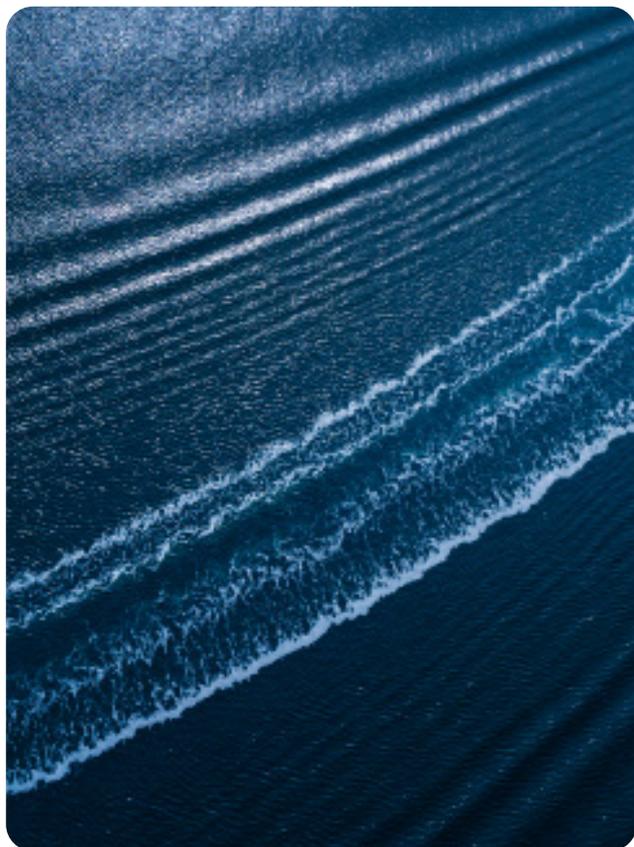
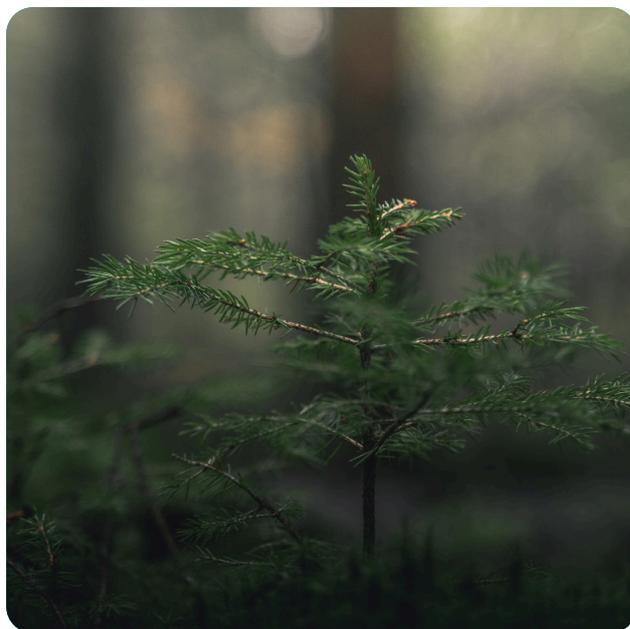


Nordnet AB (publ)

Climate transition plan



Updated February 2026





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Introduction

Nordnet stands behind the Paris Agreement and its goal of keeping global warming below 2 °C and striving to limit it to 1.5 °C. This commitment guides both our direct climate work within Nordnet's own operations and our efforts to address the indirect impact of our business. As a digital savings platform, our main contribution to societal development is by facilitating the capital shift towards sustainable investments.

Nordnet's strategy for aligning with the Paris Agreement is based on identifying how we can make a difference and where we have the greatest opportunity to influence. As part of that work, we have formulated this transition plan. We have also committed to the Science Based Targets Initiative (SBTi), and have set targets which are planned to be submitted to SBTi for validation. If validated, these targets will be scientifically verified in accordance with the Paris Agreement.

Climate change is one of the greatest challenges of our time. At the same time, we have the opportunity to influence the development in a positive direction. If we can make it easy for our customers to allocate capital to more sustainable markets we can be their choice for savings and investments. We can help drive positive change. Our work should be based on our values of passion, transparency and simplicity, and our ambition to make it easy to save sustainably.

