



Nordnet AB

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

[Read full terms of disclosure](#)

Contents

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

SEK

(1.3) Provide an overview and introduction to your organization.

(1.3.1) Type of financial institution

Select from:

Bank

(1.3.2) Organization type

Select from:

Publicly traded organization

(1.3.3) Description of organization

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. 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 450,000 members. Pension. In Sweden, Norway, Denmark and Finland, we offer pension savings with a wide range of investment opportunities. Loans. Nordnet offers two kinds of loans – margin lending and residential mortgages. 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. 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.

[Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

(1.4.1) End date of reporting year

12/30/2024

(1.4.2) Alignment of this reporting period with your financial reporting period

Select from:

Yes

(1.4.3) Indicate if you are providing emissions data for past reporting years

Select from:

Yes

(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for

Select from:

2 years

(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for

Select from:

1 year

(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for

Select from:

1 year

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

5151800000

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

SE0015192067

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

STO:SAVE

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

Denmark

Finland

Norway

Sweden

(1.9) What was the size of your organization based on total assets value at the end of the reporting period?

273222900

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

Select from:

Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

No

(1.10.6) Type of clients

Select all that apply

Retail clients

Business and private clients (banking)

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

Retail

Investing (Asset manager)

(1.10.1) Activity undertaken

Select from:

Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

No

(1.10.6) Type of clients

Select all that apply

Family offices / high network individuals

Retail clients

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

Services

Investing (Asset owner)

(1.10.1) Activity undertaken

Select from:

Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

No

(1.10.6) Type of clients

Select all that apply

- Institutional investors

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- Retail
- Apparel
- Services
- Materials
- Hospitality
- Transportation services
- Food, beverage & agriculture
- Biotech, health care & pharma
- Fossil Fuels
- Manufacturing
- Infrastructure
- Power generation
- International bodies

Insurance underwriting (Insurance company)

(1.10.1) Activity undertaken

Select from:

- Yes

(1.10.2) Insurance types underwritten

Select all that apply

- Life and/or Health

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

- No

(1.10.6) Type of clients

Select all that apply

Family offices / high network individuals

Retail clients

[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

Upstream value chain

(1.24.3) Highest supplier tier mapped

Select from:

Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

All supplier tiers known have been mapped

(1.24.7) Description of mapping process and coverage

Full coverage of all suppliers. Procurements from external parties, including the extension of existing agreements, must therefore go through Nordnet's procurement process. The purpose of the procurement process is to ensure good internal control and compliance with applicable regulations, including conducting sustainability assessments according to Nordnet's Purchasing Instruction. Sustainability plays a significant role in Nordnet's long-term strategy. Nordnet is committed to high ethical standards and sustainable business practices, as well as respect for human rights and fair and safe working conditions. The same is expected from Nordnet's suppliers. Nordnet has therefore developed a Supplier Code of Conduct based on the UN Global Compact's principles regarding the environment, human rights, anticorruption and labor law. The policy considers:

- *Minimum age requirements: Suppliers are unequivocally prohibited from participating in or deriving any*

advantage from the use of child labor. • Freedom of speech and collective bargaining: Suppliers must recognize and uphold employees' right to form, join (or not join) trade unions and engage in collective bargaining. • Discrimination: Suppliers must treat all employees and job applicants equally and fairly, creating an environment where everyone is treated with respect and dignity, and not tolerate any discrimination, harassment, or bullying in the workplace. • Working conditions and forced labor: Suppliers are expected to have written agreements with their employees, comply with applicable laws regarding working hours and rest periods, and pay employees wages and benefits that meet or exceed legal minimum standards, collective agreements, or industry standards. It is imperative that our suppliers unequivocally reject any involvement in activities associated with slavery or exploitation. This prohibition encompasses bonded or forced labor and human trafficking. Nordnet expects all major suppliers to understand and adhere to the Code, or to have their own, equivalent Code of Conduct. Furthermore, Nordnet strives for all suppliers to market these standards throughout their supply chains.

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

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. In our procurement, physical goods is a small portion of overall purchases which is the reason for no such mapping.

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

1

(2.1.4) How this time horizon is linked to strategic and/or financial planning

How we plan for the upcoming year, in terms of budget and priorities.

Medium-term

(2.1.1) From (years)

1

(2.1.3) To (years)

5

(2.1.4) How this time horizon is linked to strategic and/or financial planning

This is usually the time-period we use for strategic initiatives, analysing customer trends and positioning our company.

Long-term

(2.1.1) From (years)

5

(2.1.2) Is your long-term time horizon open ended?

Select from:

No

(2.1.3) To (years)

10

(2.1.4) How this time horizon is linked to strategic and/or financial planning

Mainly for assessing long term risks and opportunities, and to see if we need to change anything based on it.

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both dependencies and impacts

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select from:</i> <input checked="" type="checkbox"/> Both risks and opportunities	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.2) Provide details of your organization’s process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

- Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

- Dependencies
- Impacts
- Risks
- Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- Direct operations

- Upstream value chain

(2.2.2.4) Coverage

Select from:

- Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- Annually

(2.2.2.9) Time horizons covered

Select all that apply

- Short-term
- Medium-term
- Long-term

(2.2.2.10) Integration of risk management process

Select from:

- Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- Not location specific

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- Enterprise Risk Management
- Internal company methods
- Risk models
- Stress tests

International methodologies and standards

- Environmental Impact Assessment

Other

- Internal company methods
- Materiality assessment
- Partner and stakeholder consultation/analysis
- Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- Flood (coastal, fluvial, pluvial, ground water)
- Heavy precipitation (rain, hail, snow/ice)
- Storm (including blizzards, dust, and sandstorms)

Chronic physical

- Changing temperature (air, freshwater, marine water)

Policy

- Carbon pricing mechanisms

Market

- Changing customer behavior

Reputation

- Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- Stigmatization of sector

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- Customers
- Employees
- Investors
- Regulators
- Suppliers

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- No

(2.2.2.16) Further details of process

*Apart from our integrated risk work, we have updated our approach based on CSRD, and conduct an annual materiality assessment in line with CSRD.
[Add row]*

(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

Banking (Bank)

(2.2.4.1) Process in place covering this portfolio

Select from:

Yes

(2.2.4.2) Dependencies and/or impacts related to this portfolio evaluated in this process

Select from:

Both dependencies and impacts

Investing (Asset manager)

(2.2.4.1) Process in place covering this portfolio

Select from:

Yes

(2.2.4.2) Dependencies and/or impacts related to this portfolio evaluated in this process

Select from:

Impacts only

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

Judged to be unimportant or not relevant

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

No dependencies found that are not covered by the bank's dependencies.

Investing (Asset owner)

(2.2.4.1) Process in place covering this portfolio

Select from:

- No, and we do not plan to within the next two years

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

- Other, please specify :It is only the liquidity portfolio that Nordnet invests through. This portfolio is regulated and invested in interest-bearing securities with the purpose of providing liquidity and supporting the stability of the financial system.

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

It is only the liquidity portfolio that Nordnet owns assets through. This portfolio is regulated and invested in interest-bearing securities with the purpose of providing liquidity and supporting the stability of the financial system. Because of this, we have no plans within the near future.

Insurance underwriting (Insurance company)

(2.2.4.1) Process in place covering this portfolio

Select from:

- Yes

(2.2.4.2) Dependencies and/or impacts related to this portfolio evaluated in this process

Select from:

- Impacts only

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

- Judged to be unimportant or not relevant

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

No dependencies found that are not covered by the bank's dependencies.

[Fixed row]

(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

Banking (Bank)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Both risks and opportunities

(2.2.5.3) Is this process informed by the dependencies and/or impacts process?

Select from:

Yes

Investing (Asset manager)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Both risks and opportunities

(2.2.5.3) Is this process informed by the dependencies and/or impacts process?

Select from:

Yes

Investing (Asset owner)

(2.2.5.1) Process in place covering this portfolio

Select from:

No, and we do not plan to within the next two years

(2.2.5.4) Primary reason for not evaluating risks and/or opportunities related to this portfolio

Select from:

Other, please specify :It is only the liquidity portfolio that Nordnet invests through. This portfolio is regulated and invested in interest-bearing securities with the purpose of providing liquidity and supporting the stability of the financial system.

(2.2.5.5) Explain why you do not evaluate risks and/or opportunities related to this portfolio and describe any plans to do so in the future

The primary objective here is liquidity in order to meet regulatory requirements. As this is the primary goal, environment is not considered.

Insurance underwriting (Insurance company)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Both risks and opportunities

(2.2.5.3) Is this process informed by the dependencies and/or impacts process?

Select from:

Yes

[Fixed row]

(2.2.6) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.

