adopted on 18 April 2023. In addition to these committees, there is a Credit Committee specific to the bank operations.

#### **Evaluation of the work of the Board.**

The procedures state that an annual evaluation of the work of the Board should take place by means of a systematic and structured process. Although the Board's overarching responsibility cannot be delegated, the Board has established the following preparatory committees. Nordnet's Board of Directors currently has four committees: the Remuneration Committee, the Audit Committee, the Risk and Compliance Committee and the IT Committee. All of the committees serve as bodies that prepare matters for the Board of Directors. In addition to these committees, there is a Credit Com-

mittee specific to the bank operations that has been established by the Board of Directors of the subsidiary Nordnet Bank AB.

#### Remunerations Committee.

The Remuneration Committee is responsible for preparing matters regarding salaries and fees, remuneration and other terms of employment for the CEO, for Group Management and for all company employees, as well as incentive programs, pension provisions and other financial benefits for Group employees, where applicable. The Committee shall also analyze and present to the Board the risks associated with the company's remuneration system and, on the basis of this analysis, identify and present the employees who should be considered to have a substantial impact on the company's risk profile. Reporting to the Board takes place regularly.

#### Audit Committee.

Without affecting the responsibilities and tasks of the Board as a whole, the Audit Committee is principally tasked with assuring satisfactory control of risk management, internal control, accounting and financial reporting and with ensuring that the company's financial reporting is prepared in accordance with the law, other relevant regulations and applicable accounting standards. In addition, taking the company's risk strategy into account, the committee shall propose changes and submit the Board of Directors' recommendations regarding the company's capital and liquidity strategy, and continuously monitor compliance with internal and external regulatory requirements on capital and liquidity. The Audit Committee shall also ensure on-going contact with the external auditors, proposing guidelines for the Board regarding which services, beyond auditing, that may be procured from the auditor, examining and monitoring the auditor's impartiality and independence, and assisting in the preparation of proposed resolutions by the Annual General Meeting regarding the election of auditors. In addition, the Committee shall inform the Board of the results of the audit, including on how the audit contributed to the reliability of the company's financial reporting. Since the autumn of 2023, the Audit Committee assesses the implementation of the sustainability strategy. The progress of the sustainability work is reviewed at each committee meeting.

#### Risk and Compliance Committee.

In its work and, where necessary, in dialogue with the external auditors, the internal audit function, those responsible for the Risk Control and Compliance functions, as well as with other committees established by the Board of Directors and with Group Management, the Risk and Compliance Committee shall monitor the structure of the operations and the organization, as well as their regulatory compliance, risk profile and reporting of risks and incidents, increasing the Board's opportunities for insight into these areas. Transparency in ICT operations to ensure information security and compliance with internal and external requirements in these areas. The Committee shall also propose to the Board a plan for the internal audit. It shall also appraise the reviews of the operations and the policies applied conducted by the control functions and report on these to the Board of Directors.

Board Members 2	023							
Board Member <sup>1</sup>	Elected	Position	Independent in relation to Nordnet and Group Management/major shareholders:	Remunera- tion Committee	Credit Committee	Audit Committee	Risk- and Compliance Committee	IT Com- mittee
Tom Dinkelspiel	2007	Chairman of the Board	Yes/No	Member	Chairman	Member	Member	Member
Anna Bäck	2020	Board Member	Yes/Yes	Chairman				Chairman
Fredrik Bergström	2022	Board Member	Yes/Yes	Member			Member	
Karitha Ericson	2019	Board Member	Yes/Yes		Member		Member	
Charlotta Nilsson	2021	Board Member	Yes/Yes			Member		Member
Gustaf Unger	2022	Board Member	Yes/Yes		Member	Member	Chairman	
Henrik Rättzén	2022	Board Member	Yes/Yes			Chairman		
Per Widerström	2017	Board Member	Yes/Yes					Chairman

<sup>1</sup>Per Widerström was a member of the Board until 7 August but then stepped down at his own request to embark on a new CEO assignment.

#### IT Committee.

The IT Committee is tasked with ensuring that Nordnet's IT strategy and platform are effectively defined, planned and implemented in accordance with Nordnet's overarching strategy and targets.

#### Credit Committee.

For the subsidiary Nordnet Bank AB, the Board has established a Credit Committee which, among other things, is tasked with determining and preparing the limits for which the Board of Directors of the company is responsible in accordance with the Board procedures, and to prepare the annual reporting of the limits set by the Board. According to the current rules of procedures, the Credit Committee shall also report to the Board of Directors of Nordnet AB (publ).

#### **CEO and Group Management.**

The CEO leads the operations within the guidelines and instructions established by the Board. The most recently established instructions to the CEO were set by the Board on 18 April 2023. The CEO is responsible for compliance with the objectives, policies and strategic plans for the Group established by the Board. The CEO also produces the data needed to monitor the Group's position, profit, liquidity and general development, background data and decision materials in preparation for Board meetings and also presents these matters. The CEO leads the work of the Group Management team and makes decisions in consultation with other members of management. Group Management holds regular meetings at which both strategic and operational issues are discussed. Group Management comprises the heads of key business areas within the Group, see pages 83–84.

#### Audits and auditors.

At the 2023 Annual General Meeting, accounting firm Deloitte AB was re-appointed as the auditor for Nordnet AB and all of its subsidiaries until the 2023 Annual General Meeting. The principal auditor is Authorized Public Accountant Patrick Honeth. The auditors' task is to review the annual accounts, the consolidated accounts and the accounting, as well as the administration by the Board of Directors

and the CEO. The auditors report back on their findings on a number of occasions during the year and are present at the Board meetings that deal with annual accounts. The auditors also maintain continuous contact with the Audit Committee and with the Risk and Compliance Committee.

#### Internal audit.

In accordance with the Board's procedures and procedures for the subsidiaries Nordnet Bank AB and Nordnet Pensionsförsäkring AB, Nordnet Livforsikring AS and Nordnet Fonder AB, as well as the regulations of the Swedish Financial Supervisory Authority, the Board has appointed an independent review function/internal audit, which is directly subordinate to the Board. The work of the internal audit is based on a Policy adopted by the Board of Directors. The internal audit shall review and periodically assess the appropriateness and efficiency of the company's internal controls. Since 2018, this function has been held by EY.

#### The Board's control of financial reporting.

The Board monitors and assures the compliance of the financial reporting with external regulations and is responsible for following up the internal control of the financial reporting (ICFR). The ICFR framework is closely related to Nordnet's internal framework for operational risk management. Methods and processes are coordinated and adapted to assure efficiency and accuracy. Internal governance and control are performed by the Board, Group Management and other personnel, and the framework is designed to provide reasonable assurance that objectives regarding operations, reporting and compliance with regulations and policies are met. The framework serves to identify risks and establish control environments with clear roles and responsibilities. The ICFR work, as well as general operational risk control, is based on COSO (Committee of Sponsoring Organizations of the Treadway Commission) and is based on five internal control components:

 Control environment – The control environment sets the overall tone for the organization and forms the basis for all other components of internal control. Corporate culture is of fundamental importance for the effective design and implementation of internal control. Nordnet has instructions, policies, procedures, authorization manuals and guidelines related to the management of the operations, compliance, financial accounting and reporting. All documents are published and made available to all personnel.

- Risk assessment The CEO bears the overall responsibility for managing the Group's risks. Risk management is an integral part of the operational process and must be assessed and managed in accordance with the Risk Policy. To be able to exercise effective internal control of financial reporting, the company must understand and identify the risks to which the operations are exposed and, as part of the assessment process, determine and consider the consequences of the relevant risks. Nordnet continuously assesses the risks in its financial reporting that is, it identifies, analyzes and assesses the principal risks of misstatement in the financial reports.
- Control activities Control activities occur throughout the organization, at all levels and in all functions. The control activities serve to detect, guard against and limit risks and the assumption of risks in operations while also preventing deviations and errors in financial reporting. To assure the quality of the financial reporting, controls are performed at several levels. The internal reporting and control systems are based on internal regulations for financial planning, accounting principles and reporting, as well as the follow-up and analysis of financial results.
- Information and communications All employees must understand their own role in the internal control system, as well as how individual activities relate to the work of others. Employees are provided with tools for the upstream and downstream communication of important information within the company and to external parties. Each manager is responsible for adequate reporting regarding internal control to the next management level, thereby securing communications throughout the organization. Instructions, policies and guidelines are made available and kept updated via Nordnet's intranet. Knowledge and awareness of these are obtained by means of ongoing internal training and information for the various departments and functions covered by the responsibility for internal reporting.
- Supervision An annual follow-up of the controls included in the ICFR framework is performed to assure the reliability of the process. Self-assessment is performed on a regular and ongoing basis. Assessment results are followed up by the finance department and reported to the Audit Committee.

In 2023, the interim report for the third quarter was subject to review by the company's auditors. In addition, on four occasions over the year, the company's auditors conducted reviews regarding the inclusion of the interim result in the capital base for Nordnet Bank AB and its consolidated situation.

The Group's auditors report their findings to the Board in connection with the review of the annual accounts. In addition, the Board meets the company's auditors at least once a year — without the presence of the executive management team — to learn about the focus and scope of the audit, and to discuss coordination between the external and internal audits and views of the Company's risks.

#### Internal control.

Internal control aims to ensure that work and reporting processes are carried out efficiently and responsibly in accordance with current regulations, laws and policies, while also maintaining an effective risk management function to strengthen the business over time. Nordnet works with risk control in accordance with the principles of the three lines of defence, where the business operations constitute the first line of defence and are tasked with identifying, managing and mitigating potential risks. The second line of defence comprises the risk control and regulatory compliance functions and, as far as the subsidiaries Nordnet Pensionsförsäkring AB and Nordnet Livsforsikring AS are concerned, their actuarial functions. Risk Control, Compliance and the actuarial function are independent of the business operations. The functions are responsible for developing principles and frameworks for Nordnet's risk management, obtaining the operations' risk assessments and conducting independent reviews. They must also promote a healthy risk culture by supporting and educating Nordnet's employees. These functions are directly subordinate to the CEO and report regularly to both the CEO and the Board of Directors. The internal audit constitutes the third line of defence, which on behalf of the Board monitors both the first and second line of defence. The internal audit is directly subordinate to, and reports to, the Board and its main task is to assess, based on the audits conducted, the extent to which internal governance, risk management and internal control are appropriate and effective, and to submit an opinion in this regard to the Board of Directors and the CEO.

The tasks performed by the Audit Committee ensure that the financial reports maintain a high standard.

The Board follows up and assesses this quality assurance through monthly reports on the company's earnings trend, credit and risk exposure and relevant sector data and by addressing the Group's financial situation at each Board meeting.

#### Work over the year.

#### 2023 Annual General Meeting.

Nordnet's Annual General Meeting for 2022 was held on 18 April 2023. Counsel Fredrik Lundén was elected chairman of the Meeting and Nordnet's General Counsel, Carl Dahlborg was elected as secretary.

The resolutions of the Annual General Meeting included:

- Dividend of SEK 4.60 per share.
- That the Board should have eight regular members and that the company shall have the Deloitte firm of auditors as its auditor, without a deputy auditor.
- Authorization of the Board of Directors to decide to acquire a maximum of 10 percent of all shares in Nordnet.

Attendance at Annual General Meeting	
2023 (ordinary)	76%
2022 (ordinary)	72%
2021 (ordinary)	70%
2020 (ordinary)	100%
2019	100%
2018	100%

Percentage of votes and capital.

#### **Board of Directors.**

The Board of Directors held 22 meetings over the year, 11 of which were held as a per capsulam meeting. The table below shows the attendance at the meetings in 2023. The work of the Board takes place at an intensive pace to support the CEO and other members of Group Management. At each ordinary meeting, the Board discussed a number of issues relating to strategic and business-related areas. During the year, Nordnet officials have also taken part in Board meetings by presenting reports. Every month, the Board receives a report on the company's earnings trend, credit and risk exposure and relevant industry data. See the table of Board meetings at which decisions were made in 2023 on the next page. For information about Board Members, see the section Board of Directors and auditors on pages 80–82.

#### Remunerations Committee.

As of 31 December 2023, the Remuneration Committee comprised Anna Bäck (Chair), Tom Dinkelspiel and Fredrik Bergström. The committee has conventionally handled matters as wages, compensation, incentive compensation and other employment terms for the CEO and the company's top management and incentive programs for key employees. In 2023, the Committee held ten meetings, of which eight were held as a per capsulam meeting.

#### Audit Committee.

As of 31 December 2023, the members of the Audit Committee were Henrik Rättzén (chairman), Tom Dinkelspiel, Charlotta Nilsson and Gustaf Unger. Among other matters, the committee has prepared the work of the Board regarding quality assurance of financial reporting, continuous updating in the area of sustainability and maintained constant contact with the external auditor. The Committee held seven meetings in 2023.

#### Risk and Compliance Committee.

The Risk and Compliance committee comprised Gustaf Unger (chairman), Karitha Ericson, Tom Dinkelspiel and Fredrik Bergström. Among other tasks, the Committee monitors the structure, regulatory compliance, risk and incident reporting in the organization and its operations, increasing the Board of Directors' opportunities for insight regarding these matters. The Committee held six meetings during the year, of which two were held as a per capsulam meeting.

## Credit Committee (committee in Nordnet Bank AB).

At the end of 2023, the Credit Committee comprised Tom Dinkelspiel (chairman), Karitha Eriksson and Gustaf Unger. The Committee has determined and prepared the annual report of the Board's limits and limits on the company's Board of Directors in accordance with the applicable Credit Policy and credit instruction at all times. Over the year, the Committee held six meetings, four meetings by mail and three extraordinary meetings.

#### IT Committee.

As of 31 December 2023, the IT Committee comprised Anna Bäck (Chairman), Tom Dinkelspiel and Charlotta Nilsson. The Committee has prepared issues relating to IT operations and IT development. The Committee held five meetings in 2023.

Attendance at Board a	and Committee meeting	js in 2023²				
	Board meetings <sup>1</sup>	Remuneration Committee <sup>3</sup>	Credit Commit- tee <sup>4,5</sup>	Audit Committee	Risk and Compliance Committee <sup>6</sup>	IT Committee
Tom Dinkelspiel	11 of 11	10 of 10	6 of 6	7 of 7	6 of 6	2 of 5
Anna Bäck	11 of 11	10 of 10				5 of 5
Fredrik Bergström	11 of 11	9 of 10			6 of 6	
Karitha Ericson	11 of 11		6 of 6		6 of 6	
Charlotta Nilsson	11 of 11			6 of 7		5 of 5
Gustaf Unger	11 of 11		3 of 3	7 of 7	6 of 6	
Henrik Rättzén	11 of 11			7 of 7		5 of 5
Per Widerström	5 of 11					5 of 5

<sup>&</sup>lt;sup>1</sup> In addition to the pre-planned (regular) meetings listed below, 11 extraordinary Board meetings were held, including meetings held as a per capsulam meeting. <sup>2</sup> Per Widerström stepped down as Board Member on 7 August 2023, having secured a CEO appointment incompatible with his Board work due to time constraints. Gustaf Unger stepped down as Board Member on 22 February 2024, having secured a CEO appointment incompatible with his Board work.

<sup>&</sup>lt;sup>3</sup> Per Widerström attended five out of five Board meetings before stepping down from the Board.

<sup>&</sup>lt;sup>4</sup> Anna Bäck was appointed chair of the Remuneration Committee, effective 16 March. Former committee chairman, Tom Dinkelspiel, has remained as a Member. <sup>5</sup> In addition to the pre-planned (regular) meetings of the Credit Committee listed below, seven extraordinary meetings were held, including meetings held as a per capsulam meeting. Gustaf Unger was appointed as a member of the committee effective 18 April 2023.

<sup>&</sup>lt;sup>6</sup> Because Per Widerström stepped down from the Board of Directors in August 2023, Tom Dinkelspiel was elected as a new Board Member and Anna Bäck was appointed Chairman of the Board. Gustaf Unger attended six out of six Board meetings in 2023.

#### CEO.

Lars-Åke Norling has been the CEO of Nordnet since 1 September 2019.

#### Group Management.

At 31 December 2023, Group Management comprised eleven people: Lars-Åke Norling, Rasmus Järborg, Lennart Krän, Per Lindberg, Elias Lindholm, Martin Ringberg, Mari Rindal Øyen, Johan Tidestad, Carina Tovi, Suvi Tuppurainen and Tine Vestergren Uldal.

The management team is presented in greater detail in the Group Management section on pages 83–84.

Decisions are made by the Board of Directors or the CEO via the Nordnet Management Forum (NMF), which is the management team's weekly meeting, or are delegated to the function deemed appropriate through policies, instructions and role descriptions. Follow-up occurs through, for example, the Regulatory Forum (RegF), with regard to risk and regulatory compliance issues, and through the Revenue Forum (RevF), with regard to other business matters.

The NMF addresses issues of income and expenses and reviews strategic initiatives and similar overarching administration matters. RegF addresses issues involving risk and compliance culture, the status of measures aimed at managing or mitigating the risks identified in the operations (including regulatory compliance risks), as well as the expected effects and handling of new regulations. RevF addresses in detail the income trend for each of the four home markets and the factors driving the development of income-specific initiatives and customer experience-related initiatives. Product launch plans are also addressed as necessary.

## Guidelines for remuneration of senior executives.

The following guidelines for the remuneration of senior executives were adopted at the Annual General Meeting on 29 April 2021.

The guidelines are also to encompass Nordnet's Board Members, to the extent that they receive any remuneration beyond the Board

fees they receive. The guidelines are to be applied to the agreed remunerations, and to amendments made to previously agreed remunerations. The guidelines do not cover remunerations approved by the Annual General Meeting.

# How the guidelines foster Nordnet's business strategy, long-term interests and sustainability.

Put briefly, Nordnet's business strategy entails Nordnet democratizing savings and investments, which is Nordnet's core operation. This means that Nordnet gives private savers access to the same information and tools as professional investors by, for example, offering easily accessible and inexpensive online share trading. Nordnet's vision is to be the first choice for Nordic savers. For more information about Nordnet's business strategy, see www.nordnetab.com.

A prerequisite for Nordnet to be able to realize its business strategy and safeguard the Group's long-term interests, including sustainability, is that Nordnet is able to attract, motivate and retain senior executives in competition with comparable Nordic companies, primarily Nordic banks and credit market companies. These guidelines must therefore make it possible for senior executives to be offered overall remunerations that are market-based and competitive. At the same time, Nordnet's remuneration system must be compatible with sound and efficient risk management, fostering this and counteracting excessive risk-taking. The remuneration of senior executives in Nordnet must also be in accordance with Nordnet's business strategy, targets, values and long-term interests; designed to avoid conflicts of interest between employees, Nordnet and Nordnet's customers; based on quantitative business objectives and qualitative criteria reflecting regulatory compliance, appropriate treatment of Nordnet's customers and the quality of the services provided. Overall variable remuneration may not limit Nordnet's ability to maintain an adequate capital base and liquidity or to strengthen the capital base if necessary.

Nordnet applies a remunerations system designed to attract and retain the required expertise for Nordnet to deliver on its strategy and

Doord mostings in 2027	
Board meetings in 2023	
Meeting	Matters addressed
January	Year-end report. Proposed dividend. Possible revaluation of balance sheet items. Reporting of other companies Q4. Compliance incl. SAE/AML, risk control and security. Board training.
March	ICLAAP. Annual Report Report on the audit work and the Board's meeting with the auditor. Reporting from Board committees and Nordnet Pension.
April	Interim report Q1. Reporting of other companies for Q1. Solvency reporting at Group level ("RSR," "QRT" and "SFCR"). Compliance incl. SAE/AML, risk control and security. Approval of stress scenarios in ORSA. Reporting from Board committees and Nordnet Pension. Board training. Follow-up of employee satisfaction.
Jun	Forecast update. Reporting from Board committees and Nordnet Pension. Board training.
July	Results for the first six months January—June.
August	Strategy work.
September	Reporting of other companies for Q2. Compliance incl. SAE/AML, risk control and security. Reporting from Board committees and Nordnet Pension. Board training.
October	Interim report Q3. Reporting from Board committees and Nordnet Pension. Board training.
November	Strategy work. Financial plan and budget.
December	ORSA. Reporting of other companies Q3. Compliance incl. SAE/AML, risk control and security. Annual presentation credit limits. Board training. Annual ratification of policy updates.

targets. Employees primarily receive fixed remuneration based on their role, expertise and performance vis-á-vis established targets. For relevant functions and roles, these targets also include sustainability-related targets. Variable salaries occur to only a very limited extent in the form of, for example, gratuities for specific efforts, such as initiatives at critical stages of a project. No bonus programs are currently in place.

The Board of Directors takes the view that a well-balanced fixed remuneration, combined with participation in any share-related incentive programs approved by the Annual General Meeting and opportunities for variable remuneration, provide the conditions that Nordnet needs to be a competitive employer.

#### Forms of remuneration.

Remuneration of senior executives shall comprise:

- fixed salary,
- possible variable cash remuneration,
- the opportunity to participate in long-term share-based incentive programs approved by the Annual General Meeting,
- pension, and
- any other customary benefits.

#### Fixed salary.

Senior executives' fixed salaries are revised annually and must be competitive and based on the expertise, responsibility and performance of the individual. Fixed remuneration shall also constitute a sufficiently large part of the senior executive's total remuneration that the variable part can be set at zero.

#### Variable salary.

The guidelines for remuneration of senior executives, adopted by the regular Annual General Meeting on 29 April 2021 includes the possibility of paying variable salary. Since no Nordnet executive receives such remuneration in practice, guidelines for variable salary are not detailed in the Annual Report. These can instead be accessed from Nordnet's website nordnetab.com.

#### Long-term share-based incentive programs.

Long-term share-based incentive programs must be approved by the Annual General Meeting and are therefore not covered by these guidelines.

#### Targets and target follow-up.

Nordnet strives to set relevant targets, based on our strategic priorities. The targets are based on our stakeholder dialogue and shall be quantifiable to the greatest extent possible.

#### Pensions and other customary benefits.

Pension provisions are to be covered by the same policy for all senior managers, with the exception of the CEO. These must be defined-contribution pension commitments and secured through payments of premiums to insurance companies. The scale of the pension premiums is set out in Nordnet's pension plan and must, in all material respects, correspond to the provision levels applicable in accordance with the BTP 1 plan and subject to the limitations in relation to fixed annual salary following from this. No provisions are made for salary components exceeding 30 income base amounts calculated on an annual basis. For members of Group Management not residing in Sweden, local rules are applied that lead to a pension under equivalent terms. Variable cash compensation shall, in principle, not be pensionable.

Other possible benefits shall be customary and facilitate executives' opportunities to fulfil their duties, such as a company car, company

health care and health insurance.

#### Remuneration in connection with recruitment.

Beyond the aforementioned forms of remuneration, remuneration must also, in certain exceptional cases and in accordance with Nordnet's Remuneration Policy, be paid in connection with recruitment to attract certain key individuals to Nordnet as part of Nordnet's business strategy. Such remuneration shall be limited to the first year of employment.

#### Termination.

In the event of termination by Nordnet, the period of notice may not exceed 12 months. In the event of resignation by the executive, the period of notice may not exceed six months. Severance pay shall not occur.

## Remuneration Policy for banking and insurance operations.

In addition to these guidelines, Nordnet's Board of Directors has, in accordance with Swedish Financial Supervisory Authority's regulations regarding remuneration systems in credit institutions and the EBA's guidelines for sound remuneration policy, adopted a Remuneration Policy covering all employees of Nordnet and Nordnet's regulated subsidiaries. The Remuneration Policy is compatible with and promotes sound and efficient risk management and counteracts excessive risk-taking. Further information about Nordnet's Remuneration Policy is published on Nordnet's website.

## Salary and terms of employment for employees.

In preparing the Board's proposal for these remuneration guidelines, salaries and terms of employment for the Group's employees have been taken into account. The guidelines do not deviate from the remuneration systems generally applied for other employees within the Group. In other respects too, the remuneration, forms of remuneration and wage trends for senior executives are deemed to be in line with salaries and terms of employment for other Group employees.

#### Decision-making process.

The Board of Directors has established a Remuneration Committee. The Committee's tasks include preparing the Board's decisions regarding proposed guidelines for remuneration to senior executives. Every four years at least, the Board of Directors shall submit proposals for guidelines for the remuneration of senior executives for adoption by the Annual General Meeting. The guidelines shall apply until new guidelines have been adopted by the Annual General Meeting.

The Remuneration Committee shall also monitor and assess variable remuneration programs for Executive Management, in the event that any such programmes are implemented, the application of guidelines for the remuneration of senior executives and applicable remuneration structures and levels within Nordnet.

#### Deviations from the guidelines.

Where, in an individual case, the Board of Directors finds that there are specific reasons to do so, and to meet Nordnet's long-term interests, including sustainability, or to safeguard Nordnet's financial position, the Board of Directors is entitled to deviate from these guidelines, provided that the deviation is not covered by provisions in the Swedish Financial Supervisory Authority's regulations or in the EBA's guidelines. If the Board deviates from the guidelines, it shall present the reasons for this at the next Annual General Meeting.

Additional information on the remuneration of senior executives is reported in Note 13 and in the Remuneration Report for 2023. The Remuneration Report for 2023 will be published on the Group's website www.nordnetab.com.

## Remunerations paid to senior executives and auditors.

#### **Board of Directors.**

At the Annual General Meeting on 18 April 2023, it was decided that the remuneration for the current year to the Chairman of the Board and each of the Board Members shall be SEK 450,000 (SEK 450,000). Additional fees are paid for work on the Board's committees. Fees for work on the Risk and Compliance Committee amount to SEK 150,000 to the chairman and SEK 80,000 for each of the other committee members. Fees for work on the Remuneration Committee amount to SEK 40.000 to the chairman and SEK 25,000 for each of the other committee members. Fees for work on the Audit Committee amount to SEK 100,000 to the chairman and SEK 60.000 for each of the other committee members. Fees for work on the IT Committee amount to SEK 75.000 to the chairman and SEK 40,000 for each of the other committee members. Fee for the work to Credit Committee in Nordnet Bank AB amounts to SEK 75,000 more chairman and to SEK 40,000 more other information members of the committee.

#### CEO.

In 2023, the fixed monthly salary paid to the current CEO, Lars-Åke Norling, amounted to SEK 627,466. The CEO is entitled to monthly pension provisions corresponding to 35 percent of his basic salary.

#### **Auditors.**

Compensation totalling SEK 10,005 thousand (10,444) was paid to auditors and audit firms in 2023. This amount relates to audits, advice and other review work linked with auditing. Remuneration has also been paid for other advisory services, most of which pertains to consultation concerning accounting and tax issues.

For further information on the remuneration of senior executives and auditors, see Note 13.

# **Board of Directors and** auditors.

The details of the Board of Directors and Management were valid as per 31 December 2023.







**Tom Dinkelspiel** Chairman of the Board

Born: 1967

Elected: Chairman of the Board since 2019 and Board Member since 2007.

Committees: Chairman of the Credit Committee. Member of the Audit Committee, IT Committee. Remuneration Committee and the Risk and Compliance Committee.

Education and work experience: Studies at the Stockholm School of Economics. Previous experience of positions including CEO, derivatives trader and stockbroker at subsidiaries of E.Öhman J:or AB.

Other significant assignments: Chairman of the Board of VNV Global AB (publ) and E. Öhman J:or AB. Chairman of the Board and CEO of E. Öhman J:or Alternative Investments AB. Board Member of Premiefinans K. Bolin AB, E. Öhman J:or Luxembourg S.A., E. Öhman J:or Intressenter AB and Kogmot AB. Own and related parties' holdings in the company:

85,414,209 shares

Independent in relation to Nordnet and Group Management/major shareholders: Yes/No

#### Fredrik Bergström **Board Member**

Born: 1970 Elected: 2022

Committees: Member of the Risk and Compliance Committee and Remuneration

Education and work experience: Graduate economist from Uppsala University. Previous experience includes positions as CEO of Länsförsäkringar AB and of leading positions within, among others, If and SBAB. Other significant assignments: CEO Euro Accident Livförsäkring AB. Board Member of Claims Carbon Institute AB and FFOMAB

Own and related parties' holdings in the company: -

Independent in relation to Nordnet and Group Management/major shareholders:

#### Anna Bäck **Board Member**

Born: 1972 Elected: 2020

Committees: Chairman of the Remuneration

Committee and IT Committee.

Education and work experience: Master's degree in industrial economics, Linköping University and Executive MBA, Stockholm School of Economics. Anna has extensive experience in digitization and innovation. Previous experience as CEO of Kivra AB, as well as CTO at Glocalnet and operations manager at Veryday and Associate Partner at McKinsey & Company.

Other significant assignments: Board Member of Permobil AB, Tradera AB, Systembolaget AB and Svenska Skidskytteförbundet, as well as Chairman of Precis Digital AB. Member of the SNS Board of Trustees.

Own and related parties' holdings in the

70,000 shares

Independent in relation to Nordnet and Group Management/major shareholders: Yes/Yes

#### **Board of Directors and auditors.**







#### Karitha Ericson Board Member

**Born:** 1973 **Elected:** 2019

Committees: Member of the Risk and Compliance Committee and Credit Committee. Education and work experience: Education in advanced organizational psychology at Stockholm University and BA in psychology, Stockholm University. Karitha has experience of private equity operations and 'the financial sector. Karitha has worked as HR Manager for EQT and various units within SEB. Karitha was previously Deputy CEO and COO at Grant Thornton Sweden AB for ten years. Karitha is currently globally responsible, within Grant Thornton International, for its member states, sustainability and global HR management.

Other significant assignments: Board Member of Kamami AB.

Own and related parties' holdings in the company: 100,229 shares

Independent in relation to Nordnet and Group Management/major shareholders: Yes/Yes

## **Charlotta Nilsson**Board Member

Born: 1970 Elected: 2021

**Committees:** Member of the Audit Committee and IT Committee.

Education and work experience: Master of Arts in physics, Umeå University and Executive MBA, Stockholm School of Economics and OWP at IMD Business School in Lausanne. Charlotta has solid experience in innovation and growth and has, among other things, been an investment expert in blockchain, AI and start-ups for Vinnova. Charlotta has held several senior positions such as VP at Tieto AB, CEO at SIS, EVP at Vizrt (publ), MD at Ardendo AB and Deputy MD at Epsilon Hightech Innovation.

Other significant assignments: COO at Paradox Interactive (publ) including as Board Member in subsidiaries. Board Member of Industrifonden, Advisense and the Computer Games Industry Spelplan ASGD AB. Own and related parties' holdings in the company:

Independent in relation to Nordnet and Group Management/major shareholders: Yes/Yes

#### **Henrik Rättzén** Board Member

**Born:** 1965 **Elected:** 2022

Committees: Chairman of the Audit Com-

mittee.

Education and work experience: MBA from Uppsala University. Henrik has previous experience as CFO at Codan/Trygg Hansa, Postnord, Carnegie Investment Bank and SJ, and as a partner at KPMG.

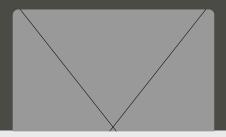
Other significant assignments: Chairman of the Board of Hedvig Försäkring, Freedom Group, Bumbee Labs and Tangerine Smart Climate Technologies. Board Member of Fjärde AP-fonden and Alektum. He also works as a senior adviser.

Own and related parties' holdings in the company:

3,250 shares

Independent in relation to Nordnet and Group Management/major shareholders: Yes/Yes

#### **Board of Directors and auditors.**



#### **Auditors**

The company's auditor has been Deloitte AB since 2017. The principal auditor is Patrick Honeth, born in 1973, Authorized Public Accountant and licensed auditor for financial companies.

#### **Group Management.**



Lars-Åke Norling CEO

**Born:** 1968 **CEO since:** 2019

Education and work experience: MA in Business Administration, School of Business, Economics and Law at the University of Gothenburg, Civil Engineering Program in Technical Physics, Uppsala University and MA in Systems Engineering, Case Western Reserve University, USA. Lars-Åke has more than 20 years of experience from companies in technology, media and telecom (TMT). Previous experience includes several management positions, including as CEO and CTO of Telenor Sweden.

Own and related parties' holdings in the company:

1,697,393 shares and 54,053 warrants.

Other significant assignments: Board Member of Tele2 AB.



Rasmus Järborg Chief Product Officer, Deputy CEO

**Born:** 1976

Chief Product Officer since: 2018.

Deputy CEO since: 2021

Education and work experience: Graduate in Business Administration, Stockholm School of Economics. Previous experience from several management positions at SEB, including Chief Strategy Officer and responsible for the bank's digitization and digital channels. Rasmus has previously worked at UBS Investment Bank in London.

Own and related parties' holdings in the company: 339,801 shares and 60,151

Other significant assignments: Board Member of Sleep Cycle AB.



**Lennart Krän** Chief Financial Officer

Born: 1965

Chief Financial Officer since: 2019
Education and work experience: Graduate in Business Administration, Stockholm University and Certified Financial Analyst, Stockholm School of Economics. Lennart has experience from the financial services sector and has held positions as CEO of SalusAnsvar and as CFO of SBAB and of HSBC Investment Bank, Stockholm Branch. Own and related parties' holdings in the company:

100,000 shares and 54,581 warrants
Other significant assignments: -



**Per Lindberg** CEO, Nordnet Pensionsförsäkring

Born: 1976

CEO of Nordnet Pensionsförsäkring since:

2023

Education and work experience: Studies within the Bachelor of Economics program and the civil engineering program at Stockholm University and the Royal Institute of Technology. Previous experience from SPP in various management roles, including as Chief Risk Officer, Head of Product & Operations and CEO of SPP Life Insurance AB. Active within SPP as actuarial consultant at Towers Watson.

Own and related parties' holdings in the

shares and – warrants



Elias Lindholm Chief Technology Officer

Born: 1980

Chief Technology Officer since: 2021
Education and work experience: Graduate
Engineer in Electrical Engineering, Chalmers
University of Technology, Gothenburg. Elias
has more than 11 years of experience from
Avanza, of which the last three as CTO. Elias
joined Nordnet in 2019 as the Head of Nordnet's Development Department, he became
CTO in 2021.

Own and related parties' holdings in the company:

25,595 shares and 16,087 warrants

Other significant assignments: -



Martin Ringberg Country Manager Sweden

Born: 1976

Country Manager Sweden since: 2018
Education and work experience: Graduate in Business Administration, Stockholm University. Previous experience from several management positions within SEB - mainly in savings and investments.

Own and related parties' holdings in the company: 183,081 shares and 30,075 warrants (through companies).

Other significant assignments: Board Member at MAMM Invest AB.

#### **Group Management.**



Mari Rindal Øyen Country Manager Norway

Born: 1982

Country Manager Norway since: 2023 Education and work experience: MA in Finance from the Norwegian Business School. Mari has more than 17 years of experience from Storebrand and joins us most recently from the role of SVP Savings Retail Market. Own and related parties' holdings in the company:

- shares and - warrants

Other significant assignments: Board Member of Dimensions Agri Technologies.



Johan Tidestad
Chief Communications Officer

Born: 1968

Chief Communications Officer since: 2012 Education and work experience: BA in Laws, Uppsala University and studies at Berghs School of Communication. Previous positions as Deputy CEO and Chief Legal Counsel at E-Trade Sweden, a digital bank for savings and investments based in the US, and founder and Deputy CEO of fund company Bergsgård Petersson Fonder AB. Own and related parties' holdings in the company:

60,559 shares and 25,619 warrants Other significant assignments: –



**Carina Tovi**Chief Human Resource Officer

Born: 1965

Chief Human Resource Officer since: 2018 Education and work experience: Graduate in Business Administration, Stockholm School of Economics. Carina has more than 30 years of experience from the financial industry, mainly in asset management, business and product development. Previous positions as CEO and Head of Products at Swedbank Robur Fonder.

Own and related parties' holdings in the company:

83,081 shares and 11,373 warrants

Other significant assignments: Board Member of Mattecentrum.



**Suvi Tuppurainen**Country Manager Finland

**Born:** 1976

Country Manager Finland since: 2016 Education and work experience: MA in Economics, University of Tampere, Finland. Suvi has 25 years of experience from the financial sector and has held positions including Head of Online Desk, stockbroker, specialist in payment control and risk management at eQ Bank. Founder of Propertit OY. Own and related parties' holdings in the company: 134,946 shares and 29,642 warrants.

Other significant assignments: Chairman of the Board of Propertit Oy.



**Tine Vestergren Uldal** Country Manager Denmark

Born: 1984

Acting Country Manager Denmark since: 2023

Education and work experience: Degrees in law and business administration. Tine has more than 17 years of experience from Nordea and has participated in the Nordea Young Significant Talent program, as well as in a course on investment strategies at Wharton. At Nordea, she was last employed in the role of Head of Investment Services & Development. Previous experience also includes roles as Head of Wealth & Investment Advice and Director, Institutional Clients

Own and related parties' holdings in the company:

shares and 6,684 warrants.
 Other significant assignments: -

#### Proposed distribution of earnings.

Share premium reserve	6,847,838,362
Other capital contributions	1,400,000,000
Profit brought forward	-5,727,022,669
Profit for the year	1,807,759,880
Total	4,328,575,574
The Board of Directors proposes the following appropriation:	
The Board of Directors proposes the following appropriation:  To shareholders, a dividend of SEK 7.20 per share	1,808,345,527
	1,808,345,527 2,520,230,047

The Board of Directors of Nordnet AB (publ) proposes that the Annual General Meeting on 29 April 2024 resolve to allocate the retained earnings, including the profit for the year according to the approved balance sheet, such that SEK 7.20 per share is distributed to shareholders and the remainder is transferred to a new account. This corresponds to a total dividend of SEK 1,808,345,527 million and a dividend payout ratio of 70 percent of the total profit for 2023.

In the opinion of the Board of Directors, the financial position of the company and the Group justifies the proposed dividend with reference to the requirements such as the nature, scope and risks of the business with regard to the scope of the company's and the Group's equity and the company's and Group operations' consolidation needs, liquidity and position in general.

The Board of Directors and the CEO provide their assurance that the annual accounts have been prepared in accordance with generally accepted accounting practices in Sweden and that the consolidated accounts have been prepared in accordance with the international accounting standards as stipulated by the European Parliament and Council's regulation (EC) No. 1606/2002 of 19 July 2002 on the application of international accounting standards and give a fair account of the Parent Company and Group's position and earnings. Furthermore, assurance is given that the Board of Directors' Report for the Parent Company and Group, respectively, provides an accurate overview of the development of operations, position and earnings of the Parent Company and the Group, and that it also describes the principal risks and sources of uncertainty faced by the Parent Company and the companies within the Group.



# Financial statements.

#### Consolidated income statement.

Group, SEK millon	Note	2023	2022
Commission income		2,457.5	2,695.0
Commission expenses		-589.3	-665.8
Net commission income	9	1,868.2	2,029.2
Interest income		3,310.7	1,662.8
Interest expenses		-671.3	-381.8
Net interest income	10	2,639.4	1,281.0
Net result of financial transactions	11	-7.6	-8.8
Other operating income	12	50.4	80.7
Total operating income		4,550.3	3,382.1
General administrative expenses	13	-1,071.7	-1,064.9
Depreciation, amortization and impairments of intangibles and equipment	14	-179.5	-172.4
Other operating expenses	15	-48.5	-54.2
Total expenses before credit losses		-1,299.7	-1,291.5
Profit before credit losses		3,250.6	2,090.6
Credit losses, net	16	-79.6	-43.4
Fees imposed; Resolution fees		-10.6	-13.1
Operating profit		3,160.4	2,034.1
Tax on profit for the year	17	-581.6	-381.7
Profit for the year <sup>1</sup>		2,578.7	1,652.5
Earnings per share before dilution, SEK	36	9.83	6.35
Earnings per share after dilution, SEK	36	9.83	6.33
Number of shares before dilution, SEK		249,880,684	249,687,500

<sup>&</sup>lt;sup>1</sup> The full profit goes to the shareholders of the Parent Company.

## Consolidated statement of comprehensive income.

SEK millon	Note	2023	2022
Profit for the year		2,578.7	1,652.5
Items that will be reversed to the income statement			
Changes in value of financial assets recognized at fair value through other comprehensive income	32	102.8	-177.2
Tax on changes in value of financial assets recognized at fair value through other comprehensive income	32	-21.2	36.5
Translation of foreign operations	32	-54.7	46.0
Tax on translation of foreign operations	32	2.2	-5.2
Total other comprehensive income after tax		29.1	-99.9
Total profit or loss and other comprehensive income <sup>1</sup>		2,607.8	1,552.6

<sup>&</sup>lt;sup>1</sup> The full profit goes to the shareholders of the Parent Company.