This transition plan represents an important step in our journey towards achieving the goals of the Paris Agreement and Nordnet's own sustainability goals. Our sustainability work must be characterised by long-term thinking and continuous improvement. This transition plan will be revised over time as methods and data are refined and as Nordnet's climate work develops.



Lars-Åke Norling

Lars-Åke Norling, CEO

Nordnet's climate strategy

Sustainability is a central part of Nordnet's overall strategy and is in line with our aim to democratise savings and investments. Climate is integrated into the sustainability strategy in two key areas: *the climate impact of our customers' savings capital, and the emissions generated by Nordnet directly but also indirectly through our suppliers.*

Climate impact from the capital on our platform

Nordnet's greatest opportunity to reduce the impact on the climate and other sustainability issues lies within the savings capital available on our platform. By making it easier for our customers to choose sustainable investment options, we can increase the flow of capital that contributes to sustainable development. Our strategy to achieve this ambition includes three parts: A wide range of sustainable savings products, features for investing sustainably and education about sustainable investments.

A wide range of sustainable savings products: To enable more savers to invest sustainably, Nordnet needs to offer a wide range of sustainable savings products. Nordnet's investment range mainly consists of shares, funds and ETFs. The ambition is to have a wide range of sustainable options within all the product categories we offer.

Features for investing sustainably: Nordnet's platform provides features that make it easier for savers to invest sustainably. It is in our DNA to develop digital and user-friendly tools that make it easier for our customers to find and choose sustainable investments.

Education about sustainable investments: To make it easy for our customers to save sustainably, Nordnet must work with education and communication around sustainable savings. Nordnet wants to inspire and contribute with knowledge about sustainable investments.

Nordnet's and our suppliers' climate impact

Nordnet's climate strategy includes Nordnet's own operations and the emissions that occur in our supply chain. Nordnet's business model is digital, and we have, for example, no physical bank branches. With a scalable digital platform, as well as automated and digital processes, Nordnet has relatively low emissions in relation to both the number of employees and turnover.

Nevertheless we still work ambitiously to limit our impact on the climate, both directly and through our suppliers. A majority of Nordnet's emissions occur within Scope 3, therefore emissions within this scope are prioritised in our work. In addition to the work to reduce emissions, we climate compensate for our greenhouse gas emissions.

Link between transition plan and Nordnet's overall strategy

Nordnet's overall strategy involves nine pillars to become the leading platform for savings and investments. One of the pillars of the strategy is sustainability. The main goal in this area is to reduce the climate impact of customers' investments. This means that this goal is regularly followed up by both management and the board.

Nordnet's strategy also includes goals around growing the customer base and customers' net savings. This has been taken into account when Nordnet formulated its sustainability goals. Nordnet has a digital business model which means that growth does not necessarily have to lead to increased emissions. Even so, we must adapt our operations to ensure that future growth does not negatively impact the environment.

Risks and opportunities

Nordnet's climate work is based on the risks and opportunities identified in the area. The starting point is that climate-related risks should be considered in the same way as other risks within the group. Climate work is therefore integrated into our overall strategy.

Identification of risks and opportunities

The process for identifying and assessing which risks and opportunities exist within climate takes into account CSRD's stipulation of double materiality, and as such it considers both financial materiality and impact materiality. The scope of risk identification incorporates all Nordnet's operations, including upstream and downstream impacts. In addition, Nordnet carries out various scenario analyses to assess, among other things, credit risks and market risks linked to the climate.

Identified risks and opportunities

Impact on the climate from customers' investments

Nordnet's customers have significant capital invested in various companies via our platform through funds and direct ownership of shares. The capital can have an impact on the companies' ability to raise capital, and as such an indirect impact on the climate. On Nordnet's platform, our customers make their own investment decisions and Nordnet as a company therefore lacks, for the majority of assets, a direct opportunity to influence which investments are made. However, we have an opportunity to indirectly influence our customers' choices by making it easy to invest sustainably. See further description under the section Nordnet's climate strategy.

Emissions from Nordnet's own operations and our employees

Nordnet has emissions from its operations and the activities conducted by our employees. Our emissions mainly include emissions from buildings, energy consumption, employee commuting and business travel. We work to reduce emissions throughout the value chain in line with the Paris Agreement. Nordnet's direct emissions are relatively small in absolute terms.

Emissions that occur in Nordnet's supply chain

This risk is aimed at emissions that occur when Nordnet purchases goods, services and transportation. The vast majority of our emissions come from the supply chain. We aim to reduce emissions in the entire value chain in line with the Paris Agreement.

