

Work Environment Policy

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1 Introduction

1.1 Background

This policy applies to Nordnet AB (publ) and Nordnet Bank AB, hereafter commonly referred to as “Nordnet” or “the Company”.

1.2 Purpose and objective

The purpose of this policy is to describe how Nordnet shoulders its responsibilities regarding the work environment and how Nordnet prevents accidents, illness and promotes health and well-being in the work place.

1.3 Regulatory basis

This policy is established in accordance with the Swedish Work Environment Act (1977:1160) and the equivalent in Norway, Finland and Denmark.

2 Definitions

2.1 Physical work environment

Physical factors such as light, noise, air-quality, equipment, ergonomic, etcetera. These should be adapted to meet individual needs, and to prevent any risk of accident or illness.

2.2 Organizational work environment

Organizational factors such as governance, communication, participation, the content and organization of work; having the mandate to influence, appropriate resources to carry out tasks, ability to learn and develop.

2.3 Social work environment

Social factors such as relationships and cooperation between people in the workplace, work satisfaction, stress and leadership.

3 Guiding principles

The work environment at Nordnet is a strategic item that affects both safety aspects, the engagement and wellbeing of our employees as well as Nordnet’s competitiveness. By maintaining a good work environment, Nordnet can achieve operational goals, while also being perceived as an attractive employer. This enables Nordnet to attract and retain employees and to make Nordnet a great workplace for the employees.

Working actively and systematically with the work environment is a profitable investment to achieve high motivation and reduce the level of absence due to illness among employees.

At Nordnet work environment and health are natural parts of the business. The goal is to achieve and maintain a good working environment for all employees. This is done by:

- Taking preventive actions and eliminating risks for illness or injury are the key elements in our work
- The starting point is the current legislation, trade agreements and internal requirements. Nordnet also strives for continuous improvements of the work environment processes, as well as of the business itself, through annual reviews and revisions
- The work environment should be safe and stimulating for each individual. Every employee should be able to enjoy their work
- Nordnet will not tolerate violence, threats, harassment, intimidation, and other disruptive behavior, either physical or verbal, that occurs in the workplace or in situations connected to employment at Nordnet. This applies to all employees, as well as to non-employees such as contractors, customers, tenants, and visitors. Workplace aggression or violence can include oral or written statements, gestures, or expressions that communicate a direct or indirect threat of physical harm, damage to property or any intentional behavior that may cause a person to feel threatened.
- Work environment initiatives should be carried out systematically in interaction between managers, employees and the Work Environment committee.

4 A systematic work process

Nordnet works systematically to minimize health and safety risks at work and invests in activities to enhance the health and the performance of our employees. Nordnet assumes the rules and guidelines in AFS 2001:1 and AFS 2015:4 and the equivalent in Norway, Finland and Denmark.

The systematic work environment work is an ongoing process, where the central activities consist of investigating the work environment, assess risks, take action and then follow up that the measures have had the desired effect.

The work environment work at Nordnet is carried out according to these guidelines:

- Each department sets its own goals for their work environment, based on their unique circumstances. Nordnet's overall work environment goals are also taken into account
- To enable continuous improvement, goals are regularly monitored and evaluated
- Interaction between employees and managers is a prerequisite for a well-functioning working environment
- Work environment initiatives are coordinated by the Work Environment committee
- Rehabilitation and adaptation of work is arranged for as soon as possible after prolonged absence due to illness according to The Swedish Work Environment Authority's regulations about work adaptation and rehabilitation (AFS 1994:01)

- Internal rules, written guidelines and internal requirements should be reviewed on a regular basis
- Accidents and incidents are immediately reported to the Human Resources function (“HR”)
- All new employees undergo a pre-determined and relevant introduction program

5 Roles and responsibilities

5.1 The Chief Executive Officer (“CEO”)

The CEO holds the ultimate responsibility for the work environment, and that Nordnet executes the work in a systematic way.

The CEO has delegated the operational responsibility for the work environment to all people managers. People managers are expected to embrace and execute work environment tasks that are mandatory and/or relevant for the business and a natural aspect of being a leader at Nordnet. The manager must have sufficient responsibility and authority, i.e. the right to make decisions and take required actions regarding e.g. budget allocation, staff, equipment, facilities, time and competence.

A manager can return one or several of the work environment tasks, to the CEO, if the manager does not consider that they have the necessary authority, resources or competence for one or more tasks.

5.2 Line managers

Each line manager within Nordnet should:

- Be familiar with this policy and to be aware of the goals and objectives for work environment work
- To arrange follow-up workshops and develop measures together with the team in connection with employee surveys on e.g. engagement and work environment
- As part of onboarding, ensure that employees and hired staff (e.g. consultants) follow established rules and safety procedures
- Follow Nordnet’s performance management process, including target setting and regular performance reviews
- Schedule regular one-to-ones with team members to discuss targets and other topics relevant for a sound work environment
- Support employees to prioritize tasks during periods of heavy workload
- Take social, psychological and physical factors and risks in the work environment into consideration when making decisions regarding organization, personnel issues and business priorities
- Follow-up on sick leave, especially in cases of frequent and/or long-term absence
- Take lead in any rehabilitation process and, when possible, adapt the work to enable people to return to work as soon as possible

- Report, follow up and investigate incidents, accidents, illness and occupational injuries
- Contribute to a safe and secure workplace

5.3 The Human Resources function (“HR”)

HR supports the line managers in their work environment responsibilities and should:

- Distribute work environment surveys, as part of the employee engagement surveys, at least yearly
- Include work environment as a part of the yearly performance management process
- Arrange health promoting activities
- Arrange onboarding days for all new employees
- Coordinate contacts with the national Social Insurance Agency, the occupational health care and other external parties related to rehabilitation
- Support line managers and employees in the rehabilitation process
- Schedule regular one-to-ones with line managers

5.4 The Work Environment Committee

The Work Environment Committee is responsible for the planning of the corporate wide work environment activities and the follow-up of the same. The responsibilities are regulated in the Swedish Work Environment Act. The Committee meets at least once each quarter. The Committee consists of representatives for both employees and the employer. The Chief Human Resources Officer (as a representative of group management), HR, work environment representatives and union representatives are mandatory members of the Committee. The Committee should:

- Set an annual schedule for its work and activities
- Contribute to a healthy and safe work environment at Nordnet
- Arrange work environment training
- Process questions related to e.g. occupational health care, new premises, training and methods for rehabilitations and work adaptation

5.5 Work environment representatives (*Sw. arbetsmiljöombud or skyddsombud*)

- Represent all employees in work environment related matters.
- Plays a central role in the Systematic Work Environment Management, including a right to participate in risk assessments and investigations.
- Supervise the protection against illness and injuries and that Nordnet as an employer fulfils its obligations in terms of work environment.
- Have the right to stop work in cases of immediate and serious danger (*Sw. skyddsstopp*).
- The lead work environment representative (*Sw. huvudskyddombud*) is a member of the Work Environment Committee.

5.6 Employees

All employees at Nordnet are responsible for participating in creating a good work environment. All employees should:

- Be familiar with the overall business goals at Nordnet
- Know about the objectives of their work and understand their role within the working group
- Take responsibility for their work tasks and have the authorities needed to fulfill them
- Contribute to continuous improvement of the work environment by taking responsibility for health, working environment and contribute in eliminating risks
- Make their voice heard through the employee surveys distributed to all employees
- Actively participate in the rehabilitation process

6 Communication and trainings

This policy is published on Nordnet's intranet. It is the responsibility of each manager, to inform their staff about the contents of this policy.