## Consolidated balance sheet.

SEK millon	Note	2023	2022
Assets			
Cash and balances in Central banks		4,192.9	3,726.5
Treasury bills and other interest bearing securities eligible for refinancing	19	5,332.0	38,960.2
Loans to credit institutions	20	481.7	485.1
Loans to the general public	21	30,199.8	28,527.4
Bonds and other interest bearing securities	22	30,765.2	11,218.5
Shares and participations	23	4.3	19.8
Assets for which customers bear the investment risk	24	147,056.7	119,974.7
Intangible fixed assets	25	1,011.6	967.5
Tangible fixed assets	26	254.6	244.0
Deferred taxed assets	17	1.7	1.3
Current tax assets	17	69.3	28.8
Other assets	27	2,280.7	2,267.6
Prepaid expenses and accrued income	28	599.2	486.4
Total assets		222,249.7	206,907.8
Liabilities			
Deposits and borrowing from the general public	29	59,679.9	70,084.1
Liabilities for which customers bear the investment risk	24	147,061.4	119,979.6
Other liabilities	30	7,262.4	10,371.4
Current tax liabilities	17	299.8	151.1
Deferred tax liabilities	17	46.2	56.1
Accrued expenses and deferred income	31	197.5	215.4
Total liabilities		214,547.3	200,857.8
Equity	32		
Share capital		1.3	1.2
Additional Tier 1(AT1) capital		1,400.0	1,100.0
Other capital contributions		7,327.0	7,086.7
Other reserves		-132.1	-161.2
Retained earnings including profit for the year		-893.8	-1,976.6
Total equity		7,702.4	6,050.1
Total liabilities and equity		222,249.7	206,907.8

## Consolidated statement of changes in equity.

SEK millon	Share capital	Addi- tional Tier 1 (AT1) capital	Other con- tributed capital	Other reserves <sup>1</sup>	Retained earnings including profit for the year	Total equity
Equity brought forward 1 January 2022	1.2	1,100.0	7,125.9	-61.4	-2,175.6	5,990.1
Profit after tax reported in the income statement	-	-	-	-	1,652.5	1,652.5
Other comprehensive income after tax	-	-	-	-99.9	-	-99.9
Total comprehensive income	-	-	-	-99.9	1,652.5	1,552.6
Transactions reported directly in equity:						
Transaction cost with issue of Tier 1 capital	-	-	-	-	-0.7	-0.7
Tax on transaction costs in connection with issue of Tier 1 capital	-	-	-	-	0.1	0.1
Interest on Tier 1 capital	-	-	-	-	-65.0	-65.0
Repurchase of own shares	-	-	-56.5	-	-	-56.5
Issue of warrants	-	-	17.6	-	-	17.6
Repurchase of warrants	-	-	-0.4	-	-	-0.4
Dividens paid	-	-	-	-	-1,387.9	-1,387.9
Total transactions reported directly in equity	-	-	-39.2	-	-1,453.4	-1,492.7
Equity carried forward 31 December 2022	1.2	1,100.0	7,086.7	-161.2	-1,976.6	6,050.1

<sup>&</sup>lt;sup>1</sup> See Note 32

SEK millon	Share capital	Addi- tional Tier 1 (AT1) capital	Other con- tributed capital	Other reserves <sup>1</sup>	Retained earnings including profit for the year	Total equity
Equity brought forward 1 January 2023	1.2	1,100.0	7,086.7	-161.2	-1,976.6	6,050.1
Profit after tax reported in the income statement	-	-	-	-	2,578.7	2,578.7
Other comprehensive income after tax	-	-	-	29.1	-	29.1
Total comprehensive income	-	-	-	29.1	2,578.7	2,607.8
Transactions reported directly in equity:						
Issue of primary capital <sup>2</sup>	_	300.0	-		-	300.0
Transaction costs on issue of Tier 1 capital	-	-	-	-	-4.0	-4.0
Tax on transaction costs on issuance of Tier 1 capital	-	-	-	-	0.8	8.0
Interest on Tier 1 capital	-	-	-	-	-120.1	-120.1
Issue of warrants	-	-	9.3	-	-	9.3
Repurchase of warrants	-	-	-3.0	-	-	-3.0
Set-off issue	0.0	-	224.3	-	-224.3	-
Warrants redemptions	0.0	-	9.7	-	-	9.7
Dividend paid	-	-	-	-	-1,148.3	-1,148.3
Total transactions reported directly in equity	-	300.0	240.3	-	-1,495.9	-955.6
Equity carried forward 31 December 2023	1.3	1,400.0	7,327.0	-132.1	-893.8	7,702.4

<sup>&</sup>lt;sup>1</sup> See Note 32

<sup>&</sup>lt;sup>2</sup> Issue of SEK 300 million in Tier 1 capital. The bonds have an indefinite maturity, can be redeemed first after five years and run with interest of three-month Stibor + 5.0 percent. The bonds are listed on Nasdaq Stockholm.

## Consolidated cash flow statement (direct method).

SEK millon	Note	2023	2022
Current operations			
Provisions received		2 457,5	2 704,2
Provisions paid		-589,3	-665,8
Interest received		3 245,8	1 549,2
Interest paid		-801,3	-445,9
Net received from financial transactions		-16,7	21,0
Other operating payments		25,4	15,7
Payments to suppliers and employees		-1 190,2	-1 185,9
Income taxes paid		-482,0	-614,4
		2 649,3	1 378,1
Increase/decrease of assets of current operations			
Increase (-)/decrease (+) of lending to the general public		-2 027,7	-1 696,5
Increase (-)/decrease (+) of other assets		-382,6	3 402,8
Increase/decrease of liabilities of current operations			
Increase (+)/decrease (-) of deposits and borrowing among the general public		-9 771,0	2 533,4
Increase (+)/decrease (-) of liabilities		-3 066,4	875,4
Cash flow from current operations		-12 598,3	6 493,2
Investing activities			
Acquisition of intangible assets	25	-180,0	-136,9
Acquisition of tangible assets	26	-36,7	-23,7
Investments in securities		-68 124,2	-51 235,2
Sales of securities		82 289,7	45 642,7
Cash flow from investing activities		13 948,8	-5 753,1
Financing activities			
Issue of warrants		9,3	17,3
Warrants issue repurchases		-3,0	-
Amortization of leasing		-45,2	-1,9
Share repurchases		-	-56,5
Set-off issue		0,0	-
Warrants redemptions		9,7	-
Issue of Tier 1 capital		300,0	-
Dividends paid to shareholders		-1 148,3	-1 387,9
Cash flow from financing activities		-877,5	-1 429,0
Cash flow for the year		473,0	-688,9
Cash and cash equivalents, January 1		4 211,7	4 894,6
Exchange rate differences in cash and cash equivalents		-10,0	6,0
Cash and cash equivalents at year-end		4 674,7	4 211,7
Cash and cash equivalents include: 1			
Cash and balances in Central Banks		4 192,9	3 726,5
Loans to credit institutions (bank deposits) <sup>2</sup>	20	481,7	485,1

<sup>&</sup>lt;sup>1</sup> This amount includes pledged assets of SEK 627 (281) million.
<sup>2</sup> Loans to credit institutions (bank deposits) only include investments with a maturity of less than three months.

## Parent Company's income statement.

SEK millon	Note	2023	2022
Net sales	37	20.1	18.2
Total operating income		20.1	18.2
Administrative expenses	38	-13.0	-14.0
Personnel costs	39	-14.6	-13.8
Other operating expenses		-2.9	-3.5
Total operating expenses		-30.5	-31.3
Operating profit		-10.4	-13.1
Result from financial investments			
Result from participations in Group companies	40	1,808.3	,2,558.7
Other interest income and similar items		10.3	0.4
Interest expense and similar items		-0.0	-0.8
Result from financial investments		1,818.7	2,558.2
Profit after financial items		1,808.3	2,545.2
Tax on profit for the year	41	-0.5	-0.1
Profit for the period		1,807.8	2,545.0
Items that will be reversed to the income statement		_	
			-
Total other comprehensive income after tax		-	-
Total profit or loss and other comprehensive income		1,807.8	2,545.0

## Parent Company's balance sheet.

SEK millon Note	2023	2022
Assets		
Fixed assets		
Financial fixed assets		
Shares in Group companies 42	2,404.5	2,412.8
Total fixed assets	2,404.5	2,412.8
Current assets		
Current receivables from Group companies	1,921.2	414.2
Current tax receivables	1.6	1.2
Other receivables 43	1.3	657.9
Prepaid expenses and accrued income 44	0.9	3.2
	1,924.9	1,076.5
Cash and cash equivalents	20.8	7.3
Current assets, total	1,945.8	1,083.8
Total assets	4,350.2	3,496.6
Equity 45		
Restricted equity		
Share capital	1.3	1.2
	1.3	1.2
Non-restricted equity		
Share premium reserve	6,847.9	6,607.6
Additional Tier 1(AT1) capital	1,400.0	1,100.0
Retained earnings	-5,727.1	-6,776.3
Profit for the year	1,807.8	2,545.0
Total non-restricted equity	4,328.6	3,476.4
Total equity	4,329.8	3,477.6
Liabilities		
Other liabilities 46		9.8
Accrued expenses and deferred income 47		9.2
Total liabilities	20.4	19.0
Total equity and liabilities	4,350.2	3,496.6

## Parent Company's statement of changes in equity.

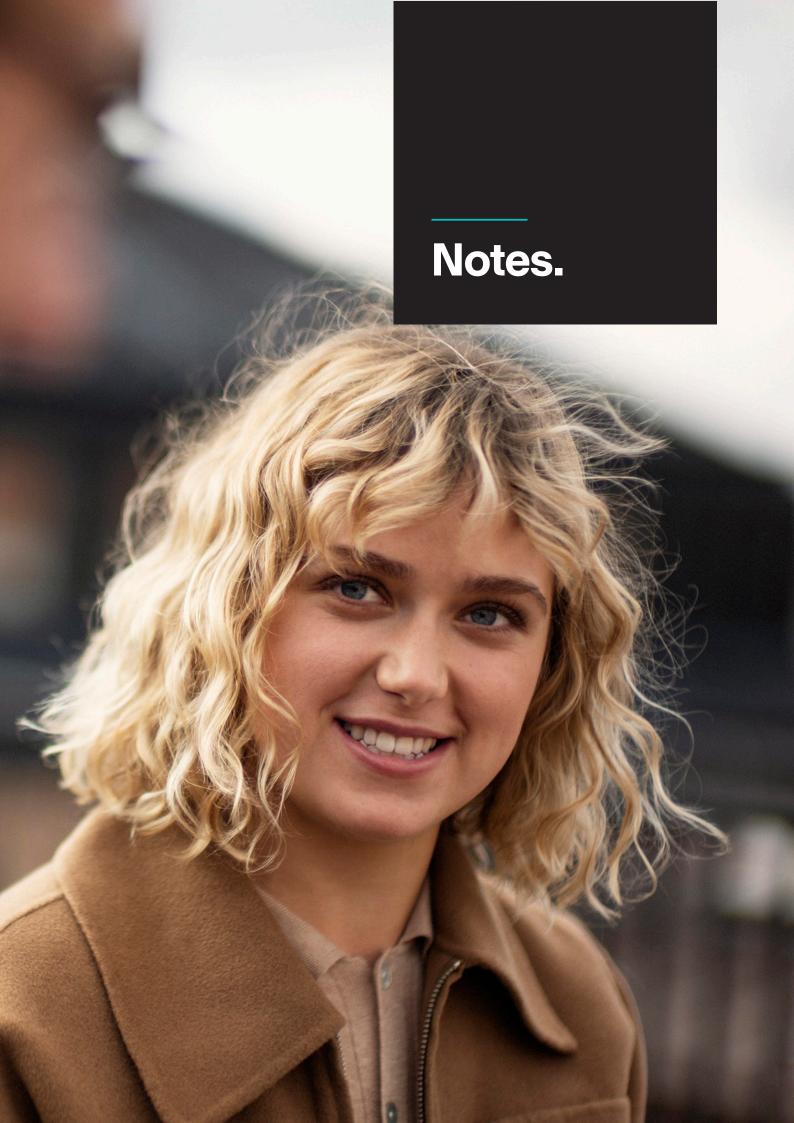
SEK millon	Share capital	Share premium reserve	Additional Tier 1 (AT1) capital	Retained earnings	Profit for the year	Total
Equity brought forward 1 January 2022	1.2	6,646.8	1,100.0	-5,623.3	300.5	2,425.2
Reallocation of last year's profit			-	300.5	-300.5	_,
Profit after tax reported in the income statement	_			-	2,545.0	2,545.0
Total comprehensive income	_	_		300.5	2,244.6	2,545.0
					_,_ :	_,-,
Transactions reported directly in equity						
Transaction costs in connection with issue of Tier 1 capital	-	-	-	-0.7	-	-0.7
Tax on transaction costs on issuance of Tier 1 capital	-	-	-	0.1	-	0.1
Interest on Tier 1 capital	-	-	-	-65.0	-	-65.0
Buyback of own shares	-	-56.5	-	-	-	-56.5
Warrants issue	-	17.6	-	-	-	17.6
Warrants repurchases	-	-0.4	-	-	-	-0.4
Dividend	-	-	-	-1,387.9	-	-1,387.9
Equity carried forward 31 December 2022	1.2	6,607.6	1,100.0	-6,776.3	2,545.0	3,477.6
	Share	Share	Additional Tier 1 (AT1)	Retained	Dugit for	
SEK millon	capital	premium reserve	capital	earnings	Profit for the year	Total
SEK millon Equity brought forward 1 January 2023		•				Total 3,477.6
	capital	reserve	capital	earnings	the year	
Equity brought forward 1 January 2023	capital	reserve	capital	earnings -6,776.3	the year 2,545.0	
Equity brought forward 1 January 2023 Reallocation of last year's profit	capital	reserve	capital	<b>earnings -6,776.3</b> 2,545.0	<b>the year 2,545.0</b> -2,545.0	3,477.6
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement	capital 1.2 -	reserve	capital 1,100.0 -	<b>earnings -6,776.3</b> 2,545.0	<b>the year 2,545.0</b> -2,545.0 1,807.8	3,477.6 - 1,807.8
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income	capital 1.2 -	reserve	capital 1,100.0 -	<b>earnings -6,776.3</b> 2,545.0	<b>the year 2,545.0</b> -2,545.0 1,807.8	3,477.6 - 1,807.8
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier	capital 1.2 -	reserve	capital 1,100.0 -	earnings -6,776.3 2,545.0 - 2,454.0	<b>the year 2,545.0</b> -2,545.0 1,807.8	3,477.6 - 1,807.8 1,807.8
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier 1 capital  Tax on transaction costs in connection with issue	capital 1.2 -	reserve	capital 1,100.0 -	earnings -6,776.3 2,545.0 - 2,454.0 -4.0	<b>the year 2,545.0</b> -2,545.0 1,807.8	3,477.6 - 1,807.8 1,807.8
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier 1 capital  Tax on transaction costs in connection with issue of Tier 1 capital	capital 1.2 -	reserve	capital 1,100.0	earnings -6,776.3 2,545.0 - 2,454.0 -4.0 0.8	the year 2,545.0 -2,545.0 1,807.8 1,807.8	3,477.6 - 1,807.8 1,807.8 -4.0
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier 1 capital  Tax on transaction costs in connection with issue of Tier 1 capital  Tier 1 capital issue 1	capital 1.2	reserve 6,607.6 - - -	capital 1,100.0 300.0	earnings -6,776.3 2,545.0 - 2,454.0 -4.0 0.8	the year 2,545.0 -2,545.0 1,807.8 1,807.8	3,477.6 - 1,807.8 1,807.8 -4.0 0.8 300.0
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier 1 capital  Tax on transaction costs in connection with issue of Tier 1 capital  Tier 1 capital issue 1  Interest on Tier 1 capital	capital 1.2	reserve 6,607.6 - - -	capital 1,100.0 300.0	earnings -6,776.3 2,545.0 - 2,454.0  -4.0  0.8120.1	the year 2,545.0 -2,545.0 1,807.8 1,807.8	3,477.6 - 1,807.8 1,807.8 -4.0 0.8 300.0
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier 1 capital  Tax on transaction costs in connection with issue of Tier 1 capital  Tier 1 capital issue 1  Interest on Tier 1 capital  Set-off issue	capital 1.2 0.0	reserve 6,607.6 - - - - 224.3	capital 1,100.0  300.0	earnings -6,776.3 2,545.0 -2,454.0 -4.0 0.8 -120.1 -224.3	the year 2,545.0 -2,545.0 1,807.8 1,807.8	3,477.6 - 1,807.8 1,807.8 -4.0 0.8 300.0 -120.1
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier 1 capital  Tax on transaction costs in connection with issue of Tier 1 capital  Tier 1 capital issue 1  Interest on Tier 1 capital  Set-off issue  Warrants redemptions	0.0 0.0	reserve 6,607.6 - - - - 224.3 9.7	capital 1,100.0  300.0	earnings -6,776.3 2,545.0 -2,454.0 -4.0 0.8 -120.1 -224.3	the year 2,545.0 -2,545.0 1,807.8 1,807.8	3,477.6 - 1,807.8 1,807.8 -4.0 0.8 300.0 -120.1 - 9.7
Equity brought forward 1 January 2023  Reallocation of last year's profit  Profit after tax reported in the income statement  Total comprehensive income  Transactions reported directly in equity  Transaction costs in connection with issue of Tier 1 capital  Tax on transaction costs in connection with issue of Tier 1 capital  Tier 1 capital issue 1  Interest on Tier 1 capital  Set-off issue  Warrants redemptions  Issuance of warrants	0.0 0.0	reserve 6,607.6 - - - - - 224.3 9.7 9.3	capital 1,100.0  300.0	earnings -6,776.3 2,545.0 -2,454.0 -4.0 0.8 -120.1 -224.3	the year 2,545.0 -2,545.0 1,807.8 1,807.8	3,477.6 - 1,807.8 1,807.8 -4.0 0.8 300.0 -120.1 - 9.7 9.3

<sup>&</sup>lt;sup>1</sup> Issue of SEK 300 million in Tier 1 capital. The bonds have an indefinite maturity, can be redeemed first on 14 February 2028 and mature with interest of three-month Stibor + 5 percent%. The bonds are listed on Nasdaq Stockholm.

## Parent Company's cash flow statement (direct method).

SEK million	Note	2023	2022
Cash flow from current operations			
Interest paid		-120.1	-65.8
Net received from financial transactions		10.3	0.3
Other operating payments		1,825.2	2,064.5
Payments to suppliers and employees		-32.1	-28.4
Cash flow from current operations before changes in working capital		1,683.4	1,970.7
Cash flow from changes in working capital			
Increase (-)/decrease (+) of other receivables		-850.4	-1,050.1
Increase (+)/decrease (-) of liabilities		5.4	1.5
Paid income taxes		-0.9	-0.8
Cash flow from current operations		837.5	921.3
Investing activities			
Cash flow from investing activities		-	-
Financing activities			
Issue of Tier 1 capital		300.0	-
Dividends from subsidiaries		17.6	514.0
Repurchase of shares		-	-56.5
Issue of warrants		6.7	-0.4
Shareholders' contribution given		-1,148.3	-1,387.9
Cash flow from financing activities		-824.0	-930.8
Cash flow for the year		13.5	-9.4
Cash and cash equivalents, January 1		7.3	16.8
Cash and cash equivalents at year-end		20.8	7.3

Cash and cash equivalents refers to the company's bank accounts.



## Notes.

#### Note 1 Company information.

The consolidated accounts for Nordnet AB (Parent Company) for the financial year ending 31 December 2023 have been approved by the Board of Directors and CEO for publication on 15 March 2024 and will be presented for adoption by the Annual General Meeting on 29 April 2024. The registered office of the Parent Company, Nordnet AB (publ) corporate identity number 559073-6681, is Alströmergatan 39, Box 30099, 104 25 Stockholm, Sweden. The Group offers financial services and products, primarily in savings and investments in its home markets of Sweden, Norway, Denmark and Finland. Since 25 November 2020, Nordnet AB's (Publ) shares have been listed on Nasdaq Stockholm. The operations are described further in the Board of Directors' Report.

## Note 2 Basis for preparation of the accounts.

## Statement of compliance with applied regulations.

The financial statements and the consolidated accounts have been prepared in accordance with International Financial Reporting Standards (IFRS) issued by the International Accounting Standard Board (IASB) and interpretative statements from the IFRS Interpretations Committee as approved by the EU. Also applied are the Annual Accounts for Credit Institutions and Investment Firms Act (1995: 1559), the Swedish Financial Supervisory Authority's regulations and general guidelines on annual accounts in credit institutions and securities companies (FFFS 2008:25), including relevant amendment regulations and the Swedish Financial Reporting Board's recommendation RFR 1 Supplementary accounting rules for groups.

The Parent Company's Annual Report is prepared in accordance with the Swedish Annual Accounts Act (1995:1554) and with application of the Swedish Financial Reporting Boards RFR 2 Accounting for legal entities. This entails that the Parent Company applies the same accounting principles as in the Group with the exceptions and additions set out in Swedish accounting legislation. IFRS valuation and rules of disclosure are applied with the exceptions and additions specified in the section concerning the Parent Company's accounting principles.

Reporting is based on different grounds of valuation. Financial assets and liabilities are measured at amortized cost, with the exception of certain financial assets and liabilities that are recognized at fair value. Non-monetary items are reported based on their historical cost. Pension provisions are reported based on the discounted value of future pension commitments. Assets and liabilities in the insurance business, where the policyholder bears the investment risk, are reported at fair value.

All figures in the Annual Report are shown in millions of Swedish kronor (SEK million) unless otherwise stated.

The accounting principles stated below were applied consistently in all periods presented in the financial statements, unless stated

otherwise

# Note 3 New and amended standards. Standards that will come into force as of January 2023 and beyond.

In preparing the consolidated financial statements, standards and interpretations are applied that are published by the International Accounting Standards Board (IASB). The following is a preliminary assessment of the impact that the introduction of these standards and interpretations may have on the Group's financial reports.

#### IFRS 17 Insurance Contracts.

IFRS 17 has replaced IFRS 4 Insurance contracts as of 1 January 2023

IFRS 17 establishes principles for the accounting, presentation, measurement and disclosure of insurance contracts. Exempted from the new standard are investment agreements with the legal form of an insurance contract but where no significant insurance risk is transferred to the insurance company.

Nordnet's assessment is that the agreements offered by Nordnet in the insurance business have the legal form of an insurance contract but do not include any significant insurance risk. A certain insurance risk arises within Nordnet's product offering in agreements where the repayment protection deviates from 100 percent. Nordnet offers endowment insurance with repayment protection of either 101 percent or 99 percent, meaning that the sum risk amounts to 1 percent of the insurance capital. Nordnet's assessment is that this risk sum is not a significant insurance risk in accordance with IFRS 17.

Nordnet also offers products where the policyholder's savings capital is not guaranteed, that is, repayment protection amounts to 0 percent. In these cases, the policyholder receives a monthly inheritance benefit. Inheritance gain is a risk compensation that reimburses the policyholder because he risks the insurance capital accruing to Nordnet in the event that the policyholder dies. The insurance risk for Nordnet is that the inheritance benefit paid out is less than the insurance capital accruing to Nordnet. IFRS 17 states that the time horizon for the assessment of insurance risk shall extend to the farthest contractual limit of an insurance contract since the insurer is able to alter the premium or the benefits. Nordnet is entitled to review and amend the inheritance benefit tariff on an ongoing basis, meaning that the risk assessment horizon is very short. Nordnet assesses the insurance risk regarding payment of inheritance benefit during this short period not to be significant in accordance with IFRS 17.

For certain pension products, risk benefits (such as health insurance, premium exemption and survivors' pension) are offered in collaboration with another insurer. When the insurance customer chooses to take out risk insurance in connection with a savings insurance, two different insurance contracts are set up, a savings insurance policy with Nordnet and a risk insurance policy with the other insurer. Nordnet has no insurance risk associated with the risk benefits covered by the other insurer.

Since Nordnet's insurance contracts lack significant insurance risk, all agreements are classified as investment agreements and are accounted for in accordance with IFRS 9. Accordingly, IFRS 17 has no significant impact on Nordnet's financial statements. Nordnet will continue to apply the same accounting and valuation principles for insurance contracts as previously, regardless of IFRS 17 coming into force

A more complete description of Nordnet's insurance products is given in Note 5, Insurance operations.

#### IAS 1 Presentation of Financial Statements.

The IAS 1 standard prescribes the basis for the design of general financial reports to ensure comparability both with the company's own financial reports for previous periods and with other companies' financial reports. The changes in IAS 1 Presentation of Financial Statements mean that companies that apply IFRS must provide disclosures of material information regarding accounting principles rather than providing information on significant accounting principles. The accounting principles will be more company-specific and disclosures perceived as less material must not obscure significant disclosures.

#### IAS 8 Accounting principles, amendments to estimates and assessments, as well as errors.

IAS 8 introduces an amendment to the definition of estimate. The purpose of the amendment is to clarify the difference between changes in estimates, accounting principles and errors. Although the changes are not expected to have a material impact on accounting practices, they are expected to facilitate the assessment of whether changes should be treated as changes in estimates, principles or as corrections of errors. The amendment entails no material impact on Nordnet's financial statements.

#### IAS 12 Income Taxes.

In accordance with IAS 12, companies shall report deferred tax on, in principle, all temporary differences. However, an exception is made among for, other things, temporary differences arising on the initial accounting of an asset or liability, given certain conditions being met. The amendments in IAS 12 make it clear that this exception is not applicable when reporting transactions simultaneously giving rise to both a liability and an asset, such as right-of-use assets, leasing liabilities and the cost fixed assets attributable to provisions for estimated future expenses for dismantling, removal and recovery. The purpose of the amendment is to foster uniform accounting with regard to deferred tax on leasing transactions and other transactions affected by the amendment. Reporting deferred tax on these transactions is an express requirement. The amendment to IAS 12 entails no material impact on Nordnet's financial statements.

In the spring of 2023, IASB issued the amendment package "IAS 12 Income Taxes: international tax reform — model rules in accordance with Pillar 2 two" to clarify the application of IAS 12 to income taxes arising from tax legislation that has been enacted for to implement the OECD's framework against profit transfers, as well as the erosion of the tax base. The framework comprises two pillars and the amendment package aims to introduce a global minimum taxation for large multinational Groups. The amendment package aims to introduce a mandatory temporary exemption for the reporting of deferred tax, tax receivables and liabilities arising due to the OECD's tax reform. The amendment package also contains requirements for the companies to provide certain information that can help users of

financial statements to better understand a company's exposure to income tax within the framework of the other pillar as a result of these regulations. The change currently entails no material influence on Nordnet's financial statements, since Nordnet is not affected by the global minimum tax.

## Note 4 Critical accounting estimates and assumptions.

Establishing financial reporting in accordance with IFRS requires that management conduct assessments and estimates as well as make assumptions that affect the application of the accounting principles and the reported amounts of both assets and liabilities on the balance sheet date, as well as income and expenses in the reporting period. Estimates and assumptions are based on historical experience and a number of other factors that seem reasonable under current conditions. The result of these estimates and assumptions is then used to assess the reported values of assets and liabilities that are not otherwise clearly stated from other sources. Estimates and assumptions are reviewed regularly. Actual outcomes may deviate from these estimates and assessments. Described below are the areas where the risk of changes in value over the ensuing year is greatest given that the assumptions or estimates may need amending.

#### Financial instruments.

In determining the fair value of the Group's financial instruments, different methods are used depending on the degree to which data and market activity can be observed. Primarily, prices quoted in active markets are used. In the absence of quoted prices, valuation models are used instead. Management assesses when the markets are considered inactive and a valuation model should be used. An active market is considered either a regulated or reliable trading venue where quoted prices are easily accessible with regularity. As some of these criteria are not met, the market is considered inactive. Management then makes an assessment of which valuation model is considered most relevant for the individual instrument. The starting point is that quoted prices for financial instruments that are as similar as possible should be used. Since such prices or components of prices cannot be identified, company management is required to make its own assumptions.

Note 33 accounts for financial instruments measured at fair value and divided into three different valuation levels. As of 31 December 2023, the value of financial instruments measured applying the company's own assumptions amounted to SEK 1,871.6 (1,633.4) thousand, of which SEK 0.8 (0.8) thousand pertained to Nordnet Bank's holdings of unlisted shares. Assets for which the customer bears the investment risk account for SEK 1,870.8 million. The valuation models applied are generally accepted and are subject to independent risk control

#### Credit losses.

Methods and models for calculating and reporting expected credit losses include assumptions, methods and input data that involve a high degree of assessment. The Group uses both quantitative and qualitative indicators to assess a significant increase in credit risk. Forward-looking information is included in the assessment of a significant increase in credit risk. From analyses of historical data, macroeconomic factors are identified that affect credit risk and credit losses. These analyses take into account internal and external

information and are consistent with the forward-looking information used for other purposes such as financial planning and forecasting. For more information on the assessments made as of 31 December 2023, see Note 21.

#### Impairment testing of goodwill.

The value of recognized goodwill is tested at least once a year to determine whether the asset may be impaired. The test requires an assessment to identify the cash-generating units as well as an assessment of the value in use of the cash-generating unit to which the goodwill value is attributable. This in turn requires the anticipated future cash flow from the cash generating unit to be estimated and a relevant discount rate to be established for calculation of the present value of the cash flow. At the end of the year, consolidated goodwill amounted to SEK 414.9 million (429.0), of which SEK 227.6 million (236.5) refers to the investment in Netfonds. Company management's assumptions when calculating the value in use at the end of the year did not lead to any impairment. For more information, see Note 5 Accounting principles and Note 7 Risks.

#### Prepaid acquisition expenses.

When determining the rate at which reported prepaid acquisition expenses are to be depreciated, an assumption is made about, among other things, the expected repurchase and mortality rates. In addition, the assessment of the fees charged on fund insurance affects the assessment of possible impairment. At the end of the year, the consolidated carrying amount for prepaid acquisition expenses amounted to SEK 133.9 (106.5) thousand.

#### Note 5 Accounting principles applied.

#### Consolidated accounts.

The consolidated accounts comprise the Parent Company and its subsidiaries where controlling influence is held. The financial reports of the Parent Company and subsidiaries included in the consolidated accounts relate to the same period and have been compiled in accordance with the accounting principles applicable to the Group. The Parent Company has controlling influence when it has the influence and ability to exert its influence over the other company's relevant operations and is exposed to variable returns and has the ability to use its influence to affect returns. Controlling influence exists when the Parent Company directly, or indirectly through subsidiaries, holds over half of the voting rights in a company. A subsidiary is included in the consolidated accounts from the time of acquisition, which is the date on which the Parent Company takes on controlling influence and is included in the consolidated accounts until the date on which the controlling interest ceases. The acquisition method entails that acquired identifiable assets, liabilities and contingent liabilities that meet the accounting conditions are reported and valued at fair value at the acquisition date. A surplus between the acquisition value and the business combination and the fair value of the acquired participation is reported as goodwill. If the amount is less than fair value, the difference is recognized directly in the income statement in other income. Acquisition-related expenses are reported as expenses when incurred. No provisions are made for expenses for planned restructuring measures resulting from the acquisition.

A subsidiary's contribution to equity consists solely of the capital that is acquired between date of acquisition and date of disposal. All intra-Group dealings that arise in transactions between companies included in the consolidated accounts are eliminated in their entirety.

#### Foreign currency translation.

The consolidated accounts are presented in Swedish kronor (SEK), which is the functional currency and reporting currency of the Parent Company. Each subsidiary and branch in the Group determines its functional currency based on its primary economic environment. Transactions in foreign currencies are reported after translation using the exchange rate on the transaction date. Monetary assets and liabilities in foreign currency are converted into functional currency at the exchange rate on the balance sheet date. All exchange rate differences are reported in the income statement. Non-monetary items in foreign currency that are valued at their historical cost are valued in the functional currency, using the exchange rate at the time of the original transaction.

Assets and liabilities in subsidiaries with a functional currency other than SEK are translated into the reporting currency at the exchange rate on the balance sheet date. For recalculation of the income statement, an average price for the period is usually used for practical reasons. Translation differences that occur are reported in other comprehensive income.

#### Income recognition.

Commission income and commission expenses

(net commission income).

Income from contracts with customers is reported as commission income, comprising compensation for service assignments performed. Commission income is reported when the performance commitment has been met, which is when the control of the product or service is transferred to the customer, who is thus able to use the service. The customer is the party who enters into a contract with Nordnet to receive the services offered by the ordinary operations. The income reflects the compensation expected to be received in exchange for these services. In the case of variable remuneration, such as discounts deducted or performance-based compensation, income is reported when it is probable that no repayment will be made. The overall compensation is broken down by the individual services and is determined by whether the services are fulfilled at a specific point in time or over time. Service assignments refer primarily to brokerage and commissions. Brokerage is reported as income on the transaction date. In part, commissions are charged on securities brokerage in connection with securities being issued, sales of structured products and guaranteed issues. These commissions are reported as income on completion of the transaction. Commissions from the fund operations are made up partly of entry commissions, which are recognized as income in connection with fund purchases, and partly of commissions based on fund volume, which are recognized monthly as income on the basis of actual volume.

Commission expenses are transaction-dependent and are usually directly related to transactions reported as income within commission income. Commitment expenses consist of expenses for services received, insofar as they are not considered to be interest, which primarily comprise expenses to stock exchanges, clearing houses and sharing to partners in connection with the purchase and sale of securities. Commission expenses for fund management operations comprise management fees consisting of fixed expenses and expenses based on actual volumes, which are recognized monthly.

#### Other operating income.

Other operating income relates to income from agreements with customers regarding, for example, custodial services, information services, software and service and support fees from partners. Other operating income also includes issue-related income, as well as capital gains on divestment of tangible assets.

#### Interest income and interest expenses (net interest income).

Interest income on receivables and interest expenses on liabilities are calculated and recognized using the effective interest rate method. The effective interest rate is the interest rate that discounts all estimated future inflows and outflows over the anticipated fixed-interest term to the reported gross value of the receivable or liability, resulting in a steady return over the term of the loan. The calculation includes transaction costs, premiums or discounts and fees paid or received that form an integral part of the return. An exception to the above consists of financial assets measured at amortized cost and that were recognized as impaired following initial recognition (Stage 3 financial assets). For these, interest income is calculated by applying the effective interest rate to the reported gross value less reserves for credit losses. Where such financial assets are no longer recognized as impaired, interest income is again calculated based on the recognized gross value.

Interest expenses on deposits from credit institutions and the general public are recognized as an expense when processed, which means that interest expenses are distributed over the period to which they relate. Interest expenses also include expenses for the deposit guarantee, which are booked in accordance with the same principle.

#### Net profit from financial transactions.

Recognized under this item are dividends received and exchange rate fluctuations. Net income from financial transactions also includes capital gains from interest-bearing securities and from the divestment of participations in subsidiaries.

#### Financial instruments.

#### Accounting, cancellation and modification.

A financial asset or financial liability is reported on the transaction date, when Nordnet becomes a party in accordance with the contractual terms of the instrument, in addition to financial assets classified as measured at amortized cost, which are reported on the settlement date. Financial assets reported in the balance sheet and considered significant include, on the asset side, cash and bank balances at central banks, sovereign bonds eligible as collateral, etc., Assets where the customer bears the investment risk, lending, bonds and other interest-bearing securities, shares and participations, and accrued income. On the liability side are Deposits, Liabilities for which the customer bears the investment risk and Accrued expenses.

When a financial instrument is reported first time it is valued at fair value including transaction expenses directly attributable to the acquisition of the financial instrument or its issue. This also applies to financial instruments not belonging to the category financial assets or financial liabilities measured at fair value via through profit or loss. When valuing a financial instrument after initial recognition, the financial asset is recognized according to the valuation category of the financial instrument.

A financial asset is de-recognized from the balance sheet once the obligations in the contract have been realized, have matured, been transferred to a third party or if the company has lost control of it. Financial liabilities are de-recognized when the liability has been terminated by the completion, cancellation or termination of the agreement. The same applies to parts of financial assets and financial liabilities.

When modifying a loan, an assessment is made as to whether this would cause it to be removed from the balance sheet. A loan is considered to be modified when the terms governing the cash flows of the loan change compared to the original agreement. Examples include deferrals, changed market conditions, measures to retain the customer and other factors unrelated to a borrower's deteriorating creditworthiness. Modified loans are removed from the balance sheet and a new loan is reported when the existing loan is terminated, with a new agreement being entered into on significantly different terms, or when the terms of an existing agreement are significantly modified. In case of modification due to a borrower encountering financial difficulties, an individual assessment is made as to whether the borrower can be granted a temporary deferment. The deferment can be of a varying nature, for example a changed term, setting up a payment plan or temporarily adjusted interest rates. The loan is then retained in the balance sheet and placed in Stage 3 in accordance with IFRS9 until the deferment and associated probation period expire.

#### Offsetting.

Financial assets and financial liabilities are recognized in the balance sheet on a net basis when there is a legally enforceable right to offset the carrying amounts and if the intention is to settle on a net basis or to simultaneously realize the asset and settle the liability.

#### Repurchase agreements.

A repurchase agreement (repo) refers to an agreement in which the parties agree on a sale of securities, as well as a subsequent repurchase of equivalent assets at a predetermined price. A security that is sold is reported in the balance sheet as the Group is exposed to the risk of changes in the value of the security over the term of the transaction. Payments received on sales of securities are reported as financial liabilities based on the counterparty. Securities that are sold are reported under the item Assets pledged for own liabilities. Payments disbursed for acquisitions of securities, referred to as reverse repurchases, are reported as lending to the vendor. Securities submitted in accordance with repurchase agreements are also reported. Cash and cash equivalents received under a buy-back agreement are recognized in the balance sheet as "Liabilities to credit institutions."

#### Margin loans.

Margin loans comprise secured lending or borrowing of securities. A security that is loaned is reported in the balance sheet as the Group is exposed to the risk of changes in the value of the security. Loaned securities are reported as a pledged deposit on the transaction date, while borrowed securities are not recognized as assets. Loaned securities are measured in the same way as other securities of the same type. On divesting borrowed securities (short-selling), an amount corresponding to the fair value of the securities is booked under Other liabilities. For on-lent securities, Nordnet receives collateral, while it pays collateral for borrowed securities. Collateral is provided and received at a surplus value of at least 5 percent.

#### Recognition and measurement.

Financial assets are classified in one of the following categories: measured at fair value through the income statement, fair value through other comprehensive income, and at amortized cost based on the company's business model for the management of financial assets and on the contractual terms of the assets. The classification also depends on whether the instrument is a debt instrument, an equity instrument or a derivative. In the income statement, financial liabilities are classified as measured either at amortized cost or at fair value.

The business model reflects how the Group manages portfolios of financial assets to generate cash flows. On determining the business model for a group of financial assets, factors are taken into account, including previous experience of how cash flows were obtained, how the performance of the financial assets are assessed and reported to management, how risks are assessed and managed and how compensation is linked to performance The terms of the agreement form the basis for identifying whether the cash flows solely represent payments of principal and interest. Capital amounts are defined as the fair value of the debt instrument on the initial reporting date, which can change over the term if repayments are made or if interest is capitalized. Interest is defined as compensation for the time value of money and the credit risk, plus a profit margin compatible with a basic lending arrangement. Where contractual terms involve exposure to other risks or volatility, this entails the cash flows not meeting the criteria for solely representing payments of principal and interest.

#### Financial assets valued at amortized cost.

Financial assets held within the framework of a business model, the objective of which is to hold financial assets for the purpose of receiving contractual cash flows comprising only payments of capital and interest on the outstanding capital amount, are measured at amortized cost.

On the initial reporting date, assets in this category are reported at fair value plus transaction costs. On subsequent assessment, they are measured at amortized cost in accordance with the effective interest rate method. The effective interest rate corresponds to the interest rate applied in discounting the future contractual cash flows to the carrying amount of the financial asset or liability.

## Financial liabilities measured at fair value via other comprehensive income.

Financial assets under management within the framework of a business model, the objective of which is to collect contractual cash flows comprising only capital and interest, either through holdings or sales, are valued at fair value through other comprehensive income.

On the initial reporting date, these assets are reported at fair value plus transaction costs. On subsequent assessment, they are measured at fair value, with unrealized changes in value being included in other comprehensive income, which are accrued against a fair value reserve in shareholders' equity. The changes in fair value are transferred from other comprehensive income to the net result of financial transactions in the income statement on realizing the asset. Impairment is reported in the income statement under the heading Net result of financial transactions and as a change in the fair value reserve in shareholders' equity through other comprehensive income. Changes in value attributable to exchange rate fluctuations are reported directly in the income statement.

#### Financial liabilities valued at fair value via the income statement.

The category consists of financial assets that are, on first being recorded, as well as in connection with subsequent valuations, measured at fair value through profit or loss to eliminate inconsistencies in valuation and accounting. The classification also includes debt instruments held under another business model — not only to receive contractual cash flows. These include debt instruments held for trading or under management and the results of which are assessed on the basis of their fair value, as well as debt instruments for which the contractual cash flows do not only comprise payments of capital and interest.

Assets in this category are measured both initially and subsequently at fair value. Transaction expenses are recognized in the income statement. Fair value is determined based on prices quoted in active markets. In the absence of these, generally accepted valuation models are used, which are based on observable market data, such as prices quoted in active markets for similar instruments or prices quoted for identical instruments in inactive markets. Changes in fair value are reported within the net result of financial transactions, as are changes in value due to exchange rate fluctuations.

#### Financial liabilities measured at amortized cost.

Financial liabilities valued at amortized cost include those not measured at fair value through profit or loss. These are reported at fair value on the transaction date, which is normally the borrowed amount, and on subsequent measurement at amortized cost in accordance with the effective interest method. The valuation is performed analogously to that applied for financial assets at amortized cost, but

without adjustment for credit loss provisions.

#### Financial liabilities measured at fair value in the income statement.

The category of financial liabilities measured at fair value through profit or loss consists of financial liabilities held for trade and financial liabilities that the Group has chosen to transfer to this category on initial reporting, in accordance with the so-called fair value option. Liabilities in this category are measured both initially and subsequently at fair value. Determining fair value and reporting gains and losses is performed analogously to financial assets measured at fair value through profit or loss. Changes in fair value are reported in the income statement under Net income from financial transactions, with the exception of changes in fair value due to changes in the Group's own credit risk. Such changes in financial liabilities valued at fair value are otherwise presented in comprehensive income without subsequent reclassification to profit.

#### Reclassification of financial assets and liabilities.

Financial assets are only reclassified if the business model for the financial assets changes, which is expected to be highly uncommon. Financial liabilities are never reclassified.

#### Credit losses.

Provisions for credit losses are reported for financial assets valued at fair value through other comprehensive income and that were valued at amortized cost. The accounting builds on a model of whether credit risk has increased significantly compared with the initial accounting date. The provision comprises a probability-weighted amount that takes into account all reasonable and verifiable information that is available without undue expense or effort.