Business risk from changing customer requirements in climate

As the climate issue becomes increasingly important, customers will place greater weight on a competitive product offering within climate investments. Nordnet sees a risk if our offer does not meet our customers' expectations. We expect that the importance of a wide offer within savings products that enable climate consideration will increase over time. This can also mean an opportunity if we succeed in creating an offer that customers appreciate.

Market risk & credit risk

Scenario analyses are important when identifying, understanding and managing climate risks and climate impacts. We carry out scenario analyses on both our mortgage portfolio and our margin lending business. These scenario analyses consider both physical risks and transition risks. For the mortgage portfolio, Nordnet produces a climate scenario inspired by NGFS¹. For margin lending, we carry out sensitivity analyses, where we simulate consequences linked to the value of underlying assets and the possibility of continuing to use these as collateral for lending. The results of these scenario analyses are then used to assess risks, assessment of capital requirements and other strategic business considerations.

¹NGFS, Network for Greening the Financial System, is an international network consisting of central banks and financial inspectorates.

Targets and follow-up

Nordnet’s overall climate goals are designed to reduce our and our customers’ emissions in line with the Paris Agreement. In 2024, Nordnet committed to Science Based Targets and has set targets intended to be in accordance with SBTi and are planned to be submitted for approval. Furthermore, Nordnet will continue to evaluate new targets and key figures as necessary to ensure that we reach our overall target to reduce emissions in line with the Paris Agreement. The climate targets are integrated into the same reporting structure and working method as the group’s other targets.

Part of the business	Target
Nordnet’s total emissions*	Reduce total emissions by at least 50 percent by 2033
Scope 1	Keep emissions close to zero
Scope 2	Reduce emissions by at least 55 percent by 2033
Scope 3 (Categories 1-14)	Reduce emissions by at least 50 percent by 2033
Assets on the platform	Reduce the carbon dioxide intensity ² from the savings capital on Nordnet’s platform by at least 55 percent by 2033

* Nordnet’s Scope 1, 2 and 3 (Categories 1-14).

Reduce the climate impact from customers’ investments

Nordnet’s target is to reduce the carbon dioxide intensity from the savings capital on Nordnet’s platform in line with the Paris Agreement. The target is that Nordnet shall reduce the carbon intensity from the savings capital on Nordnet’s platform by at least 55 percent between 2023 and 2033. This target is set by the board of directors and is the overall target within the strategic ambition “A sustainable operation”, which is one of the pillars of Nordnet’s strategy.

When following up on the target, customers’ carbon dioxide intensity is broken down by country of operation, asset class as well as companies within the Nordnet Group. This is reported and followed up quarterly by the respective responsible person.

Sub targets for savings capital

Facilitating a shift of our customers’ savings capital towards less carbon-intensive investments is an important part of reducing Nordnet’s indirect climate impact. We have therefore set the following sub-targets to achieve the ambition:

- A)** Continuously develop new features that allow customers to choose investment options that reduce carbon intensity over time.
- B)** Continuously educate customers on sustainability-related issues to be able to make informed decisions.
- C)** Continuously develop the product range to offer more sustainable options for customers.
- D)** Ongoing follow-up must take place on the measure, broken down by country and company within the group.

We believe these sub-goals will enable customers to become more aware of their indirect climate impact over time and thereby contribute to us meeting our targets.

CO₂-intensity

CO₂-intensity is calculated as a company’s emissions of CO₂ equivalents (CO₂ and other greenhouse gases) divided by the company’s sales. The units reported by Nordnet are emissions in terms of tonnes of CO₂e annually, divided by annual sales in USD millions. The CO₂-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.

$$\text{Portfolio weighted carbon intensity} = \sum_{k=0}^n \text{Portfolio weight}_k \frac{\text{Emissions}_k}{\text{Revenues}_k}$$

k is companies the portfolio is invested in.

Reduce emissions from operations

While Nordnet’s greatest impact is through the savings capital, we must also reduce our own emissions in accordance with the Paris Agreement. The overall target is to reduce emissions from Nordnet’s operations, including Scope 1, 2 and 3 (Categories 1-14), by at least 50 percent between 2023 and 2033.

