

Decision by the Disciplinary Committee regarding Swedbank AB

Stockholm, May 5, 2021 – The Disciplinary Committee of Nasdaq Stockholm has found that Swedbank AB ("Swedbank" or the "Company") has breached the rules of Nasdaq Stockholm (the "Rulebook") and therefore ordered the Company to pay a fine of twelve annual fees, corresponding to an amount of SEK 46,575,000.

The Disciplinary Committee concludes that Swedbank has breached item 3.1 of the Rulebook by not having handled well-known shortcomings in the Company's processes and routines for anti-money laundering as inside information in accordance with the EU Market Abuse Regulation.

The Disciplinary Committee also concludes that Swedbank has breached item 3.1 of the Rulebook by not having handled information relating to a television program by Sveriges Television's Uppdrag granskning in February 2019, on suspected money laundering in the Company's Baltic operations, as inside information.

Taking into account the abovementioned breaches, and the findings in relation to Swedbank's systems and procedures for handling of inside information, the Disciplinary Committee concludes that the Company has not had adequate capacity for providing information to the market as required under the Rulebook.

The Disciplinary Committee takes a serious view of the Company's violations, which have risked damaging the public's confidence in the exchange and the Swedish securities markets in general, and consequently orders the Company to pay a fine of twelve annual fees.

The Disciplinary Committee's decision is available at: https://www.nasdaq.com/solutions/decisions-sanctions-stockholm-2021

About the Disciplinary Committee

The role of Nasdaq Stockholm's Disciplinary Committee is to consider suspicions regarding whether Exchange Members or listed companies have breached the rules and regulations applying on the Exchange. If the Exchange suspects that a member or company has acted in breach of the rules, the matter is referred to the Disciplinary Committee. Nasdaq Stockholm investigates the suspicions and pursues the matter and the Disciplinary Committee issues a ruling regarding possible sanctions. The sanctions possible for listed companies are a warning, a fine or delisting. The fines that may be imposed range from one to 15 annual fees. The sanctions possible for Exchange Members are a warning, a fine or debarment. Fines paid are not included in the Exchange's business but are attributed to a foundation supporting research in the securities market. The Disciplinary Committee's Chairman and Deputy Chairman must be lawyers with experience of serving as judges. At least two of the other members of the Committee must have in-depth insight into the workings of the securities market.

Members: Former Supreme Court Justice Marianne Lundius (Chairman), Supreme Court Justice Ann-Christine Lindeblad (Deputy Chairman), Company Director Joakim Strid, Company Director Anders Oscarsson, Lawyer Wilhelm Lüning, Company Director Jack Junel, MBA Ragnar Boman, MBA Carl Johan Högbom, Lawyer Patrik Marcelius, Authorized Public Accountant Magnus Svensson Henryson, Former



Authorized Public Accountant Svante Forsberg, Lawyer Erik Sjöman and Supreme Court Justice Petter Asp.

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