- Stage 1 financial instruments for which no significant increase in credit risk has occurred since the first reporting occasion and counterparties covered by the Group's definition of low credit risk.
- Stage 2 financial instruments for which a significant increase in credit risk has occurred since the first reporting occasion but for which there is no objective evidence that the receivable is doubtful.
- Stage 3 financial instruments for which objective evidence has been identified that the receivable is doubtful.

For financial instruments at Stage 1, the reservation corresponds to the credit loss expected within 12 months. At Stage 2, as well as at Stage 3, the reservation corresponds to the total expected credit losses over the remaining maturity of the instrument.

#### Measurement.

Expected credit losses are calculated as the discounted product of the probability of default (PD), exposure at default (EAD) and loss at default (LGD). PD corresponds to the probability of a borrower defaulting at any given time during the remaining term. EAD corresponds to the expected exposure at the time of default after taking contractual payments into account. LGD corresponds to the loss expected on a defaulted exposure, taking counterparty characteristics, collateral and type of product into account.

For margin lending, a loss rate model is used in which the loss rate corresponds to PD and LGD combined. Due to historically few defaults and few losses, a combination of PD and LGD is used. PD, LGD and EAD are calculated monthly up until the end of the expected term. The expected credit losses are then discounted at the original

loan rate. A summary of the expected credit losses up to and including the end of the expected term the yields credit losses expected over the remaining term of the asset. The sum of the credit losses expected to occur within 12 months yields the expected credit losses for the next 12 months.

The calculation takes into account three scenarios (base, positive and negative) reflecting relevant macroeconomic factors, such as GDP, housing prices and unemployment. The risk parameters used to calculate expected credit losses incorporate the effects of macroeconomic forecasts. A probability is allocated for each scenario and the expected credit losses are obtained as a probability-weighted average.

For credit exposures where the bank considers it unlikely that the debtor will meet its credit obligations, the credit risk is assessed individually, without the use of input data from models.

All investments in debt instruments reported at amortized cost or fair value through other comprehensive income are considered to have low credit risk and the reported credit loss provision is therefore limited to 12 months' expected losses. Management considers "low credit risk" for listed bonds to mean that at least one major rating institute has given the rating "investment grade." Other investments are considered to have "low credit risk" when they have a low probability of default and the issuer has a high ability to meet its short-term contractual payment obligations.

#### Significant increases in credit risk.

Changes in credit risk are assessed through a combination of individual and collective data and will reflect the increase in credit risk at the level of the individual instrument as far as possible. The calculated credit risk at the individual level partly comprises historical data, such as payment history, and forward-looking information where macroeconomic factors are taken into account.

Qualitative indicators will also be taken into account, for example when the borrower has past-due unpaid amounts older than 30 days or has been granted an extension.

An instrument is no longer considered exposed to a significantly increased credit risk when none of the indicators are met any longer.

#### Default and doubtful receivables.

Default is defined in accordance with the Group's credit policy as a combination of both quantitative and qualitative factors.

An instrument is no longer considered in default or uncertain when all past-due amounts have been repaid, sufficient evidence shows that the risk of future cash flow payments not being made has decreased significantly and that there are no other indicators of default.

See also the definition of default for each product under Note 7 and credit loss provisions in Note 21.

#### Expected maturity.

In general, the expected term is limited to the maximum contract period in which the Group is exposed to credit risks, even if a longer period agrees with business practices. All contract terms are taken into account when determining the expected term, including repayment, as well as binding extension and transfer options.

The credit provision models apply an expected term that may be

shorter than the maximum contract period. The expected maturity is based on historical actual maturity and assumptions regarding expected additional repayments and early repayments of loans.

#### Modification.

When a loan is modified but not removed from the balance sheet, an assessment is made of significant increases in credit risk compared with the original credit risk calculated for purposes of impairment. Modifications do not automatically result in reduced credit risk and all qualitative and quantitative indicators will continue to be assessed. Furthermore, a modification gain or loss will be reported in the income statement regarding the difference in the present value of the contractual cash flows discounted at the original effective interest rate

When a loan is modified and removed from the balance sheet, the date when the modification was made is considered to be the first reporting date for the new loan for the purpose of assessing impairment, including the assessment of significant increases in credit risk.

#### Presentation.

Provisions for credit losses for financial assets measured at amortized cost, are presented as a reduction of the reported gross value of the asset.

In the income statement, provisions and write-offs are presented under Credit losses, net. Write-offs are applied once the loss has been conclusively determined. Repayments of write-offs and provision reversals are both recognized as income on the same line.

#### Hedge accounting.

The Group uses various types of derivative instruments to hedge the risks for interest rate and exchange rate exposures to which the Group is exposed. In accordance with IFRS 9 Financial Instruments, the Group does not, at present, apply hedge accounting. Derivatives not included in a hedging relationship are reported at fair value via the income statement.

#### Tangible assets.

Tangible assets are recognized in the balance sheet if the company is likely to derive future economic benefits from them and the acquisition value of the assets can be reliably estimated. The asset is reported at cost less accumulated amortization and impairment. Depreciation is made on a straight-line basis over the estimated useful life of the asset. On each reporting occasion, the company assesses whether there are any indications of impairment. If it is necessary to recognize impairment, the recoverable amount of the asset is calculated and if the recoverable amount is less than the carrying amount, impairment is recognized.

The tangible asset is de-recognized from the balance sheet upon scrapping or disposal, or when no future economic benefits are expected to remain. Profit and loss are determined by the difference between sales income and the asset's carrying amount.

Fixtures and fittings, computers and other hardware are normally written off after three to four years. Improvement charges for third-party property are depreciated on a straight-line basis over the remaining term of the rental contract or the useful life of the improvements, whichever is shorter.

Tangible fixed assets with right-of-use - leases.

For all leases where the Group functions as a lessee, a right-of-use asset and a lease liability are reported in the balance sheet from the date on which the leased asset is available for use by the Group. Lease liabilities are calculated at the present value of future lease payments, discounted applying the marginal loan rate, and are initially reported at their estimated present value. in subsequent periods, lease liabilities are reported by increasing the liability to reflect the effect of interest and reducing it to reflect the effect of the lease fees that have been paid.

The right-of-use asset is initially reported at a value corresponding to the lease liability, adjusted for any prepaid or accrued lease fees. In subsequent periods, the right-of-use asset is reported at cost less depreciation and impairment.

Lease fees included in measurements of lease liabilities include the following:

- fixed fees (including fees that are, by and large, fixed), following deduction of any benefits in connection with the signing of the lease.
- lease fees that vary according to index or price, measured initially as per the commencement date,
- amounts expected to be paid by the lessee under residual value guarantees,
- the exercise price for an option to purchase if it is reasonably certain that the option will be exercised, and
- fees in connection with termination, if the lease period reflects the lessee making use of an opportunity to terminate the lease agreement.

Variable lease fees not attributable to an index or price are not included in the measurement of lease liabilities and right-of-use assets but are reported as an expense under operating profit during the period in which they are incurred.

Contracts of a shorter duration than 12 months or where the underlying asset is of low value are expensed on a straight-line basis. Agreements of lesser value include those for IT equipment and smaller items of office furniture. These contracts are recognized as an expense directly in the income statement. All leases include a rental period and terms for extension.

In the consolidated balance sheet, right-of-use assets are reported as Tangible fixed assets and interest-bearing lease liabilities are presented under Other liabilities. In the income statement, an expense is recognized for the depreciation of the leased asset and an interest expense for the financial liability. Interest expenses are allocated across the lease period such that each reporting period is burdened with an amount corresponding to a fixed interest rate for the liability reported for each period. Where a lease transfers ownership at the end of the lease period or where the cost includes the probable exercise of an option to purchase, the right-of-use asset is amortized over the useful life. Depreciation is applied as of the commencement date of the lease. In the cash flow statement, the lease payments are divided between interest paid in the operating activities and repayment of lease liabilities in financing activities.

The Group's leases involve leases for premises and cars. Contracts for leased cars extend over three years. If the contracts lack stipulated maturities, a maturity of five years is assumed for local contracts and three years for leased cars.

Lease income from operational leases where the Group is the lessor is reported as income on a straight-line basis over the lease period. Initial direct expenses incurred on signing the lease agreement are added to the asset's carrying amount and expensed over the lease period on the same grounds as the lease income.

#### Intangible assets.

Intangible assets are recognized as assets in the balance sheet if the company is likely to derive future economic benefits from them and the acquisition value of the asset can be reliably estimated. An intangible asset is valued at its acquisition value when it is initially recognized in the balance sheet. After its initial recognition, an intangible asset is included in the balance sheet at its acquisition value less any accumulated depreciation and accumulated impairment. The useful life of intangible assets is estimated to be either determinable or indeterminable. Intangible assets with a determinable useful life are depreciated on a straight-line basis over their useful life. The residual value and useful life of intangible assets are reviewed, irrespective of whether there is any indication of depreciation, at the end of every financial year as a minimum, at which point the amortization period is adjusted and/or impairment recognized. Also, intangible assets, which are not yet available for use, are tested for impairment on an annual basis, even if there is no indication of an impairment loss.

#### Goodwill.

Goodwill arising in a business combination is recognized as the acquisition value on the acquisition date. Goodwill constitutes the part of the acquisition value that exceeds the net fair value of the acquired participation, of the acquired entity's identifiable assets, liabilities and contingent liabilities. After its initial recognition, any goodwill that has arisen is valued at the acquisition value less any accumulated impairments.

#### Brands.

Brands acquired separately are reported at cost. Brands acquired in a business combination are recognized at fair value on the acquisition date. All brands deemed to have limited useful lives are depreciated on a straight-line basis over their useful life, estimated at between one and five years. All brands acquired by Nordnet's have been fully amortized

#### Customer relations.

The cost of customer relations is recognized at estimated fair value on the acquisition date. Customer relations have a limited useful life and are recognized at cost less accumulated amortization and impairment. Depreciation is on a straight-line basis over the useful life of the asset, which varies between five and twenty years.

#### Capitalized expenditure for development work.

Balanced development expenses relate mainly to the development of trading systems and other applications, as well as externally purchased services, which are expected to provide future financial benefits through either increased income or cost savings. Capitalized development expenses are initially recognized at cost and subsequently at cost less accumulated amortization and impairments. Depreciation occurs after the asset is completed, on a straight-line basis over the assessed useful life, which varies between three to seven years.

## Impairment testing of tangible and intangible assets.

At each reporting date, an assessment is made of whether there are indications that assets may have decreased in value. If this is the case, an estimate is made of the asset's recoverable amount. For goodwill with an indefinite useful life, the recoverable amount is calculated at least annually. The recoverable amount of an asset is the fair value minus sales expenses for an asset or cash-generating unit and its value in use, whichever is greater. If the carrying amount exceeds the recoverable amount, impairment is made to the recoverable amount. In calculating the recoverable amount, future cash flows are estimated which are discounted at present value with a discount rate before tax which takes into account market assessments of the time value of money and the risks related to the specific asset. For an asset that does not generate cash flows, the recoverable amount of the cash-generating unit is calculated to which the asset belongs. Impairment is recognized in the income statement separately for tangible and intangible assets.

At each reporting date, an assessment is made of whether there are indications that a previous impairment, complete or partial, is not longer justified. If there are any such indications, the recoverable amount of the asset is calculated. A previous impairment is reversed only if there has been a change in the assumptions used to assess the asset's recoverable amount when the impairment was recognized. If this is the case, the carrying amount of the asset shall be increased to its recoverable amount. This increase is recognized in the income statement as a reversal of an impairment loss. Impairment of goodwill is never reversed. Impairment is reversed only to the extent that the asset's carrying amount after the reversal does not exceed the carrying amount that the asset would have had, less depreciation, if no impairment was recognized. A reversal is recognized in the income statement. Once an impairment loss has been reversed, future depreciation is adjusted to allocate the assets revised carrying amount, less any residual value, over its remaining useful life.

#### Insurance operations.

#### Nordnet's products in the insurance business.

Within the framework of the Swedish insurance company, Nordnet Pensionsförsäkring, private pension insurance, endowment insurance and occupational pension insurance are offered. For occupational pension agreements, risk benefits (such as health insurance, premium exemption and survivors' pension) are offered in collaboration with another insurer. The Swedish company also offers the product capital pension, which is closed for new subscriptions.

In the Norwegian market, Nordnet Livsforsikring offers savings insurance in the form of Investeringskonto Zero which is a capital insurance, "IPA" which is a private pension insurance, Egen pensjonskonto ("EPK") and Pensjonskapitalbevis ("PKB") which are occupational pension insurances for employees in the private sector. By establishing a branch, Nordnet Livsforsikring has, since the third quarter, offered endowment insurance with investment opportunities to the Finnish market ("Sijoitusvakuutus").

At Nordnet, savings insurance is offered as fund or custodial account insurance, meaning that policyholders choose their own investments and that the insurance has no guaranteed capital. Instead, the value of the insurance is entirely dependent on the value of the investments made by the policyholder.

Within the framework of endowment insurance, and in the Swedish market also for private pension insurance and occupational pension insurance, Nordnet's insurance customers are offered a stock lending program offering Nordnet customers an opportunity for additional returns on their share investments.

All products offered by Nordnet include repayment protection that the policyholder can opt out of in certain cases. Repayment protection means that the insurance capital is repaid to one or more beneficiaries in the event that the policyholder dies. For endowment insurance, repayment protection is mandatory and is normally taken out with a risk amount of 1 percent of the value of the insurance. If the policyholder dies, 101 percent of the insurance capital is paid to survivors. For repayment protection in excess of 100 percent, a risk premium is paid as a proportion of the insurance capital. In cases where endowment insurance is taken out with repayment protection of 99 percent, 99 percent of the insurance capital is paid to survivors if the policyholder dies. For private pension insurance and occupational pension insurance, respectively, the repayment protection is 100 percent of the value of the insurance. For some insurance products, the terms may allow the policyholder to opt out of the repayment protection. For that part of the insurance capital that is not protected by repayment protection, "inheritance gain" is paid. Inheritance gain is a risk compensation that reimburses the policyholder because he risks the insurance capital accruing to Nordnet in the event that the policyholder dies.

#### Recognition and Measurement.

Assets in the insurance business comprise the policyholders' investments in securities and cash and cash equivalents. The assets relating to the fund and custodial insurance plans are reported as assets where the customer bears the investment risk in the balance sheet, since it is the Group that legally owns the underlying assets in these insurance plans. Corresponding commitments are reported on the liability side of the balance sheet as liabilities where the customer bears the investment risk. The provision for these commitments is directly related to the development in value of the underlying securities. deposits and withdrawals. The underlying assets are reported at fair value through profit or loss and the associated liabilities are identified to be measured at fair value through profit or loss in accordance with the fair value option. Application of the fair value option has been chosen to eliminate inconsistencies in the accounting. Accordingly, the fair value of the financial liabilities is determined with the help of the fair value of the financial assets to which the financial liabilities are attributable on the balance sheet date.

Insurance-related liabilities, that is, insurance technical provisions, are divided into fund insurance commitments, conditional bonuses, life insurance provisions for guaranteed commitments and provisions for outstanding claims. Provisions for fund insurance commitments mainly consist of the technical redemption value, which corresponds to the value of all investment fund holdings on fund insurance plans, including cash and cash equivalents, in securities deposits calculated at market value, adjusted for accrued fees and risk premiums. Conditional bonuses correspond to the value of all securities holdings in custodial insurance plans, including cash and cash equivalents, in securities deposits calculated at market value, adjusted by accrued fees and risk premiums and reduced by the insurance technical provision of a possible guaranteed commitment (life insurance provision). The life insurance provision for the guaranteed commitment, which can be determined for traditional insurance at the time of updating,

corresponds to the sum of the guaranteed monthly amounts at any given time. Provisions for unsettled claims are calculated for deaths that have occurred but that are yet to be reported to the company. The provision is calculated on an actuarial basis and recognized as outstanding claims. Life insurance provisions and provisions for unsettled debts make up a very small part of the total insurance technical provisions.

#### Income recognition.

Amounts received from and paid to policyholders are reported in the balance sheet as Assets where the customer bears the investment risk or Liabilities where the customer bears the investment risk. Management fees for investment agreements are recognized as income distributed evenly across the terms of the agreements.

#### Recognition of expenses.

Expenses for insurance contracts are expensed as they are incurred, with the exception of commissions and other variable costs relating to new contracts which are capitalized as prepaid acquisition expenses. Additional charges for obtaining an agreement with a customer are recognized as an asset in the balance sheet if they can be expected to be recovered. These comprise direct charges for securing agreements with customers that the Group would not have incurred had the agreements not been secured, such as sales commissions for securing investment agreements. The charges are largely variable. They are expected to be recouped through the commission income earned through the investment agreements. Prepaid acquisition expenses are accrued and expensed over a period of five years as the related income is recognized. The assets are tested for impairment on each closing date to ensure that the anticipated future economic benefits of the contracts exceed their carrying amount. All other expenses, including fixed acquisition expenses and ongoing administrative expenses, such as commissions to proprietary personnel acting as salespeople, and ongoing administrative expenses paid over the terms of the investment agreements, are recognized during the accounting period in which they are incurred.

#### Margin loans.

Loans are provided against collateral equivalent to 105 percent of the loaned value. The stock lending program does not affect the policyholder's investment rights within the insurance scheme. The risks and returns on loaned securities remain within the Group and are recognized in accordance with IFRS 9. The securities are taken up in their entirety under the item "assets where the customer bears the investment risk," with an equivalent amount under the item "liabilities where the customer bears the investment risk." In the event that onlent securities cannot be returned due to the borrower's insolvency, received collateral is used to repurchase on-lent securities. If the security is insufficient, there is a risk that the company will incur an expense to repurchase the security. The likelihood of such a cost being incurred is considered highly unlikely. The income is classified as interest income and the compensation to the customer as an interest expense.

#### Employee benefits.

#### Short-term employee benefits.

Short-term benefits include salaries, social security contributions, paid short-term leave, performance-related pay and certain types of non-monetary benefits are recognized in the income statement in the period in which the employee performed the service for the Group.

Short-term benefit entails that the amount is due for payment within 12 months after the end of the period during which the employee has performed the services. A provision for performance-related pay is reported when the Group has a legal or informal obligation to make such payments as a consequence of the services in question having been received from the employees and the provision amount can be calculated reliably.

#### Share-based incentive programs.

Between 2020 and 2023, Nordnet established a warrant program for all employees within the Group. The first warrant program from 2020 became redeemable in 2023. The purpose of the program is to strengthen the link between employees' work and the shareholder value generated. Accordingly, greater shared interest is expected to arise between the participants and Nordnet's shareholders. Participants have been offered the opportunity to subscribe for options at market value. Beyond expenses for preparing and administrating the incentive program, Nordnet's expenses for the incentive program are limited to expenses arising in Norway regarding social security contributions. For additional information, see Note 13 General transaction costs and Note 32.

#### Post-employment benefits.

Post-employment benefits encompass pensions. The Group has defined contribution plans (see Note 13) entailing that the Group pays a fixed fee to a separate legal entity and has no legal or informal obligation to pay additional fees if the legal entity does not have sufficient assets to pay all employee benefits related to employees' service during the current period and prior. The size of the pension for the individual employee depends on the amount of money paid in and the size of the returns on the funds, unlike defined benefit pension plans, under which the employee is guaranteed a specific, predetermined pension by the employer. The Group's obligations regarding contributions to defined contribution plans are recognized as an expense in the income statement as they are earned by the employees performing services for the Group over a period.

#### Termination benefits.

Compensation for termination of employment where the personnel member is suspended is recognized immediately as an expense as there are no future financial benefits for the Group.

#### Provisions.

A provision is recognized in the balance sheet when a formal or informal commitment exists as a consequence of an event and it is likely that an outflow of resources will be required to settle that obligation and the amount can be reliably estimated. A provision for restructuring is reported only when a detailed restructuring plan has been established and restructuring has either commenced or otherwise been announced to the affected parties.

#### Pledged assets.

Pledged assets mainly refers to collateral in credit institutions and the stock exchange. Pledged assets on behalf of customers refers to securities lending in which assets are provided in the form of cash and cash equivalents from the institutions offering the securities lending. Nordnet, in turn, has corresponding coverage in collateral from customers.

#### Contingent liabilities.

Contingent liabilities are reported when there is a potential obligation stemming from past events the existence of which will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity, or where there is an obligation stemming from past events but which is not recognized because it is not probable that an outflow of resources will be required to settle the obligation, or the amount of the obligation cannot be measured with sufficient reliability.

#### Commitments.

Commitments comprise credits granted but not utilized, such as unsecured loans and mortgages, as well as custodial credit granted, which are reported at the nominal amounts granted, less any amortized cost on the amount utilized of the loan receivable.

#### Tax.

The Group's tax consists of current and deferred tax. Current tax is that paid or received pertaining to the current year, calculated applying tax rates that have been established (or to all intents and purposes established) on the balance sheet date. Any adjustment of current tax attributable to previous periods also belongs here.

Deferred tax is calculated based on temporary differences between the reported tax bases of assets and liabilities. Temporary differences are not taken into account in consolidated goodwill, or for differences arising on the initial recognition of assets and liabilities that are not business combinations that, at the time of the transaction, affect neither accounting nor taxable profit. Nor are temporary differences taken into account that relate to participations in subsidiaries and affiliates and that are not expected to be reversed in the foreseeable future. The valuation of deferred tax is based on how underlying assets or liabilities are expected to be realized or settled. Deferred tax is calculated by applying the tax rates and tax rules that have been set or essentially are set as of the balance sheet date. Deferred tax assets for deductible temporary differences are recognized to the extent that it is probable that the amounts can be utilized against future taxable income.

Current tax assets and current tax liabilities are offset when there is a legally enforceable right to offset. This entails items relating to taxes levied by the same taxation authority on either the same taxable entity or a different taxable entity, where there is an intention either to settle these tax items net or to reclaim the tax asset at the same time as the tax liability is settled. Deferred tax assets and deferred tax liabilities are generally offset to the extent that this is permitted for current tax assets and current tax liabilities.

All current and deferred taxes are reported in the income statement, unless they refer to items recognized in other comprehensive income or directly in equity.

#### Tax on returns.

The subsidiary Nordnet Pensionsförsäkring AB reports a return tax based on flat-rate calculations of the return on assets managed on behalf of policyholders. The tax is deducted from policyholders' assets and reported net in the income statement in Other income.

#### Segment reporting.

An operating segment is a component of a company that engages in business activities from which it may earn income and incur expenses and whose operating results are regularly reviewed by the company's management and for which discrete financial information is available.

Nordnet's operating segments are divided into geographical areas in the form of the countries in which the Group operates. In Sweden, unsecured loans have been separated out as a segment of their own. The highest executive decision maker in the form of Group Management monitors the development of operations per country based on operating profit. The allocation of balance items per country is not reported. Nordnet has a joint operating platform and the offering in each market is very similar in terms of a platform for investment and savings, pension savings and margin lending in the Swedish, Norwegian, Finnish and Danish markets.

The unsecured loan product is only offered in the Swedish market and mortgages only in the Swedish and Norwegian markets. Work is underway on a strategic review of the unsecured loan business. The business area's product range is built up around unsecured loans to Swedish private individuals and originally derived from an acquisition made by Nordnet in 2010. These loans are offered partly under Nordnet's own brand and partly under the Konsumentkredit brand, with distribution taking place through Nordnet's own channels as well as through loan intermediaries. The loan volume is about SEK 4 billion and the capital requirement at current volumes amounts to about SEK 450 million. The reason for the strategic review is that unsecured loans account for steadily diminishing part of Nordnet's operations and, in Nordnet's assessment, the product lacks a sufficiently strong connection to the core operations.

#### Cash flow statement.

The cash flow statement is prepared using the direct method, as this method best reflects the operations. The cash flow statement includes changes in cash and cash equivalents. Cash flow is divided into cash flow from operating activities, investment activities and financing activities. Cash flow from investment activities includes only actual payments for investments during the year.

Foreign subsidiaries' transactions are recalculated in the cash flow statement at the average exchange rate of the period. Acquired and divested subsidiaries are reported as cash flow from investing activities, net, after deduction of cash and cash equivalents in the acquired or divested company.

#### Cash and cash equivalents.

Cash and cash equivalents consist of balances at banks and corresponding credit institutions. Cash and cash equivalents can easily be converted into cash to a known amount, have an insignificant risk of value fluctuations and have a fixed-interest term of no more than three months from the date of acquisition.

#### Parent Company's accounting policies.

The Parent Company generally adheres to IFRS and the accounting principles applied in the consolidated financial statements. In addition, the Parent Company needs to take into account and prepare annual reports in accordance with the Annual Accounts Act (1995:1554) and the Swedish Financial Reporting Board's recommendation RFR 2 Accounting for Legal Entities. The Parent Company's Annual Report has therefore been prepared in accordance with IFRS as long as it is compatible with ÅRL and RFR 2. The most significant principal differences between the Parent Company and the Group's accounting policies are shown below.

#### Shares in subsidiaries.

Shares in subsidiaries are recognized according to the cost method, which means that transaction expenses are included in the carrying amount.

#### Intangible assets.

The Parent Company writes off goodwill systematically based on the estimated useful life. All expenses attributable to internally developed intangible assets are reported in the income statement as an expense.

#### Leased items.

In accordance with RFR 2, the Parent Company has chosen not to apply IFRS 16 Leases. The Parent Company reports financial lease agreements as operating lease agreements. This means that the company reports lease fees as expenses on a straight-line basis across the lease period. Consequently, the right-of-use assets and lease liabilities are not reported in the balance sheet.

### Untaxed reserves and Group contributions.

Due to the relationship between accounting and taxation, the deferred tax liability attributable to the untaxed reserves in the Parent Company is not separately disclosed. These are recognized gross in the balance sheet and income statement. Group contributions received from subsidiaries are recognized as financial income. Group contributions paid by the Parent Company to a subsidiary are recognized as an increase in participations in Group companies.

### Note 6 Transactions with related parties.

E. Öhman J:or AB with subsidiaries ("Öhman Group") is closely related to Nordnet AB (publ).

Nordnet Bank AB, Nordnet Pensionförsäkring AB and Nordnet Fonder AB regularly enter into business relations with subsidiaries of E. Öhman J:or AB in the same way as they regularly do with other financial parties. The administration of Nordnet Fonder AB's funds has been outsourced to E.Öhman J or Fonder AB, which receives compensation from Nordnet AB for its work. Nordnet Bank AB is the distributor of these funds.

According to the agreement regarding anther fund marketed in Nordnet's name and managed by Öhman Fonder, Nordnet Bank AB receives compensation for its distribution of the fund as part of the management fee debited by Öhman Fonder for the fund in question. Nordnet Bank AB and Öhman Fonder have also entered into distribution agreements regarding Nordnet Bank AB's distribution of other funds managed by Öhman Fonder. Nordnet Bank receives compensation from Öhman funds for this distribution as part of the management fee charged on fund units distributed by Nordnet Bank AB. In addition, a co-operation agreement has been entered into regarding Nordnet Bank AB's and Nordnet Pensionförsäkring AB's provision of so-called partner services to Öhman Fonder with regard to custodial accounts for Öhman Fonder's customers whose assets are deposited with Nordnet Bank AB or are covered by insurance provided by Nordnet Pensionförsäkring AB. According to the co-operation agreement, Nordnet Bank AB and Nordnet Pensionförsäkring AB receive compensation from Öhman Fonder for providing the partner service. The Öhman Group has entered into an occupational pension agreement with Nordnet Pensionsförsäkring AB. All agreements between Nordnet AB (publ) and its subsidiaries and E. Öhman J:or AB and its subsidiaries have been entered into on market terms.

During the period, Nordnet Bank AB has received commission income and other income from related parties totalling SEK 31.2 million (28.8) and paid commission expenses and other expenses to related parties totalling SEK 14.4 million (13.4). As of the balance sheet date, receivables from related companies amounted to SEK 7.2 million (5.8) and liabilities to related companies amounted to SEK 2.4 million (0).

Nordnet Bank AB offers personnel credits to all Group employees. The company has granted credits for margin lending to Board Members as well as mortgages to a Board Member and others considered to be related parties. These credits have been issued on market terms. The company has also provided credits for margin lending and unsecured loans to senior executives. No provisions relating to bad debts or expenses relating to bad debts to related parties have been reported during the financial year.

For disclosures regarding the salaries and other remuneration, expenses and obligations relating to pensions and similar benefits and contracts in respect of severance pay for the Board, the CEO and other senior executives, see Note 13.

Transactions with related parties	2023	2022
Assets		
Loans to the general public	23,3	38,7
Prepaid expenses and accrued income	7,2	4,7
Total assets	30,5	44,5
Liabilites		
Accrued expenses and deferred income	2,4	1,2
Total liabilities	2,4	1,2
Income	31,2	28,8
Expenses	-14,4	-13,4
Total income and expenses	16,6	15,5

#### Note 7 Risks.

Risk is defined as an exposure to a deviation from an anticipated financial outcome. Although risk-taking is a fundamental part of the operations, Nordnet shall not generally expose itself to risks not supported by an established business plan. Risk management must be carried out in accordance with appropriate practices so that the relationship between risk and expected return is optimized.

Nordnet's risk exposures are based on:

- Business activities intended to meet both customer needs as well as Nordnet's own needs, within the business strategy adopted by the Board
- Nordnet's long-term financial interests
- Current and future regulatory requirements
- Current and future capacity to control and mitigate risk exposure
- Acceptable loss levels and the capacity to absorb losses through earnings and capital

How risk management is conducted is described in the risk management framework. The framework comprises a number of control documents that describe strategies, processes, procedures, internal rules, limits, controls and reporting procedures. The risk framework is integrated into the organization and covers all relevant risks.

Central to the risk framework is the risk appetite, which expresses the aggregate level and the types of risks that Nordnet is willing to expose itself to within its risk capacity and in accordance with the business model to achieve strategic objectives. The risk appetite indicates the maximum accepted risk exposure at both a general level, as well as for specific risks. This is adapted to Nordnet's business strategy, with the limits being determined by the Board and assessed and updated regularly.

Risk culture is defined as the norms, attitudes and behaviours around risk awareness, risk-taking and risk management and the controls that shape decisions regarding risks. The risk culture influences the decisions that management and employees make in their daily operations and that thereby influence the risks they take. Nordnet shall have a sound risk culture that safeguards a common view of risk-taking based on risk awareness and an understanding of the specific risks and risk appetite. The resources and expertise in the business organization and the control functions must be adapted to the scope of the work performed in the respective units. Nordnet's risk processes are conducted in accordance with the principles associated with the three lines of defence.

The first line of defence comprises the operations of the line organization and involves all risk management activities performed by line management and personnel. All managers are fully responsible for the risks within each area of responsibility and the day-to-day management of these. Consequently, they are responsible for ensuring that an appropriate organization, procedures and support systems are implemented to secure an appropriate system of internal control. They are also responsible for ensuring that all activities are kept within risk appetite and adhere to internal and external rules.

The second line of defence comprises the risk control, actuarial and compliance functions. They are independent of the line operations and monitor, control and report Nordnet's risks and regulatory compliance and must also support and advise the first line of defence. The

functions develop the principles and framework of risk management, gather the business's risk assessments and perform independent follow-up procedures. They must also promote a healthy risk culture by supporting and educating line management and personnel.

The third line of defence comprises the internal audit function, which performs independent periodic reviews of the governance structure and the internal control system. These audits may be mandatory from a regulatory perspective or risk-based.

#### ICLAAP.

The internal capital and liquidity assessment process (ICLAAP) is a continuous process that evaluates capital and liquidity requirements in relation to Nordnet's risk profile, plans and global factors. As part of the ICLAAP work, a comprehensive study and analysis is conducted of the risks in the operations. Nordnet is working for the entire organization to be involved in risk analysis. All employees are responsible for identifying risks and increasing their knowledge about these. The ICLAAP process is part of the organization's work with risk and requires the active participation of risk owners and the employees concerned. For the insurance group, a risk and solvency assessment or ORSA (Own Risk and Solvency Assessment) is performed, which is a continuous process that assesses the capital requirement in relation to the Group's risk profile and business plan. The ORSA covers all material risks to which the Group is exposed.

#### Credit risk.

Credit risk is the risk of Nordnet not receiving payment as agreed and/or making a loss due to a counterparty's inability to fulfil its obligations, and where any securities do not cover Nordnet's receivables.

Nordnet's exposure to credit risks arises primarily from lending, which entails the risk of incurring losses due to borrowers not being able to meet their payment obligations for various reasons. Lending to the public comprises margin lending with collateral in listed securities. In addition to margin lending with collateral, mortgages are offered in Sweden and Norway, as well as unsecured loans without collateral in Sweden.

Nordnet's lending is characterized by good ethics, superior quality and control and is therefore based on policies established by the Board that set the framework for credit assessment, credit risk management, credit risk reporting and risk appetite. The CEO is responsible for more detailed credit instructions being established. It is in the Group's interests that lending does not entail borrowers taking unnecessary risks. All credits are assessed within the credit department, which is centrally located in the Group. Internally developed risk classification tools are used as support. Before granting credit, all credits must be identified and are assessed based on the individual borrower's financial conditions and repayment capacity in both the short and long term. Nordnet continuously monitors borrowers' repayment capacity and the credit quality of the portfolio is reviews and analyzed on an ongoing basis. Among other things, the review is performed to identify, at an early stage, particularly vulnerable customer groups that may cause Nordnet to adjust the credit assessment process associated with the identified customer group.

At the end of the year, lending to the public amounted to SEK 30,200 (28,527) million. Total provisions for expected credit losses amounted to SEK 123 (100) million, including an expert adjustment of SEK 3 (3) million regarding mortgages. The expert adjustment for mortgages

should cover expected credit losses on an average mortgage that the model does not capture.

The Group's credit risk exposures also include counterparty risks and concentration risks. Counterparty risks, defined as the risk that a counterparty in a financial transaction is unable to meet its obligations and thus causes a loss for the other party, arise primarily in the management of the Group's liquidity portfolio but also occur in clients' securities trading. Concentration risks can arise from exposures to individual counterparties/customers, industries and regions.

#### Sustainability-related risks within credit risk.

Nordnet does not conduct traditional business lending, instead its only lending to companies is through margin lending where the companies are sole proprietorships or closed companies whose main purpose is investment. Nordnet does not conduct project financing. With regard to loans to private individuals, Nordnet strives to be a responsible lender, meaning that loans are only provided to those whose repayment capacity is in accordance with Nordnet's credit assessment. Nordnet's credit assessment must include an evaluation of the individual's debt as a whole with the objective of actively preventing over-indebtedness. Nordnet must also be transparent in terms of conditions, interests and fees associated with Nordnet's product offering so that Nordnet's customers can make well-informed decisions.

#### Climate risks within credit risk

Sustainability-related issues can impact Nordnet's lending in many different ways. The direct risk is primarily managed through continuous follow-up and analysis of collateral and customer behaviours. For margin lending, this entails the loan-to-value ratio of the collateral being continuously adjusted to the assessed Risk. Sustainability issues are incorporated into a number of different processes within the bank's lending operations. Nordnet monitors concentration risks, for example, against physical climate risks in the form of areas of risk for rockfalls, landslides, erosion and flooding linked to the collateral in Nordnet's mortgage portfolio. Sustainability issues are also taken into account in Nordnet's work to establish loan-to-value ratios on financial instruments, determining how much of the granted credit limit customers utilize in margin lending. Among other things, the assessment is based on the company's sustainability-related risk, which is obtained from a third party, where a high sustainability-related risk could affect the loan-to-value ratio negatively. In addition, in 2024 Nordnet will investigate the possibility of incorporating climate risks into the bank's credit assessments.

### Credit rating.

#### Margin lending.

For margin lending the most crucial evaluation criteria for Nordnet is the value and quality of the pledged collateral as well as the customers repayment ability. The loan value of the collateral securities is evaluated in accordance with an internal model based on the quality, liquidity and volatility of the individual security. Based on this and the repayment capacity, the customer is assigned a credit limit. The maximum permissible loan-to-value ratio for an individual security is 90 percent, although the loan-to-value ratio is often lower. Nordnet's credit department constantly monitors the loan-to-value ratio at both an individual and aggregated level. The number of accounts utilizing credit amounted to approximately 25,000 (24,000) as of 31 December 2023.

In a situation where the exposure (negative balance/lending +

negative market values for short sales + collateral requirements for derivatives) exceeds the loan-to-value ratio of the collateral, socalled overdraft occurs. The customer must then remedy the shortfall that has arisen, either by selling securities, deposit additional cash and/or transferring additional securities with collateral value. If this is not rectified within a given time frame, Nordnet has the option of selling securities to the extent required to rectify the overdraft. However, Nordnet always has the opportunity to remedy overdraft directly. As of 31 December 2023, overdraft amounted totalled SEK 10.0 (12.0) million, corresponding to 0.07 percent (0.09) of the total lending for margin lending. Overdraft averaged SEK 9.6 million per day during 2023, which corresponds to 0.06 percent of the average lending for margin lending. In a situation where exposure has arisen in a account where no approved credit agreement exists, an overdraft occurs. Customers must rectify overdrafts and if this does not happen within the specified time frame, Nordnet has the opportunity to sell securities to settle the shortfall. As of 31 December 2023, overdraft amounted to SEK 45.5 (31.8) million.

Nordnet conducts ongoing stress tests to assess and calculate the risk of losses that may arise in the event of sharp stock market declines or due to concentrations in the collateral.

At the end of the year, lending totalled SEK 14,967 (13,563) million and the market value of the securities amounted to SEK 132,441 (109,786) million. The volume-weighted average loan-to-value ratio in customers' accounts with credit limits amounted to 39.5 percent (39.8). The provision for expected credit losses amounted to SEK 12.8 (11.4) million.

The change in the provision for expected credit losses has been affected by confirmed credit losses regarding a small number of loans that have been reserved for a longer period and where an assessment has been made that the borrower is unable to repay the remaining debt.

#### Mortgages.

Nordnet offers mortgages on the Swedish and Norwegian markets with a maximum loan-to-value ratio of 50 and 60 percent respectively. To personnel in Sweden, Nordnet offers mortgages with a maximum loan-to-value ratio of 75 percent. All lending is secured by mortgage deeds in single-family homes and tenant-owned apartments with Nordnet as the sole holder of the pledged assets. The value of the pledged assets is calculated on the basis of valuations by an external party: statistical valuation or valuation from brokers or authorized assessors. When buying a home, the purchase consideration can be used as market value. Revaluation takes place annually, or more frequently if needed. Nordnet also has supplementary collateral in borrowers' securities deposits with Nordnet.

Nordnet only grants mortgages following a customary credit check and a left to live on calculation, in which all income and expenditure of the borrower's household is taken into consideration to ensure that the borrower can cope with a higher interest-rate scenario. All loans are covered by regulatory amortization requirements. The interest rate follows an interest rate ladder that can be adjusted if the conditions change in the form of reduced assets that qualify for a certain discount or that the value of the home decreases.

At the end of the year, lending totalled SEK 11,344 (10,880) million. Of the total lending, 79 percent (83) is to borrowers resident in Stockholm, Gothenburg and Malmö. The volume-weighted average loan-to-value ratio amounted to 44 percent (46). The provision for

Breakdown of the loan portfolio margin lending, LTV range										
	<=20%	>20%	>40%	>60%	>80%	Totalt				
2022	19%	29%	24%	14%	13%	100%				
2023	19%	30%	29%	14%	7%	100%				

#### Margin lending

	Credit utilized	I (SEK million)	Percentage of total credit volume (%)		
Market	2023	2022	2023	2022	
Sweden	5,232	5,188	35%	38%	
Norway	3,055	2,819	21%	21%	
Denmark	2,614	2,471	17%	18%	
Finland	4,074	3,074	27%	23%	
Total	14,975	13,552	100%	100%	

Range	Total, net (S	SEK million)	Percentage of total (%)		
	2023	2022	2023	2022	
<10 SEK thousands	51	47	0%	0%	
10-500 SEK thousands	2,475	2,587	17%	19%	
501-2,000 SEK thousands	3,629	3,415	24%	25%	
>2,000 SEK thousands	8,819	7,503	59%	55%	
Total	14,975	13,552	100%	100%	

expected credit losses amounted to SEK 3.2 (3.2) million. The provision for expected credit losses includes an expert adjustment of SEK 3 million for expected credit losses that may arise if, for example, the mortgaged home is destroyed and the insurance does not cover the damage or if the pledge is invalid. The expert adjustment shall cover expected credit losses on an average mortgage.

Nordnet collaborates with Stabelo. Although Stabelo's mortgages are brokered through Nordnet, these loans are not included in Nordnet's balance sheet.

### Unsecured loans.

Nordnet offers credits of up to SEK 500,000 to private individuals in Sweden without requiring collateral. Accordingly, this type of lending has a higher inherent credit risk than in Nordnet's other lending. For these loans, individual pricing is applied that reflects the risk.

Credit assessment regarding unsecured loans applies in-house-developed scoring models combined with a calculation of how much the borrower has left to live on, and supplementary credit regulations. The scoring model predicts the risk of default based on the information registered at the time of application, credit information and internal management. A credit decision must be made based on current information, which is why an application must not be older than 30 days. The credit assessment process, its parameters and sales channels included, is reviewed on an ongoing basis and adjusted if necessary.

The internal risk rating system forms a central component in the

Group's processes for credit provision, credit review and quantification of the credit risk in the portfolio. Nordnet can thereby estimate the risk of default and future losses. This also affects the pricing in the form of the interest offered to the customer. Credit risk and the dynamics of the credit portfolio are followed up on an ongoing basis to ensure that the risk level is in line with the risk appetite approved by the Board of Directors. The models are reviewed regularly and validated internally or by an independent party.

At the end of the year, lending amounted to SEK 4,012 (4,184) million under the Konsumentlånet (consumer loan) and Nordnet brands and divided between 26,256 loans (26,771). The provision for expected credit losses amounted to SEK 107 (85) million.

