



Code of Conduct for Suppliers to SEB Group

adopted by the Corporate Sustainability Committee of
Skandinaviska Enskilda Banken AB (publ)
on 14 February 2014

Group Procurement

Code of Conduct for Suppliers to SEB Group

Because it matters

Based on our role as a financial partner for individuals, businesses and institutions the SEB Group has significant impact on the communities in which we operate. We take a broad approach to corporate sustainability with efforts targeting governance, business ethics, environmental and social responsibility. Thus, we are confident that we can influence the development towards a more sustainable economy.

Those we do business with across the countries we operate in know that we are committed to work together to create real and lasting change. We seek to develop relationships with suppliers who share similar values and conduct business in an ethical manner.

SEBs annual corporate sustainability reports are to be found at <http://www.sebgroup.com/en/About-SEB/Sustainability/Governance-and-reporting/Policies/> SEB is a signatory or has expressed support for a number of international codes. SEB is committed to:

- UN Global Compact
- Universal Declaration of Human Rights
- The eight ILO Core Conventions on Labour Standards¹
- International Covenant on Economic, Social and Cultural Rights
- International Covenant on Civil and Political Rights
- UN Convention on the Rights of the Child
- United Nations Guiding Principles on Business and Human Rights
- The Children's Rights and Business Principles
- OECD Guidelines for Multinational Enterprises
- UN Principles for Responsible Investments (PRI)
- UN Environment Program Finance Initiative (UNEPFI)
- Equator Principles
- Carbon Disclosure Project
- CDP Water Disclosure Project

As a part of our ongoing effort to develop relationship with suppliers we have adopted this Code of Conduct for Suppliers for use with our suppliers. The Code of Conduct for Suppliers is based on the belief that we can influence only by encouraging others as well as ourselves to achieve real and lasting change. We believe that active engagement in corporate sustainability will bring benefits to our customers, our people and the society at large. Therefore, it is of benefit also to our business that you as a supplier have the same broad approach to corporate sustainability.

We look forward to working with you to ensure an understanding of and compliance with the requirements set forth in this Code of Conduct for Suppliers.

¹ [Freedom of Association and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#) ; [Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#); [Forced Labour Convention, 1930 \(No. 29\)](#); [Abolition of Forced Labour Convention, 1957 \(No. 105\)](#); [Minimum Age Convention, 1973 \(No. 138\)](#); [Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#); [Equal Remuneration Convention, 1951 \(No. 100\)](#); [Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#)

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What we expect from our supplier

We believe it is important to work with suppliers that act responsible to the environment and to the communities where they are present. As such, social and environmental considerations are an integral part of how we evaluate and select our suppliers. We expect our supplier to follow the Code stated below. The Code is used by the whole SEB Group and all our suppliers shall follow the Code.

We will evaluate all our suppliers' approach to corporate sustainability. And we will evaluate a selected proportion of our supplier more thoroughly by asking them to register for a screening process regarding corporate sustainability.

The Code

The Supplier shall have an elaborated policy for corporate sustainability. The Supplier shall be able to provide a sustainability report, or equivalent reporting, that demonstrates that the Supplier is going beyond what is required from external legislations and is acting proactive.

Suppliers shall monitor their sub-suppliers, contractors and other major business partners for commitment to environmental and social responsibility.

Environment

Suppliers will take all precautions that are necessary to monitor and reduce environmental impact, for example energy, greenhouse gas emissions, waste and water, when conducting its business.

Legal and regulatory compliance practice

Suppliers will operate in compliance with all applicable environmental, labor and anti-corruption laws and regulations of the countries in which they operate, manufacture or conduct business.

Supplier will comply with applicable anti-corruption legislation and rules and shall not be involved in or associated with bribery under any circumstances. None of the Suppliers employees, members of the board, independent contractors, consultants or other party associated with the Supplier and its business may be involved directly or indirectly in offering, promising, giving, soliciting, or accepting a bribe.

Business practice

Suppliers will promote good business ethics and governance, and display good corporate citizenship.

Suppliers will have reasonable policies to be able to protect information and keep security at an appropriate level.

Suppliers will have reasonable payment policies with their own suppliers and contractors.

Suppliers will have reasonable policies with regard to gifts and entertainment. A supplier will not offer any employees, officers or other representatives of the SEB Group any gifts or benefits for doing business with the supplier.

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Human rights

We expect our suppliers to have adopted and be able to demonstrate human rights policies and records that reflect international legislation, such as the Universal Declaration of Human rights and the eight ILO core Conventions on Labor Standards. If local laws prohibit the Supplier from applying such policies and procedures, the Supplier will comply with domestic law while, to the extent permissible, applying the spirit of the particular policy or procedure in their business.

Suppliers will ensure that their employees are not required to work more than the local legal limits and respect the right of their employees to freely associate.

Suppliers will provide a safe and healthy working environment.

Suppliers will provide equal opportunity and advancement opportunities for all employees regardless of race / ethnicity, gender, national origin, age, disability, sexual orientation or religion.

Suppliers will not employ children under the age as defined by the International Labor Organization.

Suppliers will promote and enhance social responsibility such as

- human rights, prevent and combat child labor, discrimination, forced and compulsory labor,
- address the aspects of products and services; e.g. health and safety, information and labeling, marketing and privacy.