Banking (Bank)

(2.2.6.1) Environmental issue

Select all that apply

Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

Dependencies

Impacts

Risks

Opportunities

(2.2.6.4) Type of assessment

Select from:

Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

Fossil Fuels

(2.2.6.6) Frequency of assessment

Select from:

- Annually

(2.2.6.7) Time horizons covered

Select all that apply

- Not defined

(2.2.6.8) Integration of risk management process

Select from:

- A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- Not location specific

(2.2.6.10) Tools and methods used

Select all that apply

- Other, please specify :Included in annual materiality assessment.

(2.2.6.11) Risk type and criteria considered

Reputation

- Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Stigmatization of sector

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- NGOs
- Customers
- Employees
- Investors
- Suppliers

- Regulators
- Local communities

(2.2.6.13) Further details of process

Assessment of impact from customers investments is incorporated into our materiality analysis. As we are a platform that offer many different investment alternatives, customers can choose what to invest in themselves. We acknowledge the environmental risk of not offering or providing good tools for our customers to make sustainable investments. We are also aware of the potential opportunities a good offering within sustainable savings and investments provide.

Investing (Asset manager)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Impacts
- Risks

(2.2.6.4) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

- Fossil Fuels

(2.2.6.6) Frequency of assessment

Select from:

- As important matters arise

(2.2.6.7) Time horizons covered

Select all that apply

- Not defined

(2.2.6.8) Integration of risk management process

Select from:

- A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- Not location specific

(2.2.6.10) Tools and methods used

Select all that apply

- Other, please specify :Included in annual materiality assessment.

(2.2.6.11) Risk type and criteria considered

Reputation

- Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Stigmatization of sector

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- NGOs
- Customers
- Employees
- Investors
- Suppliers

- Regulators
- Local communities

(2.2.6.13) Further details of process

Nordnet funds are index funds that follow their respective indexes. An evaluation of the suitability of the choice of index happens when deemed relevant, and this is done based on the preferences and interests of different stakeholders.

Insurance underwriting (Insurance company)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Impacts
- Risks
- Opportunities

(2.2.6.4) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.6.6) Frequency of assessment

Select from:

- Annually

(2.2.6.7) Time horizons covered

Select all that apply

- Not defined

(2.2.6.8) Integration of risk management process

Select from:

- A specific environmental risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- Not location specific

(2.2.6.10) Tools and methods used

Select all that apply

- Other, please specify :Included in annual materiality assessment.

(2.2.6.11) Risk type and criteria considered

Reputation

- Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Stigmatization of sector

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- NGOs
- Customers
- Employees
- Investors
- Regulators
- Local communities

Suppliers

(2.2.6.13) Further details of process

Assessment of impact from customers investments is incorporated into our materiality analysis. As we are a platform that offer many different investment alternatives, customers can choose what to invest in themselves. We acknowledge the environmental risk of not offering or providing good tools for our customers to make sustainable investments. We are also aware of the potential opportunities a good offering within sustainable savings and investments provide.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

Yes

(2.2.7.2) Description of how interconnections are assessed

We mainly assess if impacts and opportunities/risks are aligned or not. In all material areas found for Nordnet, they are aligned, which makes our strategic priorities easier to assess. No dependencies have been found to be material so these are disregarded.

[Fixed row]

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

Banking (Bank)

(2.2.8.1) We consider environmental information

Select from:

No, and we do not plan to within the next two years

(2.2.8.2) Explain why you do not consider environmental information

Nordnet is mainly a retail platform serving individuals, and our purpose is to democratise savings and investments. As such, we do not limit who can become a client based on environmental aspects, but rather try to educate and influence our customers to invest in a sustainable manner. Furthermore, we do not have traditional corporate lending and as such it cannot be incorporated in that arm.

Investing (Asset manager)

(2.2.8.1) We consider environmental information

Select from:

No, and we do not plan to within the next two years

(2.2.8.2) Explain why you do not consider environmental information

Nordnet is mainly a retail platform serving individuals, and our purpose is to democratise savings and investments. As such, we do not limit who can become a client based on environmental aspects, but rather try to educate and influence our customers to invest in a sustainable manner. Furthermore, we do not have traditional corporate lending and as such it cannot be incorporated in that arm.

Investing (Asset owner)

(2.2.8.1) We consider environmental information

Select from:

No, and we do not plan to within the next two years

(2.2.8.2) Explain why you do not consider environmental information

As our investing is exclusively through the liquidity portfolio, the main objective is to ensure financial stability and liquidity. As we are a bank, that is our primary objective.

[Fixed row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

- Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

- Frequency of effect occurring
- Time horizon over which the effect occurs
- Likelihood of effect occurring

(2.4.7) Application of definition

Our materiality analysis is comprehensive. We assess impact based on scale, scope, remediability and consider impacts both on environment, society and the individual. For financial materiality we consider both financial effect and likelihood.

Opportunities

(2.4.1) Type of definition

Select all that apply

- Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

- Frequency of effect occurring
- Time horizon over which the effect occurs
- Likelihood of effect occurring

(2.4.7) Application of definition

Our materiality analysis is comprehensive. We assess impact based on scale, scope, remediability and consider impacts both on environment, society and the individual. For financial materiality we consider both financial effect and likelihood.

[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

Yes, both within our direct operations or upstream value chain, and within our portfolio

Forests

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our risk associated with forests are negligible.

Water

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Environmental risks exist, but none with the potential to have a substantive effect on our organization

(3.1.3) Please explain

As a digital and scalable platform, our direct effect on the environment is limited. Water is not used as a vital part of our operation, and is therefore not an important part of our value chain. Water is mainly used for consumption in our four physical buildings where the water supply is stable. Due to this, risks associated with water are negligible.

Plastics

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Insufficient data

(3.1.3) Please explain

Nordnet include plastics in our materiality analysis, but have not found and indication that it should be a material topic for us. It is important to note however that this is difficult to assess when it comes to how customers invest, as analysing plastics on a sector basis as the general approach at Nordnet is made, might not show the entire exposure to plastics.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Market

Changing customer behavior

(3.1.1.4) Value chain stage where the risk occurs

Select from:

Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

Reputational risk

Strategic risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

Denmark

Finland

Norway

Sweden

(3.1.1.9) Organization-specific description of risk

If there is a mismatch between customer demands on sustainable products, and Nordnet's offering, we might risk to not attract and retain as many customers as we would otherwise have. This is also true the other way around and can therefore also be seen as an opportunity.

(3.1.1.11) Primary financial effect of the risk

Select from:

Constraint to growth

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

About as likely as not

(3.1.1.14) Magnitude

Select from:

Medium-high

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

A constrained growth would impact our ability to achieve our financial goals, and can lead to weaker financial performance.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

No

(3.1.1.26) Primary response to risk

Diversification

Develop new products, services and/or markets

(3.1.1.29) Description of response

Nordnet has the ambition to become the leading platform for sustainable savings and investments, and work continually to achieve this. Please see our annual report and our strategy for further explanation.

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

Revenue

(3.1.2.7) Explanation of financial figures

The exact number has not been calculated or estimated, as it is difficult to predict customer behavior when the importance of environmental issues may vary. The impact is, however, deemed to be skewed, meaning that there are more potential upside than downside for our operation.

[Add row]

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

Yes, we have identified opportunities, and some/all are being realized

Forests

(3.6.1) Environmental opportunities identified

Select from:

No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

Judged to be unimportant or not relevant

(3.6.3) Please explain

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our opportunities associated with forests are negligible.

Water

(3.6.1) Environmental opportunities identified

Select from:

No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

Judged to be unimportant or not relevant

(3.6.3) Please explain

As a digital and scalable platform, our direct effect on the environment is limited. Water is not used as a vital part of our operation, and is therefore not an important part of our value chain. Water is mainly used for consumption in our four physical buildings where the water supply is deemed stable. Due to this, opportunities associated with water are negligible.

[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

Enhanced financial performance of investee companies as a result of being able to access new markets and develop new products to meet green consumer demand

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

Denmark

Finland

Norway

Sweden

(3.6.1.8) Organization specific description

If we can become the leading platform for sustainable savings and investments, we can capture mor growth as demand for sustainable products increase over time.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

Long-term

(3.6.1.12) Magnitude

Select from:

Medium-high

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

An increased growth would impact our ability to achieve our financial goals, and can lead to stronger financial performance.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

No

(3.6.1.26) Strategy to realize opportunity

Nordnet has the ambition to become the leading platform for sustainable savings and investments, and work continually to achieve this. Please see our annual report and our strategy for further explanation.

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

Both gender and independence is included.

(4.1.6) Attach the policy (optional)

Equal-Opportunities-Policy-241125-1.pdf

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

Climate change

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

Yes

Forests

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

No, and we do not plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

Judged to be unimportant or not relevant

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our opportunities associated with forests are negligible. For that reason, a board-level oversight is not necessary.