Nordnet annually reports emissions of greenhouse gases according to the accepted standard Greenhouse Gas Protocol and has subsequently set targets for each emission category³. A large part of the calculations is done with templates, which increases the uncertainty in the calculations. To set our target in terms of emissions, we have used the “Carbon Law” principle, which means that emissions must be halved every ten years. To further align with science, Nordnet has set climate targets using methodology from SBTi and is planning to submit them for approval.

Carbon Law

In the journal Science, Johan Rockström et al. published the article *A roadmap for rapid decarbonization – Emissions inevitably approach zero with a “carbon law”* (2017). The article created a rule of thumb applicable to both companies and countries as well as individuals, that assumes that halving emissions every ten years should be able to keep global warming well below a 2°C increase. The rule of thumb was named “Carbon Law”.

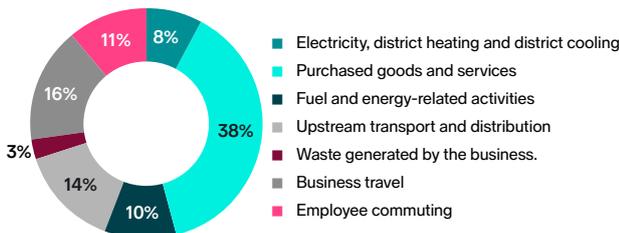
²Nordnet measures the carbon footprint as portfolio-weighted carbon intensity in accordance with the recommendation of the Task Force on Climate-related Financial Disclosures (TCFD). ³Within the framework of our climate reporting, the emission category “capital goods” is included in Purchased goods and services.

Sub-targets within emissions for operations

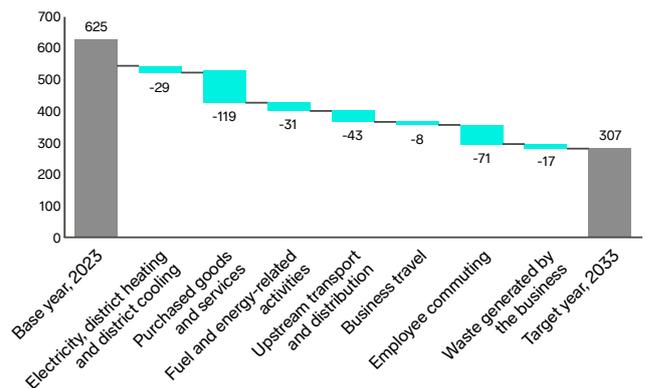
We are convinced that an important step in achieving our overall targets is to break them down into different sub-targets to increase both ownership and relevance within the organisation. Sub-goals have therefore been set per emission category.

Scope 1	Scope 3		Customers' investments
Company cars ±0% Emissions 2023: 0 tCO ₂ e	Purchased goods and services -50% Emissions 2023: 238 tCO ₂ e	Fuel and energy-related activities -50% Emissions 2023: 62 tCO ₂ e	Customers' investments on the platform, intensity -55% tCO ₂ -intensity 2023: 143 tonnes tCO ₂ e/USD million in revenue
Scope 2*	Upstream transport and distribution -50% Emissions 2023: 85 tCO ₂ e	Business travel -70% Emissions 2023: 102 tCO ₂ e	
Electricity, district heating and district cooling -55% Emissions 2023: 52 tCO ₂ e <i>* Within Scope 2, the market-based method has been used in the calculations.</i>	Employee commuting -25% Emissions 2023: 69 tCO ₂ e	Waste generated in the business -50% Emissions 2023: 16 tCO ₂ e	

Emissions base year 2023, Scope 1, 2, 3 (Categories 1-14)



Decarbonisation pathway, tCO₂e



Our climate work

For Nordnet to be able to achieve its climate targets, sustainability must be integrated into all relevant tools and processes for evaluation and decision-making. This is an ongoing effort, and sustainability is today integrated into many essential parts of our business such as in purchasing and procurement, approval of new products and services as well as product development and strategy.

Products and services

We work with products and services based on our strategy of making it easier for our customers to choose sustainable investment options and reallocate capital to investments that contribute to sustainable development.

Approval of new products

Climate aspects are taken into account within the framework of Nordnet's approval process for new products, services and processes (NPAP, New Product Approval Process). For example, an explanation is needed whether the new product or process is in line with Nordnet's sustainability strategy and whether the environment, human rights, work-related social issues or the risk of corruption are affected.