The provision adjustment of a negative SEK 2 million introduced for unsecured loans in the first quarter of 2022, was removed in the first quarter of 2023 due to the underlying model for provision calculations having been updated. This update builds largely on an update to the underlying PD model, the principal purpose of which is to generate a more robust and fair estimate of the risk of default. It is judged that the former PD model overestimated the risk, primarily for loans in Stage 1, which is why provision adjustment of a negative SEK 2 million was introduced in 2022. With the implementation of the updated model, this adjustment is no longer deemed relevant and has thus been removed.

### Liquidity portfolio.

Distribution of the loan portfolio mortgages, LTV range									
	<=20%	>20%	>40%	>60%	>80%	Totalt			
2022	3%	26%	26%	11%	1%	100%			
2023	6%	32%	52%	10%	0%	100%			

Liquidity management within Nordnet comprises the regulatory liquidity reserve (in accordance with the Swedish Financial Supervisory Authority's regulations on liquidity risk management (FFFS 2010:7)) and all other liquidities in the liquidity portfolio. The liquidity reserve constitutes a separate reserve of high-quality liquid assets, bank balances (excluding client funds), balances with central banks and investments in interest-bearing securities.

Procedures for investments in financial instruments follow established policies and instructions. These regulate the type of investment, limits per counterparty, permitted issuers, maximum fixed interest maturities, as well as procedures to ensure the quality of counterparties and pledged collateral. Securities holdings comprise certificates, bonds and treasury bills with a rating of at least BBB- issued by banks, companies, states, municipalities and county councils, as well as a holding of a Tier 1 capital instrument with a credit rating of BB. All interest-bearing securities where the issuer or instrument does not have a credit rating from a credit rating agency entail exposures to local government authorities within the EU/EEA.

Nordnet's liquidity portfolio comprises cash and bank balances at central banks, loans to credit institutions, sovereign bonds eligible as collateral and bonds and other interest-bearing securities and amounted, as of 31 December 2023, to SEK 40,772 (54,390) million.

Provision for sovereign bonds eligible as collateral, as well as for bonds and other interest-bearing securities amounted to SEK 0.1 (1.1) million. Most of the holdings carry investment grade credit ratings or, in cases where credit ratings are lacking, are issued by municipalities

Maturity analysis for unsecured loans		
	2023	2022
30 days late payment	0.95%	0.63%
60 days late payment	0.54%	0.34%
90 days late payment	0.34%	0.30%

or regions in the Nordic countries. Provisions are therefore calculated as the expected credit loss (ECL) over the ensuing 12-month period.

#### Counterparty risk.

Counterparty risks arise in the form of issuer risks in the liquidity portfolio, risks to account holders for bank deposits, settlement risks, and risks to clearing institutions and CCPs. Settlement risk comprises the risk that the counterparty to a transaction will not be able to fulfil its obligations to pay for or deliver agreed securities and that the price of the financial instrument will have changed when re-arranging the transaction with a new counterparty.

As a consequence of Nordnet's operations, a large part of the coun-

terparty risk is related to the flow of transactions on the Nordic stock markets. The risks are limited through the use of established clearing organizations, such as Euroclear and Nasdaq OMX.

Counterparty risks in the liquidity portfolio are limited by, for example, deliberately selecting counterparties with high credit quality. Trading in derivative instruments is governed by ISDA agreements, and their collateral by CSA agreements. Counterparty risks are limited through the deliberate selection of counterparties with high credit quality and by entering agreements on derivative instruments with several financial counterparties.

The table on the next page shows the credit ratings for the Group's holdings of financial instruments. According to the Group's Finance Policy, holdings in interest-bearing instruments carry a rating of at least BBB-. Nordnet may also invest in hybrid and capital instruments with a rating lower than BBB- provided that the issuer has a rating of at least BBB-. For covered bonds, the ratings of the bonds have been used; for others, the issuer's ratings have been used. Nordnet allows investments in non-rated assets issued by municipalities or county councils.

#### Concentration risk.

Concentration risks arise in commitments concentrated to a small number of customers or a certain industry, for example, or to securities issued by one particular issuer, or to a specific geographical area. Concentration risks can also arise when groups of exposures exhibit a significant degree of covariance.

Nordnet has a range of services and products targeting a broad spectrum of customers throughout the Nordic region, with relatively low exposures per customer, a favourable geographical spread and considerable variation in their trading behaviour. Nordnet has established procedures and working methods aimed at avoiding excessive concentrations to individual issuers. The credit portfolios show limited exposures to individual borrowers and are spread well between geographical markets. There is one major concentration in the mortgage portfolio, primarily in Greater Stockholm, which accounted for 63.3 percent (69.1) of this lending. Nordnet monitors the concentration risks on an ongoing basis.

As of 31 December 2023, the ten largest credits (customers with co-limits) accounted for 14.7 percent (14.7) of total margin lending. The table below presents the concentration regarding lending against individual collateral assets.

### Calculation of expected credit losses.

	Market value	(SEK million)	Lending (SI	EK million)	Average loan to value ratio % 1			
Collateral for mortgage loans	2023	2022	2023	2022	2023	2022		
Houses	21,532	19,780	7,664	7,038	41,9%	41,6%		
Tenant-owner's right	9,239	9,369	3,675	3,839	47,2%	47,9%		
Total	30,771	29,150	11,339	10,877	44%	46,0%		

<sup>&</sup>lt;sup>1</sup>Volume-weighted average loan-to-value ratio is produced by multiplying the loan-to-value ratio for each loan by its weight, which here is lending on the loan divided by total lending. All values are then summed.

#### Assumptions and techniques for assessing impairment.

Nordnet reports provisions for expected credit losses on financial assets measured at amortized cost and for irrevocable loan commitments. For all credit products, as well as for the liquidity portfolio, Nordnet has developed statistical models combining historical, current, future-oriented and macroeconomic data, as well as benchmarks deemed relevant by Nordnet and external data from multiple sources to be able to measure the credit risk and assess the potential risk of default. The measurement of credit exposure and calculation of expected credit losses (ECL) are complex and include the use of models based on the probability of default (PD), exposure at default (EAD) and loss given default (LGD).

Twelve-month and lifetime PD represents Nordnet's assessment of the probability of default within the next 12 months and over the entire remaining term of the contract at a given time based on the conditions on the balance sheet date and future financial conditions affecting credit risk. EAD refers to the expected exposure at default, taking into account repayments of principal and interest from the balance sheet date to the time of default. LGD constitutes the expected loss given default, taking into account mitigating factors, such as collateral assets and their value. PD, LGD and EAD are calculated monthly up until the end of the expected term. ECL comprises the product of PD, LGD and EAD discounted by the original effective interest rate. A summary of the expected credit losses for the lifetime of the loan amounts to the expected credit losses for the assets remaining tenure. For margin lending, a loss-rate model is applied in which PD and LGD are calculated together, as there have been very few defaults and losses historically, meaning there was insufficient data for building separate PD and LGD models.

The calculation takes into account three scenarios (base, positive and negative) reflecting relevant macroeconomic factors, such as GDP, housing prices and unemployment. The risk parameters incorporate the effects of macroeconomic forecasts. A probability is allocated for each scenario and the expected credit losses are obtained as a probability-weighted average. Significant doubtful credit exposures are assessed individually, without applying input data from models.

For all products, no provisions are made for granted, un-disbursed applications as the total provision for this category is deemed immaterial. For unsecured loans and margin lending, this is due to the automated application process, with the time from the granted application to an active loans being very brief. For granted mortgage applications, the credit risk is assessed to be so low that the total provision would not increase materially.

#### Increased credit risk.

Concentration risk	
31/12/2023	
Nordea	2.2%
Novo Nordisk	1.8%
Evolution Gaming	1.6%
Sampo	1.3%
Tesla	1.2%

Nordnet takes both quantitative and qualitative information into account when assessing whether there has been a significant increase in credit risk since initial recognition. The analyses are based on historical, current and forward-looking information alike.

For margin lending, a significant increase in credit risk is considered to have occurred where:

- An overdraft exceeding SEK 10,000 has arisen and not been settled within ten days. The reason for a limit of SEK 10,000 is that the capacity to repay has historically been significantly higher for amounts below SEK 10,000 compared with amounts above SEK 10,000.
- The credit exposure exceeds the value of the security, with the amount exceeding SEK 1,000 and not having been settled on the first banking day. If the amount is not settled within 30 days (back-stop), a significant increase in credit risk is considered to have occurred regardless of the amount.

A significant increase in credit risk for mortgages occurs if the PD at the time of reporting is higher than the PD when the mortgage was disbursed and the increase in PD exceeds 0.25 percentage points. There is also a significant increase in credit risk if a claim is more than 30 days past due (back-stop).

For unsecured loans, a significant increase in credit risk is considered to have occurred if PD has both doubled and increased by two percentage points compared with the PD calculated at the time of application. If a receivable is overdue by more than 30 days, a back-stop is also applied to capture loans that are past due but not captured by the PD comparison.

Regarding the liquidity portfolio, Nordnet's Finance Policy stipulates that an asset must be divested if the issuer's credit rating falls below BBB-. If the asset refers to a covered bond, the credit rating may not fall below AA-/Aa3. Nordnet assesses these assets in accordance with the exception for holdings with low credit risk, as the asset will be sold before the credit risk is considered to have increased significantly.

#### Collective assessment.

The assessment of a significant increase in credit risk for exposures pertaining to all lending products and the liquidity portfolio is based initially on a collective assessment applying shared risk parameters in the form of product category and credit risk rating.

#### Modified loans.

The reason for a loan being modified may be that a borrower has contacted Nordnet after encountering financial difficulties, that

Concentration risk						
31/12/2022						
Note	2.4%					
Sampo	2.0%					
Nordea	2.0%					
Evolution Gaming	1.8%					
Novo Nordisk	1.5%					

Rating
according
to Standard
& Poor's
31/12/2023

Group SEK million Assets	AAA	AA+	AA	AA-	A+	Α	A-	BBB+	BBB	ВВ	no rating	Total
Loans to credit institutions <sup>1</sup>	_	_	-	191	1,650	-	279	13	101	-	31	2,265
Loans to the general public	-	-	-	-	-	-	-	-	-	-	30,200	30,200
Fincial assets at fair value	-	-	-	-	-	-	-	-	-	-	4	4
Treasury bills and other interest bearing securities	3,249	2,007	76	-	-	-	-	-	-	-	-	5,332
Bonds and other intererst bearing securities	25,002	3,760	-	729	546	233	495	-	-	-	-	30,765
Reinvested assets in the insurande business <sup>2</sup>	-	813	-	-	-	-	-	-	-	-	-	813
Total	28,251	6,580	76	920	2,196	233	774	13	101	-	30,235	69,380

<sup>&</sup>lt;sup>1</sup>Of which SEK 1,783 million is reported as actuarial assets in the consolidated balance sheet.

Rating according to Standard & Poor's 31/12/2022

Group SEK million	AAA	AA+	AA	AA-	A+	Α	A-	BBB+	BBB	ВВ	no rating	Total
Assets												
Loans to credit institutions <sup>1</sup>	87	1,397	72	-	-	-	-	-	-	-	16	1,572
Loans to the general public	-	-	-	-	-	-	-	-	-	-	28,527	28,527
Fincial assets at fair value	-	-	-	-	-	-	-	-	-	-	20	20
Treasury bills and other interest bearing securities	35,579	2,819	-	445	-	-	-	-	-	-	117	38,960
Bonds and other intererst bearing securities	2,582	1,534	1,348	718	193	83	593	190	-	10	3,968	11,218
Reinvested assets in the insurande business <sup>2</sup>	1,954	185	-	-	-	-	-	-	-	-	-	2,139
Total	40,202	5,936	1,419	1,163	193	83	593	190	-	10	32,648	82,437

<sup>&</sup>lt;sup>1</sup> Of which SEK 1,087 million is reported as actuarial assets in the consolidated balance sheet.

<sup>&</sup>lt;sup>2</sup> Parts of the liquid assets in the insurance business were reinvested in bonds.

 $<sup>^{\</sup>rm 2}$  Parts of the liquid assets in the insurance business were reinvested in bonds.

Nordnet has taken measures to retain the customer or that changes in market conditions have occurred.

Nordnet works actively with various forms of temporary payment relief (for example interest rate adjustment, individual payment plans, amortization relief) for customers who have historically shown favourable payment capacity but who have now found themselves in financial difficulties.

A modified loan attributable to the customer's repayment capacity is categorized as a deferred loans. This requires a transfer between stages in the models used to calculate provisions for expected credit losses. The loan must then pass at least 12 months without remark or further modification to then be moved back to an earlier stage.

#### Default and doubtful receivables.

Default is defined in accordance with the Group's credit policy as a combination of both quantitative and qualitative factors.

For margin lending, an account is considered to be in default (Stage 3) if the credit exposure has exceeded the value of the collateral for more than 90 days, or if some form of deferment has been granted to the customer.

For mortgages, default is defined as a claim overdue for more than 90 days if the claim has been sent for collection or if some form of deferment has been granted to the customer.

Unsecured loans are defined as being in default if a claim is at least 90 days past due, or if the probability of repayment is considered low. Examples of this involve customers undergoing debt restructuring, who have been declared bankrupt, are deceased, are targets of fraud or have emigrated from the country. A default always leads to the claim being classified as Stage 3. In addition to the above, loans granted any form of deferral are to be placed in Stage 3. Stage 3 also includes minimum terms for reclassification to a non-default status.

#### Transfer from Stage 3.

All types of loans transferred to Stage 3 are subject to a probation period, meaning that they can only be transferred to Stage 1 or 2 after a certain period.

Loans transferred to Stage 3 due to having been deferred can be transferred to Stage 1 or 2 after 12 months at the earliest. In other instances, loans can be transferred to Stage 1 or 2 after three months.

The liquidity portfolio and lending to credit institutions are assessed in accordance with the exception for holdings with low credit risk. In accordance with Nordnet's Finance Policy, only bonds and treasury bills with a rating of at least BBB- are permitted. All bank deposits are placed at rated institutions and central banks in the Nordic banking system.

For other financial instruments measured at amortized cost, such as accounts receivable, default is defined as a claim that is more than 90 days past due, or for which there are other indicators (bankruptcy) suggesting that debtors are unlikely to pay their credit obligations in full.

### Application of forward-looking information.

Nordnet includes forward-looking information in its calculations of

expected credit losses. From analyses of historical data, macroeconomic factors are identified that affect credit risk and, thus, expected credit losses. These analyses take into account internal and external information on country, borrower and product type and are consistent with the forward-looking information used for other purposes such as financial planning and forecasting. These consist of reasonable and verifiable factors, such as unemployment, GDP and a housing price index. The effect of forward-looking macroeconomic factors is calculated through the application of three different scenarios (base, positive and negative). The probabilities for the different scenarios, as well as the methodology and assumptions used in the models, are reviewed regularly and adjusted as necessary.

In margin lending, GDP is considered a relevant macro variable in the calculation of expected credit losses. Years of negative GDP growth show a correlation with developments in the stock market, leading to an increase in credit losses. Data from Bloomberg and from various forecast institutes are used for forecasting the GDP trend in Sweden, Norway, Finland and Denmark. As the risk of credit losses on margin lending is often strongly correlated with the diversification and level of risk in the customer's specific securities portfolio, the GDP trend is therefore often used as a general indicator of the economic trend. In addition to GDP forecasts, volatility in financial markets and other forecasts of future economic development may be taken into account.

For unsecured loans, forecast unemployment, in relation to current unemployment, is used as a variable when calculating the expected default level in the coming year. These forecasts are obtained from Bloomberg, which provides data from various forecasting institutes. Each scenario is then given a probability. This probability is initially 50 percent base, 25 percent positive, 25 percent negative, but can be adjusted based on quantitative and qualitative assessments. A quantitative assessment can be a big difference between forecast and actual unemployment, while a qualitative assessment can be that the forecasts are not assumed to be updated or contain all the available macroeconomic information that can have an effect on the expected credit losses.

In 2022, the scenario weighting was changed to 60/30/10 (negative, base, positive). This change was based on the desire to allow the deteriorating macroeconomic situation to have an even greater impact on the provisions, apart from the effect of the already worsening forecasts. Nordnet continually updates the forecasts and outcomes of macroeconomic indicators used to calculate provisions.

In connection with mortgages, the housing price index is used to reflect the price trend in the Swedish housing market, and future housing price expectations and forecast GDP trends are also applied.

Historical price trend data is taken from Valueguard HOX Sweden and housing price expectations are taken from the SEB housing price indicator. As Nordnet's mortgage portfolio has very low risk, with approved loan-to-value ratios of up to 50 percent in Sweden and 60 percent in Norway, larger declines in future house price expectations are required to have significant effects on the expected credit losses.

Changes in market interest rates are used to forecast the risk of credit losses in the liquidity portfolio. The interest rate affects funding expenses for states, banks and institutions that borrow money on the capital markets. Accordingly, the interest rate has an impact on credit providers' credit quality in the form of refinancing opportunities, interest payments and financing expenses. Macroeconomic factors

are reflected in the credit ratings of credit providers and the portfolio instruments.

A forecast is also given of each credit rating (positive/stable/negative). Forecast credit losses are based on three different scenarios. Base — all credit ratings are unchanged. Negative — credit ratings with a negative outlook are downgraded one level. Positive — credit ratings with a positive outlook are upgraded one level.

A 12-month provision is calculated for each of the scenarios. These are then weighted with the probability of each scenario occurring, with the final provision being the sum of these weighted amounts.

## Sensitivity analysis, forward-looking information.

In the provisions for mortgages, expected credit losses are calculated for different scenarios (base, positive, negative). In the negative scenario, the market value of housing and customers' pledged capital are stressed.

For provisions for unsecured loans, a sensitivity analysis shows that at an unemployment rate of 12 percent the percentage of agreements in Stage 2 will increase from 4.4 percent to 5.3 percent of total portfolio volume. The reason for using unemployment as a macroeconomic indicator of future credit losses is that Nordnet has historically seen that it is the indicator that best correlates with credit losses. The reason for using 12 percent unemployment is based on historical levels, where unemployment in Sweden during the 1990s almost reached these levels.

Nordnet conducts ongoing stress tests regarding margin lending and regarding concentration risks for margin lending and mortgages. Nordnet's stress tests of both margin lending and mortgages indicate favourable resilience and low risk for increased credit losses, even in the event of a worsening macroeconomic scenario.

Each year, Nordnet conducts a climate risk analysis of the mortgage portfolio, in which potential risk areas, in accordance with MSB, are analyzed on the basis of potential future climate-related issues. Exposure, loan-to-value ratio and geographic concentration are analyzed to ensure that any local climate-related problems do not impact the total credit risk excessively. Based on this analysis, assurance can the be provided that the mortgage portfolio is geographically well diversified, with low to moderate loan-to-value ratios in particularly exposed areas.

For margin lending, the ESG score is included as an underlying parameter on which loan-to-value ratio is based. Among other things, this is to ensure that climate-related risks are taken into account in this process.

No corresponding analysis is currently carried out for unsecured loans.

The conclusion of the analysis showed a relatively low share of exposures to national risk areas, and any climate-related credit losses are considered to have had little effect on the total credit losses

### Compliance measures.

Nordnet's contractual outstanding amount with regard to financial assets that have been written off but that are still covered by compliance measures in the form of instalment plans, amounts to SEK 17.0 (11.8) million as of 31 December 2023.

### Confirmed credit losses.

Confirmed credit losses are credit losses for which Nordnet has made the assessment that it will not be possible to recover all or part of the credit exposure on an individual loan. Confirmed credit losses entail the credit exposure being removed from the balance sheet and expensed. Examples of confirmed credit losses include when a counterparty is declared bankrupt and there is no collateral to cover the credit exposure. A confirmed credit loss arises even if a loan receivable is sold to a purchaser of receivables as is the case for unsecured loans. In addition, where the probability of repayment is assessed as very low, continuous amortizations of unpaid receivables are applied.

Confirmed credit losses for 2023 totalled SEK 57.7 (48.9) million. This corresponds to 0.19 (0.17) percent of total lending as per 31 December 2023. For margin lending, the confirmed credit losses amounted to SEK 0.0 (0.9) million. The credit losses involve a small number of old, defaulted credits for which the assessment has been made that the borrowers lack the means to repay the debts. Nordnet has not had any confirmed credit losses regarding mortgages over the year, nor has it had any confirmed credit losses since beginning to offer mortgages in 2016. The confirmed credit losses for unsecured loans amounted to SEK 57.7 (48.0) million, which corresponds to 1.15 (1.16) percent of total lending for unsecured loans as of 31 December 2023.

#### Market risk.

Market risk derives from the risk that the fair value or future cash flow from a financial instrument is affected by changes in market prices. Nordnet is exposed to market risks in the form of interest rate risk, exchange rate risk and share price risk. As Nordnet's operations are structured around customer trading and no trading is conducted on Nordnet's own behalf, the interest rate risks are primarily attributable to the bank book. Exchange rate risks arise in connection with differences between assets and liabilities in different currencies. The risk appetite for market risk is low, with the strategy being to match assets and liabilities with regard to currency, interest rate index and interest rate maturity.

### Interest rate risks.

Interest rate risk is the risk that the fair value of, or future cash flows

### Number of concessionary loans by product and lending for these loans

Product	Number of loans with concession	Total lending for conces- sional loans, MSEK	Total lending to loans with concession, MSEK
Personal loans	267	55,0	8,8
Margin loans	6	1,8	1,1
Residential mortgages	-	-	-

from, a financial instrument fluctuates due to changes in market interest rates. Interest rate risks in the form of price risk and cash flow risk occur in connection with maturities imbalances between assets and liabilities, as well as in changes in asset values due to changes in market interest rates.

Nordnet's credit provision generally involves variable interest rates and is primarily funded through deposits at variable interest rates. The interest rate risk is deemed to be limited as the credit turnover rate is relatively high, and the credit agreements allow interest rate adjustments with a relatively short periodicity. The Board has set limits for the maximum interest rate risk level and interest rate sensitivity is measured and reported daily to Risk Control and the CFO. At the end of each quarter a sensitivity analysis of the portfolio is conducted.

At the end of the year, the interest rate risk amounted to SEK 140.9 (266.4) million in the event of a negative change in the market interest rate of 2 percentage points (2), which would be charged against profit after tax and reduce equity by SEK 111.9 (211.5) million. Correspondingly, a positive change in the market interest rate of two percentage points would increase profit after tax and increase equity by SEK 111.9 (211.5) million. A list of Nordnet's fixed-interest terms is provided in the table on page 108. Nordnet has an internal model for measuring credit spread risk. At the end of the year, the credit spread risk according to this model amounted to SEK 128.6 (392.0) million.

### Exchange rate risks.

Exchange rate risk is the risk that fluctuations in one currency in relation to another will affect Nordnet's profit, balance sheet and/or cash flows. Nordnet's home market is the Nordic region, with currency exposure mainly arising in NOK, DKK and EUR, although there are also currency flows in GBP, CAD and USD, for example.

To limit its exchange rate risk, Nordnet conducts currency exchange transactions on a daily basis and holds only minor flow-related currency positions over more than one banking day. According to the Policy established by the Board, Nordnet measures and reports its exchange rate risk on an ongoing basis.

At the end of the year, the total net exposure in foreign currency amounted to SEK 1,009.0 (1,009.7) million. An unfavourable exchange rate development of 10 percent in either currency would entail an effect of SEK 100.9 (101.0) million, which would be charged against profit after tax and other comprehensive income in the amount of SEK 80.1 (80.2) million. This includes net assets from foreign operations that are not hedged. For a more detailed description of assets and liabilities in foreign currency, see the table below.

### Share price risk.

Share price risk is the risk that the fair value of, or future cash flows from, a share will vary due to changes in market prices. Nordnet's direct exposure to share price risk is low as the Group does not normally hold any positions of its own.

At the end of the year, the company's own total exposure to share price risk amounted to SEK 4.3 (19.8) million. A sudden negative market development for all the shares of 10 percent entails a risk of approximately SEK 0.4 (2.0) million, which would be charged against profit after tax and reduce equity by SEK 0.3 million.

### Financing risk/liquidity risk.

Liquidity risk refers to the risk that Nordnet would be unable to finance existing assets or meet its payment obligations, or only be able to do so at significant expense. Liquidity risk can be divided into two components. The first part is the risk of Nordnet having insufficient cash and cash equivalents to fund its operations, and the other part is the risk of being unable to convert investments into cash without significantly increased expenses.

The Board of Directors has adopted policy limits, a segregation of duties, review procedures and contingency plans. The Board has decided that Nordnet shall have a low-risk appetite for liquidity risk. Nordnet must always have cash and cash equivalents available to manage the daily flows in the operations. Contingencies shall always be in place to handle disruptions, with possibilities to redistribute liquidity quickly or to divest assets. The liquidity portfolio must comprise investments with good credit quality. Among other things, Nordnet's contingency plan includes risk indicators, a division of responsibilities, a plan of action to generate liquidity and planned measures in connection with serious disruptions. Treasury is responsible for continuously monitoring, analyzing, forecasting, managing and reporting liquidity risks. Liquidity forecasts and various risk measures are reported to the Board on an ongoing basis. Regular stress tests ensure liquidity preparedness under conditions deviating from the normal, such as significant outflows of deposits from the public, disturbances in the capital market and deteriorating repayment behaviour.

Most of Nordnet's lending operations are short-term in nature, with the exception of the mortgage product in Sweden and Norway. As Nordnet's financing mainly comprises equity, customers' deposits and two issued bonds, the structural liquidity risk is low. In the maturity table (see page 125), deposits from the public are categorized as payable on demand, although the behavioural flow differs from the contractual one as deposits from the public have historically been a long-term and stable source of financing.

Lending to the public in relation to deposits from the public (including deposits from the public included in the item Liabilities where

#### Provision per product, based on 100% weight against each scenario

Product	Actual	Positive	Base	Negative
Personal loans	106.6	104.3	106.1	107.2
Margin loans	12.8	11.0	12.8	14.6
Residential mortgages	3.2	3.1	3.1	3.7

the customer bears the investment risk, which corresponds to cash and cash equivalents in accordance with Note 24) amounts to 45 percent (35) as of the balance sheet date. In Sweden, Nordnet has also issued three so-called AT1 bond loans of SEK 500, 600 and 300 million to optimize the capital structure and generate scope for continued growth. Nordnet's liquidity risk is reduced by its financing being spread between many customers and several geographical markets, and its payment contingencies are deemed to be very good. Concentrations in deposits, both on a customer and geographical basis, are monitored daily.

### Operational risk.

Operational risk consists of the risk of losses due to inappropriate or failed processes, human error, faulty systems or external events. The definition also includes legal, compliance, privacy and BCM risk. Besides all the risks that may be associated with human error and mistakes, typical examples of operational risks include: computer failure, dependence on key individuals, fraud, inadequate compliance with legislation and internal regulations, or external events, such as fire, natural disasters, sabotage or changes in laws and regulations.

To maintain good internal control of operational risks, Nordnet maintains well-functioning systems and procedures, as well as ongoing training of employees. The principal responsibility for the management of operational risks lies with the individual departments and functions in the organization. The self-assessment process includes identification and an evaluation of operational risks in all significant processes. The self-assessment is based on a shared method and is documented in a shared systems support. The results are reported annually to the Board and CEO. Based on the self-assessment and incidents having occurred, Nordnet identifies operational risks in its products, services, functions, processes and IT systems. The risk control function supports and guides the divisions in their risk work and performs the independent follow-up of the handling of operational risks and reports to the Board and the CEO.

Given the nature of Nordnet's operations, it follows that IT risks and data security are of considerable importance. Not only does rapid technological development create opportunities, it also entails threats in the form of cyber attacks, insider attacks, IT disruptions and online scams. There is also a risk that the IT infrastructure will become outdated and obsolete. Cyber threats against the Swedish financial sector are extensive and intrusions can cause downtime in important systems and sensitive data being leaked. For Nordnet, a fundamental concern is maintaining a high level of cyber security with

a strong, highly secure, digital outer shell.

Development and outcomes are closely monitored by both Group Management and the Board. A special IT security function works on the identification, prevention and control of risks related to Nordnet's IT systems.

#### Insurance risk.

(Life) insurance risk refers to the risk of loss as a result of changed customer behaviour or changes in the expenses associated with managing the insurance company's insurance obligations. Insurance risk also arises as a result of changes in demographic conditions, such as changes in the lifespan of the insured party. For Nordnet, life insurance risk mainly encompasses customer behaviour risk, in the form of the risk that income will be lost as a result of policyholders moving out or repurchasing their insurance to a greater extent than expected or if a large amount of savings is cancelled at one and the same time.

In Nordnet's insurance business, the main insurance risk lies in customer choices that risk having a negative impact on the company's future earnings, such as the risk of cancellations in the form of repurchases or transfers of insurance. To reduce the financial impact of cancellations, the insurance companies have taken out a reinsurance solution that to some extent mitigates the cancellation risk.

The insurance operations comprise traditional policies with conditional bonuses (custodial insurance) and fund insurance in which the insured party bears its own investment risk. This means that the Company's financial risk is very limited. In traditional insurance policies with periodic pay-outs, there is a guarantee over the first five years of the pay-out period. The guarantee amount totals 3 percent, in accordance with conditions guaranteeing 15 percent of the insurance capital, which is spread over 5 years. Insurance provisions for guaranteed commitments amount to SEK 55 (45) million, corresponding to 0.04 (0.04) percent of total insurance technical provisions.

Group - valuation of assets and liabilities in foreign currency	2023	2022
Assets		
Loans to credit institutions	1,571.6	917.5
Loans to the general public	10,458.8	8,396.8
Shares and participations	3.7	20.7
Treasury bills and other interest bearing securities	24,940.5	37,544.4
Other assets	28,590.3	24,081.5
Total	65,564.9	70,959.9
Liabilities		
Deposits and borrowing from the general public	39,748.9	49,992.3
Other liabilities	24,820.2	19,979.7
Total	64,569.1	69,972.0

				Exchange rate
2023	Assets	Liabilities	Net exposure	risk <sup>1</sup>
NOK	34,859.0	34,128.8	730.2	73.0
DKK	15,561.0	15,490.2	70.8	7.1
EUR	13,063.7	12,862.4	201.4	20.1
Other	2,081.2	2,087.8	6.6	0.7
Total	65,564.9	64,569.2	1,009.0	100.9

2022	Assets	Liabilities	Net exposure	Exchange rate risk <sup>1</sup>
NOK	32,832.9	32,173.3	659.6	66.0
DKK	17,664.9	17,538.7	126.2	12.6
EUR	17,546.2	17,333.2	213.0	21.3
Other	2,915.9	2,926.8	10.9	1.1
Total	70,959.9	69,972.0	1,009.7	101.0

<sup>&</sup>lt;sup>1</sup>Displays the currency risk in an unfavorable fluctuation of 10 percent in each currency.

### Sustainability-related risks.

Sustainability factors can drive risk in all risk categories and the management of sustainability risks is an integral part of the management of each risk. Nordnet is exposed to sustainability risk through, for example, its lending to the public, through investments in the liquidity portfolio and in its operational processes. In addition, Nordnet is exposed to long-term effects on its brand and growth due to customers' future expectations and behaviours linked to sustainability.

Nordnet reports on sustainability in accordance with the GRI standards and prepares a Sustainability Report detailing the consequences of our operations (in accordance with ÅRL). Nordnet also reports in accordance with the Taxonomy Regulation, has made information available in line with the Disclosure Regulation and implements CSRD requirements.

31/12/2023 Interest period										
Assets	0-1 months	2-3 months	4-6 months	7-12 months	1-2 years	2-3 years	3-4 years	4-5 years	No fixed rates	Total
Cash and balances in Central banks	4,192.9	-	-	-		-	-	-	-	4,192.9
Loans to credit institutions	481.7					_	_	_		481.7
Loans to the general public	30,199.8			_			_			30,199.8
Financial assets at fair value	-	_	_	-	-	-	_	_	4.3	4.3
Treasury bills and other interest bearing securities	2,257.8	2,771.8	54.4	248.0	_	_	_	_		5,332.0
Bonds and other interest bearing securities	5,954.0	20,013.8	3,481.7	1,278.8	37.0	-	-	-	_	30,765.2
Reinvested assets in the insurance business	185.0	513.4	79.7	34.4	0.8	-	-	_	-	813.4
Other assets	-	-	-	-	-	-	-	-	151,273.8	151,273.8
Total assets	43,271.3	23,299.0	3,615.7	1,561.1	37,8	-	-	-	151,278.1	223,063.1
Liabilities										
Deposits and borrowing from the general public	59,679.9	-	-	-	-	-	-	-	-	59,679.9
Other liabilities	-	-	-	-	-	-	-	-	154,867.4	154,867.4
Total liabilities	59,679.9	-	-	-	-	-	-	-	154,867.4	214,547.3
Difference between assets and liabilities	-16,408.6	23,299.0	3,615.7	1,561.1	37.8	-	-	-	-3,589.3	8,515.8
Adopted remaning interest period, year (present value)	0.04	0.21	0.42	0.79	1.50	2.50	3.50	4.50		
Adopted interest rate change, %	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%	2.00%		
Risk weight	0.08%	0.42%	0.84%	1.58%	3.00%	5.00%	7.00%	9.00%		
Total net interest risk	-13.1	97.9	30.4	24.7	1.1	-	-	-		140.9
31/12/2022 Interest period										
Assets	0-1 months	2-3 months	4-6 months	7-12 months	1-2 years	2-3 years	3-4 years	4-5 years	No fixed rates	Total
							,	years	Tates	Total
Cash and halances in Central hanks	3 726 5		_	_	_	_				
Cash and balances in Central banks  Loans to credit institutions	3,726.5 485.1	-	-	-	-	-	-	- -	-	3,726.5
Loans to credit institutions	485.1						-	-	-	3,726.5 485.1
Loans to credit institutions  Loans to the general public		-	-	-	-	-	-	-	- -	3,726.5 485.1 28,527.4
Loans to credit institutions	485.1	-	-	-	-	-	-	-	-	3,726.5 485.1
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest	485.1 28,527.4	-	-	-	-	-	-	-	- -	3,726.5 485.1 28,527.4 19.8
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing	485.1 28,527.4 - 6,192.1	- - 21,452.2	- - - 4,413.0	6,079.1	-	-	-		- -	3,726.5 485.1 28,527.4 19.8 38,960.2
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance	485.1 28,527.4 - 6,192.1 5,125.1	- - 21,452.2 5,959.8	- - - 4,413.0	- - - 6,079.1 132.6	- - - 823.8	-	-	- - - -	- -	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business	485.1 28,527.4 - 6,192.1 5,125.1 482.3	- - 21,452.2 5,959.8 1,168.3	- - 4,413.0 0.9	- - - 6,079.1 132.6 264.7	- - 823.8 - 35.1	-	-	-	- - 19.8 - -	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business  Other assets	485.1 28,527.4 - 6,192.1 5,125.1 482.3	- 21,452.2 5,959.8 1,168.3	- - 4,413.0 0.9 188.1	- - 6,079.1 132.6 264.7	- - 823.8 - 35.1	-	-	-	- 19.8 - - - 123,970.3	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business  Other assets  Total assets	485.1 28,527.4 - 6,192.1 5,125.1 482.3	- 21,452.2 5,959.8 1,168.3	- - 4,413.0 0.9 188.1	- - 6,079.1 132.6 264.7	- - 823.8 - 35.1	-	-	-	- 19.8 - - - 123,970.3	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business  Other assets  Total assets  Liabilities  Deposits and borrowing from the	485.1 28,527.4 - 6,192.1 5,125.1 482.3 - 44,538.6	- 21,452.2 5,959.8 1,168.3 - 28,580.3	- - 4,413.0 0.9 188.1 - 4,602.0	- - 6,079.1 132.6 264.7 - 6,476.4	- - 823.8 - 35.1	-	-	-	- 19.8 - - - 123,970.3	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business  Other assets  Total assets  Liabilities  Deposits and borrowing from the general public	485.1 28,527.4 - 6,192.1 5,125.1 482.3 - 44,538.6	- 21,452.2 5,959.8 1,168.3 - 28,580.3	- - 4,413.0 0.9 188.1 - 4,602.0	- - 6,079.1 132.6 264.7 - 6,476.4	- 823.8 - 35.1 - 858.9	-	-	-	- 19.8 - - - 123,970.3 123,990.0	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3 Totalt 70,084.1
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business  Other assets  Total assets  Liabilities  Deposits and borrowing from the general public  Other liabilities	485.1 28,527.4 - 6,192.1 5,125.1 482.3 - 44,538.6	21,452.2 5,959.8 1,168.3 - 28,580.3	- 4,413.0 0.9 188.1 - 4,602.0	- - 6,079.1 132.6 264.7 - 6,476.4	- 823.8 - 35.1 - 858.9	-		-	- 19.8 - 19.8 - - 123,970.3 123,990.0	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3 Totalt 70,084.1 130,773.6
Loans to credit institutions Loans to the general public Financial assets at fair value Treasury bills and other interest bearing securities Bonds and other interest bearing securities Reinvested assets in the insurance business Other assets Total assets Liabilities Deposits and borrowing from the general public Other liabilities Total liabilities	485.1 28,527.4 - 6,192.1 5,125.1 482.3 - 44,538.6 70,084.1	21,452.2 5,959.8 1,168.3 - 28,580.3	- 4,413.0 0.9 188.1 - 4,602.0	- - 6,079.1 132.6 264.7 - 6,476.4	- 823.8 - 35.1 - 858.9	-		-	- 19.8 - - 123,970.3 123,990.0	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3 Totalt 70,084.1 130,773.6 200,857.8
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business  Other assets  Total assets  Liabilities  Deposits and borrowing from the general public  Other liabilities  Difference between assets and liabilities  Adopted remaning interest period,	485.1 28,527.4 - 6,192.1 5,125.1 482.3 - 44,538.6 70,084.1 - 70,084.1	21,452.2 5,959.8 1,168.3 - 28,580.3	- 4,413.0 0.9 188.1 - 4,602.0	- - 6,079.1 132.6 264.7 - 6,476.4	- 823.8 - 35.1 - 858.9	-		-	- 19.8 - - 123,970.3 123,990.0	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3 Totalt 70,084.1 130,773.6 200,857.8
Loans to credit institutions  Loans to the general public  Financial assets at fair value  Treasury bills and other interest bearing securities  Bonds and other interest bearing securities  Reinvested assets in the insurance business  Other assets  Total assets  Liabilities  Deposits and borrowing from the general public  Other liabilities  Total liabilities  Difference between assets and liabilities  Adopted remaning interest period, year (present value)	485.1 28,527.4 - 6,192.1 5,125.1 482.3 - 44,538.6 70,084.1 - 70,084.1 -25,545.5	21,452.2 5,959.8 1,168.3 - 28,580.3	- 4,413.0 0.9 188.1 - 4,602.0	- 6,079.1 132.6 264.7 - 6,476.4 - - - - 6,476.4	- 823.8 - 35.1 - 858.9 - - - - 858.9	- - - - - - - - 2.50	- - - - - - - - - - - - - - - -	4.50	- 19.8 - - 123,970.3 123,990.0	3,726.5 485.1 28,527.4 19.8 38,960.2 11,218.4 2,138.5 123,970.3 209,046.3 Totalt 70,084.1 130,773.6 200,857.8

Maturity review 2023							
In the maturity review, non-discounted cash flows are allocated based on the remaining maturity.							
Remaining maturity 2023	Payable on request	Max 3 months	3 months-1 year	1-5 years	5-10 years	Without maturity	Total
Assets							
Cash and balances in Central banks	-	-	-	-	-	4,192.9	4,192.9
Treasury bills and other interest bearing securities	-	1,851.5	1,091.3	2,389.2	-	-	5,332.0
Loans to credit institutions	481.7	-	-		-	-	481.7
Loans to the general public	14,953.7	2.6	10.6	452.2	14,780.6	-	30,199.8
Bonds and other interest bearing securities	-	4,247.5	5,222.9	21,294.7	-	-	30,765.2
Shares and participations	-	-	-	-	-	4.3	4.3
Assets for which customers bear the investment risk	147,056.7						147,056.7
Other assets	-	1,969.9	-	-	-	2,247.2	4,217.1
Total assets	162,492.1	8,071.5	6,324.9	24,136.1	14,780.6	6,444.4	222,249.7
Liabilities							
Deposits and borrowing from the general public	59,679.9	-	-	-	-	-	59,679.9
Liabilities for which customers bear the investment risk	147,061.4	-	-	-	-	-	147,061.4
Lease liability	-	21.1	24.9	106.4	18.4	-	170.8
Other liabilities and equity	-	1,784.7	-	-	-	13,552.8	15,337.5
Total liabilities	206,741.3	1,805.8	24.9	106.4	18.4	13,552.8	222,249.7
Net assets and liabilities (+/-)	-44,249.2	6,265.7	6,300.0	24,029.7	14,762.2	-7,108.4	0

### Maturity review 2022

In the maturity review, non-discounted cash flows are allocated based on the remaining maturity.