Water

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

No, and we do not plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

- Judged to be unimportant or not relevant

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

As a digital and scalable platform, our direct effect on the environment is limited. Water is not used as a vital part of our operation, and is therefore not an important part of our value chain. Water is mainly used for consumption in our four physical buildings where the water supply is stable. Due to this, risks associated with water are negligible. For that reason, a board-level oversight is not necessary.

Biodiversity

(4.1.1.1) Board-level oversight of this environmental issue

Select from:

- No, and we do not plan to within the next two years

(4.1.1.2) Primary reason for no board-level oversight of this environmental issue

Select from:

- Judged to be unimportant or not relevant

(4.1.1.3) Explain why your organization does not have board-level oversight of this environmental issue

As a digital and scalable platform, our direct effect on the environment is limited. Biodiversity is not directly affected by our operation, and is therefore not an important part of our value chain. Due to this, risks associated with biodiversity are negligible. For that reason, a board-level oversight is not necessary.
[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board’s oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- Chief Executive Officer (CEO)
- Board-level committee

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- Board mandate

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- Overseeing the setting of corporate targets
- Monitoring progress towards corporate targets
- Approving corporate policies and/or commitments
- Overseeing and guiding public policy engagement
- Monitoring the implementation of the business strategy
- Overseeing reporting, audit, and verification processes
- Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities

(4.1.2.6) Scope of board-level oversight

Select all that apply

- Risks and opportunities to our own operations
- The impact of our investing activities on the environment

- Risks and opportunities to our banking activities
- The impact of our own operations on the environment
- Risks and opportunities to our investment activities
- The impact of our banking activities on the environment

- Risks and opportunities to our insurance underwriting activities
- The impact of our insurance underwriting activities on the environment

(4.1.2.7) Please explain

*the sustainability department at Nordnet reports to the Audit Committee on every meeting.
[Fixed row]*

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

- Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- Consulting regularly with an internal, permanent, subject-expert working group
- Engaging regularly with external stakeholders and experts on environmental issues
- Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

- No, and we do not plan to within the next two years

(4.2.4) Primary reason for no board-level competency on this environmental issue

Select from:

- Judged to be unimportant or not relevant

(4.2.5) Explain why your organization does not have a board with competence on this environmental issue

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our opportunities associated with forests are negligible. For that reason, a board-level competence is not necessary.

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

- No, and we do not plan to within the next two years

(4.2.4) Primary reason for no board-level competency on this environmental issue

Select from:

- Judged to be unimportant or not relevant

(4.2.5) Explain why your organization does not have a board with competence on this environmental issue

As a digital and scalable platform, our direct effect on the environment is limited. Water is not used as a vital part of our operation, and is therefore not an important part of our value chain. Water is mainly used for consumption in our four physical buildings where the water supply is stable. Due to this, risks associated with water are negligible. For that reason, a board-level competence is not necessary.

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

Climate change

(4.3.1) Management-level responsibility for this environmental issue

Select from:

Yes

Forests

(4.3.1) Management-level responsibility for this environmental issue

Select from:

No, and we do not plan to within the next two years

(4.3.2) Primary reason for no management-level responsibility for environmental issues

Select from:

Judged to be unimportant or not relevant

(4.3.3) Explain why your organization does not have management-level responsibility for environmental issues

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our opportunities associated with forests are negligible. For that reason, management-level responsibility is not necessary.

Water

(4.3.1) Management-level responsibility for this environmental issue

Select from:

No, and we do not plan to within the next two years

(4.3.2) Primary reason for no management-level responsibility for environmental issues

Select from:

Judged to be unimportant or not relevant

(4.3.3) Explain why your organization does not have management-level responsibility for environmental issues

As a digital and scalable platform, our direct effect on the environment is limited. Water is not used as a vital part of our operation, and is therefore not an important part of our value chain. Water is mainly used for consumption in our four physical buildings where the water supply is stable. Due to this, risks associated with water are negligible. For that reason, management-level responsibility is not necessary.

Biodiversity

(4.3.1) Management-level responsibility for this environmental issue

Select from:

No, and we do not plan to within the next two years

(4.3.2) Primary reason for no management-level responsibility for environmental issues

Select from:

Judged to be unimportant or not relevant

(4.3.3) Explain why your organization does not have management-level responsibility for environmental issues

As a digital and scalable platform, our direct effect on the environment is limited. Biodiversity is not directly affected by our operation, and is therefore not an important part of our value chain. Due to this, risks associated with biodiversity are negligible. For that reason, management-level responsibility is not necessary.
[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Policies, commitments, and targets

- Measuring progress towards environmental corporate targets

Strategy and financial planning

- Managing acquisitions, mergers, and divestitures related to environmental issues
- Managing major capital and/or operational expenditures relating to environmental issues
- Managing priorities related to innovation/low-environmental impact products or services (including R&D)

(4.3.1.4) Reporting line

Select from:

- Reports to the board directly

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- More frequently than quarterly

(4.3.1.6) Please explain

The CEO is responsible for executing decisions in accordance with the directives of the board of directors to ensure that the sustainability strategy is properly implemented Nordnet's operations. The CEO is also responsible for ensuring that proper reporting is done to the board of directors. The CEO is also present at all audit committee meetings when the sustainability director reports on the progress of the sustainability working including goals, which happens more frequently than quarterly.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

As a digital and scalable platform, our direct effect on the environment is limited with a fairly low CO2 emission. For that reason, management and other staff within Nordnet does not have a direct way to materially affect the performance related to the matter. In our typical organisation and the business we conduct, it might also be difficult to measure and quantify.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our opportunities associated with forests are negligible. For that reason, management and other staff within Nordnet does not have a direct way off affecting and thus measure the performance related to the matter.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

No, and we do not plan to introduce them in the next two years

(4.5.3) Please explain

As a digital and scalable platform, our direct effect on the environment is limited. Water is not an important part of our value chain. Due to no direct connection, our opportunities associated with water are negligible. For that reason, management and other staff within Nordnet does not have a direct way off affecting and thus measure the performance related to the matter.

[Fixed row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

- Climate change

(4.6.1.2) Level of coverage

Select from:

- Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

- Direct operations
- Downstream value chain
- Portfolio

(4.6.1.4) Explain the coverage

Please see our *Environmental Policy*, *Whistleblower Policy*, *Equal Opportuntieis policy* and *Supplier Code of Conduct*.

(4.6.1.5) Environmental policy content

Environmental commitments

- Commitment to comply with regulations and mandatory standards
- Commitment to take environmental action beyond regulatory compliance
- Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

- Commitment to 100% renewable energy

Social commitments

- Adoption of the UN International Labour Organization principles
- Commitment to promote gender equality and women's empowerment
- Commitment to respect internationally recognized human rights

Additional references/Descriptions

- Description of environmental requirements for procurement
- Description of grievance/whistleblower mechanism to monitor non-compliance with the environmental policy and raise/address/escalate any other greenwashing concerns

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

- Publicly available

(4.6.1.8) Attach the policy

(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

Banking (Bank)

(4.7.1) Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies

Select from:

No, and we do not plan to include environmental requirements and/or exclusion policies in our policy framework in the next two years

(4.7.2) Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio activities

Select from:

Judged to be unimportant or not relevant

(4.7.3) Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion policies

Nordnet mainly has retail clients where it is the customer that makes the investment decisions, which is why it is difficult to implement requirements. For exclusion policies we have guidelines that the fund company follows, which is the only part where exclusion policies is relevant. This is as Nordnet does not have a traditional corporate lending arm, and consequently exclusions in our loan business is not considered material.

Investing (Asset manager)

(4.7.1) Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies

Select from:

No, but we plan to include environmental requirements and/or exclusion policies in our policy framework in the next two years

(4.7.2) Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio activities

Select from:

Judged to be unimportant or not relevant

(4.7.3) Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion policies

Nordnet mainly has retail clients where it is the customer that makes the investment decisions, which is why it is difficult to implement requirements. For exclusion policies we have guidelines that the fund company follows, which is the only part where exclusion policies is relevant. This is as Nordnet does not have a traditional corporate lending arm, and consequently exclusions in our loan business is not considered material.

Investing (Asset owner)

(4.7.1) Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies

Select from:

No, and we do not plan to include environmental requirements and/or exclusion policies in our policy framework in the next two years

(4.7.2) Primary reason for not including both policies with environmental client/investee requirements and environmental exclusion policies in your policy framework for portfolio activities

Select from:

Other, please specify

(4.7.3) Explain why the policy framework for your portfolio activities does not include both policies with environmental client/investee requirements and environmental exclusion policies

It is only the liquidity portfolio that Nordnet invests through. This portfolio is regulated and invested in interest-bearing securities with the purpose of providing liquidity and supporting the stability of the financial system. Because of this, we have no such plans within the near future.

