

# **The Nordea Responsible marketing policy summary**

**May 2023**

*Sustainability is an integrated part of Nordea's business plan and risk management framework, and we are committed to working for a greater good and to being a sustainable partner in society. Responsible marketing is an important part of our efforts to drive the change towards a more sustainable society.*

The baseline for responsible marketing at Nordea is to comply with relevant, national and international laws and regulations and marketing standards. All our sustainability-related efforts should be aligned with our [Sustainability Policy](#). In addition, we strive to adhere to the [ICC Advertising and Marketing Communications Code](#).

Our Risk Management and Compliance Risk Management Frameworks oversee that we effectively manage risks related to sustainability and marketing and keep informed of new and emerging risks.

Our responsible marketing rules and practices, which are detailed in this policy summary, apply to the whole Nordea Group and our marketing and communication partners.

Our policy includes marketing and communications activities regardless of media and channel, such as TV, radio, digital advertising, print, outdoor, cinema, sponsored content, social media, sponsorships, community engagement activities, our websites, mobile and online bank, newsletters etc.

## **Responsible marketing materials**

In our commitment to sustainable marketing, we aim to shift from physical to digital communication. During the last years we have replaced many of our physical letters with customer-friendly digital solutions through our Paperless Banking Programme. Between 2017 and 2021, the programme digitalised approximately 50% of all customer letters, which means lower carbon emissions connected to distribution. In 2021 Nordea's total CO<sub>2</sub>e emissions for postal services decreased by 56% compared to 2019, and total CO<sub>2</sub>e emissions for paper decreased by 64% compared to 2019.

Even though more communication is digital, there are some cases where we still need to communicate in printed form. In these cases, we strive to produce the material in a sustainable way, with as low environmental footprint as possible.

We are committed to working continuously to limit the carbon footprint of our digital channels and online marketing. By measuring and optimising our web design and content for efficiency and focusing on reducing both page weight and load speed, we improve the web experience overall and simultaneously minimise the carbon footprint.

In regard to online advertising, we work to avoid inappropriate context by using whitelists handled by our media agency. We strive for the highest level of brand security control on all social media platforms, to reduce the risk of various kinds of infringements and fraud.

In accordance with the ICC Code article 18, we take extra care when our marketing activities are directed to or feature young people. Accordingly, we do not direct marketing advertisements in media to children. When producing films or images with children or when young people are involved, particular care is taken.

## **Responsible events**

Today we often conduct our events both in digital and physical form to be as accessible and inclusive as possible for our customers. We aim to carry out our events in a sustainable way to minimise the carbon footprint.

Potential giveaways or thank-you gifts are consciously selected, such as certificates from charity organisations as one example. Locations for our physical events are carefully chosen and we aim to ensure that our venues are close to public transport and easily accessible for all individuals, independent of physical abilities.

When possible, we serve organic and/or fair trade and locally produced food and beverages to attendees. We minimise disposable materials and use porcelain and glass as our primary option.

## **Diversity and inclusion**

We are committed to being a diverse and inclusive bank – for our employees, our customers and society at large – because we know that our differences make us stronger together. We ensure equality as a fundamental human right and offer equal opportunities. We believe in leveraging the power of our differences and treating everyone fairly and with respect.

In advertising we strive to represent society as a whole, with people of different ages, backgrounds and origins and we do not accept discrimination. When producing images or films we always strive to break negative stereotypes in the way we portray people.

[Download our Diversity & Inclusion Policy here.](#)

## Accessibility

In our commitment to be an inclusive financial partner, we strive to be as accessible as possible in our communication. That means that we:

- strive to communicate our products and services in an easy, transparent and straightforward way
- use a language that is accessible and easy to understand
- avoid complex words, acronyms, jargon and abbreviations as far as possible.

Our websites are created to ensure that everyone has easy and equal access to our content. We adhere to the [Web Content Accessibility Guidelines \(WCAG\)](#), ensuring that our websites are accessible and inclusive for everyone.

As an example, we strive to have triple A contrast in our images, which makes them easy to read. We also aim to add text to all images and videos to increase readability and accessibility.

We revise and refine our websites and documents continuously.

## Community engagement

Community engagement is about creating positive change in society and is closely linked to Nordea's purpose to contribute to a greater good. We focus on building financial skills and entrepreneurship and we are fully committed to sharing our knowledge in areas such as budgeting, making financial decisions and entrepreneurship. [Read more about our focus areas.](#)

As part of our community engagement, employees at Nordea get to volunteer two days per year for the purpose of increasing knowledge and competences within financial skills and entrepreneurship. The opportunity to volunteer is an important and valued employee benefit and thousands of employees participate in the programme. During 2022 we launched our Nordea refugee program to support refugees from Ukraine. So far hundreds of employees have taken part in the program.

A selection of our initiatives:

*Me & My city* is an example of a long-term partnership where over one thousand Nordea employees have volunteered to teach children about personal finances, social studies and entrepreneurship and give them positive experiences of working life.

*Investor Speed Dating* is an example of our own entrepreneurship programme where we match Nordic start-ups and scale-ups with local and global investors.

An example of sponsorships is the *Nordea Open* tennis tournament. Here we utilise a traditional sports sponsorship to encourage conversations about how we can join forces in creating a more sustainable society.

[Read more about our community engagement](#)

## Commitments

In addition to our rules and practices detailed in this policy, we also commit to the following in our marketing practices:

- In a comprehensive way educate and inform our customers about our services and products, including fees, charges and potential negative consequences
- Secure that all information is based on scientific evidence
- Provide environmental, health or other sustainability related information that goes beyond legal requirements
- Use appropriate targeting of customers considering the type of product being marketed

## Let us know how to improve

We are fully committed to becoming more responsible in our marketing and communications. If you have any feedback, ideas or suggestions, we would be very happy to hear from you. Please contact: [linda.thorling@nordea.com](mailto:linda.thorling@nordea.com)

### Disclaimer

Nordea operates a comprehensive risk management framework including policies, controls and practices aligned with our risk taxonomy. This document is compiled using relevant information from across this framework.