Remaining maturity 2022	Payable on request	Max 3 months	3 months-1 year	1-5 years	5-10 years	Without maturity	Total
Assets							
Cash and balances in Central banks	-	-	-	-	-	3,726.5	3,726.5
Treasury bills and other interest bearing securities	-	2,854.3	6,027.9	30,078.0	-	-	38,960.2
Loans to credit institutions	485.1	-	-		-	-	485.1
Loans to the general public	13,551.8	2.1	9.9	443.1	14,520.5	-	28,527.4
Bonds and other interest bearing securities	-	6,194.6	1,361.3	3,662.6	-	-	11,218.5
Shares and participations	-	-	-	-	-	19.8	19.8
Assets for which customers bear the investment risk	119,974.7	-	-	-	-	-	119,974.7
Other assets	-	2,097.0	-	-	-	1,898.6	3,995.6
Total assets	134,011.6	11,148.0	7,399.1	34,183.7	14,520.5	5,644.9	206,907.8
Liabilities							
Deposits and borrowing from the general public	70,084.1	-	-	-	-	-	70,084.1
Liabilities for which customers bear the investment risk	119,979.6	-	-	-	-	-	119,979.6
Lease liability	-	18.0	24.2	95.9	25.5	-	163.6
Other liabilities and equity	-	2,171.9	-	-	-	14,508.6	16,680.5
Total liabilities	190,063.7	2,189.9	24.2	95.9	25.5	14,508.6	206,907.8
Net assets and liabilities (+/-)	-56,052.1	8,958.1	7,374.9	34,087.8	14,495.0	-8,863.7	0

### Note 8 Group — income from customer contracts

2023	Sweden	Norway	Denmark	Finland	Total
Commission income - transaction related	310.0	325.3	382.3	392.7	1,410.3
Commission income - non transaction-related	284.0	161.8	46.8	28.3	520.9
Currency exchange income	108.6	107.1	157.0	60.4	433.1
Other commission income	48.1	18.6	11.0	15.5	93.2
Total	750.7	612.8	597.2	496.9	2,457.5
Income associated with IPOs and company events	2.1	1.2	2.9	27.6	33.7
Other operating income	9.8	5.6	16.9	13.1	45.3
Total	762.6	619.5	616.9	537.5	2,536.6
Timing of revenue recognition					
Service gradually transferred to customer	-	-	-	-	-
Service transferred to customer at one point in time	762.6	619.5	616.9	537.5	2,536.6

2022	Sweden	Norway	Denmark	Finland	Total
Commission income - transaction-related	387.1	391.8	374.3	464.4	1,617.5
Commission income - non transaction-related	260.5	176.9	38.8	23.3	499.6
Currency exchange income	122.5	140.6	153.7	78.1	495.0
Other commission income	38.0	19.3	12.5	13.1	82.9
Total	808.1	728.6	579.3	578.9	2,695.0
Income associated with IPOs and company events	8.5	4.2	1.7	27.0	41.3
Other operating income	22.3	8.4	16.2	12.1	58.9
Total	838.9	741.1	597.2	618.0	2,795.2
Timing of revenue recognition					
Service gradually transferred to customer	-	-	-	-	-
Service transferred to customer at one point in time	838.9	741.1	597.2	618.0	2,795.2

### Note 9 Group — Commission income and commission expenses.

Commission income	2023	2022
Brokerage commissions	1,410.3	1,617.5
Currency exchange income	395.1	450.8
Total transaction-related income	1,805.4	2,068.3
Fund-related income	520.9	499.6
Currency exchange income	38.0	44.2
Total fund-related income	558.9	543.8
Other commission income	93.2	82.9
Total commission income	2,457.5	2,695.5
Commission expenses		
Commission expenses – transaction-related	-385.5	-449.1
Commission expenses – fund-related	-139.2	-208.2
Other commission expenses	-64.6	-8.4
Total commission expenses	-589.3	-665.8
Net commission income	1,868.2	2,029.2
Of which, attributable to financial assets and liabilities measured at fair value in profit/loss	-	-

### Note 10 Group — Interest income and interest expenses.

Interest income	2023	2022
Loans to credit institutions	103.7	8.0
Interest-bearing securities	1,014.0	421.8
Interest-bearing securities at amortized cost	681.6	215.7
Total interest income from the liquidity portfolio	1,799.3	645.6
Loans to the public – mortgages	411.3	133.7
Loans to the public – margin lending	654.6	462.6
Loans to the public – unsecured loans	288.6	209.6
Total interest income from loans to the public	1,354.6	805.9
Other interest income	156.8	211.3
Total interest income	3,310.7	1,662.8
Interest expenses		
Liabilities to credit institutions	-0.6	-2.1
Interest-bearing securities	-152.2	-219.3
Total interest expenses from the liquidity portfolio	-152.8	-221.4
Deposits and borrowing by the public	-379.7	-6.4
Other interest expenses	-138.8	-154.1
Of which, deposit guarantee fees	-61.6	-59.3
Total interest expenses	-671.3	-381.8
Net interest income	2,639.4	1,281.0

### Cont. Note 10 Group — Interest income and interest expenses.

	2023	2022
Of which attributable to financial assets and liabilities valued at fair value via the income statement.		
Interest income	724.0	318.2
Interest expense	-90.6	-56.6

### Note 11 Group — net result from financial transactions.

	2027	2022
	2023	2022
Capital gains/losses, shares and participations	-3.7	-0.2
Unrealised value changes, shares and participations	1.5	-2.7
Capital gains/losses, interest-bearing securities	-10.8	-5.2
Exchange income	5.3	-0.7
Total net result from financial transactions	-7.6	-8.8
Net profit/Net loss per category		
Fair value through profit and loss	-2.1	-2.9
Fair value through other comprehensive income	-10.8	-5.2
Exchange income	5.3	-0.7
Total	-7.6	-8.8

### Note 12 Group — other operating income.

	2023	2022
Other account-related side-income	9.5	32.0
Fees from customers private loans	0.8	1.1
Revenues from market activities	6.2	5.6
Rental income	-	0.6
Fee for unlisted shares	6.8	5.5
Revenues related to IPOs	33.7	41.3
Coupon tax	-29.7	-22.4
Other operating income	23.0	16.9
Total	50.4	80.7

### Note 13 Group — General adminstration costs.

General administration expenses	2023	2022
Personnel expenses	-730.1	-645.4
Rental and property expenses	-30.0	-25.0
Other operational leasing expenses	-2.0	-1.5
Information expenses	-26.0	-33.6
System and communication expenses	-178.5	-167.9
Purchased services	-66.3	-79.7
Other general administration expenses	-38.9	-111.7
Total general administration expenses	-1,071.7	-1,064.9

Average number of employees covers the following geographical markets	2023	2022
Sweden	629	589
- of whom women	228	208
- of whom men	401	381
Norway	35	33
- of whom women	9	7
- of whom men	26	26
Finland	40	38
- of whom women	19	15
- of whom men	21	23
Denmark	41	44
- of whom women	19	25
- of whom men	23	19
Total	745	704
- of whom women	275	256
- of whom men	470	448
Number of full-time employees at year-end	735	666
Of whom parent company	1	1
- of whom women	-	-
- of whom men	1	1

	Parent company		Group		
Distribution of personnel expenses	2023	2022	2023	2022	
Salaries and other remuneration	-7.8	-7.5	-564.7	-497.5	
Social insurance contributions	-6.9	-5.6	-263.0	-227.6	
- of which pension expenses incl social security expenses	-3.6	-3.2	-108.4	-92.5	
Other personnel expenses	0.0	-0.7	-44.3	-36.0	
Total personnel expenses	-14.6	-13.8	-872.0	-761.1	
Of which capitalized personnel expenses	-	-	141.9	115.7	
Total expensed personnel expenses	-14.6	-13.8	-730.1	-645.4	

	20	23	20	2022		
	Salaries and other remuneration¹	other expenses incl		Social security expenses (of which pension expences incl. social security expenses)		
Group	-569.2	-263.0 (-108.4)	-501.0	-227.6 (-92.5)		
Of which Board members, Chief Executive Officer and corresponding officials	-50.7	-23.6 (-9.1)	-32.9	-17.5 (-8.2)		
Parent company <sup>2</sup>	-12.2	-6.9 (-3.6)	-11.1	-5.6 (-3.2)		
Of which Board members and Chief Executive Officer	-12.2	-6.9 (-3.6)	-11.1	-5.6 (-3.2)		

<sup>&</sup>lt;sup>1</sup> Remuneration to the Board is reported among administrative expenses in the Parent Company and Group.

<sup>&</sup>lt;sup>2</sup> The Parent Company only has one employee (CEO).

2023	Fixed remuneration	Benefits	Pension	Fees	Total
Board Chairman	remuneration	belletits	expenses	rees	IOtal
Tom Dinkelspiel				-0.7	-0.7
Other board members					
Karitha Ericsson				-0.6	-0.6
Anna Bäck				-0.5	-0.5
Per Widerström (- aug 2023)				-0.4	-0.4
Gustaf Unger <sup>1</sup>				-0.7	-0.7
Charlotta Nilsson				-0.6	-0.6
Henrik Rättzén				-0.5	-0.5
Fredrik Bergström				-0.5	-0.5
Chief Executive Officer					
Lars-Åke Norling	-7.8	-0.1	-2.7		-10.5
Vice Chief Executive Officer					
Rasmus Järborg	-3.8	-0.1	-0.7		-4.6
Other senior executives					
9 people on average (whereof 1 consultant)	-20.5	-14.0 <sup>2</sup>	-4.2		-38.7
Total	-32.1	-14.2	-7.5	-4.5	-58.3

<sup>&</sup>lt;sup>1</sup> Gustaf Unger resigned from the board in February 2024.

 $<sup>^{2}</sup>$  SEK 13.6 million refers to benefit taxation of the redemption of warrants for employees in Finland and Denmark

2022	Fixed remuneration	Benefits	Pension expenses	Fees	Total
Board Chairman					
Tom Dinkelspiel				-0.6	-0.6
Other board members					
Charlotta Nilsson				-0.4	-0.4
Jan Dinkelspiel (- mar 2022)				-0.1	-0.1
Christian Frick (- okt 2022)				-0.3	-0.3
Hans Larsson (- mar 2022)				-0.2	-0.2
Per Widerström				-0.4	-0.4
Karitha Ericsson				-0.4	-0.4
Anna Bäck				-0.4	-0.4
Gustaf Unger (apr 2022 - )				-0.5	-0.5
Fredrik Bergström (okt 2022 - )				-0.1	-0.1
Henrik Rättzén (okt 2022 - )				-0.1	-0.1
Chief Executive Officer					
Lars-Åke Norling	-7.3	-0.1	-2.5		-10.0
Vice Chief Executive Officer					
Rasmus Järborg <sup>1</sup>	-3.6	-0.1	-0.6		-4.3
Other senior executives					
9 people on average (whereof 1 consultant)	-17.9	-0.3	-3.7		-21.9
Total	-28.8	-0.5	-6.8	-3.3	-39.5

#### **Board of Directors.**

Remunerations to Board Members are paid in accordance with a resolution by the ordinary Annual General Meeting on 18 April 2023 regarding the period 1 April 2023 to 31 March 2024. Remunerations to Board Member for the period 1 January 2023 to 31 March 2023 were determined by the ordinary Annual General Meeting on 28 April 2022. Remuneration paid to Board Members in 2023 amounted to SEK 4.5 (3.3) thousand.

For work on the Risk and Compliance Committee, a fee of SEK 150 (150) thousand shall be paid to the chairman and fees of SEK 80 (75) thousand shall be paid to each of the other members. Fees for work on the Audit Committee amount to SEK 100 (100) thousand to the chairman and SEK 60 (60) thousand for each of the other committee members. Fees for work on the Remuneration Committee amounted to SEK 40 (50) thousand to the chairman and SEK 25 (25) thousand to each of the other members. Fees for work on the IT Committee amounted to SEK 75 (50) thousand to the chairman and SEK 40 (25) thousand to each of the other members. Fees for work on the Credit Committee of Nordnet Bank AB amounted to SEK 75 (50) thousand to the chairman and SEK 40 (25) thousand to each of the other members. No other remuneration has been paid to the Board apart from minor travel expenses. There are no other agreements concerning pensions or severance pay.

The table Remuneration of senior executives above includes expenses for the Board fees during the 2023 financial year. These are disbursed by Nordnet AB (publ). The Board comprises 4 (5) men and 3 (3) women. The discussion and decision process applied with regard to remuneration to the Chairman of the Board takes place within the Board. Remuneration to the Board has been distributed in accordance with the Annual General Meeting's resolution. For details of Board Members' shareholdings, see the section about the Board on page 81 and onwards in the Corporate Governance Report.

### Chief Executive Officer.

The expense for occupational pension in 2023 amounted to 35 percent of pensionable salary. Pensionable salary refers to the basic salary including holiday pay. For the CEO, general rules on retirement age apply. The period of notice from the company to the CEO is 12 months, and the period of notice from the CEO to the company is 6 months.

The preparation and decision process applied with regard to remuneration and other terms for the CEO is a Board issue. The Board's preparation of remuneration issues is handled by the Remuneration Committee. Details of the Remuneration Committee are presented in the Corporate Governance Report.

The Board's preparation of remuneration issues is handled by the Remuneration Committee. Details of the Remunera-

tion Committee are presented in the Corporate Governance Report.

### Deputy CEO and other senior executives.

The Deputy CEO and other senior executives are defined as members of Group Management, excluding the CEO. The Group Management team changed over the year, and as of 31 December 2023 it amounted to 10 (9) people besides the CEO, of whom 6 (6) are men and 4 (3) are women. One person is employed at Nordnet Bank AB's Norwegian branch, one is employed at Nordnet Bank AB's Finnish branch and one is employed at Nordnet's Danish branch — all others are employed in Sweden. Remuneration in the above table relates to the time each individual has been part of the Group Management team. Any salary adjustments or other remuneration for the company's management is proposed by the CEO to the Remuneration Committee, which has been commissioned by the Board to discuss such issues. Beyond paid health insurance, Group Management receives no special additional benefits.

The period of notice for the CEO and other senior executives, if served by the company, is six months. The period of notice, if served by the CEO or other senior executives, is six months. For the Deputy CEO and other senior executives, the general rules on retirement age in the individual's country of employment are applied.

Nordnet Bank AB offers personnel credits to all Group employees. As of 31 December 2023, the company had provided margin loans, mortgages and unsecured loans to senior executives totalling SEK 23.3 (32.6) million, of which utilized credits totalled SEK 27.1 (40.0) million. No provisions relating to bad debts or expenses relating to bad debts to related parties have been reported during the financial year.

#### Remuneration Policy.

The Group has adopted a Remuneration Policy regulating the system of remuneration for employees. The Remuneration Policy has been drawn up in accordance with the Swedish Financial Supervisory Authority's Regulations and general advice on remuneration policies in credit institutions, securities companies and fund companies (FFFS 2011:1). The purpose of this Credit Policy is to establish a remuneration system for the Group that promotes sound and efficient risk management and that does not encourage excessive risk-taking. According to the Credit Policy, the Group applies the general principle that employees receive fixed remuneration based on their

responsibilities and tasks. Employees in the independent functions receive only fixed remuneration. The members of all boards receive a fixed fee for their board assignment. Nordnet employees holding board assignments receive no compensation for this.

An account of the company's remuneration system and an analysis of the risks associated with the remuneration system will be available on Nordnet's website in connection with the publication of the Annual Report.

### Pension Policy.

The Group's Pension Policy is a defined contribution plan applicable to all personnel within the Group. Pension expenses for the Group average approximately 18.6 percent (18.6) of pensionable salary, depending on age and salary.

### Share-based incentive programs.

The Annual General Meeting on 18 April 2023 resolved to establish a further incentive program, 2023/2026 for all Nordnet Group employees. A total 413,639 warrants were issued at a market value of SEK 22.44 per warrant. Each warrant entitles the holder to subscribe for one (1) share in the company at a subscription price of 120 percent of the closing price for the company's share on Nasdaq Stockholm on 25 April 2023. Unlike the first two programs, this program has no ceiling.

This is the company's fourth incentive program and the purpose of these programs and the reasons for the deviation from shareholders' preferential rights, is to strengthen the connection between employees' work and the shareholder value that is generated. Accordingly, greater shared interest is expected to arise between the participants and the company's shareholders. The Board of Directors intends to propose a similar warrant program annually at future Annual General Meetings.

The number of warrants issued to each participant depended on the participant's function in the Group. Each warrant can be used to subscribe for one (1) share in Nordnet AB (publ) during a subscription period as shown in the table above. In all programs, the warrants have been transferred on market terms at a fair value determined applying the Black & Scholes valuation model.

Important inputs in the valuation model are the value of the underlying share at the time of valuation, exercise price, volatility, expected maturity of the options and an annual, risk-free interest rate,

Program	Subscription period	CEO	Other board members	Other members	Overdue / Repurchase	Total
LTIP 2021	14/10/2024- 9/12/2024 alt. 13/1/2025-24/3/2025	15,243	112,801	734,651	-43,899	818,796
LTIP 2022	14/04/2025,-,5/6/2025 18/8/2025-12/09/2025	27,670	117,597	829,721	-43,441	931,547
LTIP 2023	13/4/2026-5/6/2026 17/8/2026-31/8/2026	11,140	114,742	287,757	-2,450	411,189

corresponding to a three-year Swedish government bond yield. As Nordnet was first listed on the stock exchange in connection with the issuance of the first option program, the volatility is based on the historical volatility of companies with which Nordnet considers itself closely comparable. For the second program, the share's last 90 days of volatility are also taken into account, measured from 5 November 2021. In the third and fourth programs, the share has been weighted for its recent volatility.

Expenses for the incentive programs, in addition to expenses for preparing and administrating the incentive program, are limited to expenses incurred in Norway regarding social security contributions. Expenses amounted to SEK 0.1 (2.4) million and are reported as part of the personnel expenses. These expenses are affected by Nordnet AB's (publ) share price at the time when the options are exercised. Nordnet has no legal or informal obligation to repurchase or settle the options in cash. The number of warrants that can be subscribed for by the participants in the incentive programs may give rise to a total dilution effect of at most 0.9 percent of Nordnet AB's (publ) share capital.

The Annual General Meeting also resolved that the company, in connection with the subscription period for the first program for 2020/2023, would submit a set-off offer to the option holders to transfer warrants to Nordnet at a price equivalent to the warrants' market value, and where payment for the warrants takes the form of newly issued shares in Nordnet. Of a total 5,766,265 warrants outstanding in the program, 5,689,865 warrants were repurchased by Nordnet AB (publ) for a value equivalent to SEK 224.3 million. Nordnet AB (public) issued 1,451,609 new shares to participants who have accepted the offer at the subscription price of SEK 154.50.

The remaining 76,400 warrants in the 2020/2023 program were used to subscribe shares in accordance with ordinary subscription rights where each warrant entitles the holder to subscribe for one share. The number of shares and votes in Nordnet AB (public) has thus increased by a total 1,534,101. For more information, see Note 32 Equity.

### Summary of issued and outstanding warrants in warrant programs.

	202	23	202	22
	Average exercise price in SEK per option	Number of options	Average exercise price in SEK per option	Number of options
Number of warrants issued				
Opening number of warrants issued		7,688,232	135.94	6,843,244
Warrants forfeited	118.80	-5,980,529		
New warrants program	195.96	413,639	173.94	974,988
Total number of warrants issued	192.23	2,251,322	138.44¹	7,818,232
Outstanding warrants issued				
Opening number of warrants outstanding		7,688,252	136.08	6,756,559
Warrants subscribed during the year	195.96	413,639	173.94	974,988
Less warrants repurchased during the year	170.24	-174,094	126.59	-43,295
Less warrants exercised during the year	118.00	-,5,766,265	-	-
Total warrants outstanding	192.21	2,161,532	138.69¹	7,688,252
Weighted average remaining agreed maturity at end of year		1.58,år		1.75,år

<sup>&</sup>lt;sup>1</sup>The redemption price has been adjusted downwards due to payment of dividend No options could be exercised

#### Audit.

Audit services refer to the statutory audit, i.e. the reviewing of the Annual Report, the accounts and the administration by the Board of Directors and Managing Director. Audit services also include any other tasks that the auditor for the Group and the Parent Company is required to perform. Activities beyond the audit assignment involve quality assurance measures, that is to say, in part, any review of management, the Articles of Association, statutes or agreements intended to result in a report, certificate or other document addressed to a party other than the principal and, in part, advice or other assistance occasioned by observations made during an audit. Reviews of interim financial reports are included in the audit assignment outside the assignment. Tax advice includes advice on income taxes and VAT.

Other services include advice on accounting issues, services in connection with corporate/business changes and operational efficiency.

### Auditing costs.

Deloitte	2023	2022
Audit services	-6.7	-4.9
Audit services outside the assignment	-2.1	-4.8
Tax advice	-0.9	-0.8
Other services	-0.3	-
Total	-10.0	-10.4

#### Leases.

Nordnet leases office space and cars. Leases are normally drawn up for fixed periods of between three and five years, although there may also be possibilities for extension. The terms for each agreement are negotiated separately and contain a large number of different contractual terms. Although the leases do not include any specific terms that would entail their termination if the terms were not met, leased assets may not be used as collateral for loans.

Lease payments are discounted at the marginal loan rate. Nordnet has chosen to use the rate corresponding to a five-year Swedish government bond +2 percent as an approximation for the marginal loan rate for premises leases. As of 31 January 2023, Nordnet's weighted average marginal borrowing rate was 4.6 (3.6) percent. A variable interest rate is stated in the vehicle leases.

Recognised in the balance sheet 2020 - IFRS 16	2023	2022
Assets with Right of use, reported under "tangible fixed assets"		
Office facilities	158.4	152.2
Cars	4.4	5.2
Total	162.8	157.4
Leasing liabilities, reported under "Other liabilities"		
Short-term	65.0	60.9
Long-term	105.8	102.7
Total	170.8	163.6
Depreciation of Right of use		
Office facilities	38.2	36.2
Cars	1.1	1.1
Total	39.3	37.3
Interest expenses (included in financial expenses)	8.0	6.3
Expenses attributable to short-term leases	8.2	6.0
Expenses attributable to low value leasing agreements (not short-term leasing)	0.3	0.4
Expenses attributable to variable lease payments that are not included in lease liabilities	17.5	15.3
Revenue from subletting of Right of use	-	0.6
Cash flow attributable to leasing agreements	45.2	1.9

# Note 14 Group — Amortization, depreciation and impairment of tangible and intangible assets.

	2023	2022
Customer relations, amortization	-21.4	-24.8
Capitalized expenditure on development work, depreciation	-87.5	-78.4
Tangible assets, depreciation	-31.4	-31.9
Right-of-use assets	-39.3	-37.4
Total	-179.5	-172.4

### Note 15 Group — Other operating expenses.

	2023	2022
Marketing and sales	-45.5	-50.9
Bank expenses	-	-0.1
Corporate insurance	-2.9	-3.2
Total	-48.5	-54.2

### Note 16 Group — Credit losses, net.

	2023	2022
Change of the year, stages		
Loan receivables stage 1	-0.3	2.4
Loan receivables stage 2	-0.2	-5.9
Loan receivables stage 3	-21.5	8.9
Total	22.0	5.4
Confirmed credit losses		
Write-off for the period for confirmed losses	-57.7	-48.9
Recoveries of previously confirmed losses	0.1	0.1
Total	-57.6	-48.8
Total net credit losses for the period	-79.6	-43.4

All confirmed credit losses are attributable to personal loans in lending to the public. For reservations per product, refer to Note 21.

### Note 17 Group — Taxes.

Tax charged to income	2023	2022
Current tax expense (-)/ tax income (+)		
Adjustment current tax for previous years	-4.1	-1.1
Current tax	-584.5	-392.2
Deferred tax expense (-)/ tax income (+)		
Deferred tax related to temporary differences	7.0	11.6
Tax on net income for the year	-581.6	-381.7

### Cont. Note 17 Group — Taxes.

Reconciliation of effective tax		2023		2022
Profit before tax		3,160.4	2,034.1	
Tax expense in the income statement	-18.4%	-581.6	-18.8	-381.7
Tax as per current tax rate for the Parent Company	-20.6%	-651.0	-20.6	-419.0
Difference	2.2%	69.4	1.8	37.3
The difference consists of the following items:				
Effect of profit charged with tax on returns	2.3%	73.0	3.0%	61.7
Effect of non-deductible expenses/non-taxable income	0.1%	2.7	-0.9%	-17.9
Effect of non-deductible foreign tax	0.0%	0.0	-0.1%	-1.8
Effect of corrected tax from previous years	-0.1%	-4.1	-0.1%	-1.1
Differences in tax rate between countries	-0.1	-2.3	-0.2%	-3.5
Others	0.0%	0.0	0.0%	0
Reported effective tax	2.2%	69.4	1.8%	37.3

Deferred tax, recognised in the balance sheet	2023	2022
Opening balance, deferred tax assets	1.3	0.9
Recognized in the income statement	0.4	0.4
Closing balance, deferred tax asset	1.7	1.3
Deferred tax is attributable to:		
Financial lease	1.7	1.3
Total	1.7	1.3
Opening balance, deferred tax liabilities	-56.1	-65.7
Recognised in the income statement	6.6	11.3
Conversion differences for the year	3.3	-1.7
Closing balance, deferred tax liabilities	-46.2	-56.1
Deferred tax is attributable to:		
Untaxed reserves	-3.5	-4.9
Temporary differences in depreciation	-40.7	-48.5
Other provisions	-2.0	-2.7
Total	-46.2	-56.1

The current tax asset of SEK 69.3 (28.8) million is mainly attributable to Nordnet Pensionsförsäkring AB and Nordnet Bank AB danish branch. Current tax liabilities of SEK 299.8 (151.) million are mainly attributable to Nordnet Bank AB and Nordnet Pensionsförsäkring AB. These taxes will be paid during 2024.

### Note 18 Group — Segments.

2023						
	Sweden ex. personal loans	Sweden	Norway	Denmark	Finland	Total
Net commission income	560.6	403.0	526.2	381.7	-3.3	1,868.2
Net interest income	793.8	546.0	542.3	468.5	288.7	2,639.4
Net result of financial transactions	-4.9	-1.8	1.0	-2.0	-	-7.6
Other operating income	-23.2	7.2	20.0	40.8	5.5	50.4
Total operating income	1,326.3	954.4	1,089.6	889.1	290.9	4,550.3
Total operating expenses	-399.3	-309.4	-274.6	-261.0	-55.5	-1,299.7
Result before credit losses	-399.3	-309.4	-274.6	-261.0	-55.5	-1,299.7
Result before credit losses and resolution fees	926.9	645.1	815.0	628.1	235.5	3,250.6
Net credit losses	-1.1	0.3	0.3	0.1	-79.3	-79.6
Fees imposed: resolution fees	-2.5	-1.9	-3.2	-3.0	-	-10.6
Operating profit	923.4	643.4	812.1	625.2	156.2	3,160.4

No customer accounts for more than 10% of the Group's income.

2022						
	Sweden ex. personal loans	Sweden	Norway	Denmark	Finland	Total
Net commission income	616.6	476.1	489.7	453.3	-6.5	2,029.2
Net interest income	464.3	371.4	137.4	98.2	209.7	1,281.0
Net result of financial transactions	-8.9	2.3	0.6	-2.8	-	-8.8
Other operating income	0.8	14.5	19.7	39.3	6.5	80.7
Total operating income	1,072.8	864.2	647.5	588.0	209.6	3,382.1
Total operating expenses	-491.0	-272.2	-232.7	-228.0	-67.5	-1,291.5
Result before credit losses	-491.0	-272.2	-232.7	-228.0	-67.5	-1,291.5
Result before credit losses and resolution fees	581.8	592.0	414.8	360.0	142.1	2,090.6
Net credit losses	2.8	-1.9	-1.1	-0.4	-42.9	-43.4
Fees imposed: resolution fees	-3.4	-2.3	-3.6	-3.8	-	-13.1
Operating profit	581.3	587.8	410.1	355.7	99.2	2,034.1

No customer accounts for more than 10% of the Group's income.

### Note 19 Group — Treasury bills and other eligible bills, etc.

	2023	2022
Collateralized mortgage bonds	-	31,150.1
States and state exposure	1,910.5	2,583.5
Municipalities	3,421.5	5,226.6
Total	5,332.0	38,960.2

Loss provisions in step 1 are included in an amount of SEK 0.1 (1.1) million in the table above.

### Note 20 Group – Lending to credit institutions.

	2023	2022
Liquid assets	2,265.2	1,572.1
Contains of		
Loans to credit institutions	1,783.5	1,087.0
Assets in the insurance business <sup>1</sup>	481.7	485.1

<sup>&</sup>lt;sup>1</sup> Assets in the insurance business are included in the item Assets where the customer bears the investment risk. Loss provisions amounts to SEK 0 million.

### Note 21 Group — Lending to the public.

2023	Residential mortgages		Residential mortgages Margin loans		Personal loans	
	Amortized cost	Provisions for expected credit losses	Amortized cost	Provisions for expected credit losses	Amortized cost	Provisions for expected credit losses
Stage 1	10,638.3	-3.1	14,874.2	-0.5	3,663.9	-18.9
Stage 2	700.4	-0.1	46.5	-1.1	220.5	-26.0
Stage 3	5.2	-	46.1	-11.2	127.3	-61.8
Summa	11,344.0	-3.2	14,966.8	-12.8	4,011.7	-106.7

2022	Residential ı	mortgages	Margin loans		Personal loans		
	Amortized cost	Provisions for expected credit losses	Amortized cost	Provisions for expected credit losses	Amortized cost	Provisions for expected credit losses	
Stage 1	10,302.5	-3.1	13,423.4	-0.4	3,888.1	-19.8	
Stage 2	577.5	-0.1	118.8	-1.6	183.2	-23.5	
Stage 3	-	-	21.0	-9.4	112.5	-41.7	
Summa	10,880.0	-3.2	13,563.3	-11.4	4,183.8	-85.0	

### Cont. Note 21 Group – Lending to the public.

Consolidated credit loss reserve - total lending to the public	Stage 1	Stage 2	Stage 3	Total
Opening balance January 1, 2023	23.3	25.2	51.1	99.6
Currency effects and other	-0.8	0.1	5.3	4.6
Write-downs recognized credit losses	-0.5	-6.2	-7.3	-14.0
New financial assets	4.6	2.1	7.2	13.9
Transfers and reservation changes: 1				
-to 12-month expected credit losses	0.9	-10.2	-1.5	-10.8
-to expected maturity credit losses (no default)	-1.4	17.2	-1.5	14.2
-to expected maturity credit losses (default)	-0.6	-3.2	22.1	18.3
Repayment	-	-	-	-
Changes in models/parameters	-3.2	-1.5	-2.1	-6.8
Changes in models/parameters	-	3.7	-	3.7
Closing balance December 31, 2023	22.4	27.3	73.0	122.7

Consolidated credit loss reserve - total lending to the public	Stage 1	Stage 2	Stage 3	Total
Opening balance January 1, 2022	24.0	21.2	60.0	105.2
Currency effects and other	-	0.1	0.6	0.7
Write-downs recognized credit losses	-0.3	-4.8	-20.0	-25.1
New financial assets	5.8	3.6	3.4	12.8
Transfers and reservation changes: 1				
-to 12-month expected credit losses	-0.7	-5.7	-1.4	-7.9
-to expected maturity credit losses (no default)	-1.0	16.5	-0.8	14.6
-to expected maturity credit losses (default)	-0.3	-1.2	14.1	12.6
Repayment	-4.2	-1.4	-4.7	-10.3
Changes in models/parameters	-0.2	1.0	-	0.8
Changes in models/parameters	-	-4.0	-	-4.0
Closing balance December 31, 2022	23.3	25.2	51.1	99.6

<sup>&</sup>lt;sup>1</sup> The three lines that show transfers and reserve changes reflect the three steps according to IFRS 9. Each line shows how the reserves for the respective step changed during the year. The reserves for loans moved to another step were removed and the reserves for the loans that were added from the other two steps were added. In addition, the reserve change for loans that remain in the same step is added. The reserve changing even though the loan remains in the same step is due to the credit risk on the loan changing during the year. The reserve decreasing may be due to the customer being considered less risky, the macroeconomic outlook improving or the size of the loan decreasing.

### Cont. Note 21 Group - Lending to the public.

For margin lending and mortgages, analyses and stress tests show a low correlation between macroeconomic forecasts and expected credit losses. Instead, it is the customers' portfolio concentrations and unforeseen events in the market that will lead to future credit losses, which is not reflected in macroeconomic forecasts. Accordingly, the macro variables are not included as an individual variable in the calculations of the provisions for margin lending and mortgages.

However, the macro variables are included in assessing the probability of different scenarios (base, positive, negative), which affects the calculation of expected credit losses.

For unsecured loans, there is a high correlation between macroeconomic forecasts and expected credit losses. The table below shows the extent of the effect of the macroeconomic factors on the provisions.

0007 B	01	010	01	7.1.1
2023 - Personal loans	Stage 1	Stage 2	Stage 3	Total
Amortized cost	3,663.9	220.5	127.3	4,011.7
Provisions for expected credit losses	-18.9	-26.0	-61.8	-106.7
of which macro impact	-0.3	-0.3	0.0	-0.6
Reservation rate %	1%	12%	49%	3%
2022 - Personal Joans	Stage 1	Stage 2	Stage 3	Total
Amortized cost	3,857.6	181.8	111.6	4,151.0
Provisions for expected credit losses	-19.8	-23.5	-41.7	-85.0
of which macro impact	-0.5	-0.4	-0.1	-1.1
Reservation rate %	1%	13%	37%	2%
Given borrowers' places of domicile, the company's loan rec	eivables are attributab	le to ¹	2023	2022
Sweden			19,721.5	20,031.9
Norway			3,833.7	2,956.6
Finland			4,046.0	3,069.3
Denmark			2,598.6	2,469.5
			30,199.8	28,527.4
Loan receivables are distributed as follows				
Households in Scandinavia			26,271.3	25,411.3
Non-financial corporate sector			3,848.8	2,991.0
Other			79.7	125.2
Total			30,199.8	28,527.4
Given borrowers' places of domicile, the company's reserve attributable to	for anticipated credit lo	osses is		
Sweden			-112.9	-89.0
Norway			-4.9	-5.2
Finland			-1.5	-1.8
Denmark			-3.4	-3.7
Total			-122.7	-99.6

<sup>&</sup>lt;sup>1</sup>Unsecured loans occur only Sweden. Mortgages occur only in Sweden and Norway.

Of lending to the public, SEK 653.1 (1,214.5) million involves account credits that are fully covered by pledged cash and cash equivalents in endowment insurance plans and investment savings accounts (ISKs); the lending rate applied to the credits corresponds to the deposit rate on the pledged cash and cash equivalents.

Of total lending to the public, SEK 4,012 (4,183) million pertains to unsecured loans. The remainder of lending to the public is secured by collateral in the form of securities.

### Note 22 Group – Bonds and other interest-bearing securities.

	2023	2022
Issued by government bodies	1,696.5	4,502.5
Issued by other borrowers	29,068.7	6,716.0
Total	30,765.2	11,218.5

Interest-bearing securities entail investments of the company's surplus deposits — primarily in bonds. Provision for expected credit losses is included in the recognized amount in an immaterial amount.

### Note 23 Group – Shares and participations.

	2023	2022
Shares and participations, listed	3.5	19.0
Shares and participations, unlisted	0.8	0.8
Total	4.3	19.8

<sup>&</sup>lt;sup>1</sup> Unlisted shares and participations measured at fair value. For more information, see Note 33.

# Note 24 Group — Assets and liabilities where the customer bears the investment risk.

	2023	2022
Financial assets where the policyholder bears the risk of investments	2020	2022
Shares and participations	136,941.9	107,023.4
Interest-bearing securities	1,526.5	1,255.0
Derivatives	847.3	633.5
Cash and cash equivalents <sup>1</sup>	7,741.0	11,062.8
Total assets in the insurance business	147,056.7	119,974.7
Liabilities in the insurance business		
Life insurance provision	54.6	44.7
Claims outstanding	3.3	3.3
Fund insurance obligations	11,763.8	8,523.6
Conditional bonus	135,239.7	111,408.0
Total liabilities in the insurance business	147,061.4	119,979.6
Of which liabilities relating to investment contracts	147,061.4	119,979.6
of which liabilities relating to insurance contracts	-	-

<sup>1</sup> Distributed between lending to credit institutions SEK 1,783.5 (1,087.0) million and assets held for sale of SEK 5,957.5 (9,975.8) million.

All assets in the insurance operations entail assets for which the policyholders bear the direct investment risk. For liabilities in the insurance operations pertaining to investment contracts, the policyholders bear the direct risk. This means that the policy holders receive a return but are also responsible for the risk that assets and liabilities in the insurance business incur. The Group is not entitled to cash flow attributable to the invested funds.

The liabilities are measured according to the category financial assets and liabilities measured at fair value via profit or loss. The equivalent applies to assets beyond the part pertaining to cash and cash equiv-

alents that is measured at amortized cost. The net effect on earnings of acquired securities, unrealized changes in value, realized changes in value, interest and dividends received and changes in value of the debt is zero.

### Note 25 Group – Intangible fixed assets.

	Good	will	Bran	nds	Customer	relations	Capita expen on deve wo	diture	To	tal
	2023	2022	2023	2022	2023	2022	2023	2022	2023	2022
Accumulated costs										
On 1 January	461.2	454.6	25.2	24.8	628.4	605.7	703.3	666.4	1,818.1	1,751.6
Acquisition	-	-	-	-	-	-	-	-	-	
Additions	-	-	-	-	-	-	180.0	136.9	180.0	136.9
Divestments and disposals	-	-	-12.0	-	-142.0	-	-227.2	-100.0	-381.2	-100.0
Conversion differ- ences for the year	-14.5	6.6	-0.8	0.4	-22.0	22.7	-0.1	-	-37.4	29.7
	446.7	461.2	12.4	25.2	464.4	628.4	656.0	703.4	1,579.5	1,818.2
Accumulated amortization and impairments										
On 1 January	-32.1	-32.0	-25.2	-24.8	-429.0	-388.2	-364.2	-385.8	-850.5	-830.9
Amortization for the year	-	-	-	-	-21.4	-24.8	-87.5	-78.4	-109.0	-103.2
Write-downs for the year	-	-	-	-	-	-	-	-	-	-
Divestments and disposals	-	-	12.0	-	142.0	-	227.2	100.0	381.2	100.0
Conversion differences for the year	0.3	-0.1	0.8	-0.4	9.1	-16.0	-	-	10.3	-16.6
	-31.8	-32.1	-12.4	-25.2	-299.3	-429.0	-224.5	-364.3	-567.9	-850.7
Carrying amount at the end of the year	414.9	429.0	-	-	165.1	199.4	431.5	339.1	1,011.6	967.5

# Goodwill and acquisition-related intangible assets.

Nordnet has carried out a number of strategic acquisitions over the years that have resulted in intangible assets with indefinite useful lives. A useful life is determined as indeterminate in the event an asset's expected ability to contribute financial benefits cannot be determined.

Goodwill represents the positive difference between acquisition cost and fair value of the Group's share of the acquired company's net assets on the acquisition date and is recognized at cost less accumulated impairment losses. Goodwill is allocated to cash-generating units (CGU) and is tested annually to identify any impairment need using a valuation model based on discounted future cash flows. Other acquisition-related intangible assets consist mainly of brands and customer relationships, which are recognized at fair value on the acquisition date and subsequently at cost less accumulated amortization/depreciation and impairment. Acquisition-related intangible assets with an indefinite useful life are tested annually for impairment in the same way as goodwill. Goodwill and intangible assets with indefinite useful lives are allocated to a CGU comprising the respective countries in which Nordnet operates. Each year, the Group examines by country whether there is any need for impairment of goodwill and intangible assets with indefinite useful lives. The recovery value for CGUs has been set by calculating utility value. These calculations are based on estimated future cash flows based on financial projections approved by management and covering a three-year period. Cash flows beyond the three-year period are extrapolated using the estimated growth rate.

The main assumptions in the three-year plan are management's assessment of net profit, including credit losses, growth in each economy and development of risk-weighted assets.

In order to extrapolate cash flows beyond the budget period, a growth rate of 2 percent has been used. Due to the long-term nature of the investments, an assessment has been made for perpetual cash flow. The use of perpetual cash flow is motivated by the fact that all

### Cont. Note 25 Group – Intangible fixed assets.

	Good	lliwb	Bra	nds	Customer relations	
	2023	2022	2023	2022	2023	2022
Sweden						
AD Aktiedirekt AB	29.7	29.7	-	-	-	-
Deriva Financial Services AB	6.9	6.9	-	-	-	-
Konsumentkredit	63.7	63.7	-	-	-	-
Verksamhet förvärvad från Öhman	5.9	5.9	-	-	-	-
Shareville	2.3	2.3	-	-	-	-
Netfonds Bank AS	107.0	107.0	-	-	-	-
Sweden	215.5	215.5	-	-	-	-
Norway						
Stocknet Securities AS	78.4	84.1	-	-	2.1	5.5
Netfonds Bank AS	112.4	120.2	-	-	163.0	193.9
Netfonds Liv AS	8.5	9.3	-	-	-	-
Norway	199.3	213.5	-	-	165.1	199.4
Total	414.9	429.0	-	-	165.1	199.4

cash-generating units are part of the Group's domestic markets, for which there are no intentions to leave. The long-term growth assumption is based on external assessments as well as the Group's experience and assessment of growth in the banking sector in relation to GDP growth and inflation.

In addition, an average discount rate in local currency before tax has been used. The discount rate has been determined by calculating the weighted capital cost (WACC) for each country, which is based on the market's risk-free interest rate, the market's return requirement and the specific risk of the asset. The discount rate is in the range 13.53–16.16 (9.40–16.90) percent before tax, which corresponds to the calculated return requirement for each country. Net cash flow refers to the amount theoretically available as a dividend or alternatively contributed as a capital contribution. The 2023 annual testing of impairment needs was carried out in the fourth quarter. This testing did not indicate any needs to recognize impairment. As part of the impairment testing, Nordnet also performed a sensitivity analysis in which the discount rate was raised by 5 percent and unrestricted cash flow was reduced by 10 percent. Neither of these scenarios indicated any need to recognize impairment.

The Norwegian customer relations regarding Netfonds were identified in connection with the acquisition of Netfonds Bank AS. The carrying amount is SEK 163.0 (193.9) million. The amortization period is 15 years, reflecting the estimated useful life. The remaining amortization period is 10.2 years.

The value of the Norwegian customer relations regarding Stocknet was identified in connection with the acquisition of Stocknet Securities AS. The carrying amount is SEK 2.1 (5.5) million. The amortization period is 20 years, reflecting the estimated useful life. The remaining amortization period is 0.6 years.