[Fixed row]

(4.8) Does your organization include covenants in financing agreements to reflect and enforce your environmental policies?

(4.8.1) Covenants included in financing agreements to reflect and enforce policies

Select from:

No, and we do not plan to in the next two years

(4.8.2) Primary reason for not including covenants in financing agreements

Select from:

Judged to be unimportant or not relevant

(4.8.3) Explain why your organization does not include covenants in financing agreements

Nordnet does not have a traditional corporate lending arm, and consequently exclusions in our loan business is not considered material. Please find more information on our website nordnetab.com.

[Fixed row]

(4.9) Does your organization offer its employees a pension scheme that incorporates environmental criteria in its holdings?

	Pension scheme incorporates environmental criteria in its holdings	Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated
Climate change	Select from: <input checked="" type="checkbox"/> Yes, as an investment option	<i>For the part where Nordnet as the employer chooses the investments, they are always at least article 8 according to SFDR.</i>

	Pension scheme incorporates environmental criteria in its holdings	Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated
Forests	Select from: <input checked="" type="checkbox"/> Yes, as an investment option	For the part where Nordnet as the employer chooses the investments, they are always at least article 8 according to SFDR.
Water	Select from: <input checked="" type="checkbox"/> Yes, as an investment option	For the part where Nordnet as the employer chooses the investments, they are always at least article 8 according to SFDR.

[Fixed row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

- Principles for Responsible Investment (PRI)
- Science-Based Targets Initiative (SBTi)
- UN Global Compact

(4.10.3) Describe your organization's role within each framework or initiative

We are signatories of PRI, SBTi and UN Global Compact. Nordnet strives to align all part of our business (upstream, within the organisation, and sown stream) in order to contribute to each framework and initiatives goals relevant to Nordnet.

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

No, we have assessed our activities, and none could directly or indirectly influence policy, law, or regulation that may impact the environment

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

Paris Agreement

Another global environmental treaty or policy goal, please specify :Science Based Target, United Nations Framework Convention on Climate Change

(4.11.4) Attach commitment or position statement

Nordnet-transition-plan.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

Unknown

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

Nordnet ensures that all external engagement activities align with our environmental commitments and transition plan through structured governance, clear policies, and integration of sustainability into core processes. Our climate work is guided by the Paris Agreement and our commitment to Science Based Targets, with the overall goal of reducing emissions from both our operations and customers' savings capital by at least 50% by 2033 (base year 2023). Governance is central to this process. The Board adopts Nordnet's sustainability strategy annually and monitors progress through the Audit Committee and Risk & Compliance Committee. The Sustainability Manager develops and follows up on the strategy, while each business unit is responsible for implementing it. This ensures accountability across the group and that sustainability considerations are embedded in all decision-making. External engagements, whether with suppliers, partners, or industry bodies, are guided by our Supplier Code of Conduct and Environmental & Sustainability Policy. All major suppliers must meet requirements on renewable energy use, efficiency, and climate neutrality targets. New agreements with data providers, hardware, and transport suppliers explicitly include environmental criteria, ensuring consistency with our climate goals. Our New Product Approval Process (NPAP) requires that environmental and social impacts are assessed before launch. Similarly, sustainability is integrated into product development, lending practices, and fund management. For example, Nordnet Fonder applies ESG criteria to allocation funds, and index funds follow benchmarks that exclude controversial sectors. Corporate engagements such as IPO distribution are reviewed by our Investment Council to ensure alignment with both customer interests and Nordnet's sustainability objectives. We also engage externally through industry collaborations and international initiatives, including the UN Global Compact, PRI, CDP, and SBTi. Participation in these frameworks strengthens transparency, supports best practices, and ensures our activities are benchmarked against global standards. Finally, training is provided across the organization to prevent greenwashing and ensure employees can competently reflect Nordnet's commitments in external interactions. In this way, all engagements—commercial, financial, and educational—support our transition plan and long-term climate targets.

(4.11.9) Primary reason for not engaging in activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select from:

Judged to be unimportant or not relevant

(4.11.10) Explain why your organization does not engage in activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

As a digital and scalable platform, our direct effect on the environment is limited. As Nordnet only provides financial services through saving and investing, and lending through margin lending and mortgage, the direct and indirect impact is limited compared to traditional banks that offer corporate loans and market financing. Nordnet also wants to provide tool for our customers, rather than enforcing anything. For this reason we want to focus on that very purpose as our main objective.
[Fixed row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

Yes

(4.12.1) Provide details on the information published about your organization’s response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

- In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ESRS

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change

(4.12.1.4) Status of the publication

Select from:

- Underway - previous year attached

(4.12.1.5) Content elements

Select all that apply

- Governance
- Emission targets
- Emissions figures
- Risks & Opportunities
- Value chain engagement
- Water accounting figures

(4.12.1.6) Page/section reference

31-88

(4.12.1.7) Attach the relevant publication

Annual-and-sustainability-report-2024_new.pdf

(4.12.1.8) Comment

See attached
[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

Yes

(5.1.2) Frequency of analysis

Select from:

Annually

Forests

(5.1.1) Use of scenario analysis

Select from:

No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

Judged to be unimportant or not relevant

(5.1.4) Explain why your organization has not used scenario analysis

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our opportunities associated with forests are negligible. For that reason, scenario analysis is not necessary.

Water

(5.1.1) Use of scenario analysis

Select from:

- No, and we do not plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

- Judged to be unimportant or not relevant

(5.1.4) Explain why your organization has not used scenario analysis

As a digital and scalable platform, our direct effect on the environment is limited. Water is not used as a vital part of our operation, and is therefore not an important part of our value chain. Water is mainly used for consumption in our four physical buildings where the water supply is stable. Due to this, risks associated with water are negligible. For that reason, scenario analysis is not necessary.

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

- Bespoke physical climate scenario

(5.1.1.3) Approach to scenario

Select from:

- Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

- Business activity

(5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical
- Chronic physical
- Market
- Reputation

(5.1.1.6) Temperature alignment of scenario

Select from:

- 1.5°C or lower

(5.1.1.7) Reference year

2023

(5.1.1.8) Timeframes covered

Select all that apply

- 2025

(5.1.1.9) Driving forces in scenario

Finance and insurance

- Cost of capital
- Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- Consumer sentiment

Regulators, legal and policy regimes

- Global regulation

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

Nordnet conducts different scenario analyses, for example in our mortgage lending business, our marginal lending and when we calculate our capital position. These are revised at least annually, and based on a number of factors, such as reputational risk, risk for impairment on physical assets (mortgage), and market sentiment (margin lending).

(5.1.1.11) Rationale for choice of scenario

*We use it for different purposes. Some are regulatory driven, some are used to assess materiality, and some are done for risk management.
[Add row]*

(5.1.2) Provide details of the outcomes of your organization's scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- Risk and opportunities identification, assessment and management
- Strategy and financial planning
- Resilience of business model and strategy
- Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- Organization-wide

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

Incorporating sustainability aspects into Nordnet's lending is a matter of course. This is done on several different fronts. It is ensured, for example, that all customers who are granted a limit have a satisfactory repayment capacity and a good understanding of the product. This is ensured through solid credit checks and clear customer communication both within and after the application. Nordnet carries out minimum annual analyses regarding the risk level in the mortgage portfolio based on the property risk and energy efficiency of the collateral. The analyses are done both on a total level and broken down into specific climate-related factors such as the risk of flooding and rain damage. Nordnet also conducts an annual stress test to quantify the risk of flooding as a result of sea level rise caused by global warming. The results of the stress test are used in Nordnet's capital planning. When it comes to determining loan-to-value ratios on financial instruments, the company's sustainability score is taken into account, Nordnet also makes sure not to offer loan-to-value in any instruments that are linked to companies registered on sanctions lists. 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 collateralised lending in companies active in the 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 planning.

[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:

Yes

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

We do not have a feedback mechanism in place, and we do not plan to introduce one within the next two years

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

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 is reflected in our climate work within the framework of Nordnet's own operations, as well as the indirect impact as a result of the bank we operate. As a digital savings platform, we have the opportunity to contribute to healthy societal development by facilitating the capital shift towards sustainable investments. The transition plan builds on our two main targets, decrease our total emissions by at least 50% to 2033, and decrease the carbon intensity by at least 50% of our customer's portfolios. The transition plan lays out a detailed path to our we will reduce our emissions in line with our targets, and can be found at our webpage www.nordnetab.com.