Product development

The sustainability manager is represented in the forum where product development is planned at a strategic level and where the direction is determined for a slightly longer term. The sustainability manager also participates in the strategic work around the development of new savings products within the area of Nordnet's fund company. In addition, the sustainability function collaborates with the development teams when necessary.

Example of offer: Watch lists that enable customers to find new sustainable investments. The lists include shares, mutual funds and ETFs.

Communication and education

A major opportunity for Nordnet involves education and inspiration within various private financial issues. This is done, for example, through our savings economists and information on our platforms.

Example of offer: Sustainability section in Nordnet Academy with training in sustainable share, fund and ETF saving.

The credit portfolio

Incorporating sustainability aspects into Nordnet's lending is done in several different areas. Nordnet has two types of lending: mortgages and margin lending.

Mortgages

Nordnet carries out an analysis regarding the risk level in the mortgage portfolio based on the collateral's climate exposure and energy efficiency at least annually. The analyses are done both at a portfolio level and divided into specific climate-related ones, for example, the risk of damage linked to flooding based on increasing precipitation and sea level rises. The results of stress tests are used in Nordnet's capital evaluation.

In addition to this, Nordnet will also investigate the possibility of incorporating climate risks into the bank's credit assessments within mortgages, where the security value of real estate could be negatively affected in the assessment if it is in an environmentally vulnerable area.

Margin lending

When it comes to determining loan-to-value ratios on financial instruments, the company's sustainability rating is considered. Nordnet also performs stress tests annually to quantify the effect of two different scenarios linked to the oil and gas sector. A scenario where regulatory changes prevent lending security to shares tied to companies operating in the oil and gas sector and a scenario where a sharp price drop in the sector is simulated. The results of the stress tests are taken into account in Nordnet's capital evaluation.

Corporate lending and business services

Nordnet does not engage in traditional corporate financing. Instead, Nordnet offers distribution and communication in connection with IPOs, new issues or similar transactions. Collaborations of this type are reviewed and approved by Nordnet's Investment Council. As part of its work, the Investment Council assesses several actors to ensure that each transaction aligns with both Nordnet's goals and the customers' interests.

Nordnet and project financing

Nordnet does not offer traditional business lending or project financing. The only lending offered to companies is margin lending and then primarily to one-man and limited liability companies. Consequently, no lending takes place to finance projects in, for example, oil, gas, coal or weapons manufacturing. The share of exposure to these sectors is therefore zero percent today. Since Nordnet does not have an ambition to introduce business lending, this exposure should continue to be zero going forward.

Nordnet Fonder

Nordnet Fonder AB started its operations in 2022 and offers index funds and allocation funds. For the allocation funds, before the first investment in an underlying fund, the fund company must ensure that each fund meets the fund company's requirements for environmental and/or social factors. If a fund no longer meets the fund company's requirements, dialogue work must be carried out, or divestment should take place.

The index funds replicate their benchmarks by directly investing in underlying securities. It is therefore the construction of each index fund's underlying index that determines which instruments the index fund invests in. If one instrument no longer meets the fund company's requirements, advocacy work must be carried out against the index provider.

The majority of Nordnet's index funds are Article 8 funds, tracking indices that exclude specific sectors and considers good governance through controversies and UN Global Compact breaches.

Nordnet Fonder has, as well as the rest of the Nordnet group, an exclusion policy that stipulates what sectors and company behaviours Nordnet do not want to be invested in.

Insurance and pension

In the cases where Nordnet offers various types of pension products and capital insurance, it is the customers who make the investment decisions, that is, in which funds and/or other securities they want to invest their insurance capital. Nordnet's range of securities has not been limited from a sustainability perspective, as Nordnet's business model is built around offering customers a wide range of investment options and empowering them with tools for making informed decisions. As a consequence, Nordnet can't directly integrate sustainability risks into the processes for investment decisions. However, Nordnet can have an indirect impact similar to that described in our strategy.

Clarification on Nordnet's activities regarding investment advice

Nordnet Bank AB provides no investment advice in accordance with the Securities Market Act (SFS 2007:528) and is thus not covered by the requirements set out

regarding sustainability factors linked to investment advice in the Sustainable Finance Disclosure Regulation 2019/2088 (SFDR). Nordnet Bank AB does, however, offer some advice regarding insurance products in accordance with the Insurance Distribution Act (SFS 2018:1219) and is therefore covered by the SFDR within this area.