All development costs that meet the criteria of IAS 38 are capitalized in the form of capitalized development costs for development

work. Costs for improvements are expensed on an ongoing basis in the income statement. The carrying amount for Nordnet's three most significant development projects is SEK 340.4 million, pertaining to the website, Customer Journeys and Mobile Application. Development is ongoing and the depreciation period is on straight-line basis over three to seven years. Balanced personnel-related expenses for the year amounted to SEK 141.9 (115.7) million.

Over the year, the company scrapped older items under brands, customer relations and capitalized development expenditure that are no longer considered to be of any value. These items have been fully depreciated do not therefore burden profit/loss.

### Note 26 Group — Tangible fixed assets.

	Inven	Inventories		Right-of-use assets	
	2023	2022	2023	2022	
Accumulated cost					
On 1 January	254.5	234.0	296.0	290.7	
Additions	36.7	23.7	-	-	
Acquisitions	-	-	11.3	2.6	
Right of use assets, lease	-72.7	-5.3	-8.2	-1.5	
Change of contracts	-	-	34.8		
Conversion differences for the year	-0.7	2.1	-1.2	4.2	
	217.8	254.5	332.7	296.0	
Accumulated depreciation					
On 1 January	-167.9	-139.5	-138.7	-99.9	
Depreciation for the year	-31.4	-31.9	-	-	
Right of use assets, lease	-	-	-39.3	-37.3	
Divestments and disposals	72.7	5.3	7.3	0.7	
Conversion differences for the year	0.5	-1.8	0.7	-2.1	
	-126.0	-167.9	-169.9	-138.6	
Carrying amount at the end of the year	91.8	86.7	162.8	157.4	

Accumulated acquisition values include fees for improvement of someone else's property, amounting to SEK 56.4 (55.5) thousand, which relates to the subsidiary Nordnet Bank AB. The depreciation plan is based on a useful life of 60 months, and the residual value according to plan amounts to SEK 18.7 (22.5) thousand. A linear method is used when depreciating tangible fixed assets.

### Note 27 Group - Other assets.

	2023	2022
Liquid fund receivables regarding unsettled transactions	1,969.9	2,098.0
Other assets	310.8	169.5
Total	2,280.7	2,267.6

Gross liquid fund receivables amount to 1.969.9 (2,098.0) MSEK. Gross amounts for liabilities that are offset against assets are subject to agreements that provide legal set-off rights. Other assets consist entirely of short-term receivables that fall due within one year.

The table below describes the balance sheet items that are the basis for net recognition. Other items are reported gross in the balance sheet.

31/12/2023			
	Gross amount for assets	Gross amount for liabilities set off against assets	Net amount in the Balance Sheet
Other assets			
Unsettled trades that are not subject to set-off or netting agreements	1,447.7	-	1,447.7
Unsettled trades that are subject to set-off or netting agreements	3,708.7	3,186.4	522.2
Total	5,154.2	3,186.4	1,969.9
	Gross amount for liabilities	Gross amount for assets set off against liabilities	Net amount in the Balance Sheet
Other liabilities			
Unsettled trades that are not subject to set-off or netting agreements	1,372.4	-	1,372.4
Unsettled trades that are subject to set-off or netting agreements	3,598.7	3,186.4	412.3
Total	4,971.2	3,186.4	1,784.7

### 31/12/2022

31/12/2022			
	Gross amount for assets	Gross amount for liabilities set off against assets	Net amount in the Balance Sheet
Other assets			
Unsettled trades that are not subject to set-off or netting agreements	1,629.9	-	1,629.7
Unsettled trades that are subject to set-off or netting agreements	3,476.0	3,007.9	468.1
Total	5,105.9	3,007.9	2,098.0
	Gross amount for liabilities	Gross amount for assets set off against liabilities	Net amount in the Balance Sheet
Other liabilities			
Unsettled trades that are not subject to set-off or netting agreements	1,571.2	-	1,571.2
Unsettled trades that are subject to set-off or netting agreements	3,608.7	3,007.9	600.8
Total	5,179.9	3,007.9	2,171.9

The distribution of previous year's trades has been adjusted between trades that are subject to set-off and trades that are not subject to set-off. 468.1 MSEK is reported in this year's table for 2022 as Unsettled deals that are subject to set-off or netting agreements. This amount was reported for 2022 as Non-settlement trades that are not subject to set-off or netting agreements.

### Note 28 Group - Prepaid expenses and accrued income.

	2023	2022
Prepaid expenses	204.0	164.3
Accrued interest income	231.9	167.2
Accrued commission income	155.9	150.5
Other accrued income	7.3	4.4
Total	599.2	486.4

## Note 29 Group — Deposits and borrowing by the public.

	2023	2022
Sweden	24,183.4	25,455.9
Norway	8,606.6	11,406.3
Finland	12,780.7	17,127.2
Denmark	16,706.1	19,320.2
Deposits in Nordnet Pensionsförsäkring AB and Nordnet Livsforsikring AS <sup>1</sup>	-2,596.9	-3,225.6
Total	59,679.9	70,084.1

<sup>&</sup>lt;sup>1</sup> Recognized as actuarial liabilities in the consolidated balance sheet

### Note 30 Group - Other liabilities.

	2023	2022
Liquid fund liabilities regarding unsettled transactions	1,784.7	2,171.9
Debt to policyholder <sup>1</sup>	5,124.7	7,837.3
Accounts payable	16.0	58.0
Lease liability	170.8	163.6
Other liabilities	166.2	140.7
Total	7,262.4	10,371.4

Fund liabilities amount gross to SEK 1,784.7 (2,171.9) million.

For information on settlement of fund cash and equivalents, receivables and liabilities, see Note 27.

## Note 31 Group – Accrued expenses and deferred income.

	2023	2022
Personnel related expenses	80.9	70.1
Accrued interest expenses	13.5	23.6
Accrued commission expenses	33.7	26.9
Other accrued expenses <sup>1</sup>	69.4	94.7
Total accrued expenses and deferred income	197.5	215.4

<sup>&</sup>lt;sup>1</sup> The largest component is attributable to accrued administrative costs in the operating activities.

<sup>1</sup> Refers to surplus liquidity from policyholders that has been invested in the pension company's own holdings in interest-bearing securities.

### Note 32 Group — Equity.

A summary of changes in equity can be found in the statement of changes in equity.

#### Share capital.

The total number of fully paid shares amounts to 251,534,101 (250,000,000), with a quota value of SEK 0.005 each (0.005). Quota value refers to share capital divided by the number of shares. Holders of ordinary shares are entitled to dividends determined by the Annual General Meeting and are entitled exercise one vote per share held at the Annual General Meeting. In connection with redemption of Nordnet's first warrant program in the autumn of 2023, the Company issued 1,534,101 new shares. For more information, see Note 13 General transaction costs.

#### Other capital contributions.

Comprise unconditional shareholder contributions and issue proceeds in the form of non-cash and cash issues.

#### Buyback of own shares

In February 2022, the company repurchased 375,000 shares to secure parts of the company's obligations under its long-term share-related incentive program. The procedure was approved by the shareholders at the regular Annual General Meeting in 2022. The shares were repurchased at an average price of SEK 150.66, with prices varying between SEK 146.45 and SEK 153.52. The total cost of SEK 56,498 thousand decreased other contributed capital. No repurchases were implemented in 2023.

#### Share-based incentive program

In the spring, Nordnet introduced an additional incentive program for Group employees. A total 413,639 warrants were issued for a value of SEK 9,282 thousand. For more information, see Note 13 General transaction costs.

#### Tier 1 capital instruments.

Issued Tier 1 capital instruments are deemed to meet the conditions for an equity instrument as the instrument, according to the conditions, has no set date of maturity, meaning that the issuer has an unconditional right to refrain from making repayment, and that the issuer of the instrument has full discretion regarding interest payments, that is, it is under no obligation to pay interest.

Tier 1 capital instruments						
	2023	2022				
Opening balance	1,100.0	1,100.0				
Issue of Tier 1 capital instruments	300.0	-				
Closing balance	1,400.0	1,100.0				

Tier 1 capital instruments						
Issue year	Term	First possible date of redemption	Nominal amount	Carrying amount	Curren- cy	Coupon rate
2019	Perpetual	21-03-2024	500.0	500.0	SEK	STIBOR 3M + 6.75%
2021	Perpetual	16-11-2026	600.0	600.0	SEK	STIBOR 3M + 3.9%
2023	Perpetual	14-02-2028	300.0	300.0	SEK	STIBOR 3M + 5.0%
Total			1,400.0	1,400.0		

### Cont. Note 32 Group — Equity.

Equity - other reserves	2023	2022
Translation reserve		
Opening balance	-37.2	-78.0
Translation difference, foreign subsidiary	-54.7	46.0
Tax on taxable part of translation difference, foreign subsidiaries	2.2	-5.2
Closing balance	-89.7	-37.2
Fair value reserve		
Opening balance	-124.0	16.7
Change in value, financial assets at fair value through other comprehensive income, net after tax	81.6	-140.7
Closing balance	-42.4	-124.0
Total		
Opening balance	-161.2	-61.3
Translation difference, foreign subsidiary	-52.5	40.8
Change in value, financial assets at fair value through other comprehensive income	81.6	-140.7
Closing balance	-132.1	-161.2

#### Other provisions.

#### Fair value reserve.

In the fair value reserve, the accumulated change in value among holdings of financial debt instruments measured at fair value is reported via other comprehensive income until the asset has been de-recognized from the statement of financial position. On divestment, unrealized changes in value are reclassified to the income statement. Any impairment is recognized in the income statement.

#### Reserve for translation differences.

Reported in the reserve for translation differences are all foreign exchange differences arising on translation of the foreign operations that prepare their financial statements in a currency other than that applied in the consolidated accounts.

For the year's change in other provisions, see the table above.

#### Profit brought forward.

Comprises the preceding year's unrestricted equity following payment of any dividend. Constitutes, together with the profit for the year, the fair value reserve and Tier 1 capital instruments, total unrestricted equity, that is the amount available for dividends to shareholders.

#### Dividend.

The Annual General Meeting of shareholders in Nordnet AB (publ) on 18 April 2023 approved a dividend of SEK 4.60 per share and that the undistributed profit for 2022 be carried forward in a new account. This dividend is equivalent to 70

percent of the company's net profit for 2022. No treasury shares were acquired during the year.

## Note 33 Group — Categorization of financial instruments.

2023	Fair value through consolidated income statement					
Assets	Amortized cost	Held for trading	Other business models	Fair value through other comprehensive income	Non financial instruments	Total
Cash and balances in Central banks	4,192.9	-	-	-	4,192.9	4,192.9
Treasury bills and other interest bearing securities eligible for refinancing	1,178.21	-	-	4,153.8	5,332.0	5,333.1
Loans to credit institutions	481.7	-	-	-	481.7	481.7
Loans to the general public	30,199.8	-	-	-	30,199.8	30,199.8
Bonds and other interest bearing securities	11,523.5 <sup>1</sup>	-	-	19,241.6	30,765.2	30,756.6
Shares, listed	-	3.5	-	-	3.5	3.5
Shares, unlisted	-	0.8	-	-	0.8	0.8
Assests for which customers bear the investment risk	1,783.5	-	144,459.8	813.4	147,056.7	147,056.7
Other assets	2,280.7	-	-	-	2,280.7	2,280.7
Prepaid expenses and accrued income	395.1	-	-	-	395.1	395.1
Total assets	52,035.5	4.3	144,459.8	24,208.8	220,708.4	220,701.1
Liabilities						
Deposits and borrowing from the general public	59,679.9	-	-	-	59,679.9	59,679.9
Liabilities for which customers bear the investment risk	-	-	147,061.4	-	147,061.4	147,061.4
Other liabilities	7,262.4	-	-	-	7,262.4	7,262.4
Accrued expenses	197.6	-	-	-	197.6	197.6
Total liabilities	67,140.0	-	147,061.4	-	214,201.4	214,201.4

<sup>&</sup>lt;sup>1</sup> As of 31 December 2023, the market value amounted to SEK 12,694.3 million. Unrealized profit not included in the balance sheet amounted to a negative SEK 7.4 million. <sup>2</sup> SEK 813.4 million refers to re-investments in bonds and SEK 1,783.5 million refers to cash and cash equivalents. <sup>3</sup> This amount includes pension customers' deposits of SEK 7,741 million.

#### Fair value through consolidated income statement

	Amortized			Fair value through other		
Assets	cost	Held for trading	Other business models	comprehensive income	Non financial instruments	Total
Cash and balances in Central banks	3,726.5	-	-	-	3,726.5	3,726.5
Treasury bills and other interest bearing securities eligible for refinancing	16,241.6,¹	-	-	22,718.6	38,960.2	39,006.6
Loans to credit institutions	485.1	-	-	-	485.1	485.1
Loans to the general public	28,527.4	-	-	-	28,527.4	28,527.4
Bonds and other interest bearing securities	5,039.6,1	-	-	6,178.9	11,218.5	11,208.4
Shares, listed	-	19.0	-	-	19.0	19.0
Shares, unlisted	-	0.8	-	-	0.8	0.8
Assests for which customers bear the investment risk	1,087.0	-	116,749.2	2,138.5	119,974.7	119,974.7
Other assets	2,267.6	-	-	-	2,267.6	2,267.7
Prepaid expenses and accrued income	322.1	-	-	-	322.1	322.1
Total assets	57,697.0	19.8	116,749.2	31,036.0	205,502.0	205,538.2
Liabilities						
Deposits and borrowing from the general public	70,084.1	-	-	-	70,084.1	70,084.1
Liabilities for which customers bear the invest- ment risk	-	-	119,979.6	-	119,979.6	119,979.6
Other liabilities	10,371.4	-	-	-	10,371.4	10,371.4
Accrued expenses	215.4	-	-	-	215.4	215.4
Total liabilities	80,670.9	-	119,979.6	-	,200,650.5	200,650.5

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<sup>&</sup>lt;sup>1</sup> As of 31 December 2022, the market value amounted to SEK 21,317.5 million. Unrealized profit not included in the balance sheet amounted to a negative SEK 36.5 million. <sup>2</sup> SEK 2,138.5 million refers to re-investments in bonds and SEK 1,087.0 million refers to cash and cash equivalents.

 $<sup>^{\</sup>rm 3}$  This amount includes pension customers' deposits of SEK 11,063 million.

### Cont. Note 33 Group — Categorization of financial instruments.

# Determination of fair value for financial instruments.

When the Group determines fair values for financial instruments, different methods are used depending on the degree of observability of market data in the valuation and the market activity. An active market is considered either a regulated or reliable trading venue where quoted prices are easily accessible with regularity. Where necessary, an ongoing assessment of the activity is done by analyzing factors such as differences in buying and selling prices.

The methods are divided into three different levels:

Level 1 — Financial assets and financial liabilities valued on the basis of unadjusted listed prices from an active market for identical assets or liabilities.

Level 2 — Financial assets and financial liabilities valued on the basis of input data other than that included in Level 1, either directly (prices) or indirectly (derived from prices) observable. Instruments in this category are measured applying: a) Quoted prices for similar assets or liabilities, or identical assets or liabilities from markets not deemed to be active; or b) Valuation models based primarily on observable market data.

Level 3 – Financial assets and financial liabilities valued on the basis of observable market data.

The level of the fair value hierarchy to which a financial instrument is classified is determined based on the lowest level of input data that is significant for the fair value in its entirety.

In cases where there is no active market, fair value is determined using established valuation methods and models. In these cases, assumptions that cannot be directly derived from a market can be applied. These assumptions are then based on experience and knowledge about valuation in the financial markets. The objective, however, is always to use data from an active market. In cases when deemed necessary, relevant adjustments are made to reflect a fair value, in order to correctly reflect the parameters contained in the financial instruments and to be reflected in its valuation.

For financial instruments recognized at fair value through profit or loss, mainly assets where the customer bears the investment risk, fair value is determined based on quoted prices for the assets. Liabilities where the customer bears the investment risk receive an indirect asset valuation, which classifies them as Level 2 instruments, with the exception of liabilities relating to insurance contracts not classified as a financial liability.

Forward rate agreements are valued at fair value by discount-

ing the difference between the contracted forward rate and the forward rate available on the balance sheet date for the remaining contract period. The discount rate is the risk-free rate based on government bonds.

The fair value of interest-bearing securities has been calculated by discounting anticipated future cash flows, with the discount rate being set based on the current market interest rate

Fund units not considered to be traded in an active market at listed prices are measured at fair value based on NAV (net asset value).

For lending and deposits at variable interest rates, including lending with financial instruments or housing as collateral, which are reported at amortized cost, the carrying amount is considered to be fair value. For assets and liabilities in the balance sheet with a remaining maturity of less than six months, the carrying amount is considered to reflect the fair value.

## Cont. Note 33 Group — Categorization of financial instruments.

Level distribution in accordance with IFRS 9.

2023	Level 1	Level 2	Level 3	Total
Financial assets at fair value				
Treasury bills and other interest bearing securities eligible for refinancing	2,501.6	1,652.2	-	4,153.8
Bonds and other interest bearing securities	16,919.4	2,322.3	-	19,241.7
Shares and participations <sup>1</sup>	3.5	-	0.8	4.3
Assets for which customers bear the investment risk <sup>2</sup>	144,680.8	505.2	1,870.8	147,056.7
Subtotal	164,105.3	4,479.7	1,871.6	170,456.5
Financial assets where fair value is given for information purposes				
Cash and balances in Central banks	4,192.9	-	-	4,192.9
Loans to credit institutions	-	481.7	-	481.7
Loans to the general public	-	30,199.8	-	30,199.8
Treasury bills and other interest bearing securities eligible for refinancing	1,179.4	-	-	1,179.4
Bonds and other interest bearing securities	11,324.3	190.6	-	11,514.9
Other assets	2,280.7	-	-	2,280.7
Accrued income	395.1	-	-	395.1
Subtotal	19,372.3	30,872.1	-	50,244.5
	184,235.2	34,594.3	-	220,701.1
Total				
Financial liabilities at fair value	-	147,061.4	_	147,061.4
Liabilities for which customers bear the investment risk	-	147,061.4	-	147,061.4
Total				

<sup>&</sup>lt;sup>1</sup> SEK 813.4 million refers to re-investments in bonds and SEK 1,783.5 million refers to cash and cash equivalents. These items are included in Level 1.

### Cont. Note 33 Group - Categorization of financial instruments.

31/12/2022	Level 1	Level 2	Level 3	Total
Financial assets at fair value				
Treasury bills and other interest bearing securities eligible for refinancing	22,718.6	-	-	22,718.6
Bonds and other interest bearing securities	5,087.9	1,091.0	-	6,178.9
Shares and participations <sup>1</sup>	19.0	-	0.8	19.8
Assets for which customers bear the investment risk	117,877.9	464.2	1,632.6	119,974.7
Subtotal	145,703.3	1,555.2	1,633.4	148,891.9
Financial assets where fair value is given for information purposes				
Cash and balances in Central Banks	3,726.5	-	-	3,726.5
Loans to credit institutions	-	485.1	-	485.1
Loans to the general public	-	28,527.4	-	28,527.4
Treasury bills and other interest bearing securities eligible for refinancing	16,288.0	-	-	16,288.0
Bonds and other interest bearing securities	498.8	4,530.7	-	5,029.5
Other assets	2,267.6	-	-	2,267.6
Accrued income	322.1	-	-	322.1
Subtotal	23,103.0	33,543.2	-	56,646.3
Total	168,806.4	35,098.4	1,633.4	205,538.2
Financial liabilities at fair value				
Liabilities for which customers bear the investment risk	-	119,979.6	-	119,979.6
Total	-	119,979.6	-	119,979.6

<sup>1</sup> SEK 2,138.5 million pertains to re-investments in bonds and SEK 1,087.0 million pertains to cash and cash equivalents. These items are included

# Description of valuation levels in accordance with IFRS 13.

Level 1 mainly contains shares, funds, bonds, treasury bills and standardized derivatives where the quoted price has been used in the valuation.

Level 2 primarily involves bonds that are valued based on an interest rate curve and liabilities in the insurance operations, the value of which is indirectly linked to a specific asset value valued based on observable input data. For less liquid bond holdings, credit spread adjustments are based on observable market data such as the credit derivatives market. This category includes funds, derivatives and certain interest-bearing securities.

Level 3 contains other financial instruments for which own internal assumptions have a significant effect on the calculation of fair value. Level 3 contains mainly unlisted equity instruments. When valuation models are used to determine fair value of financial instruments in Level 3, the consideration paid or received is considered to be the best assessment of fair value on initial recognition.

When the Group determines the level at which financial instruments are to be reported, each one is individually assessed in its entirety.

Financial instruments are transferred to or from Level 3 depending on whether internal assumptions have changed for the valuation. Input data in Level 3 primarily comprise external assessments applying the valuation method for relevant inputs.

#### Detailed disclosures regarding Level 3.

Over the year, financial assets were transferred from level 2 to level 3, with the main reason for the transfer being due to instruments lacking observable market data and therefore valued in accordance with independent theoretical valuations. Financial assets were also transferred from level 3 to level 2, with the main reason for the transfer being because instruments that previously lacked reliable data or were valued in accordance with independent theoretical valuations have now been calculated using valuation methods based on observable market data.

Of the closing amount in Level 3 as of 31 December 2023, 99.8 percent comprised Swedish holdings, which is why the currency effect, shown under Changes in value, represents an immaterial part of the amount for foreign holdings.

## Cont. Note 33 Group — Categorization of financial instruments.

Nordnet's valuation techniques for level 3 comprise discounted cash flow analyses, option price models and current transactions for similar instruments. Nordnet may employ theoretical valuations by independent counterparties in accordance with valuation techniques if these prices are provided to Nordnet. If the valuation data for the most recent three months following the end of a quarter are insufficient, the valuation is set to zero based on observable market data.

#### Information on changes within level 3

2023	Assets where the cus- tomer bears the invest- ment risk	Stocks and shares
Opening balance	1,632.6	0.8
Buy	118.9	-
Transfers to level 3	118.4	-
Sell	-86.5	-
Transfers from level 3	0.01	-
Change in value including currency effect	87.4	-
Closing balance	1,870.8	0.8

All changes in value accrue to the customers, which is why no division into realized and unrealized changes in value is made.

<sup>&</sup>lt;sup>1</sup> The market value of the instrument in level 3 was 0 SEK January 1st 2023.

2022	Assets where the cus- tomer bears the invest- ment risk	Stocks and shares
Opening balance	4,445.2	0.7
Buy	943.6	-
Transfers to level 3	8.0	-
Sell	-3,546.9	-
Transfers from level 3	-23.0	-
Change in value including currency effect	-194.3	0.1
Closing balance	1,632.6	0.8

All changes in value accrue to the customers, which is why no division into realized and unrealized changes in value is made.

### Note 34 Group - Pledged assets, contingent liabilities and commitments.

	2023	2022
Phylodesia	2025	2022
Pledged assets		
Pledged assets and comparable collateral for own liabilities <sup>1</sup>	685.2	771.1
Other pledged assets and comparable collateral		
Bonds and other interest bearing securities <sup>2</sup>	2,425.2	2,468.7
of which deposits with credit institutions	1,885.5	2,018.7
of which deposits with clearing houses	542.7	450.1
Obligations		
Contingent liabilities		
Warranty commitment, rental contract	12.5	13.2
Commitments		
Granted undrawn credit facilities <sup>3</sup>	71.2	85.7
Funds managed on behalf of third parties		
Client funds	109.6	147.3

<sup>&</sup>lt;sup>1</sup> The amount includes reserved funds of SEK 627 (281) million, pertaining mainly to collateral pledged with clearing institutions, central banks and the stock exchange.

As at the balance sheet date of 31 December 2023, the insurance operations held registered assets amounting to SEK 147,057 million (119,975) to which the policyholders have priority rights.

Pledged assets for own liabilities comprise securities pledged in connection with buy-back agreements. The transactions are carried out in accordance with standard agreements used by the parties on the financial market and counterparties in these transactions are credit institutions. The transactions are primarily short-term with a duration of less than three months.

Other pledged assets consist partly of bonds and other fixed-interest securities that have been provided as security for the customer's margin lending, and for payment to clearing institutions. Counterparties in margin lending transactions are other credit institutions.

As both repurchase agreements and other pledged assets entail that the securities are returned to Nordnet, all risks and rewards associated with the transferred instruments at Nordnet remain, even if they are not available to Nordnet during the period in which they are transferred. The other party to the transaction holds securities as collateral but has no right to any other assets in Nordnet. The securities are still recognized in the balance sheet and reported, as well as related liabilities, at fair value.

As at the balance sheet date of 31 December 2023, the insurance operations held registered assets amounting to SEK

147,057 (119,975) million to which the policyholders have priority rights.

In addition to the commitments specified in the table on the preceding page, SEK 20,466 (18,474) million of a credit facility related to possible securities-collateralized borrowing remained unutilized at the end of the period. For each customer, the credit size is restricted by the minimum amount of credit limit, which is set individually per customer by the company, and the collateral value of security holdings. Credit agreements can be terminated with 60 days' notice. The leverage value of a security can be changed instantly.

<sup>&</sup>lt;sup>2</sup> This amount includes granted, un-disbursed mortgages of SEK 31 (64) million.

### Note 35 Group — Capital adequacy information.

The rules on capital adequacy are the legislator's requirement for how much capital in the form of a capital base an institution must have in relation to the level of risk it takes. The regulations aim to strengthen the link between risk taking and capital requirements in the Group's operations. The legal capital requirements are calculated in accordance with Regulation 575/2013 of the European Parliament and of the Council (CRR), as well as the 2013/36 EU (CRD V) Directive.

Information in this note is provided in accordance with Regulation (EU) 575/2013 of the European Parliament and of the Council on supervisory requirements for credit institutions and investment firms ("the supervisory regulation") and regulations supplementing the supervisory regulation, the Swedish Financial Supervisory Authority's regulations and general guidelines (FFFS 2008:25) on the annual accounts of credit institutions and securities companies and the Swedish Financial Supervisory Authority's regulations and general advice (FFFS 2014:12) on supervisory requirements and capital buffers. Other required information is provided in a separate Pillar 3 report available on Nordnet's website, see www.nordnetab.com.

### Financial conglomerate.

#### Own funds and capital requirements.

The financial conglomerate comprises Nordnet AB (publ) and all of its subsidiaries. For the determination of the financial conglomerate's regulatory capital requirement, the Law (2006:531) on special supervision of financial conglomerates and the Swedish Financial Supervisory Authority's regulations and general advice (FFFS 2011:26) on the special supervision of financial conglomerates are applicable. The conglomerate's capital base shall cover the minimum capital requirements under the Superisory regulation and the Solvency Requirement under the Insurance Companies Act. The rules contribute to strengthening the Group's resilience to financial losses and thereby protecting customers.

The capital base and capital requirement have been calculated in accordance with the consolidation method. The Group-

based accounts have been compiled in accordance with the same accounting principles as the consolidated accounts. As a consequence of the solvency rules, the item Solvency capital, which refers to the estimated future present value of the insurance companies (Nordnet Pensionsförsäkring AB) including the subsidiary Nordnet Livsforsikring AS) includes cash flows generated by the policyholders' capital.

The capital requirement for units in the insurance business is affected by the policyholders' assets. The capital requirements for the banking operations (presented in detail under a separate heading for the consolidated situation) vary primarily in terms of the size and credit quality of the bank's exposures. For the financial conglomerate, solvency capital requirements and own funds are calculated according to the standard model under Solvency 2, which affirms the total capital requirement from both the banking and insurance operations. Within the financial conglomerate, Nordnet has a surplus of capital of SEK 2,344.6 million.

#### Consolidated situation.

#### Own funds and capital requirements.

The consolidated situation consists of Nordnet AB (publ) and Nordnet Bank AB. Accordingly, the difference compared with the financial conglomerate is that the insurance business and Nordnet Fonder is not taken into account in the consolidated situation. In order to establish statutory capital requirements for the consolidated situation, the Special Supervision of Credit Institutions and Investment Firms Act (2014:968); the Capital Requirements Regulation (EU) 575/2013 of the European Parliament and of the Council; the Capital Buffers Act (2014:966), and the Swedish Financial Supervisory Authority's regulations (FFFS 2014:12) on supervisory requirements and capital buffers all apply.

The capital base shall cover minimum capital requirements, the combined buffer requirement, as well as supplemental Pillar 2 requirements. Nordnet applies the standardized method when calculating capital base requirements for credit risk, meaning that exposures are distributed across expo-

#### The financial conglomerate

	31/12/2023	31/12/2022
Capital base after regulatory adjustments	6,806.0	5,642.7
Capital requirements financial conglomerate	4,461.4	4,850.9
Excess capital	2,344.6	791.8
Capital ratio	1.5	1.2

As of 30 June 2019, Solvency II figures are recognized with a one-quarter delay.

### Cont. Note 35 Group — Capital adequacy information.

sure classes and assigned a risk weight based on this class and additional factors. Credit risk is calculated on all asset items in and off the balance sheet, except for items deducted directly from the capital base. The own funds requirement for exchange rate risk comprises all items in and outside the balance sheet measured at current market value and converted to Swedish kronor at the balance sheet date. The own funds requirement for operational risk is calculated in accordance with the standardized method.

The capital requirement is usually expressed as a percentage of the total risk-weighted exposure amount, which amounted to SEK 18,907.0 million for the period at hand. The basic capital base requirement is 8 percent (SEK 1,512.6 million) and includes a Common Equity Tier 1 capital requirement of 4.5 percent (SEK 850.8 million) and a Tier 1 capital requirement of 6 percent (SEK 1,134.4 million). In addition to the basic capital requirement, there is also the combined buffer requirement, which amounts to 4.6 percent of the risk-weighted exposure amount (SEK 867.5 million). The combined buffer requirement consists of a capital conservation buffer (2.5 percent) and a countercyclical buffer (2.1 percent), the requirement must be fully met with CET1 capital. The countercyclical buffer is calculated based on each country's supervisory authority's established level for the countercyclical buffer weighted over Nordnet's risk-weighted exposures in the countries in which the company operates.

As part of the Swedish Financial Supervisory Authority's Review and Evaluation Process (SREP), which was completed in the third quarter of 2023, the Financial Supervisory Authority decided that Nordnet, in addition to the basic capital requirements and buffer requirements, shall meet a Pillar 2 requirement of 2.89 percent for the consolidated situation, corresponding to SEK 546.4 million as of 31 December 2023. Nordnet's capital requirements for risks within Pillar 2 always correspond to the internally assessed Pillar 2 requirement or the Swedish Financial Supervisory Authority's approved Pillar 2 requirement, whichever is higher. For the period at hand, the internally assessed capital requirement for risks within Pillar 2 amounted to SEK 310.4 million. Three quarters of the Pillar 2 requirement must be met with Tier 1 capital, of which at least three quarters shall comprise Common Equity Tier 1 capital.

Common Equity Tier 1 capital consists of equity reduced for items to be deducted from the capital base, such as intangible assets, deferred tax assets and value adjustments. The profit for the year in 2023 is included in the capital base as external auditors have verified the profit and permission to include the profit has been obtained from the Swedish Financial Supervisory Authority. Of the profit for the year, 70 percent are deducted from the capital base as anticipated dividends in accordance with Nordnet's dividend policy. The profit in the consolidated situation includes an anticipated dividend from the insurance operations.

During 2023, supervisory authorities in Sweden, Denmark and Norway increased the countercyclical buffer requirements in each country, which has contributed to increasing Nordnet's capital requirements in relation to the total risk-weighted exposure amount.

As of 31 August 2023, Nordnet has chosen to exclude Nordnet Fonder AB from the consolidated situation, a measure that has a marginally negative impact on the capital relations of the consolidated situation. The change has been made to improve efficiency and to simplify Group governance and processes to a certain extent.

During 2023, the Swedish Financial Supervisory Authority announced a decision within the framework of SREP — this decision lowers Nordnet's prescribed Pillar 2 requirement from 6.49 percent to 2.89 percent, with the total capital requirement being lowered to a corresponding extent.

The temporary holdings in Nordnet's funds launched in the preceding year contributed to raised capital requirements at the end of 2022. In accordance with the plan, the funds were sold in 2023 and no longer affect Nordnet's capital situation.

In contrast with prior years, Nordnet applied the equity method as valuation principle in accordance with Article 18.7 of the supervisory regulation for its shareholding in the subsidiary Nordnet Pensionsförsäkring AB, as well as for the indirect holding in the subsidiary's subsidiary (Nordnet Livsforsikring AS). Compared with the former valuation principle (amortized cost), the equity method brings increasing own funds, increased risk-weighted exposure amounts in the categories Equity exposures and Operational risk and a deduction against own funds for significant shareholdings in the financial sector. Overall, the change does not have a major impact on the regulatory capital and liquidity measures.

Deductions for value adjustments are made using the simplified approach for financial instruments valued at fair value as regulated by Regulation (EU) 2016/101 on prudent valuation. Deductions are made for foreseeable costs and possible dividends under Commission Delegated Regulation (EU) 241/2014.

Nordnet applies a reduced deduction for intangible software assets in accordance with the option for this in Article 13a of Implementing Regulation (EU) No. 241/2014. This means that intangible software assets, the value of which is not significantly affected by an institution's resolution, insolvency or liquidation, are excluded from deductions against the capital base based on a prudent valuation (maximum three-year depreciation period) and capitalized with a risk weight of 100 percent. Deductions against the capital base are still made for software assets that do not meet the aforementioned criteria.

## Cont. Note 35 Group - Capital adequacy information.

The application of Article 13a is more favourable in relation to previous rules which entailed deductions for all software assets from the capital base. This change means that, all other things being equal, the capital base and the total risk-weighted exposure amount increase by SEK 255.4 million as of 31 December 2023.

In summary, the capital base in the consolidated situation amounts to SEK 4,991.0 million, compared with a total capital requirement of SEK 2,926.8 million. This gives a capital surplus of SEK 2,064.2 million, the surplus consists entirely of CET1 capital.

#### Own funds and capital requirements.

The capital adequacy is thus satisfactory and meets all statutory requirements. For more information about Nordnet's capital base and capital requirements, see Nordnet's Pillar 3 reports and documentation of key performance indicators published on Nordnet's website, www.nordnetab.com.

## Cont. Note 35 Group — Capital adequacy information.

#### The consolidated situation

		31/12/2023	30/09/2023	30/06/2023	31/03/2023	31/12/2022
	Available own funds (amounts)					
1	Common Equity Tier 1 (CET1) capital	3,591.0	3,399.8	3,304.5	3,042.5	2,798.3
2	Tier 1 capital	4,991.0	4,799.8	4,704.5	4,442.5	3,898.3
3	Total capital	4,991.0	4,799.8	4,704.5	4,442.5	3,898.3
	Risk-weighted exposure amounts					
4	Total risk exposure amount	18,907.0	18,162.4	18,631.1	18,482.0	18,631.3
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	19.0%	18.7%	17.7%	16.5%	15.0%
6	Tier 1 ratio (%))	26.4%	26.4%	25.3%	24.0%	20.9%
7	Total capital ratio (%)	26.4%	26.4%	25.3%	24.0%	20.9%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.9%	2.9%	6.5%	6.5%	6.5%
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.6%	1.6%	3.6%	3.6%	3.6%
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.2%	2.2%	4.9%	4.9%	4.9%
EU 7d	Total SREP own funds requirements (%)	10.9%	10.9%	14.5%	14.5%	14.5%
	Combined buffer and overall capital require- ment (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2.5%	2.5%	2.5%	2.5%	2.5%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)					
9	Institution specific countercyclical capital buffer (%)	2.1%	2.1%	2.1%	1.4%	1.3%
EU 9a	Systemic risk buffer (%)					
10	Global Systemically Important Institution buffer (%)					
EU 10a	Other Systemically Important Institution buffer (%)					
11	Combined buffer requirement (%)	4.6%	4.6%	4.6%	3.9%	3.8%
EU 11a	Overall capital requirements (%)	15.5%	15.5%	19.1%	18.4%	18.2%
12	CET1 available after meeting the total SREP own funds requirements (%)	12.9%	12.6%	9.6%	8.3%	6.5%

## Cont. Note 35 Group — Capital adequacy information.

Risk-weighted own funds requirement.

		31/12/2023	30/09/2023	30/06/2023	31/03/2023	31/12/2022
	Additional own funds requirements to address other risks than the risk of insufficient leverage ratio (SEK million)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (SEK million)	546.4	524.9	1,205.4	1,195.8	1,205.4
EU 7b	of which: to be made up of CET1 capital (SEK million)	308.2	296.0	678.2	672.8	678.2
EU 7c	of which: to be made up of Tier 1 capital (SEK million)	410.3	394.1	903.6	896.4	903.6
EU 7d	Total SREP own funds requirements (SEK million)	2,059.0	1,977.9	2,695.9	2,674.5	2,695.9
	Combined buffer requirement and collective capital requirement (SEK million)					
8	Capital conservation buffer (SEK million)	472.7	454.1	465.8	462.1	465.8
9	Institution specific countercyclical capital buffer (SEK million)	394.8	380.5	392.5	262.8	263.3
11	Combined buffer requirement (SEK million)	867.5	834.6	858.2	724.8	702.1
EU 11a	Overall capital requirements (SEK million)	2,926.8	2,813.4	3,554.8	3,399.0	3,389.3
12	CET1 available after meeting the total SREP own funds requirement (SEK million)	2,432.0	2,286.4	1,787.9	1,538.0	1,202.3

## Cont. Note 35 Group - Capital adequacy information.

#### Leverage ratio.

The leverage ratio is calculated as the quota of Tier 1 capital and total exposures and is expressed as a percentage. Nordnet's binding minimum leverage ratio requirement amounts to 3.0 percent, corresponding to SEK 2,234.7 million for the period at hand. In addition to the minimum requirement, the Swedish Financial Supervisory Authority proposes leverage ratio guidance that must be met with Common Equity Tier 1 capital to be able to absorb any losses in the best possible way. In connection with its latest Supervisory Review and Evalution Process (SREP for 2023, the Swedish Financial Supervisory Authority adopted guidance regarding the leverage ratio for Nordnet's consolidated situation of 0.5 percent, which together with the statutory requirement provides an appropriate leverage ratio level for Nordnet of 3.5 percent, equivalent to SEK 2,607.1 million for

the period at hand. In relation to the leverage ratio requirement, Nordnet has a capital surplus of SEK 2,756.3 million and, in relation to a suitable leverage ratio, a surplus of SEK 2,383.8 million.

#### Leverage ratio

		74 (40 (0007	70 (00 (0007	70 (00 (0007	74 (07 (0007	74 (40 (0000
	Laurana vatia	31/12/2023	30/09/2023	30/06/2023	31/03/2023	31/12/2022
	Leverage ratio					
13	Leverage ratio total exposure measure	74,489.5	76,057.0	77,414.8	79,225.5	84,519.2
14	Leverage ratio (%)	6.7%	6.3%	6.1%	5.6%	4.6%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
EU 14b	of which: to be made up of CET1 capital (percentage points)	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirement (%)	3.0%	3.0%	3.0%	3.0%	3.0%

Capit	al base requirement for leverage ratio, SEK million	31/12/2023	30/09/2023	30/06/2023	31/03/2023	31/12/2022
	Additional own funds requirements to address other risks than the risk of insufficient leverage ratio (SEK million)					
EU 14c	Total SPRE leverage ration requirements (SEK million)	2,234.7	2,281.7	2,322.4	2,376.8	2,535.6
EU 14e	Overall leverage ratio requirements (SEK million)	2,234.7	2,281.7	2,322.4	2,376.8	2,535.6

### Cont. Note 35 Group – information regarding capital adequacy and liquidity.

#### Internally assessed capital requirement.

The minimum requirement for capital under Pillar 1 amounts to 8 percent. In addition to the minimum requirement, Nordnet maintains capital to meet the combined buffer requirement as well as to cover the total capital requirement resulting from the Bank's internal capital adequacy assessment process (ICAAP). This is governed by EU directive on capital adequacy 2013/36/EU Article 73 and the Financial Supervisory Authority's Regulations (FFFS 2014:12 Chapter 10). The capital evaluation aims at analyzing and highlighting risks that may be underestimated in calculating capital base requirements under Pillar 1 and identifying other significant risks to which the bank is exposed within Pillar 2.

The internal capital assessment (ICAAP) is based on Nordnet's business plan, current and future regulatory requirements and scenario-based simulations and stress tests. A summary of the results is reported annually to the Board and forms the basis for the company's capital planning as approved by the Board of Directors. The Swedish Financial Supervisory Authority reviews and evaluates Nordnet's risk management and ascertains whether sufficient capital is retained to cover the significant risks to which the bank is exposed.

Nordnet calculates the internal capital requirement for the consolidated situation at SEK 1,823.0 million (2,344.8). This is considered to be a satisfactory level of capital given the activities conducted by Nordnet. Nordnet's internal assessment of the capital requirement is not completely comparable to the statutory capital requirement, partly due to the Financial Supervisory Authority's adopted Pillar 2 requirement being based on the risks identified by the Financial Supervisory Authority in the momentary scenario on which the SREP is based (31 December 2022) expressed as a percentage of the risk-weighted exposure amount, while the internally assessed Pillar 2 requirement is calculated as an amount of the risks identified by Nordnet at the end of 2023. Accordingly, the Financial Supervisory Authority's adopted Pillar 2 requirement of 2.89 percent reflects the conditions on 31 December 2022 with an underlying assumption that the relationship would endure until 2023. Nordnet's internally assessed capital requirement calculates the actual risk exposures as of the end of 2023, resulting in a lower Pillar 2 requirement in relation to the total exposure amount (1.64%) compared with the level determined by the Swedish Financial Supervisory Authority.