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

As the transition plan was adapted in november 2024, the progress for the remainder of 2024 is limited. However, during 2024 the total GHG emissions got reduced from 719 in 2023 to 602 tonnes, or by 16.3%. CO2-intensity on the platform got reduced from 142 CO2e/USD million in 2023 to 87 CO2e/USD million by the end of 2024, or a reduction by 38.7%.

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

Nordnet-transition-plan.pdf

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

No other environmental issue considered

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

Products and services

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

Risks

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

During the year, we joined the Science Based Targets Initiative (SBTi) and intend to ensure that our climate goals are scientifically based using SBTi's method in the coming year. In April, we signed the UN Global Compact, a global UN initiative for companies with the goal of incorporating sustainability-related principles. We have been working based on the UN Global Compact for several years, both within our operations and in our supply chain, where we expect our suppliers to live up to the Global Compact's standards. Furthermore, through our fund company Nordnet Fonder, we are now members of the Principles for Responsible Investments (PRI), which is an initiative supported by the UN where various investors work together to promote sustainable development.

[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

Claims reserves

(5.3.2.2) Effect type

Select all that apply

Risks

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

Nordnet conducts annual scenario-analyses on our lending business from environmental affects. These results are incorporated in our lending process and our capital situation.

[Add row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Primary reason for not pricing environmental externalities	Explain why your organization does not price environmental externalities
	Select from: <input checked="" type="checkbox"/> No, and we do not plan to in the next two years	Select from: <input checked="" type="checkbox"/> Lack of internal resources, capabilities, or expertise (e.g., due to organization size)	Nordnet has up until this point not identified any externalities that would be material and therefore not incorporated them.

[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

Clients

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

Investees

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

Judged to be unimportant or not relevant

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Nordnet does not have this type of stakeholder in its traditional sense.

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

(5.11.2) Environmental issues covered

Select all that apply

Climate change

Smallholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

- No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

- Judged to be unimportant or not relevant

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

Smallholders are not a part of our value chain. Nor do we judge them to in any way be directly or indirectly affected by Nordnet's business.

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

- Yes

(5.11.2) Environmental issues covered

Select all that apply

- Climate change

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

- Yes

(5.11.2) Environmental issues covered

Select all that apply

- Climate change

[Fixed row]

(5.11.3) Provide details of your environmental engagement strategy with your clients.

Row 1

(5.11.3.1) Type of clients

Select from:

Clients of Banks

(5.11.3.2) Environmental issues covered by the engagement strategy

Select all that apply

Climate change

(5.11.3.3) Type and details of engagement

Innovation and collaboration

Other innovation and collaboration activity, please specify :We develop user-friendly tools to enable people to invest more sustainably.

(5.11.3.5) % of portfolio covered in relation to total portfolio value

Select from:

76-99%

(5.11.3.6) Explain the rationale for the coverage of your engagement

-

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

Through our annual report.

(5.11.3.9) Staff in your organization carrying out the engagement

Select all that apply

- Specialized in-house engagement teams

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

- Other, please specify :Sustainability department.

(5.11.3.11) Effect of engagement, including measures of success

CO2-intensity from customers' investments.

(5.11.3.12) Escalation process for engagement when dialogue is failing

Select from:

- No, we don't have an escalation process

[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

- Emissions reduction

(5.11.7.3) Type and details of engagement

Financial incentives

- Other financial incentive, please specify :Only collaborate with suppliers that live up to our environmental demands.

(5.11.7.4) Upstream value chain coverage

Select all that apply

Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

76-99%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

76-99%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

We engage with our IT and data-providers as these account for most of our emissions. Here we have goals on e.g. energy efficiency.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

Yes

Water

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

No, this engagement is unrelated to meeting an environmental requirement

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

- Investors and shareholders

(5.11.9.2) Type and details of engagement

Education/Information sharing

- Share information on environmental initiatives, progress and achievements

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

We see this as mutually beneficial, as we can get input from stakeholders what they believe is most material for Nordnet, and as we can explain how Nordnet is a business that can have a positive impact.

(5.11.9.6) Effect of engagement and measures of success

We follow up on the number of meetings had where we address sustainability, but do not measure anything additional as these engagements mainly regards a continuous dialogue.

[Add row]

(5.14) Do your external asset managers have to meet environmental requirements as part of your organization's selection process and engagement?

(5.14.1) External asset managers have to meet specific environmental requirements as part of the selection process and engagement

Select from:

- No, and we do not plan to include environmental requirements in the next two years

(5.14.3) Primary reason for not including environmental requirements in selection process and engagement with external asset managers

Select from:

- Not an immediate strategic priority

(5.14.4) Explain why environmental requirements are not included in selection process and engagement with external asset managers

Nordnet has the ambition to offer our customers a wide offering, which is why we do not limit the universe. What we instead do is educate the customer and provide different tools so the customer can make informed decisions.

[Fixed row]

(5.15) Does your organization exercise voting rights as a shareholder on environmental issues?

	Exercise voting rights as a shareholder on environmental issues	Primary reason for not exercising voting rights as a shareholder on environmental issues	Explain why you do not exercise voting rights on environmental issues
	Select from: <input checked="" type="checkbox"/> No, and we do not plan to in the next two years	Select from: <input checked="" type="checkbox"/> Judged to be unimportant or not relevant	<i>As a digitalized bank with very limited effect on the environment and low environmental risk, it is not deemed as important as a topic to vote on.</i>

[Fixed row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

Financial control

(6.1.2) Provide the rationale for the choice of consolidation approach

All activities that Nordnet or one of its subsidiaries have the opportunity to impact.

Forests

(6.1.2) Provide the rationale for the choice of consolidation approach

As a digital and scalable platform, our direct effect on the environment is limited. Forests, nor any product from the forest, is an important part of our value chain. Due to no direct connection to the forest, our opportunities associated with forests are negligible. For that reason, no consolidation approach is necessary.

Water

(6.1.1) Consolidation approach used

Select from:

Operational control

(6.1.2) Provide the rationale for the choice of consolidation approach

Nor material but easily measured as our consumption on our own buildings gets monitored.

Plastics

(6.1.2) Provide the rationale for the choice of consolidation approach

As a digital and scalable platform, our direct effect on the environment is limited. The usage of plastic is not an essential part of our operation and thus there is no needs to calculate performance related to the matter.

Biodiversity

(6.1.2) Provide the rationale for the choice of consolidation approach

As a digital and scalable platform, our direct effect on the environment is limited. Biodiversity is not directly affected by our operation, and is therefore not an important part of our value chain. Due to this, risks associated with biodiversity are negligible. For that reason, no consolidation approach is necessary.

[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	<p>Has there been a structural change?</p>
	<p>Select all that apply</p> <p><input checked="" type="checkbox"/> No</p>

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	<p>Change(s) in methodology, boundary, and/or reporting year definition?</p>	<p>Details of methodology, boundary, and/or reporting year definition change(s)</p>
	<p>Select all that apply</p> <p><input checked="" type="checkbox"/> Yes, a change in methodology</p>	<p>In 2024, we have adjusted the method for calculating emissions from business travel (from spend-based to distance-based).</p>

[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

Yes

(7.1.3.2) Scope(s) recalculated

Select all that apply

Scope 3

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

With the same methodology for Business Travel, emissions for 2023 would have been adjusted by 10 tons to 199 tons.

(7.1.3.4) Past years' recalculation

Select from:

Yes

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

The Greenhouse Gas Protocol: Scope 2 Guidance

The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

	Scope 2, location-based	Scope 2, market-based	Comment
	Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, location-based figure	Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, market-based figure	Please see our annual report for 2024

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.

Row 1

(7.4.1.1) Source of excluded emissions

Non material office supplies and other smaller goods.