Reduce our own emissions

In accordance with our sub-targets to reduce emissions in Scope 1, 2 and 3 (Categories 1-14), we have several ongoing initiatives. Read more about our initiative efforts to reduce emissions from our operations and our suppliers in the table below. To achieve Nordnet's targets, ongoing initiatives and evaluations are carried out within each area. Climate compensation will not be used as a substitute for emission reductions or count towards the achievement of our emission reduction targets but may be implemented as a mitigation measure for the climate impact.

Cooperation with other financial actors

Climate change is a global problem that needs to be solved through global cooperation. A large part of our work is therefore based on the various organisations Nordnet participates in, such as the Swedish Banking Association, the Swedish Securities Market Association, the Swedish Investment Fund Association and its equivalent in the respective countries in which we are active. In addition, Nordnet is a signatory of several initiatives:

- **UN Global Compact:** The UN Global Compact is a global initiative to incorporate sustainability-related considerations into operations. The initiative is based on ten principles based on international conventions.
- **Principles for responsible investments (PRI):** Through our subsidiary Nordnet Fonder, Nordnet has signed the UN-backed initiative PRI. PRI is an initiative where investors work to implement various guidelines and principles for responsible investment.
- **Carbon Disclosure Project (CDP):** CDP is an independent, international non-profit organisation that works for transparency and dialogue about companies' environmental impact and to make the information available to investors. Nordnet contributes by reporting data to CDP from 2024.
- **Science Based Targets Initiative (SBTi):** SBTi enables companies and financial institutions to take meaningful action to combat the climate crisis. Nordnet has set targets intended to be in line with SBTi, and is planning to send them in for validation. These targets should be in line with the Paris Agreement, which means a 1.5°C or well-below 2°C decarbonization pathway.

Targets for emission reductions and effects of measures

Emission category	Emissions 2023	Target 2033	Estimated emissions 2033	Taken or planned measures	Assumptions & methods regarding reduction
Company cars	0 tCO ₂ e	N/A	N/A	A) All company-owned cars must be hybrid or all-electric.	N/A
Electricity, district heating and district cooling	52 tCO ₂ e	-55%	-69%	A) 100 percent of the energy consumption for electricity in our office premises must be renewable.	A) Norway's heating emissions factor remains constant (Norway's Climate Action Plan for 2021–2030) B) Denmark uses renewable energy for heating by 2030 (IEA) C) Sweden uses renewable energy for heating by 2030 (Miljöbarometern, Fossilbränslefri organisation 2030, Stockholms stad, 2025)
Purchased goods and services ⁴	238 tCO ₂ e	-50%	-42%	For services and cloud providers: A) All new agreements with data providers must meet requirements for energy efficiency, PUE ⁵ 1,3. B) All new agreements with data providers must have 100 percent renewable electricity. C) All of Nordnet's most important suppliers must live up to Nordnet's code of conduct for suppliers, which also includes environment and climate. D) All new agreements with data suppliers must have the target of becoming climate-neutral. E) All our development and operating environment must be climate-neutral by 2030 at the latest, made possible by a migration to the cloud. External data centers are encouraged to have renewable energy source. For hardware: F) Set requirements regarding the climate efficiency of suppliers when procuring hardware. G) Work to continue to have long employee hardware replacement cycles. H) Collect data at the product level to enable, where possible, the selection of products with a lower climate footprint.	A) Weighted reduction based on main suppliers' emissions targets
Fuel and energy-related activities	62 tCO ₂ e	-50%	-15%	A) 100 percent of the energy consumption for electricity in our office premises must be renewable.	A) Nordic Carbon Neutral Scenario (Energy decarbonization pathway)
Upstream transport and distribution	85 tCO ₂ e	-50%	-19%	A) Set requirements regarding the climate efficiency of suppliers when procuring transport. B) Require the provision of CO ₂ data from all procured suppliers. C) Use climate-neutral transport options as much as possible.	A) Land transport decarbonization pathway (SBTi)
Business travel	102 tCO ₂ e	-70%	-51%	A) All domestic air travel shall be replaced by train journeys. B) Reducing air travel in favor of rail travel. C) Only organise business trips when digital meetings are less effective and/or when a physical meeting creates significant business value.	A) SBTi Aviation Sector Decarbonization Pathway (Well-Below 2°C Scenario)
Employee commuting	69 tCO ₂ e	-25%	-23%	A) All cars that the company offers for leasing must be either semi- or fully-electric.	A) Reduction in emissions from cars: Future EU Fleet Average CO ₂ Targets (WLTP) for Cars (European Commission)
Waste generated by the business	16 tCO ₂ e	-50%	N/A	A) Sort the highest possible proportion of waste that occurs in the business. B) Reduce the total amount of waste in the business and have several ongoing initiatives for reduction. C) Conduct dialogue and set demands towards landlords regarding improved waste management and reliable data.	N/A
Total	625 tCO₂e	-51%	-37%		