#### Liquidity.

The liquidity coverage ratio (LCR) is calculated as the ratio between the bank's liquidity buffer and net cash flows in a highly stressed scenario over a 30-day period. The ratio shall be at least 100 percent. In addition to this requirement, the Swedish Financial Supervisory Authority has decided in the SREP that Nordnet Bank AB must meet additional liquidity requirements at the Group level: a LCR of 100 percent in EUR, an LCR of 75 percent in other currencies, and that the liquidity buffer applied in calculating the LCR at the Group level, may consist of at most 50 percent covered bonds issued by Swedish issuing institutes. As Nordnet matches its liquidity portfolio in relation to the currency distribution in the company's deposits, the currency distribution in the liquidity portfolio is sufficient to meet all liquidity coverage ratios determined for the company by the Swedish Financial Supervisory Authority in each of the currencies. The net stable funding ratio, NSFR, is calculated as the ratio of stable funding available to the stable funding needed. The measure is intended to safeguard the long-term liquidity situation. The minimum requirement applies at an aggregate level and the quota must amount to at least 100 percent.

Nordnet's high LCR and NSFR quotas show that the bank is highly resilient to disturbances in the financing market and has a good liquidity situation in both the short and long term. Nordnet continuously monitors regulatory and internal measures of the liquidity situation and actively manages its liquid assets in order to maintain a satisfactory liquidity buffer. The internal liquidity adeqacy assessment process (ILAAP) also contains in-depth assessments of the liquidity need in relation to future developments under both normal and stressed conditions.

In accordance with FFFS 2010:7, Chapter 5, Nordnet reported information regarding liquidity positions as of the balance sheet date 31 December 2023. The information refers to the consolidated situation, which includes Nordnet AB (publ), org. no. 559073-6681 and Nordnet Bank AB, org. no. 516406-0021.

## Cont. Note 35 Group - information regarding capital adequacy and liquidity.

		31/12/2023	30/09/2023	30/06/2023	31/03/2023	31/12/2022
	Liquidity Coverage Ratio					
15	Total high-quality liquid assets (HQLA) (Weighted value -average)	23,450.0	25,257.1	28,300.2	30,508.6	31,952.8
EU 16a	Cash outflows - Total weighted value	7,618.5	7,953.9	8,293.4	8,458.1	8,573.1
EU 16b	Cash inflows - Total weighted value	2,331.4	2,738.3	2,591.6	2,458.4	2,241.6
16	Total net cash outflows (adjusted value)	5,287.2	5,215.6	5,701.8	5,999.7	6,331.5
17	Liquidity coverage ratio (in %)	443.5%	484.3%	496.3%	508.5%	504.7%
	Liquidity coverage ratio SEK (in %)	187.5%	177.8%	176.6%	187.5%	198.4%
	Liquidity coverage ratio NOK (in %)	406.4%	410.5%	416.5%	414.6%	410.1%
	Liquidity coverage ratio DKK (in %)	327.1%	342.9%	347.4%	378.8%	420.6%
	Liquidity coverage ratio EUR (in %)	562.9%	661.8%	850.3%	960.9%	1,017.7%
	Net Stable Funding Ratio					
18	Total available stable funding	61,593.2	62,964.1	65,021.4	64,978.1	70,206.8
19	Total required stable funding	28,300.7	28,780.9	29,134.3	28,756.2	28,766.5
20	NSFR ratio (%)	217.6%	218.8%	223.2%	226.0%	244.1%

## Cont. Note 35 Group - information regarding capital adequacy and liquidity.

The liquidity reserve is financed by deposits from the public, shareholders' equity and a number of issued bonds, known as "AT1 bond loans" totalling SEK 1,400 million. Most of the liquidity reserve is invested in bonds with a high rating, such as covered bonds, sovereign bonds and balances at central or other banks. The liquidity reserve is deemed sufficiently large to be able to respond to situations of temporary or prolonged stress. Nordnet Bank AB is a member of the Swedish, Norwe-

gian, Finnish and Danish central banks, further strengthening the Group's liquidity preparedness.

#### Liquidity buffer.

31/12/2023	Total	SEK	NOK	DKK	EUR	USD	Övriga
Cash and lending to credit institutions	5,404	1,265	342	1,568	2,071	107	51
Securities issued or guaranteed by sovereigns, central banks or multinational development banks	6,477	3,729	1,430	717	600	0	0
Covered bonds	16,578	2,433	5,089	7,521	1,535	0	0
Other securities	1,111	0	0	0	715	396	0
Total buffer	29,569	7,427	6,861	9,806	4,922	503	51
Buffer composition by currency	100.0%	25.1%	23.2%	33.2%	16.6%	1.7%	0.2%

#### Liquidity buffer.

31/12/2022	Total	SEK	NOK	DKK	EUR	USD	Övriga
Cash and lending to credit institutions	4,427	625	90	2,065	1,448	95	104
Securities issued or guaranteed by sovereigns, central banks or multinational development banks	7,031	3,938	969	146	1,979	0	0
Covered bonds	21,930	2,215	7,256	9,478	2,981	0	0
Other securities	0	0	0	0	0	0	0
Total buffer	33,388	6,777	8,315	11,688	6,409	95	104
Buffer composition by currency	100.0%	20.3%	24.9%	35.0%	19.2%	0.3%	0.3%

#### Additional liquidity measures

	2023-12-31
Liquidity reserve/deposits from the public	47.5%
Loans to the public/deposits from the public	48.5%

	2022-12-31
Liquidity reserve/deposits from the public	45.5%
Loans to the public/deposits from the public	38.9%

## Cont. Note 35 Group - Capital adequacy information.

	Consolidat ation		Consolic situati	
	31/12/2	.023	31/12/2	2022
Risk weighted exposures				
Exposure to credit risk according to the standardized method	12,516.9		13,683.7	
of which exposures to institutions	701.8		1,372.8	
of which exposures to corporates	756.5		1,423.1	
of which retail exposures	4,065.9		3,963.3	
of which exposures secured by mortgages on immovable property	2,740.5		2,604.7	
of which exposures in default	95.3		100.6	
of which exposures in the form of covered bonds	2,129.9		2,676.9	
of which equity exposures	997.8		369.8	
of which regional and local authorities	0.0		5.4	
of which exposure to CIUs	0.0		210.3	
of which other items	1,029.1		956.9	
Exposures market risk	50.5		92.0	
Exposure operational risk	6,339.6		4,855.6	
Total risk weighted exposures	18,907.0		18,631.3	
Capital requirement				
Credit risk according to the standardized method	1,001.4	5.3%	1,094.7	5.9%
Market risk	4.0	0.0%	7.4	0.0%
Operational risk	507.2	2.7%	388.4	2.1%
Capital requirement Pillar 1	1,512.6	8%	1,490.5	8%
Credit related concentration risk	92.6	0.5%	104.3	0.6%
Interest rate risk in other operations	453.8	2.4%	1,101.1	5.9%
Capital requirement Pillar 2	546.4	2.9%	1,205.4	6.5%
Buffer requirement	867.5	4.6%	702.1	3.8%
Total capital requirement	2,926.8	15.5%	3,398.0	18.2%

The table shows figures for capital requirements in both MSEK and as a percentage of total risk weighted assets.

## Note 36 Group — Earnings per share.

Earning per share before and after dilution	2023	2022
Profit for the period attributable to the shareholders of Nordnet AB (publ)	2,578.7	1,652.5
Interest on Tier 1 capital recognised in equity 1	-121.5	-65.8
Profit attributable to shareholders of the Parent Conpany before and after dilution	2,457.2	1,586.7
Number of outstanding shares before dilution	249,880,684	249,687,500
Number of outstanding shares after dilution	249,880,684	250,581,110
Earning per share before dilution	9.83	6.35
Earning per share before dilution	9.83	6.33
<sup>1</sup> Including interest for the period and accrued transaction costs, net after tax	-1.4	-0.8

### Note 37 Parent Company – Net sales.

Net sales are made up entirely of internal Group invoicing, referring to administrative services.

## Note 38 Parent Company – Administrative expenses.

Deloitte	2023	2022
Audit	-1.1	-0.9
Audit services beyond the assignment	-0.3	-1.1
Tax advice	-0.1	-0.1
Other services	-0.2	-
Total audit services	-1.7	-2.1

## Note 39 Parent Company - Personnel expenses.

Salaries and other remuneration	2023	2022
Salaries and other remuneration <sup>1</sup>	-7.7	-7.5
Social security expenses	-3.2	-2.4
Pnesion expenses	-3.6	-3.2
Other personell expenses	-	-0.7
Total personnel expenses	-14.5	-13.8

<sup>&</sup>lt;sup>1</sup> For other disclosures regarding personnel expenses and remuneration of the Board, CEO and other senior executives, please see Note 13.

## Cont. Note 39 Parent Company — Personnel expenses.

Average number of employees	2023	2022
Total	1	1
of whom women	-	-
of whom men	1	1

All employees within the Parent Company are located in Sweden.

## Note 40 Parent Company – Profit from participations in Group companies.

Income from participations in group companies	2023	2022
Dividend from subsidiaries	1,825.9	2,560.8
Impairment of shares in subsidiaries	-17.6	-14.0
Group contributions received	-	11.9
Total	1,808.3	2,558.7

## Note 41 Parent Company — Taxes.

Tax charged to income	2023	2022
Current tax expense (-)/ tax income (+)		
Adjustment current tax for previous years	-	-
Current tax	-0.5	-0.1
Tax on net income for the year	-0.5	-0.1

Reconciliation of effective tax		2023		2022
Profit before tax		1,808.3		2,545.2
Tax expense in the income statement	0.0%	-0.5	0.0%	-0.1
Tax as per current tax rate for the Parent Company	20.6%	372.5	20.6%	524.3
Difference	20.6%	372.0	20.6%	524.2
The difference consists of the following items:				
Effect of dividend from subsidiaries	20.8%	376.2	20.7%	527.5
Effect of adjusted tax from previous years	0.0%	-	0.0%	-
Effect of non-deductible expenses/non-taxable income	-0.2%	-4.2	-0.1%	-3.3
Reported effective tax	20.6%	372.0	20.6%	524.2

## Note 42 Parent Company - Participations in Group companies.

Name	Corporate ID	Headquarters	% of share capital	Number of shares	Book value
Nordnet Bank AB	516406-0021	Stockholm	100.00%	480,001	2,395.0
Nordnet Incentive AB	559338-6385	Stockholm	100.00%	25,000	9.4
Total					2,404.4

## Cont. Note 42 Parent Company – Participations in Group companies.

	2023	2022
Accumulated acquisition value		
On 1 January	2,426.8	2,409.2
Shareholders contribution	9.2	17.6
Total	2,436.0	2,426.8
Accumulated impairments		
At the beginning of the year	-14.0	-
Impairment of shares in subsidiaries	-17.6	-14.0
Total	-31.6	-14.0
Reported value at the end of the year	2,404.4	2,412.8

## Note 43 Parent Company – Other assets.

	2023	2022
Anticipated dividend <sup>1</sup>	-	656.7
Tax account	1.3	1.2
Total	1.3	657.9

<sup>&</sup>lt;sup>1</sup> The receivable for the anticipated dividend is reported under Receivables from group companies in 2023

## Note 44 Parent company - Prepaid expenses and accrued income.

	2023	2022
Other prepaid expenses	0.8	3.2
Total	0.8	3.2

## Note 45 Parent Company – Equity.

Details of changes in equity are given in the statement of changes in Parent Company equity.

As per 31 December 2023, registered share capital amounted to 251,534,101 (250,000,000) shares with a quotient value of SEK 0.005 per share (0.005). Restricted equity pertains to share capital of SEK 1,257 (1,250) thousand.

In the autumn of 2023, Nordnet conducted a repurchase of a total 5,689,865 warrants issued within the framework of the company's 2020/2023 warrant program for payment in the form of 1,451,609 newly issued shares. The remaining 76,400 warrants in the 2020/2023 program were used to subscribe shares in accordance with ordinary subscription rights where each warrant entitles the

holder to subscribe for one share. The number of shares and votes in Nordnet has thus increased by 1,534,101.

In February 2022, the Company repurchased 375,000 shares, with the intention of securing certain parts of the company's commitments, given the company's non-current share-related incentive programmes. No shares were repurchased in 2023.

## Note 46 Parent Company - Other current liabilities.

	2023	2022
Accounts payable	0.1	3.2
Other liabilites	11.9	6.6
Total	12.0	9.8

Other liabilities are current liabilities - that is, they fall due for payment within 12 months of the balance sheet date.

## Note 47 Parent company - Accrued expenses and deferred income.

Accrued expenses and prepaid income	2023	2022
Accrued social security contributions	0.5	0.4
Accrued holiday pay	0.7	0.6
Other accrued personell costs	1.3	1.3
Accrued payroll tax	4.4	4.3
Accrued consultancy costs	0.3	0.9
Accrued auditors fee	1.1	1.5
Other accrued expenses	-	0.2
Total	8.3	9.2

# Note 48 Parent Company – Details of purchases and sales between Group companies.

Of the Parent Company's total purchases and sales in terms of SEK, 0 percent (0) of purchases and 100 (100) percent of sales pertain to other Group companies.

The Parent Company's outstanding balances to Group companies as of the balance sheet date consists of a receivable from Nordnet Bank AB of SEK 1,446.6 (414.0) million and a receivable from Nordnet Pensionsförsäkring AB of SEK 0.3 (0.2) million.

### Note 49 – Events after the reporting period.

#### Group.

The Board of Directors proposes that the Annual General Meeting approve a dividend of SEK 7.20 per share, corresponding to 70 percent of profit after tax for 2023.

On 30 January, Nordnet announced that it would implement a premature redemption of all outstanding Tier 1 capital instruments (AT1) issued on 21 March 2019, with a total outstanding nominal amount of SEK 500 million. The date for early redemption is 21 March 2024.

In February, Nordnet sent notification to Finanstilsynet (the Norwegian financial supervisory authority) that it sought to set up an insurance branch in Denmark. The branch will belong to Nordnet's Norwegian insurance company Nordnet Livsforsikring AS — a wholly owned subsidiary of Nordnet Pensionsförsäkring AB.

In May 2022, the Swedish Financial Supervisory Authority fined Nordnet a penalty of SEK 100 million due to violations of the regulations for The background. Although Nordnet appealed the decision, both the Swedish Financial Supervisory Authority and the Administrative Court of Appeal assessed the appeal as having been submitted too late. Nordnet applied to the Administrative Court of Appeal for restoration of forfeited time, and the Court announced its decision in line with Nordnet's application in December 2023. the Swedish Financial Supervisory Authority appealed the Administrative Court of Appeal's decision to the Supreme Administrative Court, which, however, rejected the appeal in February 2024. Accordingly, the Swedish Financial Supervisory Authority has processed Nordnet's appeal from June 2022, which arrived on time. A judicial review of the underlying matter, the scale of fines imposed, can now commence.

At the end of February, Gustaf Unger resigned from Board of Directors at his own request.

### Note 50 - Proposed appropriation of profits

The following profits are at the disposal of the Annual General Meeting (SEK):	
Share premium reserve	6,847,838,362
Other capital contributions	1,400,000,000
Non-restricted reserve	-5,727,022,669
Profit brought forward	1,807,759,880
Total	4,328,575,574
The Board proposes the following allocation:	
To shareholders, a dividend of SEK 7,20 per share, in total	1,808,345,527
Carried forward to next year	2,520,230,047
Total	4,328,575,574

The Board of Directors of Nordnet AB (publ) proposes that the Annual General Meeting on 29 April 2024 resolve to allocate the retained earnings, including the profit for the year according to the approved balance sheet, such that SEK 7.20 per share is distributed to shareholders and the remainder is transferred to a new account. This corresponds to a total dividend of SEK 1,808,345,527 and a dividend payout ratio of 70 percent of the total profit for 2023.

In the opinion of the Board of Directors, the financial position of the company and the Group justifies the proposed dividend with reference to the requirements such as the nature, scope and risks of the business with regard to the scope of the company's and the Group's equity and the company's and Group operations' consolidation needs, liquidity and position in general.

The Board of Directors and the CEO provide their assurance that the annual accounts have been prepared in accordance with generally accepted accounting practices in Sweden and that the consolidated accounts have been prepared in accordance with the international accounting standards as stipulated by the European Parliament and Council's regulation (EC) No. 1606/2002 of 19 July 2002 on the application of international accounting standards and give a fair account of the Parent Company and Group's position and earnings. Furthermore, assurance is given that the Board of Directors' Report for the Parent Company and Group, respectively, provides an accurate overview of the development of operations, position and earnings of the Parent Company and the Group, and that it also describes the principal risks and sources of uncertainty faced by the Parent Company and the companies within the Group.

# Signatures of the Board of Directors.

The Board of Directors and CEO provide their assurance that the 2023 annual report provides an accurate overview of the operations, position and earnings of the Group and the Parent Company, and that it also describes the principal risks and sources of uncertainty faced by the Parent Company and the companies within the Group.

Stockholm 15 March 2024

**Tom Dinkelspiel**Chairman of the Board

Fredrik Bergström Board member Anna Bäck Board member

Karitha Ericson Board member Charlotta Nilsson Board member Henrik Rättzén Board member

Lars-Åke Norling CEO

Our auditor's report was submitted on 14 March 2023.

**Deloitte AB** 

Patrick Honeth
Authorized Public Accountant

#### For further information, please contact:

Johan Tidestad, Chief Communications Officer +46708 875 775, johan.tidestad@nordnet.se

Marcus Lindberg, Head of Investor Relations +46764 923 128, marcus.lindberg@nordnet.se

This information is information that Nordnet AB (publ) is obliged to make public pursuant the Securities Markets Act. This information was submitted for publication on 16 March 2023 at 8:00 a.m. CET.

# **Auditor's report.**

To the annual general meeting of the shareholders of Nordnet AB (publ) corporate identity number 559073-6681.

# Report on the annual accounts and consolidated accounts

#### **Opinions**

We have audited the annual accounts and consolidated accounts of Nordnet AB (Publ) for the financial year 2023 except for the corporate governance statement on pages 73-85. The annual accounts and consolidated accounts of the company are included on pages 54-72 and pages 86-169 of this document.

In our opinion, the annual accounts have been prepared in accordance with the Annual Accounts Act and present fairly, in all material respects, the financial position of the parent company as at 31 December 2023 and its financial performance and cash flow for the year then ended in accordance with the Annual Accounts Act. The consolidated accounts have been prepared in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies and present fairly, in all material respects, the financial position of the group as at 31 December 2023 and their financial performance and cash flow for the year then ended in accordance with International Financial Reporting Standards (IFRS) as adopted by the EU, and the Annual Accounts Act for Credit Institutions and Securities Companies. Our opinions do not cover the corporate governance statement on pages 73-85. The statutory administration report is consistent with the other parts of the annual accounts and consolidated accounts.

We therefore recommend that the general meeting of shareholders adopts the income statement and balance sheet for the parent company and the group.

Our opinions in this report on the the annual accounts and consolidated accounts are consistent with the content of the additional report that has been submitted to the parent company's audit committee in accordance with the Audit Regulation (537/2014) Article 11.

#### **Basis for Opinions**

We conducted our audit in accordance with International Standards on Auditing (ISA) and generally accepted auditing standards in Sweden. Our responsibilities under those standards are further described in the Auditor's Responsibilities section. We are independent of the parent company and the Group in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements. This includes that, based on the best of our knowledge and belief, no prohibited services referred to in the Audit Regulation (537/2014/EU) Article 5.1 have been provided to the audited company or, where applicable, its parent company or its controlled companies within the EU.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinions.

#### **Key Audit Matters**

Key audit matters of the audit are those matters that, in our professional judgment, were of most significance in our audit of the annual accounts of the current period. These matters were addressed in the context of our audit of, and in forming our opinion thereon, the annual accounts and consolidated accounts as a whole, but we do not provide a separate opinion on these matters.

#### Commission income recognition

Commission income is an integral part of the Group's income. These consist of a number of different revenue streams such as commission in connection with the purchase and sale of securities, commission for the transfer of securities in connection with issuance of debt securities, sales of structured products and guaranteed issues, commissions from fund operations and, commissions from customers' exchange related transactions.

Income recognition includes several risks, primarily regarding the interpretation and application of accounting principles, which include management's judgement regarding when income is to be reported as well as risks related to completeness and valuation. IT systems and applications are used for debiting income, and a large amount of data is generated in these systems and applications when customers use Nordnet's services and networks. Therefore, we consider the recognition of commission income to be a key audit matter. For the year 2023, the Group reported net sales related to commission income of SEK 2 457,5 million. The reporting item is thus essential from a financial reporting perspective. Revenue recognition is deemed a particularly important area due to the large transaction volumes which makes completeness critical for a significant error in the financial reporting not to arise.

Refer to the related information on accounting principles in note 5 and net commission income in note 9.

Our audit procedures included testing and evaluation of design and effectiveness in controls for commission income recognition. This includes the evaluation of essential procedures and controls for income recognition, including relevant IT systems and applications used for accounting and related controls. We have also conducted analytical and detailed procedures for a selection of income reported.

Our substance review has been conducted by comparing data from the source system with the accounts to ensure proper transfer. In order to ensure correct data in the source system, we have, based on random selection, examined whether individual transactions have been registered based on specified parameters.

#### Valuation of financial instruments at fair value

Financial instruments valued at fair value both in the insurance and banking operations are mostly financial instruments that are actively traded and for which quoted market prices are available. To a lesser extent, there are holdings in financial instruments for which the valuation is based on market data other than quoted prices in the same instrument.

As at December 31, 2023, financial instruments measured at fair value comprised of assets of SEK 170 457 million and liabilities of SEK 147 061 million.

For financial instruments that are actively traded and for which quoted market prices are available, there is a higher degree of objectivity in determining the market price (level 1). When observable and liquid market prices are not available, the fair value of financial instruments are subject to significant estimation uncertainty (level 2 and 3 instruments). The valuation of such instruments is determined through different valuation techniques, which often include significant judgements and estimates made by management.

These instruments constitute a key audit matter in our audit due to the significant proportion of financial instruments measured at fair value and the impact of the inherent uncertainty and subjectivity in the assessment of level 2 and 3 financial instruments.

Refer to disclosures of financial instruments at fair value in note 33.

Our audit procedures included, but were not limited to:

- We obtained an understanding of the key controls in the valuation process, and designed tests to verify if the controls operated effectively during the year, which included controls over data inputs into valuation models and independent valuation.
- For level 1 instruments, we have compared reported fair values with available quoted market prices. Similar procedures have been performed for level 2 instruments since Nordnet's level 2 financial assets primarily consist of market traded instruments, but where the market is not considered active.
- For level 3 instruments, we have assessed the appropriateness of valuation methods used.

## IT-systems that support complete and accurate financial reporting

Nordnet relies on IT systems to (1) serve customers, (2) support business processes, (3) ensure proper financial transaction processing, and (4) support the overall internal control framework. The financial reporting is dependent on several systems. Many of Nordnet's internal controls over financial reporting are dependent on automated system controls with regard to completeness and integrity in reports generated by IT systems.

Given the high dependence on IT, we consider this a key audit in our audit. It is essential that permissions and access rights to systems and program modifications are adequately managed to ensure proper financial reporting.

Refer to the related information on Operational risks in note 7.

Our audit has included review of general IT controls and judgement of whether Nordnet has satisfactory procedures for achieving the required IT security and environment needed to ensure financial reporting. Our review has focused on significant systems with a direct impact on the financial reports. Our tests have included reviewing access to programs and data, managing program changes and reviewing access restrictions.

#### Valuation of loan receivables

Recognition and measurement of financial instruments as regulated in IFRS 9 is a complex area with significant impact on Nordnet's business and financial reporting. IFRS 9 is a new and complex accounting standard that requires significant judgement to determine the loan loss provision. Key areas of judgment include:

- The interpretation of the requirements to determine loan loss provisions under application of IFRS 9, which is reflected in Nordnet's expected credit loss model.
- The identification of exposures with a significant deterioration in credit quality.
- Assumptions used in the expected credit loss model such as the financial condition of the counterparty, expected future cash flows and forward-looking macroeconomic factors.

At December 31, 2023, loans to the public amounted to SEK 30 200 million, with loan loss provisions of SEK 123 million. Given the significance of loans to the public, the impact from the inherent uncertainty and subjectivity involved in assessing loan loss provisions, as well as the extensive disclosures required under IFRS 9, we consider this a key audit matter for our audit.

Refer to critical judgments and estimates in note 4, disclosures of credit risk in note 7 and related disclosures of credit risk in note 16 and lending to the public in note 21.

Our audit procedures included, but were not limited to:
• We evaluated key controls within the loan loss provision process to verify if they are appropriately designed and

operated effectively during the year; including key controls for approval, recording and monitoring of loans, input data, accuracy and completeness of loan loss provision.

- We assessed, supported by our credit risk modelling specialists, the modelling techniques and model methodologies against the requirements of IFRS 9. We assessed the sufficiency the underlying models developed for loan loss provisions. We involved our credit risk modelling specialists in the consideration of principal credit risk modelling decisions against requirements of IFRS 9 and industry practice. We evaluated key assumptions, evaluated the calculation methodology and ensured the completeness of source data in the models.
- We assessed the completeness and accuracy of the disclosures relating to loan loss provision to assess compliance with disclosure requirements included in IFRS.

## Other information than the annual accounts and consolidated accounts

This document also contains other information than the annual accounts and consolidated accounts and is found on pages 1-53 and pages 177-191. The Board of Directors and the Managing Director are responsible for this other information. Our opinion on the annual accounts does not cover this other information and we do not express any form of assurance conclusion regarding this other information.

In connection with our audit of the annual accounts and consolidated accounts, our responsibility is to read the information identified above and consider whether the information is materially inconsistent with the annual accounts and consolidated accounts. In this procedure we also take into account our knowledge otherwise obtained in the audit and assess whether the information otherwise appears to be materially misstated.

If we, based on the work performed concerning this information, conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

## Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director are responsible for the preparation of the annual accounts and consolidated accounts and that they give a fair presentation in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies. The Board of Directors and the Managing Director are also responsible for such internal control as they determine is necessary to enable the preparation of annual accounts and consolidated accounts that are free from material misstatement, whether due to fraud or error.

In preparing the annual accounts and consolidated accounts, The Board of Directors and the Managing Director

are responsible for the assessment of the parent company's and the Group's ability to continue as a going concern. They disclose, as applicable, matters related to going concern and using the going concern basis of accounting. The going concern basis of accounting is however not applied if the Board of Directors and the Managing Director intend to liquidate the company, to cease operations, or have no realistic alternative but to do so.

The Audit Committee shall, without prejudice to the Board of Director's responsibilities and tasks in general, among other things oversee the company's financial reporting process.

#### Auditor's responsibility

Our objectives are to obtain reasonable assurance about whether the annual accounts as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs and generally accepted auditing standards in Sweden will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these annual accounts.

A further description of our responsibilities for the audit of the annual accounts is located at the Swedish Inspectorate of Auditors website:

www.revisorsinspektionen.se/revisornsansvar. This description forms part of the auditor's report".

## Report on other legal and regulatory requirements

#### **Opinions**

In addition to our audit of the annual accounts and consolidated accounts, we have also audited the administration of the Board of Directors and the Managing Director of Nordnet AB (publ) for the financial year 2023 and the proposed appropriations of the company's profit or loss.

We recommend to the general meeting of shareholders that the profit to be appropriated in accordance with the proposal in the statutory administration report and that the members of the Board of Directors and the Managing Director be discharged from liability for the financial year.

#### **Basis for Opinions**

We conducted the audit in accordance with generally accepted auditing standards in Sweden. Our responsibilities under those standards are further described in the Auditor's Responsibilities section. We are independent of the company in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinions.

## Responsibilities of the Board of Directors and the Managing Director

The Board of Directors is responsible for the proposal for appropriations of the company's profit or loss. At the proposal of a dividend, this includes an assessment of whether the dividend is justifiable considering the requirements which the company's type of operations, size and risks place on the size of the company's equity, liquidity and position in general. The Board of Directors is responsible for the company's organization and the administration of the company's affairs. This includes among other things continuous assessment of the company's financial situation and ensuring that the company's organization is designed so that the accounting, management of assets and the company's financial affairs otherwise are controlled in a reassuring manner. The Managing Director shall manage the ongoing administration according to the Board of Directors' guidelines and instructions and among other matters take measures that are necessary to fulfill the company's accounting in accordance with law and handle the management of assets in a reassuring manner.

#### Auditor's responsibility

Our objective concerning the audit of the administration, and thereby our opinion about discharge from liability is to obtain audit evidence to assess with a reasonable degree of assurance whether any member of the Board of Directors or the Managing Director in any material respect:

- has undertaken any action or been guilty of any omission which can give rise to liability to the company, or
- in any other way has acted in contravention of the Companies Act, the Banking and Financing Business Act, the Annual Accounts Act for Credit Institutions and Securities Companies or the Articles of Association.

Our objective concerning the audit of the proposed appropriations of the company's profit or loss, and thereby our opinion about this, is to assess with reasonable degree of assurance whether the proposal is in accordance with the Companies Act.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with generally accepted auditing standards in Sweden will always detect actions or omissions that can give rise to liability to the company, or that the proposed appropriations of the company's profit or loss are not in accordance with the Companies

A further description of our responsibilities for the audit of the management's administration is located at the Swedish Inspectorate of Auditors website:

www.revisorsinspektionen.se/rn/showdocument/documents/rev\_dok/revisors\_ansvar.pdf. This description forms part of the auditor's report.

## The auditor's examination of the Esef report Opinion

In addition to our audit of the annual accounts and consolidated accounts, we have also examined that the Board of Di-

rectors and the Managing Director have prepared the annual accounts and consolidated accounts in a format that enables uniform electronic reporting (the Esef report) pursuant to Chapter 16, Section 4 a of the Swedish Securities Market Act (2007:528) for Nordnet AB (publ) for the financial year 2023.

Our examination and our opinion relate only to the statutory requirements.

In our opinion, the Esef report has been prepared in a format that, in all material respects, enables uniform electronic reporting.

#### Basis for opinion

We have performed the examination in accordance with FAR's recommendation RevR 18 Examination of the Esef report. Our responsibility under this recommendation is described in more detail in the Auditors' responsibility section. We are independent of Nordnet AB (publ) in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

## Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director are responsible for the preparation of the Esef report in accordance with the Chapter 16, Section 4 a of the Swedish Securities Market Act (2007:528), and for such internal control that the Board of Directors and the Managing Director determine is necessary to prepare the Esef report without material misstatements, whether due to fraud or error.

#### Auditor's responsibility

Our responsibility is to obtain reasonable assurance whether the Esef report is in all material respects prepared in a format that meets the requirements of Chapter 16, Section 4(a) of the Swedish Securities Market Act (2007:528), based on the procedures performed.

RevR 18 requires us to plan and execute procedures to achieve reasonable assurance that the Esef report is prepared in a format that meets these requirements.

Reasonable assurance is a high level of assurance, but it is not a guarantee that an engagement carried out according to RevR 18 and generally accepted auditing standards in Sweden will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Esef report.

The audit firm applies International Standard on Quality Management 1, that requires the company to design, implement, and maintain a comprehensive system of quality control,

including documented policies and procedures regarding compliance with professional ethical requirements, professional standards and legal and regulatory requirements.

The examination involves obtaining evidence, through various procedures, that the Esef report has been prepared in a format that enables uniform electronic reporting of the annual accounts and consolidated accounts. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement in the report, whether due to fraud or error. In carrying out this risk assessment, and in order to design audit procedures that are appropriate in the circumstances, the auditor considers those elements of internal control that are relevant to the preparation of the Esef report by the Board of Directors and the Managing Director, but not for the purpose of expressing an opinion on the effectiveness of those internal controls. The examination also includes an evaluation of the appropriateness and reasonableness of assumptions made by the Board of Directors and the Managing Director.

The procedures mainly include validation of the Esef report is established in a valid XHTML-format and a reconciliation of the Esef report with the audited annual accounts and consolidated accounts.

Furthermore, the procedures also include an assessment of whether the Esef report has been marked with iXBRL which enables a fair and complete machine-readable version of the consolidated statement of financial performance, financial position, changes in equity and cash flow statement.

## The Auditor's Examination of the Corporate Governance Statement

The Board of Directors is responsible for that the corporate governance statement on pages 52-67 has been prepared in accordance with the Annual Accounts Act.

Our examination of the corporate governance statement is conducted in accordance with FAR's recommendations of auditing standard RevR 16 The auditor's examination of the corporate governance statement. This means that our examination of the corporate governance statement is different and substantially less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinions.

A corporate governance statement has been prepared. Disclosures in accordance with chapter 6 section 6 the second paragraph points 2-6 of the Annual Accounts Act and chapter 7 section 31 the second paragraph the same law are consistent with the other parts of the annual accounts and are in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies.

Deloitte AB, was appointed auditor of Nordnet AB (publ) by

the general meeting of the shareholders on the on April 18, 2023 and has been the company's auditor since April 25, 2017.

Stockholm March 14, 2024
Deloitte AB
Signatures on Swedish original

Patrick Honeth
Authorised public accountant

## **Definitions.**

Alternative Performance Measures (APM) are financial measures of historical or future financial position, performance or cash flow that are not defined in applicable reporting regulations (IFRS) or in the fourth capital requirement directive (CRD IV) or in the EU capital requirement regulation no. 575/2013 (CRR) or the EU's Solvency II directive 2015/35. Nordnet uses alternative key performance measures when it is relevant to describe our operations and monitor our financial situation. APM-measures are mainly used to be able to compare information between periods and to describe the underlying development of the business. These measures are not directly comparable with similar key indicators presented by other companies Disclosures regarding financial measures not defined in IFRS but stated outside of the formal financial statements, "alternative performance measures", are presented in the note references below.

#### Number of trades1

A registered transaction on the stock exchange or in the marketplace. Orders sometimes involve several trades.

#### Number of trades per trading day<sup>1</sup>

Number of trades during the period divided by the number of trading days in Sweden during the period.

#### Number of trading days1

Number of days on which the relevant exchanges are open.

#### Number of full-time employees at end of period1

Number of full-time positions, including fixed-term employees, but excluding staff on parental leave and leaves of absence, at the end of the period.

#### Number of customers1

Number of private individuals and legal entities who hold at least one account with a value of more than SEK 0, or who had an active credit commitment at the end of the period.

#### Return on equity 2,4

Return on equity calculated as the period's accumulated profit, including interest on additional Tier 1 capital and associated periodized transaction expenses net after tax recognized in equity, in relation to the average of equity excluding Tier 1 capital over the corresponding period. The average of equity excluding Tier 1 capital is calculated based on opening, quarterly and closing equity for the period in question.

#### Leverage ratio<sup>2</sup>

Tier 1 capital as a percentage of the total exposure amount.

#### Cash market<sup>2</sup>

Cash market refers to trade in shares, warrants, ETFs, certificates, bonds and similar instruments.

#### Equity excluding intangible assets1

Total equity less intangible assets.

#### Average savings capital per customer - rolling 12 months<sup>2</sup>

The average quarterly savings capital per customer for the current period (calculated as the average quarterly savings capital per customer that includes the opening KPI at the beginning of the current period and the closing KPI at the end of every quarter that is included in the current period).

#### Cash deposits at end of period<sup>2</sup>

Deposits and borrowing from the public including deposits attributable to liabilities in the insurance operations at end of period.

#### Adjusted return on equity 2,4

Return on equity calculated as the period's adjusted accumulated profit, including interest on additional Tier 1 capital and associated periodized transaction expenses net after tax recognized in equity, in relation to the average of equity excluding Tier 1 capital over the corresponding period. The average of equity excluding Tier 1 capital is calculated based on opening, quarterly and closing equity for the period in question.

#### Adjusted return on equity excluding intangible assets 2,4

Return on equity calculated as the period's adjusted accumulated profit, including interest on additional Tier 1 capital and associated periodized transaction expenses net after tax recognized in equity, excluding amortization related to acquisitions in relation to the average of equity excluding Tier 1 capital and intangible assets over the corresponding period. The average of equity excluding Tier 1 capital and intangible assets is calculated based on opening, quarterly and closing equity for the period in question.

#### Adjusted operating income in relation to savings capital<sup>2</sup>

Adjusted operating income in relation to the average quarterly savings capital for the same period (calculated as the average quarterly savings capital that includes the opening amount at the beginning of the current period and the closing amounts at the end of each quarter that is included in the current period).

#### Adjusted C/I ratio %2

Adjusted operating expenses before credit losses in relation to adjusted operating income.

<sup>&</sup>lt;sup>1</sup> Financial key figures that are directly reconcilable with the financial statements.

<sup>&</sup>lt;sup>2</sup> Financial key figures that can be deduced from historical financial data published quarterly at https://nordnetab.com/sv/om/finansiell-information.

<sup>&</sup>lt;sup>3</sup> Definitions in accordance with IFRS and the EU's capital requirement regulation no. 575/2013 (CRR) and the EU's Solvency II directive 2015/35.

<sup>&</sup>lt;sup>4</sup> Annualization is calculated as the denominator for the period divided by the quotient of the number of quarters in the period and the number of quarters per year.

#### Adjusted operating expenses in relation to savings capital 2

Adjusted operating expenses before credit losses in relation to the average quarterly savings capital for the same period (calculated as the average quarterly savings capital that includes the opening amount at the beginning of the current period and the closing amounts at the end of each quarter that is included in the current period).

#### Adjusted profit <sup>2</sup>

Profit for the period adjusted for items affecting comparability over the period.

## Adjusted profit before amortization of intangible assets in purchase consideration allocation <sup>2</sup>

The profit for the period after tax adjusted for items affecting comparability and excluding amortization of intangible assets from acquisitions of companies (purchase consideration allocation). Items affecting comparability have illustratively been taxed at an assumed tax rate of 20 percent insofar as such items affecting comparability are deductible and/or give rise to a tax expense. The amortization of the purchase consideration allocation is not deductible and has accordingly not been illustratively taxed.

## Adjusted profit before amortization of intangible assets in purchase consideration allocation per share before and after dilution <sup>2</sup>

The profit for the period after deduction of interest on additional Tier 1 capital adjusted for items affecting comparability and excluding amortization of intangible assets from acquisitions of companies (purchase consideration allocation) per share before and after dilution.

#### Adjusted operating income <sup>2</sup>

Total operating income adjusted for items affecting comparability over the period.

#### Adjusted operating expenses before credit losses 2

Expenses before credit losses, adjusted for items affecting comparability over the period.

#### Adjusted operating margin <sup>2</sup>

The adjusted operating profit in relation to adjusted operating income

#### Adjusted operating profit <sup>2</sup>

Profit for the period adjusted for items affecting comparability. Items affecting comparability are items reported separately due to their nature and amount.

#### Own funds<sup>3</sup>

The sum of Core Tier 1 capital and Tier 2 capital.

#### C/I ratio excluding operating losses 1

Total expenses before credit losses in relation to total operating income.

#### Core Tier 1 capital<sup>3</sup>

Equity excluding unrevised earnings, proposed dividend, deferred

taxes and intangible assets and some further adjustments in accordance with the EU capital requirements regulation no. 575/2013 (CRR) and EU 241/2014.

#### Core tier 1 capital ratio 3

Core tier 1 capital divided by total risk-weighted exposure amount.

#### Net savings<sup>2</sup>

New deposits of cash and cash equivalents and securities, less withdrawals of cash and cash equivalents and securities.

#### Traded value cash market<sup>2</sup>

Cash market refers to trade in shares, warrants, ETFs, certificates, bonds and similar instruments.

#### Earnings per share 2

Profit for the period, including interest on additional Tier 1 capital and associated periodized transaction expenses net after tax recognized in equity, in relation to weighted average number of ordinary shares before and after dilution.

#### Operating expenses<sup>3</sup>

Operating expenses before credit losses.

#### Operating margin<sup>1</sup>

Operating profit in relation to total operating income.

#### Savings capital<sup>2</sup>

Total of cash and cash equivalents and value of securities for all active accounts.

#### Savings ratio<sup>2</sup>

Net savings over the past 12 months as a percentage of savings capital 12 months ago.

#### Total capital ratio<sup>2</sup>

Total own funds in relation to risk-weighted exposure amount.

#### Lending/deposits<sup>2</sup>

Lending to the public at the end of the period in percentage of deposits from the public at the end of the period.

#### Lending excluding pledged cash and equivalents <sup>2</sup>

Lending to the public, excluding lending through account credits that are fully covered by pledged cash and cash equivalents on endowment insurance plans and investment savings accounts (ISKs), where the lending rate applied to the credits corresponds to the deposit rate on the pledged cash and cash equivalents.

#### Lending at end of period <sup>2</sup>

Lending to the public at the end of the period.

#### Profit margin<sup>1</sup>

Profit for the period in relation to operating income.

#### Annual customer growth<sup>2</sup>

Annual growth rate in customers over the period.

<sup>&</sup>lt;sup>1</sup> Financial key figures that are directly reconcilable with the financial statements.

<sup>&</sup>lt;sup>2</sup> Financial key figures that can be deduced from historical financial data published quarterly at https://nordnetab.com/sv/om/finansiell-information.

<sup>&</sup>lt;sup>3</sup> Definitions in accordance with IFRS and the EU's capital requirement regulation no. 575/2013 (CRR) and the EU's Solvency II directive 2015/35.

<sup>&</sup>lt;sup>4</sup> Annualization is calculated as the denominator for the period divided by the quotient of the number of quarters in the period and the number of quarters per year.

# Other sustainability disclosures.

The reporting of our sustainability work has been made in accordance the guidelines of the Global Reporting Initiative (GRI) since 2010. The Sustainability Report for the 2023 calendar year is presented with reference to GRI Standards 2021. The Sustainability Report has been prepared in compliance with statutory Sustainability Reporting requirements in the Annual Accounts Act. The account covers Nordnet AB (publ) and its subsidiaries. Furthermore, Nordnet reports in accordance with the taxonomy regulation (EU) 2020/852. Nordnet's Sustainability Report 2023 has not been reviewed by the company's auditor.