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

Scope 3: Purchased goods and services

(7.4.1.6) Relevance of Scope 3 emissions from this source

Select from:

Emissions are not relevant

(7.4.1.10) Explain why this source is excluded

*Non material
[Add row]*

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO₂e)

0

(7.5.3) Methodological details

-

Scope 2 (location-based)

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO₂e)

83

(7.5.3) Methodological details

-

Scope 2 (market-based)

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

58

(7.5.3) Methodological details

-

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

236

(7.5.3) Methodological details

-

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

66

(7.5.3) Methodological details

-

Scope 3 category 4: Upstream transportation and distribution

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

85

(7.5.3) Methodological details

-

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

16

(7.5.3) Methodological details

-

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

189

(7.5.3) Methodological details

** In 2024, we have adjusted the method for calculating emissions from business travel (from spend-based to distance-based).*

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

(7.5.3) Methodological details

-

Scope 3 category 8: Upstream leased assets**(7.5.1) Base year end***12/30/2023***(7.5.2) Base year emissions (metric tons CO2e)**

0

(7.5.3) Methodological details

-

Scope 3 category 9: Downstream transportation and distribution**(7.5.1) Base year end***12/30/2023***(7.5.2) Base year emissions (metric tons CO2e)**

0

(7.5.3) Methodological details

-

Scope 3 category 10: Processing of sold products

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3 category 12: End of life treatment of sold products

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3 category 14: Franchises

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3: Other (upstream)

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-

Scope 3: Other (downstream)

(7.5.1) Base year end

12/30/2023

(7.5.2) Base year emissions (metric tons CO2e)

0

(7.5.3) Methodological details

-
[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

	Gross global Scope 1 emissions (metric tons CO2e)	End date	Methodological details
Reporting year	1	Date input [must be between 11/19/2015 - 11/19/2024]	We report our greenhouse gas emissions annually according to the Greenhouse Gas Protocol standard

	Gross global Scope 1 emissions (metric tons CO2e)	End date	Methodological details
Past year 1	0	12/30/2023	<i>We report our greenhouse gas emissions annually according to the Greenhouse Gas Protocol standard</i>
Past year 2	0	12/30/2022	<i>We report our greenhouse gas emissions annually according to the Greenhouse Gas Protocol standard</i>

[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

41

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

29

(7.7.4) Methodological details

We report our greenhouse gas emissions annually according to the Greenhouse Gas Protocol standard

Past year 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

83

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

(7.7.3) End date

12/30/2023

(7.7.4) Methodological details

*We report our greenhouse gas emissions annually according to the Greenhouse Gas Protocol standard
[Fixed row]*

(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**Purchased goods and services****(7.8.1) Evaluation status**

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

284

Capital goods**(7.8.1) Evaluation status**

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

0

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

56

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

40

Waste generated in operations

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

12

Business travel

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

89

Employee commuting

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

91

Upstream leased assets

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

No impact from leased assets upstream.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

As we provide services digitally no transportation as a result.

Processing of sold products

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

We do not sell products. Therefore not relevant.

[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/30/2023

(7.8.1.2) Scope 3: Purchased goods and services (metric tons CO2e)

236

(7.8.1.3) Scope 3: Capital goods (metric tons CO2e)

0

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

66

(7.8.1.5) Scope 3: Upstream transportation and distribution (metric tons CO2e)

85

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

189

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

69

(7.8.1.19) Comment

The cells that are blank are out of scope for Nordnet End of 2024
[Fixed row]*

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> No third-party verification or assurance
Scope 2 (location-based or market-based)	Select from: <input checked="" type="checkbox"/> No third-party verification or assurance

	Verification/assurance status
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance

[Fixed row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

	Change in emissions (metric tons CO2e)	Direction of change in emissions	Emissions value (percentage)
Other emissions reduction activities	28	<i>Select from:</i> <input checked="" type="checkbox"/> Decreased	48

[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

Location-based

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

No

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

Don't know

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> Yes

	Indicate whether your organization undertook this energy-related activity in the reporting year
Generation of electricity, heat, steam, or cooling	<i>Select from:</i> <input checked="" type="checkbox"/> No

[Fixed row]

(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

Consumption of purchased or acquired heat

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

Consumption of purchased or acquired steam

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

Consumption of purchased or acquired cooling

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

Total energy consumption

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

1752

(7.30.1.3) MWh from non-renewable sources

402

(7.30.1.4) Total (renewable + non-renewable) MWh

2154.00

[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

	Consumption of purchased electricity (MWh)	Consumption of self-generated electricity (MWh)
Denmark	35	0
Finland	79	0
Norway	49	0
Sweden	720	0

[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

5.6e-9

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

29

(7.45.3) Metric denominator

Select from:

unit total revenue

(7.45.4) Metric denominator: Unit total

5151800000

(7.45.5) Scope 2 figure used

Select from:

Market-based

(7.45.6) % change from previous year

55.8

(7.45.7) Direction of change

Select from:

Decreased

(7.45.8) Reasons for change

Select all that apply

Change in output

Change in revenue

[Add row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:

Waste

(7.52.2) Metric value

12

(7.52.5) % change from previous year

25

(7.52.6) Direction of change

Select from:

Decreased

(7.52.7) Please explain

By improving waste data, streamlining recycling, and collaborating with property owners to optimize waste management, Nordnet can improve its waste management processes. Limitations here include a reliance on external stakeholders, such as property owners, to implement improvements.

Row 2

(7.52.1) Description

Select from:

Energy usage

(7.52.2) Metric value

2154

(7.52.5) % change from previous year

14

(7.52.6) Direction of change

Select from:

Decreased

(7.52.7) Please explain

Nordnet's Sustainability and Environmental Policy states that Nordnet should work to reduce our direct and indirect emissions in line with the Paris Agreement. This means, among other things, that we will actively work to reduce Nordnet's direct impact on the environment, for example by striving to run our office space with 100 percent renewable energy
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

Absolute target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, and we have committed to seek validation of this target by the Science Based Targets initiative in the next two years

(7.53.1.4) Target ambition

Select from:

1.5°C aligned

(7.53.1.5) Date target was set

12/30/2023

(7.53.1.6) Target coverage

Select from:

- Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

- Carbon dioxide (CO2)

(7.53.1.8) Scopes

Select all that apply

- Scope 1
- Scope 2
- Scope 3

(7.53.1.9) Scope 2 accounting method

Select from:

- Market-based

(7.53.1.10) Scope 3 categories

Select all that apply

- Scope 3, Category 2 – Capital goods (not included in Scope 1 or 2)
- Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)
- Scope 3, Category 6 – Business travel
- Scope 3, Category 7 – Employee commuting
- Scope 3, Category 1 – Purchased goods and services
- Scope 3, Category 4 – Upstream transportation and distribution

(7.53.1.11) End date of base year

12/30/2023

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

0

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

58

(7.53.1.14) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target (metric tons CO2e)

236

(7.53.1.15) Base year Scope 3, Category 2: Capital goods emissions covered by target (metric tons CO2e)

0

(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

66

(7.53.1.17) Base year Scope 3, Category 4: Upstream transportation and distribution emissions covered by target (metric tons CO2e)

85

(7.53.1.19) Base year Scope 3, Category 6: Business travel emissions covered by target (metric tons CO2e)

189

(7.53.1.20) Base year Scope 3, Category 7: Employee commuting emissions covered by target (metric tons CO2e)

69

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

645.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

703.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.35) Base year Scope 3, Category 1: Purchased goods and services emissions covered by target as % of total base year emissions in Scope 3, Category 1: Purchased goods and services (metric tons CO2e)

100

(7.53.1.36) Base year Scope 3, Category 2: Capital goods emissions covered by target as % of total base year emissions in Scope 3, Category 2: Capital goods (metric tons CO2e)

100

(7.53.1.37) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

100

(7.53.1.38) Base year Scope 3, Category 4: Upstream transportation and distribution covered by target as % of total base year emissions in Scope 3, Category 4: Upstream transportation and distribution (metric tons CO2e)

100

(7.53.1.40) Base year Scope 3, Category 6: Business travel emissions covered by target as % of total base year emissions in Scope 3, Category 6: Business travel (metric tons CO2e)

100

(7.53.1.41) Base year Scope 3, Category 7: Employee commuting covered by target as % of total base year emissions in Scope 3, Category 7: Employee commuting (metric tons CO2e)

100

(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2033

(7.53.1.55) Targeted reduction from base year (%)

50

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

351.500

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

29

(7.53.1.59) Scope 3, Category 1: Purchased goods and services emissions in reporting year covered by target (metric tons CO2e)

284

(7.53.1.60) Scope 3, Category 2: Capital goods emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

63

(7.53.1.62) Scope 3, Category 4: Upstream transportation and distribution emissions in reporting year covered by target (metric tons CO2e)

40

(7.53.1.64) Scope 3, Category 6: Business travel emissions in reporting year covered by target (metric tons CO2e)

62

(7.53.1.65) Scope 3, Category 7: Employee commuting emissions in reporting year covered by target (metric tons CO2e)

54

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

503.000

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

532.000

(7.53.1.78) Land-related emissions covered by target

Select from:

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

48.65

(7.53.1.80) Target status in reporting year

Select from:

Underway

(7.53.1.82) Explain target coverage and identify any exclusions

It covers all material GHG protocol categories, throughout all our operations, countries and upstream value chain.