Accounting Principles

In addition to assumptions about emission trajectories and political scenarios, several further assumptions have been required:

1. The assumption is that Nordnet's headcount will remain steady, except for new hires related to the German expansion. This is a rough assumption.
2. A majority of the scenarios used to model the reduction extend only to 2030. For these scenarios, we assume no additional reduction between 2030 and 2033.

⁴The category capital goods is included in the category purchased goods and services.

⁵PUE stands for Power Usage Effectiveness and is the ratio between the total amount of energy used by a data center facility and the energy delivered to computer equipment. An ideal PUE is 1.0.

Governance

Nordnet works continuously to improve risk management and governance within climate work. In recent years, Nordnet has carried out a major review of internal processes and governing documents.

Policies and Guidelines

Nordnet has several policies and guidelines related to the climate area. Several of the governing documents, including our Supplier Code of Conduct as well as our Environmental and Sustainability policy, can be found on our website.

Allocation of responsibilities

The board of Nordnet AB adopts Nordnet's sustainability strategy every year through our environmental and sustainability policy. Furthermore, the board is kept continuously informed about the work through the sustainability manager. The board's audit committee follows up on the implementation of the sustainability strategy at each committee meeting. The risk and compliance committee is kept informed on sustainability-related risks in the quarterly risk report. Sustainability-related risks are also discussed in the "Regulatory Forum", which is chaired by Nordnet's risk manager and where, among others, the CEO, CFO and general counsel together with the management team are represented.

The sustainability manager is responsible for developing and following up on the sustainability strategy and reports back to the audit committee. The respective department heads are responsible for implementing the sustainability strategy in their part of the business. Each company within the Nordnet Group has its respective sustainability policy that regulates operations.

Nordnet also has a Sustainability Committee, which is led by Nordnet's Head of Sustainability. Other members of the committee are the CEO and representatives from group management and department heads, whose areas of responsibility and knowledge have been deemed relevant from a sustainability perspective. In the operational business, the Sustainability Committee is responsible for continuously evaluating the management of impacts, risks, and opportunities in order to decide on measures to improve management, if necessary. In addition to the Sustainability and environmental policy, the committee's work is also governed by an instruction adopted by the CEO.

Risk work

Identification of sustainability-related risks takes place, as for other risks, as well as with a so-called "Top Down" and a "Bottom Up" perspective in which management as well as each unit and its employees participate.

The processes for monitoring and managing sustainability-related risks continue to be developed and improved within all risk categories.

Incorporation of sustainability into product and business development

Our Chief Product Officer is responsible for designing an effective process for managing operational risk in relation to the products Nordnet offers. In addition, within each product area, there is an appointed area manager who is responsible for identifying and mitigating operational risk (which includes, for example, reputational risk, legal risk, regulatory compliance risk and business risk) at the product level. These responsibilities also include sustainability-related risks.

Internal control within the area of sustainability

Nordnet works with internal control based on the principle of three lines of defence. This principle also applies to Nordnet's work with regulatory compliance and risk management in sustainability.

Competence and training of employees

Nordnet has adopted a sustainability education plan to ensure that the right skills are available within the group. Adaptation of training takes place as needed within different parts of the company, where, for example, departments with customer contact receive extended training in greenwashing, while risk and regulatory compliance functions conduct training that focuses more on regulations. In addition to training for all new hires, implementation of further mandatory training for all employees is planned.

Compensation

Nordnet has a compensation system that is designed to attract and retain the competence required for Nordnet to deliver on its strategy and goals. The employees mainly receive fixed compensation based on role, competence and performance against set targets. For relevant functions and roles, they also include sustainability-related targets. Variable pay only occurs to a limited extent in the form of e.g. gratifications for special work efforts such as efforts at critical stages of a project. There is currently no ongoing program with variable pay, and there are currently no active bonus programs.

Scope of the transition plan

This transition plan applies to Nordnet AB and all its subsidiaries.

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