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305–4  GRI 401: Employ 3-3 401–1  GRI 404: Trainin 3-3 404–3  GRI 405: Diversi	Greenhouse gas emissions intensity  yment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview	p. 39, 182-183 p. 43-47, 184 p. 43, 47 p. 34-36, 43-44, 184 p. 43
305–4  GRI 401: Employ 3-3 401–1  GRI 404: Trainin 3-3 404–3  GRI 405: Divers 3-3	Greenhouse gas emissions intensity  yment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview  ity and Equality	p. 39, 182-183 p. 43-47, 184 p. 43, 47 p. 34-36, 43-44, 184 p. 43
305–4  GRI 401: Employ 3-3 401–1  GRI 404: Trainin 3-3 404–3  GRI 405: Divers 3-3 405–1	Greenhouse gas emissions intensity  yment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview  ity and Equality  Management of material topics	p. 39, 182-183 p. 43-47, 184 p. 43, 47 p. 34-36, 43-44, 184 p. 43 p. 45-47, 181-182, 184 p. 181-182
305–4  GRI 401: Employ 3-3  401–1  GRI 404: Trainin 3-3  404–3  GRI 405: Divers 3-3  405–1  405–2	Greenhouse gas emissions intensity  yment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview  ity and Equality  Management of material topics  Composition of the company  Salary differences between genders	p. 39, 182-183 p. 43-47, 184 p. 43, 47 p. 34-36, 43-44, 184 p. 43 p. 45-47, 181-182, 184 p. 181-182
305–4  GRI 401: Employ 3-3 401–1  GRI 404: Trainin 3-3 404–3  GRI 405: Divers 3-3 405–1 405–2  GRI 406: Non-d	Greenhouse gas emissions intensity  yment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview  ity and Equality  Management of material topics  Composition of the company  Salary differences between genders	p. 39, 182-183 p. 43-47, 184 p. 43, 47
305–4  GRI 401: Employ 3-3 401–1  GRI 404: Trainin 3-3 404–3  GRI 405: Divers 3-3 405–1 405–2  GRI 406: Non-d 3-3	Greenhouse gas emissions intensity  yment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview  ity and Equality  Management of material topics  Composition of the company  Salary differences between genders  iscrimination	p. 39, 182-183  p. 43-47, 184  p. 43, 47  p. 43-44, 184  p. 43  p. 45-47, 181-182, 184  p. 47  p. 47, 184
305–4  GRI 401: Employ 3-3	Greenhouse gas emissions intensity  /ment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview  ity and Equality  Management of material topics  Composition of the company  Salary differences between genders  iscrimination  Management of material topics  Number of cases of discrimination	p. 39, 182-183  p. 43-47, 184  p. 43, 47  p. 34-36, 43-44, 184  p. 43  p. 45-47, 181-182, 184  p. 181-182  p. 47
305–4  GRI 401: Employ 3-3 401–1  GRI 404: Trainin 3-3 404–3  GRI 405: Divers 3-3 405–1 405–2  GRI 406: Non-d 3-3 406–1	Greenhouse gas emissions intensity  /ment conditions and Working conditions  Management of material topics  Personnel turnover  g  Management of material topics  Development interview  ity and Equality  Management of material topics  Composition of the company  Salary differences between genders  iscrimination  Management of material topics  Number of cases of discrimination	p. 39, 182-183  p. 43-47, 184  p. 43, 47  p. 34-36, 43-44, 184  p. 43  p. 45-47, 181-182, 184  p. 181-182  p. 47, 184

## Dialogue with stakeholders.

Nordnet conducts ongoing dialogues on sustainability issues with these stakeholder groups:

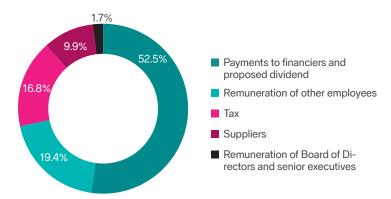
- Employees
- Board of Directors
- Savers
- Shareholders
- Suppliers

Every year since 2011, we have distributed a sustainability survey to all Nordnet employees. The survey allows employees to evaluate our sustainability work and provide development proposals. In the survey, employees can also indicate how they commute to and from the workplace, and these statistics are then used when calculating the greenhouse gas emissions of Nordnet as a whole. In 2020, we conducted a survey on sustainability with select customers in Sweden, Norway, Denmark and Finland. In 2021, in-depth interviews were conducted with shareholders and a questionnaire was also distributed to Nordnet's shareholders and Board of Directors, in which they

were asked to respond to questions about Nordnet's sustainability work. In 2023, we conducted a survey of the Board of Directors, in which we also conducted in-depth interviews with several Board Members. Based on the responses from these stakeholder groups, the following priority areas have been identified.

In addition to the stakeholder groups listed in the table above, we also see the media, analysts, government agencies, competitors, and the public as key stakeholders who, in a broader sense, affect our operations.

# Nordnet's financial impact on various stakeholder groups.



Stakeholder groups	Priority areas in sustainability
	<ul> <li>Well-being among employees and opportunities for development</li> </ul>
	<ul> <li>Provide education to private savers in personal finance with a particular focus on sustainability</li> </ul>
Employees	<ul> <li>Digital user tools that facilitate sustainable investments</li> </ul>
	Offering transparent financial products
	Preventing money laundering
	Offering a wide range of investments and a sustainable fund offer with a focus on climate change
Board of directors	<ul> <li>Create digital user tools that facilitate sustainable investments</li> </ul>
	<ul> <li>Make investments available to a wider group of savers</li> </ul>
	Anti-corruption work
Savers	<ul> <li>Preventing money laundering</li> </ul>
	Protecting customer data and privacy
	Sustainable investments and a sustainable fund offering
Shareholders	<ul> <li>Making investments available to a wider group of savers</li> </ul>
Shareholders	<ul><li>Education of the public in savings</li></ul>
	<ul> <li>Anti-corruption, preventing money laundering and combating financial crime</li> </ul>
	Customer service and support
Suppliers	Offering transparent financial products
	Protecting customer data and privacy

## Materiality analysis.

The dialogue with our primary stakeholder groups forms the foundation for our materiality analysis and choice of sustainability issues which we focus on. The results of the materiality

analysis are presented in the table below. For further details of our materiality analysis method, we refer to the section "regulations within sustainability," pages 51-53.

Materiality area	Section in the sustainability report	GRI standards
Climate change	<ul> <li>Sustainable savings, p.23-32</li> <li>Environment and climate work at Nordnet and among suppliers, p. 38-42</li> </ul>	Information about sustainable investments, energy, emissions.
Own workforce	<ul> <li>Employees, p. 43-44</li> <li>Better through diversity and inclusion, p. 45-47.</li> </ul>	Diversity and equality, equal compensation for women and men, non-discrimination. employment relationships, labour terms.
Consumers and end-users	<ul> <li>Democratizing savings and investments, p. 13-22.</li> <li>Business ethics and regulatory compliance, p. 34-37.</li> </ul>	Indirect financial impact, offering transparent and responsible financial products, financial performance, education in personal finance.
Responsible business	■ Business ethics and regulatory compliance, p. 34-37.	Anti-corruption, customer privacy

## **Background data for GRI indicators.**

In this section, we describe the methods, assumptions, and conversion factors used to develop Norden's GRI indicators. In addition, supplementary tables and information are included in the Annual Report.

## **Employees.**

Employee key figures are based on the actual number of employees as at the end of December and the year, respectively, and are therefore not converted to full-time equivalents or such.

Employees, 31 Dec	2023	<b>3</b> 1	202	2 <sup>1</sup>	202	.1 <sup>2</sup>
Sweden	Number	Women (%)	Number	Women (%)	Number	Women (%)
Total number of employees	618	35	560	35%	642	36%
Number of permanent employees	610	34	555	34%	551	35%
- Of which full time	599	34	544	34%	541	35%
- Of which part-time	11	52	11	55%	10	40%
Number of fixed-term employees	8	63	5	60%	91	41%
Finland						
Total number of employees	38	50	33	45%	53	42%
Number of permanent employees	36	50	32	44%	33	42%
- Of which full time	34	50	31	42%	31	39%
- Of which part-time	2	50	1	100%	2	100%
Number of fixed-term employees	2	50	1	100%	20	40%
Norway						
Total number of employees	35	29	34	24%	42	19%
Number of permanent employees	35	29	33	24%	42	19%
- Of which full time	35	29	33	24%	34	24%
- Of which part-time	0	0	0	0%	8	0%
Number of fixed-term employees	0	0	1	0%	0	0%
Denmark						
Total number of employees	44	41	39	54%	61	49%
Number of permanent employees	43	42	38	55%	57	46%
- Of which full time	39	36	33	48%	36	53%
- Of which part-time	4	100	5	100%	21	33%
Number of fixed-term employees	1	0	1	0%	4	100%
	735		666		798	

<sup>&</sup>lt;sup>1</sup> As of 1 January 2022, permanent, probationary and fixed-term employees are reported, but not those on parental leave, professional leave or hourly employees.

<sup>&</sup>lt;sup>2</sup> For 2021, permanent, probationary, fixed-term and hourly employees are reported, but not those on parental or professional leave.

Composition of the company	2023	20231 20221				2021 <sup>2</sup>		
Employees at different levels within the company	Number	Women (%)	Number	Women (%)	Number	Women (%)		
Board of directors	7	43%	8	38%	8	38%		
Below 30 years	0	0%	0	0%	0	0%		
30-50 years	2	50%	2	50%	4	50%		
Above 50 years	5	40%	6	33%	4	25%		
Management <sup>3</sup>	11	36%	10	30%	10	30%		
Below 30 years	0	0%	0	0%	0	0%		
30-50 years	7	43%	5	20%	5	20%		
Above 50 years	4	25%	5	40%	5	40%		
Employees with personnel responsibilities	91	45%	81	42%	75	41%		
Below 30 years	4	75%	5	80%	7	86%		
30-50 years	71	38%	61	34%	60	32%		
Above 50 years	16	69%	15	60%	8	75%		
Other employees	633	34%	575	36%	713	36%		
Below 30 years	173	40%	170	39%	310	39%		
30-50 years	399	31%	335	31%	348	33%		
Above 50 years	61	39%	70	53%	55	42%		

<sup>&</sup>lt;sup>1</sup> As of 1 January 2022, permanent, probationary and fixed-term employees are reported, but not those on parental leave, professional leave or hourly employees.

#### **Environment.**

## Energy.

To recalculate the energy consumption from MWh to GJ, the conversion factor 3.6 is used.

## Greenhouse gas emissions.

To calculate our greenhouse gas emissions, we use, to the extent possible, conversion factors that include all relevant greenhouse gases, i.e.  $\mathrm{CO}_2$ ,  $\mathrm{CH}_4$ ,  $\mathrm{N}_2\mathrm{O}$ , HFCs, PFCs,  $\mathrm{SF}_6$  and  $\mathrm{NF}_3$ . We do not implement our own conversions from other greenhouse gases to  $\mathrm{CO}_2\mathrm{e}$  and therefore have no overall value for Global Warming Potential (GWP).

Just like fossil fuels, combustion of renewable fuels causes greenhouse gas emissions, but as these emissions are part of a cycle, we do not report emissions in the current calculation methodology. The conversion factors related to the consumption of renewable fuels are the part of the fuel that is fossil fuel. However, we report fossil

greenhouse gas emissions that arise in the production of fossil and renewable fuels.

The table details Nordnet's greenhouse gas emissions by Scope in accordance with the Greenhouse Gas Protocol. Nordnet's Scope 2  $\rm CO_2$  emissions for energy consumption, applying the location-based method were instead 83 (58) tonnes  $\rm CO_2$ e.

For 2022, we have adjusted our total emissions, from the previous year's reported 163 tonnes to 225 tonnes CO<sub>2</sub>e, with the addition of the Scope 3 category "Upstream transport and distribution."

Nordnet's greenhouse gas emissions, tonnes CO <sub>2</sub> e	2023	2022	2021
Scope 1, direct greenhouse gas emissions	0.0	0.0	0.0
Scope 2, indirect greenhouse gas emissions from energy consumption	58	31	55
Scope 3, other indirect greenhouse gas emissions	645¹	195	67
Total greenhouse gas emissions	703	225	122
Greenhouse gas emissions per trade, g CO <sub>2</sub> e	14.4	4.0	1.7

<sup>&</sup>lt;sup>1</sup> For 2023, additional emissions categories are included in the calculations, meaning that the figures are not comparable between years. Applying the same method as previously, the emissions for 2023 would have amounted to 401 tonnes Co<sub>2</sub>e.

<sup>&</sup>lt;sup>2</sup> For 2021, permanent, probationary, fixed-term and hourly employees are reported, but not those on parental or professional leave.

<sup>&</sup>lt;sup>3</sup>The table shows the number of employees excluding consultants.

Activity	Activity data	Conversion factor
		Market-based: Denmark, Sweden and Norway: 372.0 g CO2e/kWh. Source: Swedish Energy Markets Inspectorate (2022) Finland: 285.3 g CO2e/kWh. Source: AIB (2021)
Electricity consumption	Data for each office and data centre.	Location-based: Denmark: 181.3 g CO <sub>2</sub> e/kWh Finland: 95.8 g CO <sub>2</sub> e/kWh Sweden: 7.7 g CO <sub>2</sub> e/kWh Norway: 4.5 g CO <sub>2</sub> e/kWh Source: AIB (2021)
District heating	Data for each office. Standard amounts have been used for Oslo and Helsinki.	Stockholm: 42 g CO <sub>2</sub> e/kWh. Source: Energy companies (2021) Copenhagen: 72.0 g CO <sub>2</sub> e/kWh. Source: Swedish Energy Agency (2020) Oslo: 5.3 g CO <sub>2</sub> e/kWh. Source: Norsk Fjernverme (2021) Helsinki: 110 g CO <sub>2</sub> e/kWh. Source: Finnish Agency (2020)
District cooling	Data for each office and data centre. Data for each office.	Stockholm: 0 g CO <sub>2</sub> e/kWh (2020) Copenhagen: 0 g CO <sub>2</sub> e/kWh (2020) Data centres: 170.3 g 0 g CO <sub>2</sub> e/kWh Source: DEFRA (2022) Helsinki and Oslo: 29g CO <sub>2</sub> e/kWh Source: Nordic average (2019)
Business-related travel with company vehicles and compa- ny cars	Driving distance in company cars is based on employee reporting to receive mileage compensation for business-related travel.	The result refers to driving distance and average consumption for mixed driving for each car in combination with the following conversion factors: Petrol: 2,360 g $\rm CO_2$ /litre Source: SBPI (2019) Diesel: 2,560 g $\rm CO_2$ /litre: SBPI (2019)
Business-related travel, private car	Driving distance in company cars is based on employee reporting to receive mileage compensation for business-related travel.	Assumptions regarding petrol-fuelled cars: Consumption: 0.58 I/10 km Emissions: 136.88 g $\rm CO_2$ e/km Source: Swedish Environmental Protection Agency, SBPI (2019)
Business-related travel, taxi	The statistics consist of booked taxi costs.	Assumptions on travel with average Taxi Stockholm: 8 g CO <sub>2</sub> e/SEK. Source: Taxi Stockholm
Business-related travel, air travel	Statistics comprise booked expenses for airline tickets.	Emissions report from travel agency is used as a template for calculating all air travel expenses. Emissions: 97.6 g $\rm CO_2e/SEK$
Employee commu- ting	Average travel distance with different forms of transportation, calculated from responses in employee survey sent to all employees.	Petrol vehicle: 2,360 g CO <sub>2</sub> /litre Diesel vehicle: 2,560 g CO <sub>2</sub> /litre Ethanol vehicle: 1,000 g CO <sub>2</sub> e/km Gas vehicle: 99.5 g CO <sub>2</sub> e/km Hybrid vehicle: 40 g CO <sub>2</sub> e/km Motorcycle/moped: 2,360 g CO <sub>2</sub> e/litre Rail transport: 0.3 g CO <sub>2</sub> e/km Bus: 70 g CO <sub>2</sub> e/km Electric car: 372 g CO <sub>2</sub> e/kWh Source: Swedish Transport Agency (2020), SPBI (2019), SJ (2020), Swedish Energy Markets Inspectorate (Ei) (2021)
Purchased goods and services	Covers all services purchased within the Nordnet Group. Accordingly, we do not differentiate between puchased goods and services, and capital goods. Instead both categories are included in purchas-	Services: Emissions for services, based on calculations of emissions from the largest suppliers and standard calculations. IT and data-related services: 0.083 t CO <sub>2</sub> e/SEK million spent Cloud services and suppliers: 0.607 t CO <sub>2</sub> e/SEK million spent Financial services: 0.018 t CO <sub>2</sub> e/SEK million spent Non-categorized: 0.078 t CO <sub>2</sub> e/SEK million spent Hardware:
	ed goods and services.	Mobile phones: 0.061 t CO <sub>2</sub> e/unit Laptop: 0.167 t CO <sub>2</sub> e/unit Computer screens: 0.481 t CO <sub>2</sub> e/unit Source: Apple Product Environmental report 2022
Fuel- and energy-re- lated activities	For Nordnet's part, this category mainly includes emissions originating from the transfer and distribution of electricity, district heating and cooling to Nordnet.	Electricity: 20.8g CO <sub>2</sub> e/kWh, Source: SMED & IVL Report C 619 (2021) District heating: 33.41g CO <sub>2</sub> e/kWh, Source: DEFRA (2023) District cooling: 33.41g CO <sub>2</sub> e/kWh, Source: DEFRA (2023) Petrol vehicle: 500g CO <sub>2</sub> e/litre, Source: NTM
	assist reading and cooling to Nordilet.	Diesel vehicle: 630g CO <sub>2</sub> e/litre, Source: NTM

## Risks, governance and follow-up of sustainability.

#### Sustainability area

#### **Risk description**

#### Policies and governance

## Follow-up and results

Social conditions, personnel and human rights.

Materiality areas: Own workforce; Responsible business Ensuring a favourable work environment and that our employees are motivated is the key to our success. As a digital platform, we are dependent on an IT workforce, a workforce that is in short supply. The risks we see in this area include not being able to recruit staff at the pace we would like, that skilled employees leave and problems associated with health and workload. Finance and tech are areas mainly dominated by male employees, and there is therefore a risk that Nordnet's gender distribution will be one-sided.

Nordnet's operations are concentrated in the Nordic countries; a region where the incidence of human rights violations is normally low. Nordnet has not specified any specific risks in the area of human rights. Human rights are nonetheless included in our Code of Conduct for suppliers. On an annual basis, we review the proportion of our outsourcing and significant suppliers having signed our Code of Conduct or maintaining their own equivalent code.

Relevant policies adopted for Nordnet's operations in these areas are, for example, Equal Opportunities Policy, Work Environment policy, Remuneration Policy and Employee Handbook. Nordnet has a work environment committee that works systematically with health promotion, prevention and aftercare with activities. Nordnet's overarching target scenario is a 50/50 distribution between women and men by 2030, albeit with a tolerance interval of +/- 10 percentage points. We also work according to our target of achieving and maintaining a safe and stimulating work environment for all employees.

Our supply chain is controlled by Nordnet's Code of Conduct for suppliers, which can be read in full on our website.

We work proactively and systematically with Nordnet's work environment to achieve a high level of motivation and to reduce absenteeism due to illness or stress. Sick leave was 1.8 percent in 2023, which was less than in 2022 when sick leave was 1.9 percent. Nordnet's employee satisfaction has developed in a positive direction for several years and, in 2023, amounted to 45 (35) measured as eNPS. We work actively with our work environment and to increase our attractiveness as an employer by, for example, investing in creating an engaging culture, providing opportunities for personal development and arranging health-promoting activities. Nordnet's stated objective is for the workplace to be characterized by diversity and equality, and we work actively to prevent discrimination. No (0) cases of discrimination were reported in 2023. Among new recruits, the proportion of women improved by 5 percentage points over 2023 as a whole, compared with 2022. Read more on page 36 and on pages 42-47.

#### Environment and climate.

Materiality areas: Climate change

Reducing our climate footprint and our direct impact on the environment is part of our sustainability work. Climate change is one of the areas we have identified as material within the framework for CSRD. Certain exposures to climate change in our mortgage portfolio, margin lending and securities portfolio. A further risk in this area is if we at Nordnet fail to meet our customers' demand for information services and sustainable-savings investment alternatives.

Nordnet stands behind the Paris Agreement and targets halving emissions within the next ten years. Nordnet seeks to minimize risks related to the environment and climate, and the management of these risks is therefore an integral part of our general risk framework, which is approved by the Board, Accordingly, considerations and controls regarding specific environmental and climate risks are addressed in the management of credit risks, market risks and operational risks. Minimizing our direct climate footprint is part of Nordnet's overall Sustainability Policy and sustainability work. We are also working continuously to reduce the climate impact of our customers' portfolios with our established target of halving CO<sub>2</sub>-intensity of our customers' investments over a period of ten years.

To monitor Nordnet's environmental and climate effects, we measure our energy consumption and greenhouse gas emissions annually. We also climate-compensate our greenhouse gas emissions, including parts of Scope 3 taking into account materiality and the reliability of the data. We strive to use 100-percent renewable electricity at our offices. We addresses the risks in our lending and securities portfolio by performing special checks to mitigate any climate risks.

To follow up on the target of halving the  $\mathrm{CO}_2$ -intensity of the customer capital managed on our platform, we report developments on both an annual and quarterly basis. We also assess and follow up our customers' and other stakeholders' views on Nordnet's sustainability work and product range in sustainable savings. Read more on pages 23-32 and 38-42.

## Risks, governance and follow-up of sustainability.

#### Sustainability area

#### Risk description

## Policies and governance

## Follow-up and results

## Countering corruption and financial crime.

Materiality areas: Responsible business A common definition of corruption is the abuse of power to benefit oneself or others. Corruption can take various forms, such as bribery, fraud, extortion, abuse of power and conflicts of interest. Financial sector players are always at risk of being exploited by criminals for financial crimes such as money laundering, fraud, unfair market impact or insider trading. The presence of such criminal activities and violations may harm Nordnet and its customers, brands and investors.

Nordnet applies internal rules and control processes to combat financial crime and corruption. Relevant policies that have been adopted in this area include an Anti-Corruption Policy, Ethics Policy, Policy on Conflicts of Interest, Policy and Guidelines in the Area of Money Laundering and a Code of Conduct for employees. Nordnet has also set up a whistle-blower function that enables employees to report any irregularities completely anonymously. Nordnet also has a dedicated department, the Financial Crime Prevention Unit, which monitors, among other things, customer transactions and otherwise works to prevent financial crime and which reports directly to the CEO.

We regularly hold training in relevant areas, such as the Code of Conduct, money laundering and financial crime. In 2023, zero (0) incidents linked to corruption were reported or discovered through internal control processes. Read more about how we combat corruption and financial crime on pages 34-36.

#### Customers and consumers.

Materiality areas:

Customers and end-user

The overarching purpose of Nordnet's operations is to democratize savings. Increased accessibility and increased financial freedom have a positive impact on individuals, as well as on society. At the same time, there are some risks associated with how we interact and protect our end-users.

Losses of customer data could have a negative impact on our customers. In addition, IT security is an important area when it comes to protecting our customers. The accessibility of Nordnet's platform and interface is critical for our capacity to deliver our services to customers. The risks in this area are governed by several policies. In part, there is Nordnet's Ethics Policy and Code of Conduct, which details how we should behave as a company and as employees. There is also a Complaints Policy, a Data Policy regulating how we handle personal data, an IT Security Policy, as well as a Marketing Policy.

Zero (0) complaints regarding privacy or privacy violations were received from customers or public authorities in 2023. The total number of personal data incidents in the Group reported to the supervisory authority amounted to 15 (16) for 2023. A personal data incident could entail an unauthorized party gaining access to certain personal data, for example. Over the year, no (0) personal data incidents were deemed to entail a high risk for the rights and freedoms of physical individuals. Read more on pages 13-22 and 34-37.

#### Responsible business, beyond countering corruption and financial crime.

Materiality areas: Responsible business

For Nordnet's operations, the confidence of customers, supervisory authorities and other stakeholders is of utmost importance. Circumstances that may damage this trust can also potentially harm Nordnet's operations. Accordingly, Nordnet works long-term to ensure good business ethics and transparency, to uphold confidence in relations with customers, employees, owners, suppliers and other stakeholders. To safeguard this, Nordnet has established a large number of internal guidelines that all employees have undertaken to adhere to. These guidelines are included in Nordnet's governance documents, which are updated and approved by Board of each Group company at least once annually.

Nordnet has an extensive flora of policies in this area. This is, in turn, regulated by Nordnet's policies within control functions.

Among other things, Nordnet has published its Whistleblower Policy, a Policy on Conflicts of Interest, our Code of Conduct, as well as our Ethics Policy on our external website.

In order to identify potential or actual events that violate Nordnet's internal regulations, Nordnet has, in addition to clear internal escalation and reporting processes, a whistle-blower function with which employees can anonymously report violations 24 hours a day. In 2023, two (0) potential violations were reported through this function. All violations are investigated and handled in accordance with Nordnet's internal rules, with feedback always being provided to those reporting such violations. Read more on pages 34-37.

## Taxonomy reporting.

Nordnet's taxonomy reporting refers to the consolidated situation. The consolidated situation does not include Nordnet Pensions-försäkring AB, Nordnet Livsforsikring or Nordnet Fonder AB. The balance sheet exposure forming the basis for Nordnet's assets financing activities that are covered by the taxonomy and that are environmentally sustainable predominantly comprise Nordnet's lending to private individuals, holdings in interest-bearing securities in the liquidity portfolio and loans to credit institutions.

### Reporting.

Taxonomy reporting is conducted in accordance with Appendix VI of the Commission's delegated regulation (EU). For 2023, reporting is conducted in accordance with the templates:

- 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation,
- 1. Assets for the calculation of GAR.
- 3. GAR KPI stock and
- 4. GAR KPI flow.

Only the tables for the environmental targets climate change mitigation and climate change adaptation are reported on as data was unavailable for the other four environmental targets. Nonetheless, there has been no exposure to adaptations to climate change, which is why the total coincides with the first climate goal. The tables for sector information, financial guarantees and assets under management are not reported based on the assumption that there are no exposures to these categories within the consolidated situation. Nor is GAR reported separated for the turnover indicator and capital expenditure indicator as only exposures to NFRD companies occur via financial institutions for which GAR has been used as an indicator.

#### Loans to private individuals.

Nordnet's mortgages are deemed to be covered by the taxonomy, while other household loans are not deemed to be covered. For mortgages, energy data was available for 23 percent of the mortgage portfolio. Of these, 36 percent are assessed as comprising loans for environmentally sustainable activities. Of the total mortgage portfolio, however, the share is only 8 percent. For residentials to be classified as environmentally sustainable, the energy performance must be among the 15 percent best nationwide. To determine this, the assumption has been made that the energy performance needs to be below 78 kwh/m² for single family homes and 81 kw/m² for tenant-owner apartments¹. Mortgages are assumed not to harm any of the other environmental goals (DNSH²), although an assessment of physical climate risks is made in the portfolio.

#### Exposures to companies.

In the credit portfolio, exposures to companies takes the form of margin lending, primarily small businesses, loans to credit institutions or interest-bearing securities. The analysis of exposures to companies is performed in two steps. An initial analysis determines whether the company is an "NFRD company" (Non-Financial Reporting Directive)<sup>3</sup>. If this is the case, an examination is conducted to determine if the company is taxonomy-eligable. Data on the number of employees at the companies, as well as information on whether they are listed on a European stock exchange, have been

used to determine if the company needs to report in accordance with NFRD. Subsequently, data reported by the companies has been used to determine the extent to which the NFRD companies' activities are taxonomy-eligible. As of 31 December 2023, there were no exposures to non-financial NFRD companies, although there were exposures to financial NFRD companies. For financial companies, reported GAR was used. To a large extent, data was available regarding whether the assets of the financial NFRD companies were taxonomy-eligible. However, data regarding whether the assets were environmentally sustainable (taxonomy-aligned) has only been available for an extremely limited share of the exposures.

If the exposure is to a special purpose in the form of a so-called green bond, it has been assumed that the exposure was taxonomy-eligable and finances environmentally sustainable activities (taxonomy-aligned).

#### Exposures to municipalities.

In the interest bearing securities portfolio, Nordnet has securities issued by municipalities. Exposure to municipalities have been placed under the item *Financing of local authorities*. For municipalities too, it has been assumed that the exposure towards a special purpose in the form of a so-called green bond, is taxonomy-eligable and finances environmentally sustainable activities.

#### Acquired assets.

The GAR flow is calculated by analyzing acquired assets during the year such as new loans to households and securities invested in. Decreased assets, such as repaid loans, are not taken into account. As regards the interest bearing securities, exposures still in the portfolio as of 31 December are taken up if they were acquired during the year. Positions with shorter maturities that have expired or that were divested before the end of the year have not been taken up. For loans to credit institutions, only the net of the balance at the start of the year and at the end of the year is used.

<sup>&</sup>lt;sup>1</sup> Based on a report prepared by Chalmers Industriteknik on behalf of Fastighetsägarna (property owners association) in 2022.

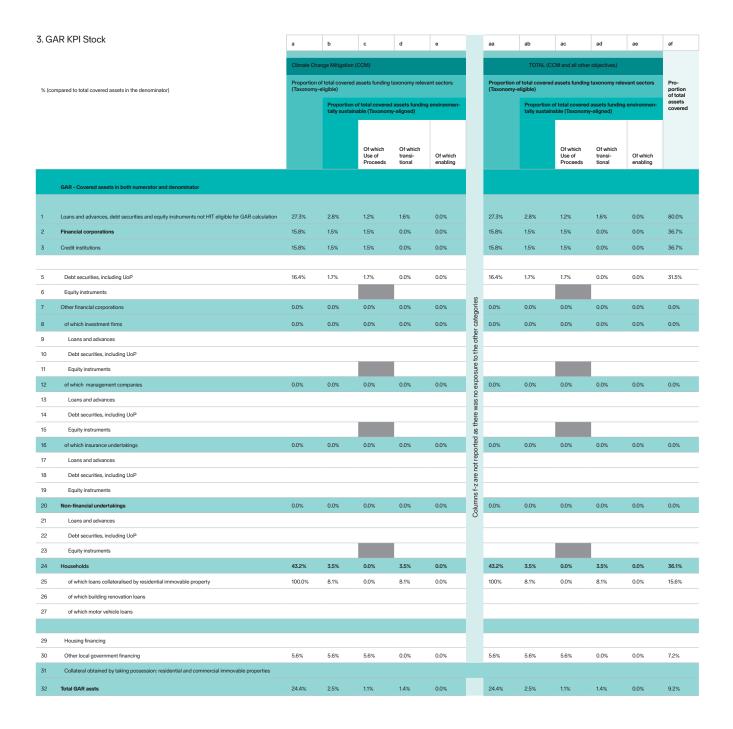
<sup>&</sup>lt;sup>2</sup>Do No Significant Harm.

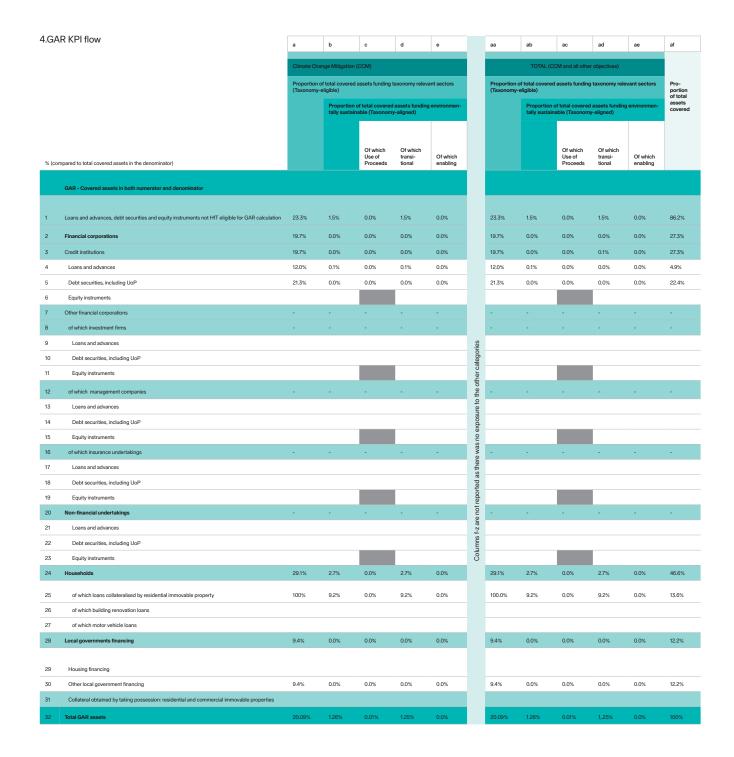
<sup>&</sup>lt;sup>3</sup>Companies that need to report in accordance with the Non-Financial Reporting Directive (NFRD).

## 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environme- ntally sustainable assets (SEK million)	KPI, turnover	KPI, capital expendi- ture	% covergae (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green Asset Ratio (GAR) stock	1,604	2.5%	2.5%	89.2%	9.2%	10.8%
		Total environme- ntally sustai- nable activities (SEK million)	KPI, turnover	KPI, capital expendi- ture	% covergae (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additio- nal KPIs	GAR (flow)	178	1.3%	1.3%	85.4%	11.8%	14.6%
	Financial guarantees	N/A	N/A	N/A			
	Assets under ma- nagement	N/A	N/A	N/A			

Continue	1 ^	and for the color delice of CAD									Oth	er sustair	ability dis	sclosur
Part	I. Ass	sets for the calculation of GAR	a	b	С	d	е	f	al	b	ac	ad	ae	
Part				Climate Ch	ange Mitigatio	on (CCM)						тот	AL (CCM and all c	ther objectiv
Part	CEV									M				
Mathematical	SEKI	illion	carrying	Of which tow					U	or which tow				
Content			amount		Of which en	vironmentally sust	ainable (Taxonon	ny-aligned))			Of which en	vironmentally sus	ainable (Taxonom	y-aligned)
Minimakan managana						Use of						Use of		Of which
Control		CAR Covered excels in both summeries and descriptors				Proceeds	transitional	enabling				Proceeds	transitional	enabling
Water   Wate														
1	1	Loans and advances, debt securities and equity instruments not HTT eligible for GAR calculation	58,151.44	15,846.57	1,604.40	681.29	923.11	-	15	5,846.57	1,604.40	681.29	923.11	-
1	2	Financial corporations	26,675.87	4,211.61	389.67	387.04	2.63	-	4,	,211.61	389.67	387.04	2.63	-
18   18   18   18   18   18   18   18	3	Credit institutions	26,675.87	4,211.61	389.67	387.04	2.63	-	4,	,211.61	389.67	387.04	2.63	-
	4						2.63	-					2.63	-
	5		22,887.72	3,758.15	387.04	387.04		-	3,	,758.15	387.04	387.04		-
			-											
	7		-	-	-	-	-	-						
Second content properties   1968   1969						-								
Second processed process														
Section   Process   Proc	12			-				-						
Communication   Communicatio	13													
Total properties of the prop	14													
	15													
Section information   1	16	of which insurance undertakings	-	-	-		-	-						
The content of the	17	Loans and advances	-											
Second control of the control of t	18	Debt securities, including UoP	-											
Control cont	19	Equity instruments	-											
Second inclination of promoting immoniting property   1,300	20	Non-financial undertakings	-	-	-	-	-	-						
Second inclination of promoting immoniting property   1,300	21	Loans and advances	-						ories					
Second inclination of promoting immoniting property   1,300	22	Debt securities, including UoP	-						categ					
Second inclination of promoting immoniting property   1,300	23	Equity instruments	-						other					
Second inclination of proteints immonish property   1,340,7   1,	24	Households	26,258.63	11,340.71	920.48	-	920.48	-	the c	1,340.71	920.48	-	920.48	-
Second and sources   Second	25	of which loans collateralised by residential immovable property	11,340.71	11,340.71	920.48	-	920.48	-		1,340.71	920.48	-	920.48	-
Second and sources   Second	26	of which building renovation loans	-						exbo					
Second and sources   Second	27								/as no					
Second and sources   Second	28	Local governments financing	5,216.93	294.25	294.25	294.25	-	-	here v	94.25	294.25	294.25		-
Second and sources   Second	29	Housing financing	-						dast					
Second and sources   Second	30	Other local government financing	5,216.93	294.25	294.25	294.25	-	-	2 porte	94.25	294.25	294.25	-	-
Second and sources   Second	<b>Z1</b>								not re					
Second and sources   Second	51								aa are					
Second and sources   Second	32	the denominator)		-	-	-	-	-	ns g-					
Second and sources   Second	33	Non-financial undertakings	3,941.14						Solum					
1	34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations							Ĭ					
2001   Sequel y instruments   1	35													
Part	36													
Figurial print trummints   Figuria print trummints   Figuria print trummints   Figuria print trummints   Figuria print trummint	37													
A	38													
Loans and advances														
Publis securities														
Equity instruments														
Add   Derivatives														
A			-											
46 Cash and cash-related assets 47 Other categories of assets (e.g. Goodwill, commodities etc.) 48 Total GAR assets 49 Other asset not covered for GAR calculation 50 Soverigns 51 Central banks exposure 52 Trading book 53 Total assets 54 Financial guarantees 55 Assets under management 56 Cash and cash-related assets 57 Total assets 58 Assets under management 59 Financial guarantees 50 Assets under management 50 Cash and cash-related assets 50 Cash asset														
47 Other categories of assets (e.g. Goodwill, commodifies etc.) 48 Total GAR assets 49 Other asset not covered for GAR calculation 50 Soverigns 51 Central banks exposure 52 Trading book 53 Total assets 54 Financial guarantees 55 Assets under management 57 Assets under management 58 Assets under management 59 Assets under management 59 Assets under management 50 Assets u	46													
48 Total GAR assets  49 Other assets not covered for GAR calculation  7813.11  7813.		Cash and cash-related assets	-											
50         Soverigns         3,620.19         Security Sources         Securi	47													
		Other categories of assets (e.g. Goodwill, commodities etc.)	2,769.04	15,846.57	1,604.40	681.29	923.11	-	15	5,846.57	1,604.40	681.29	923.11	
52     Trading book     -       53     Total assets     72,674.73     15,846.57     1,604.40     681.29     923.11     -     15,846.57     1,604.40     681.29     923.11     -       Off-balances beet exposures - Corporates subject to NFRD disclosure obligations     -	47 48 49	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets	2,769.04 <b>64,861.62</b>	15,846.57	1,604.40	681.29	923.11		15	5,846.57	1,604.40	681.29	923.11	-
5. Total assets 72,674.73 15,846.57 1,604.0 681.29 923.11 - 15,846.57 1,604.40 681.29 923.11 - 00ff-balance sheet exposures - Corporates subject to NFRD disclosure obligations  5. Assets under management	<b>48</b> 49	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets  Other assets not covered for GAR calculation	2,769.04 <b>64,861.62</b> 7,813.11	15,846.57	1,604.40	681.29	923.11		18	5,846.57	1,604.40	681.29	923.11	-
Off-balance sheet exposures - Corporates subject to NFRD disclosure obligations  54 Financial guarantees -  55 Assets under management -   -   -   -   -   -   -   -   -   -	<b>48</b> 49 50	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets  Other assets not covered for GAR calculation  Soverigns	2,769.04 64,861.62 7,813.11 3,620.19	15,846.57	1,604.40	681.29	923.11	-	18	5,846.57	1,604.40	681.29	923.11	-
54 Financial guarantees - 55 Assets under management -	48 49 50 51	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets  Other assets not covered for GAR calculation  Soverigns  Central banks exposure	2,769.04 64,861.62 7,813.11 3,620.19 4,192.92	15,846.57	1,604.40	681.29	923.11	-	18	5,846.57	1,604.40	681.29	923.11	
55 Assets under management -	48 49 50 51 52	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets  Other assets not covered for GAR calculation  Soverigns  Central banks exposure  Trading book	2,769.04 64,861.62 7,813.11 3,620.19 4,192.92											
	48 49 50 51 52 53	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets  Other assets not covered for GAR calculation  Soverigns  Central banks exposure  Trading book  Total assets	2,769.04 64,861.62 7,813.11 3,620.19 4,192.92											
56 Of which debt securities -	48 49 50 51 52 53 Off-ba	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets  Other assets not covered for GAR calculation  Soverigns  Central banks exposure  Trading book  Total assets  Islance sheet exposures - Corporates subject to NFRD disclosure obligations	2,769.04 64,861.62 7,813.11 3,620.19 4,192.92 - 72,674.73											
57 Of which equity instruments -	49 50 51 52 53	Other categories of assets (e.g. Goodwill, commodities etc.)  Total GAR assets  Other assets not covered for GAR calculation  Soverigns  Central banks exposure  Trading book  Total assets  Islance sheet exposures - Corporates subject to NFRD disclosure obligations  Financial guarantees  Assets under management	2,769.04 64,861.62 7,813.11 3,620.19 4,192.92 - 72,674.73											





# Auditor's report on the statutory sustainability report.

To the general meeting of the shareholders in Nordnet AB (publ), corporate identity number 559073-6681

## Engagement and responsibility.

It is the board of directors who is responsible for the statutory sustainability report for the year 2023 on pages 10–53 along with pages 178–190 and that it has been prepared in accordance with the Annual Accounts Act.

### The scope of the audit

Our examination has been conducted in accordance with FAR's standard RevR 12 The auditor's opinion regarding the statutory sustainability report. This means that our examination of the statutory sustainability report is substantially different and less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinion.

## Opinion.

A statutory sustainability report has been prepared.

Stockholm March 14, 2024

Signatures on Swedish original

Patrick Honeth Approved Public Accountant

Nordnet AB (publ)
Box 30099, SE-104 25 Stockholm
Visiting address: Alströmergatan 39
Tel: +46 10 583 30 00, e-mail: info@nordnet.se
Company registration number: 559073-6681

For more information on Nordnet and financial reports, go to nordnetab.com

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