(7.53.1.83) Target objective

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"¹ 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 CO₂ 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

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

Nordnet has established a clear plan to ensure that all external engagement activities support our environmental commitments and climate transition targets. Our overarching goal is to reduce both operational emissions and the carbon intensity of customers' savings capital by at least 50% between 2023 and 2033, in line with the Paris Agreement and our commitment to Science Based Targets. The plan is built on four pillars: governance, supplier and partner management, product and service integration, and external collaboration. 1. Governance and accountability. The Board annually adopts Nordnet's sustainability strategy and reviews progress

through the Audit and Risk Committees. The Sustainability Manager develops and follows up on the strategy, while business units implement it. This ensures that all external engagements are consistent with our climate objectives. 2. Responsible supplier and partner engagement. All significant suppliers must comply with Nordnet's Supplier Code of Conduct, including requirements on renewable energy, energy efficiency (e.g. PUE standards), and climate neutrality. New agreements with data providers, hardware vendors, and transport partners integrate binding environmental criteria. Supplier performance is followed up continuously, ensuring that upstream activities do not undermine our transition targets. 3. Integration into products and services. External engagements related to product development and distribution follow the New Product Approval Process (NPAP), where sustainability impact is assessed before launch. Nordnet Fonder applies ESG criteria in allocation funds and follows exclusionary indices for most index funds. Our lending processes integrate climate risk, e.g. stress testing mortgage portfolios for flood risk and adjusting loan-to-value ratios based on sustainability ratings. All corporate transactions such as IPOs are reviewed by the Investment Council to ensure alignment with Nordnet's sustainability strategy. 4. Industry collaboration and transparency. Nordnet strengthens its transition plan by participating in global initiatives such as UN Global Compact, PRI, CDP, and SBTi. These memberships ensure that our external engagements are consistent with international standards and that our progress is transparent. Finally, employee training on sustainability, greenwashing risks, and regulatory compliance ensures that every external interaction reflects our commitments.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

No

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

Other climate-related targets

(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.

Row 1

(7.54.2.1) Target reference number

Select from:

Oth 1

(7.54.2.2) Date target was set

12/30/2023

(7.54.2.3) Target coverage

Select from:

Business activity

(7.54.2.4) Target type: absolute or intensity

Select from:

Intensity

(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)

Green finance

Other green finance, please specify

(7.54.2.6) Target denominator (intensity targets only)

Select from:

metric ton of aggregate

(7.54.2.7) End date of base year

12/30/2023

(7.54.2.8) Figure or percentage in base year

143

(7.54.2.9) End date of target

12/30/2033

(7.54.2.10) Figure or percentage at end of date of target

72

(7.54.2.11) Figure or percentage in reporting year

87

(7.54.2.12) % of target achieved relative to base year

78.8732394366

(7.54.2.13) Target status in reporting year

Select from:

Underway

(7.54.2.15) Is this target part of an emissions target?

Nordnet stands behind the Paris Agreement to limit global warming well below 2°C and striving to limit it to 1.5°C. In line with this ambition, Nordnet's overarching target is for the CO2 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 CO2 footprint from the savings capital as the overarching objective within the strategic ambition "A sustainable business" which is a cornerstone of Nordnet's strategy. Our objective is to Halve the emissions from customers' investments between 2023 and 2033

(7.54.2.16) Is this target part of an overarching initiative?

Select all that apply

No, it's not part of an overarching initiative

(7.54.2.18) Please explain target coverage and identify any exclusions

It covers all assets on our platform

(7.54.2.19) Target objective

Halve the emissions of customers' CO2 intensity, in order to be in line with the Paris Agreement.

(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year

The progress is well underway. Plans to achieve target is to further increase the offering within sustainable investing and savings, as well as increase the educational content on the matter.

[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Implementation commenced	8	367

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Waste reduction and material circularity

Waste reduction

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- Scope 3 category 5: Waste generated in operations

(7.55.2.4) Voluntary/Mandatory

Select from:

- Voluntary

Row 2**(7.55.2.1) Initiative category & Initiative type**

Transportation

- Employee commuting

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)**(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur**

Select all that apply

- Scope 3 category 7: Employee commuting

(7.55.2.4) Voluntary/Mandatory

Select from:

- Voluntary

Row 3

(7.55.2.1) Initiative category & Initiative type

Transportation

Business travel policy

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

132

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

Scope 3 category 6: Business travel

(7.55.2.4) Voluntary/Mandatory

Select from:

Voluntary

Row 4

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

Low-carbon electricity mix

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

62

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- Scope 3 category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2)

(7.55.2.4) Voluntary/Mandatory

Select from:

- Voluntary

(7.55.2.9) Comment

Includes: Electricity, district heating and district cooling Fuel and energy-related activities

Row 5

(7.55.2.1) Initiative category & Initiative type

Company policy or behavioral change

- Supplier engagement

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

161

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- Scope 3 category 1: Purchased goods & services
- Scope 3 category 2: Capital goods

(7.55.2.4) Voluntary/Mandatory

Select from:

- Voluntary

[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

- Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Using policy and governance to set boundaries for what the company can and cannot do.

[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

- Yes

(7.79.1) Provide details of the project-based carbon credits retired by your organization in the reporting year.

Row 1

(7.79.1.1) Project type

Select from:

- Natural regeneration

(7.79.1.2) Type of mitigation activity

Select from:

- Carbon removal

(7.79.1.3) Project description

Every year we measure and offset our greenhouse gas emissions, including parts of scope 3 emissions such as employee commuting. Our policy is to offset 110 percent of what we emit in the categories we offset. The offset in 2024 was made through a Plan Vivo-certified project in central Kenya. The project aims to help farmers in an area that has been subject to deforestation both grow better and prevent climate change. The area is subject to erosion and with the help of planting plants and smarter irrigation, the project can both absorb carbon dioxide and improve agriculture and the living conditions of local residents.

(7.79.1.4) Credits retired by your organization from this project in the reporting year (metric tons CO2e)

662

(7.79.1.5) Purpose of retirement

Select from:

Voluntary offsetting

(7.79.1.8) Were these credits issued to or purchased by your organization?

Select from:

Purchased

(7.79.1.9) Carbon-crediting program by which the credits were issued

Select from:

Plan Vivo

(7.79.1.10) Method the program uses to assess additionality for this project

Select all that apply

Standardized Approaches

[Add row]

C12. Environmental performance - Financial Services

(12.1) Does your organization measure the impact of your portfolio on the environment?

Banking (Bank)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

Yes

(12.1.2) Disclosure metric

Select all that apply

Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.5) We measure the impact of our portfolio on forests

Select from:

No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

Select from:

Lack of tools or methodologies available

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

The majority of investments on Nordnet's platform is invested by our customers. The vast number of investment options have made it difficult to make a consolidated calculation of the exposure to forests and it's issues, as that topic in itself is vast.

(12.1.8) We measure the impact of our portfolio on water

Select from:

- No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

Select from:

- Lack of tools or methodologies available

(12.1.10) Explain why your organization does not measure its portfolio impact on water

The majority of investments on Nordnet's platform is invested by our customers. The vast number of investment options have made it difficult to make a consolidated calculation of the exposure to water and it's issues, as that topic in itself is vast.

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

- No, but we plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

- Lack of tools or methodologies available

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

The majority of investments on Nordnet's platform is invested by our customers. The vast number of investment options have made it difficult to make a consolidated calculation of the exposure to biodiversity issues, as that topic in itself is vast. Nevertheless, Nordnet strives to find methods that can identify biodiversity exposures in a reliable and reasonable manner, and we are continuously investigating alternatives.

Investing (Asset manager)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

- Yes

(12.1.2) Disclosure metric

Select all that apply

- Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.5) We measure the impact of our portfolio on forests

Select from:

- No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

Select from:

- Lack of tools or methodologies available

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

The majority of investments on Nordnet's platform is invested by our customers. The vast number of investment options have made it difficult to make a consolidated calculation of the exposure to forests and it's issues, as that topic in itself is vast.

(12.1.8) We measure the impact of our portfolio on water

Select from:

- No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

Select from:

- Lack of tools or methodologies available

(12.1.10) Explain why your organization does not measure its portfolio impact on water

The majority of investments on Nordnet's platform is invested by our customers. The vast number of investment options have made it difficult to make a consolidated calculation of the exposure to water and it's issues, as that topic in itself is vast.

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

- No, but we plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

- Lack of tools or methodologies available

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

The majority of investments on Nordnet's platform is invested by our customers. The vast number of investment options have made it difficult to make a consolidated calculation of the exposure to biodiversity issues, as that topic in itself is vast. Nevertheless, Nordnet strives to find methods that can identify biodiversity exposures in a reliable and reasonable manner, and we are continuously investigating alternatives.

Investing (Asset owner)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

- No, and we do not plan to do so in the next two years

(12.1.3) Primary reason for not measuring portfolio impact on climate

Select from:

- Other, please specify

(12.1.4) Explain why your organization does not measure its portfolio impact on climate

Nordnet invests exclusively through its liquidity portfolio. This portfolio is regulated and allocated to interest-bearing securities, with the primary purpose of providing liquidity and supporting the stability of the financial system. As a result, the importance of financial stability prevails which is the reason such impacts are not measured.

(12.1.5) We measure the impact of our portfolio on forests

Select from:

No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

Select from:

Other, please specify :See answer for climate

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

Nordnet invests exclusively through its liquidity portfolio. This portfolio is regulated and allocated to interest-bearing securities, with the primary purpose of providing liquidity and supporting the stability of the financial system. As a result, the importance of financial stability prevails which is the reason such impacts are not measured.

(12.1.8) We measure the impact of our portfolio on water

Select from:

No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

Select from:

Other, please specify :See answer

(12.1.10) Explain why your organization does not measure its portfolio impact on water

Nordnet invests exclusively through its liquidity portfolio. This portfolio is regulated and allocated to interest-bearing securities, with the primary purpose of providing liquidity and supporting the stability of the financial system. As a result, the importance of financial stability prevails which is the reason such impacts are not measured.

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

No, and we do not plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

Other, please specify :See answer

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

Nordnet invests exclusively through its liquidity portfolio. This portfolio is regulated and allocated to interest-bearing securities, with the primary purpose of providing liquidity and supporting the stability of the financial system. As a result, the importance of financial stability prevails which is the reason such impacts are not measured.

[Fixed row]

(12.1.3) Provide details of the other metrics used to track the impact of your portfolio on the environment.

Climate change

(12.1.3.1) Portfolio

Select from:

Investing (Asset manager)

(12.1.3.2) Portfolio metric

Select from:

Portfolio carbon footprint (tCO2e/Million invested)

(12.1.3.3) Metric value in the reporting year

87

(12.1.3.4) % of portfolio covered in relation to total portfolio value

81

(12.1.3.5) Total value of assets included in the calculation

991357368239

[Add row]

(12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?

	Portfolio breakdown	Please explain why you do not provide a breakdown of your portfolio impact on the climate
Banking (Bank)	Select all that apply <input checked="" type="checkbox"/> Yes, by asset class	We do
Investing (Asset manager)	Select all that apply <input checked="" type="checkbox"/> Yes, by asset class	We do

[Fixed row]

(12.2.1) Break down your organization's financed emissions and other portfolio carbon footprinting metrics by asset class, by industry, and/or by scope.

Row 1

(12.2.1.1) Portfolio

Select from:

Investing (Asset manager)

(12.2.1.2) Portfolio metric

Select from:

Portfolio carbon footprint (tCO2e/Million invested)

(12.2.1.4) Asset class

Select from:

Equity investments

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

100

(12.2.1.7) Value of assets covered in the calculation

501224826795

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The intensity is provided by Morningstar for each asset. The % calculated is covered AUM divided by total AUM.

Row 2

(12.2.1.1) Portfolio

Select from:

Investing (Asset manager)

(12.2.1.2) Portfolio metric

Select from:

Portfolio carbon footprint (tCO2e/Million invested)

(12.2.1.4) Asset class

Select from:

- Other, please specify :Funds

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

83.5

(12.2.1.7) Value of assets covered in the calculation

220518322882

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

- Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The intensity is provided by Morningstar for each asset. The % calculated is covered AUM divided by total AUM.

Row 3

(12.2.1.1) Portfolio

Select from:

- Investing (Asset manager)

(12.2.1.2) Portfolio metric

Select from:

- Portfolio carbon footprint (tCO2e/Million invested)

(12.2.1.4) Asset class

Select from:

Other, please specify :ETF

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

90.7

(12.2.1.7) Value of assets covered in the calculation

131369109418

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The intensity is provided by Morningstar for each asset. The % calculated is covered AUM divided by total AUM.

[Add row]

(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Lending to all fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

No corporate lending

Lending to thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

No corporate lending

Lending to met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

No corporate lending

Lending to oil

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

No corporate lending

Lending to gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

No corporate lending

Investing in all fossil fuel assets (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

No, and we do not plan to report our portfolio's exposure to fossil fuel in the next two years

Investing in thermal coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

No, and we do not plan to report our portfolio's exposure to fossil fuel in the next two years

Investing in met coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

No, and we do not plan to report our portfolio's exposure to fossil fuel in the next two years

Investing in oil (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

No, and we do not plan to report our portfolio's exposure to fossil fuel in the next two years

Investing in gas (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

No, and we do not plan to report our portfolio's exposure to fossil fuel in the next two years

[Fixed row]

(12.4) Does your organization provide finance and/or insurance to companies in the commodity value chain? If so, for each commodity and portfolio, state the values of your financing and/or insurance in the reporting year.

Lending to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Lending to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Lending to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Lending to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Lending to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Lending to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Lending to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

No

Investing (asset manager) to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

[Fixed row]

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

Banking (Bank)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

No, and we do not plan to report in the next two years

(12.5.35) Primary reason for not providing values of the financing and/or insurance

Select from:

Judged to be unimportant or not relevant

(12.5.36) Explain why you are not providing values of the financing and/or insurance

Nordnet does not have typical finance or insurance activities, so this falls outside of the scope.

Investing (Asset manager)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

No, and we do not plan to report in the next two years

(12.5.35) Primary reason for not providing values of the financing and/or insurance

Select from:

Judged to be unimportant or not relevant

(12.5.36) Explain why you are not providing values of the financing and/or insurance

Nordnet does not have typical finance or insurance activities, so this falls outside of the scope.

Investing (Asset owner)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

No, and we do not plan to report in the next two years

(12.5.35) Primary reason for not providing values of the financing and/or insurance

Select from:

Judged to be unimportant or not relevant

(12.5.36) Explain why you are not providing values of the financing and/or insurance

Nordnet invests exclusively through its liquidity portfolio. This portfolio is regulated and allocated to interest-bearing securities, with the primary purpose of providing liquidity and supporting the stability of the financial system. As a result, the importance of financial stability prevails which is the reason such impacts are not measured or take into account.

[Fixed row]

(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

	Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

[Fixed row]

(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.

Row 1

(12.6.1.1) Environmental issue

Select all that apply

Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

Mitigation

(12.6.1.3) Portfolio

Select from:

Banking (Bank)

(12.6.1.4) Asset class

Select from:

Equity investments

(12.6.1.5) Type of product classification

Select all that apply

- Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

- Externally classified using other taxonomy or methodology, please specify :Nordnet displays different data points that enable customers to make sustainable choices, such as SFDR article 9 data, and CO2-intensity on funds.

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

- Other, please specify

(12.6.1.8) Description of product/service

Nordnet displays different data points that enable customers to make sustainable choices, such as SFDR article 9 data, and CO2-intensity on funds.

(12.6.1.11) Product considers principal adverse impacts on environmental factors

Select from:

- No

[Add row]

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?

Forests

(12.7.1) Target set

Select from:

No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

Nordnet does not engage in traditional lending, nor do we offer capital market financing such as bond originations. Our goal is to democratize savings and investing, which means we strive to provide broad access rather than limit our customers by excluding specific asset classes from our platform. Instead, we focus on offering a wide range of sustainable investment products to encourage and enable our customers to choose responsible and forward-looking alternatives.

Water

(12.7.1) Target set

Select from:

No, we have not set such targets and we do not plan to in the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

Nordnet does not engage in traditional lending, nor do we offer capital market financing such as bond originations. Our goal is to democratize savings and investing, which means we strive to provide broad access rather than limit our customers by excluding specific asset classes from our platform. Instead, we focus on offering a wide range of sustainable investment products to encourage and enable our customers to choose responsible and forward-looking alternatives.

[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party	Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party	Explain why other environmental information included in your CDP response is not verified and/or assured by a third party
	<i>Select from:</i> <input checked="" type="checkbox"/> No, but we plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Not an immediate strategic priority	<i>We will start with limited assurance for accounting year 2025.</i>

[Fixed row]

(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

(13.2.1) Additional information

As a bank focused exclusively on savings and investments, Nordnet operates a fundamentally different business model compared to traditional banks. While traditional banks often engage in a wide range of services—such as providing loans through Debt Capital Markets (DCM), facilitating mergers and acquisitions via corporate finance functions, or issuing bonds through bond originations—Nordnet does not offer any of these services. Instead, our offering is centered around being a powerful and user-friendly platform, serving as a true one-stop shop for everything related to savings and investing. We only provide lending through mortgages and margin lending. To properly interpret our responses, it's important to fully understand our business model, as it differs significantly from that of "traditional" financial institutions.

[Fixed row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Head of Sustainability

(13.3.2) Corresponding job category

Select from:

Environment/Sustainability manager

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

No

