

# Corporate Communications and Marketing Policy

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# Contents

Corporate Communications and Marketing Policy	1
<b>1. Introduction</b>	<b>3</b>
• 1.1 In the context of a sound corporate culture	3
<b>2. Background, purpose and approach</b>	<b>3</b>
<b>3. Key disciplines in communications and marketing</b>	<b>3</b>
• 3.1 Internal communications	4
• 3.2 Employer branding and digital employee advocacy	4
• 3.3 Press relations	4
• 3.4 Public affairs	4
• 3.5 Marketing	4
• 3.6 Customer communications	5
• 3.7 Social media	5
<b>4. Governance, organisation and reporting</b>	<b>5</b>

Approved by the Boards of Directors of

- Nykredit Bank A/S (3 November 2025)
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- Nykredit Realkredit A/S (3 December 2025)
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## 1. Introduction

This Corporate Communications and Marketing Policy applies to Nykredit A/S, and all of the Group's organisational and legal entities, including subsidiaries ("Nykredit").

### 1.1 In the context of a sound corporate culture

This policy supports Nykredit's efforts to promote a sound corporate culture, particularly by establishing the framework for responsible communications and marketing practices.

## 2. Background, purpose and approach

Nykredit is the largest lender in Denmark, including the largest lender to homeowners and one of the largest lenders to small and medium-sized businesses, the agricultural sector and the housing sector. Nykredit is also one of the largest wealth and asset managers. As such, Nykredit plays a key role in Danish society.

For more than 165 years, Nykredit has helped Danish families buy their homes and Danish businesses grow. And as a natural continuation of Nykredit's cooperative heritage, we are today predominantly owned by an association of customers. In essence, this means that our overarching objective is to run a financial business for the benefit of our customers. Nykredit therefore has a special obligation to communicate actively with the world that surrounds us.

Our core values, as expressed in "The Story of Nykredit: Nykredit In Denmark", comprise six pledges to our key stakeholders: our customers, Totalkredit and Sparinvest partners, society, colleagues, shareholders and investors. Our strategy lays out a shared course for the entire Group.

The customer-ownership structure, our values and our strategy are the foundation for the position we wish to command in the market and for our internal communications to colleagues and our external communications to the world that surrounds us. We particularly seek to ensure that the ambition of our communications and marketing initiatives is to clearly illustrate what it means to be a customer or an employee with a customer-owned business such as Nykredit.

Our customer-ownership structure is ingrained in our organisation and values – and therefore also in the way we communicate and brand Nykredit, internally as well as externally.

As a rule, Nykredit will always refrain from commenting on individual customer relationships or from otherwise acting in breach of existing provisions on confidentiality or other applicable rules and regulations.

As a company we always strive to:

- Be open and act reliably and respectfully
- Respond in a timely and clear manner
- Communicate in compliance with current legislation and guidelines, stock exchange codes of ethics and internal rules
- Conduct marketing in compliance with current legislation and guidelines as well as internal rules, with particular focus on the specific requirements for marketing financial products
- Communicate and market ourselves in a manner and with content that is accurate, complete and easily understandable
- Be transparent about the risks and costs of our products – for example, by providing information about the marketed products on our website.
- Ensure responsible and targeted marketing towards relevant customer groups.

This applies to oral as well as written internal and external communications and marketing.

## 3. Key disciplines in communications and marketing

Nykredit's corporate communications and marketing primarily comprise the following key disciplines, which overlap, supplement and strengthen each other on a day-to-day basis. The policy covers our presence in all channels used in our communications and marketing, including digital channels, social media, traditional media, sponsorships, our internal communications platforms etc.

### 3.1 Internal communications

Nykredit's internal communications are a key management tool for strengthening the organisation's focus on organisational values and strategic and business priorities, promoting the necessary cultural cohesion and effectiveness and supporting the Group's management teams in their communications with employees. Nykredit's internal communications must at all times come across as relevant, transparent, nuanced and credible in order to be perceived as effectful by the employees.

### 3.2 Employer branding and digital employee advocacy

Employer branding is about creating a strong and differentiating position for the Nykredit Group as an attractive workplace. With our employer branding initiatives we seek to shape the awareness and understanding of Nykredit as a customer-owned employer, internally and externally, and we support the recruitment of selected types of people.

As part of our employer branding, we also work with employee advocacy supporting the sharing of information by selected colleagues about Nykredit as employer, particularly on social media (see also *Social media*), on a structured and strategic basis, aimed at both colleagues and customers – existing as well as potential.

### 3.3 Press relations

In its dealings with the press, Nykredit must come across as competent, credible and professional. Press relations should help underpin Nykredit's strategic profile and the perception of Nykredit and Nykredit's management. To that end, Nykredit Press Relations is tasked with proactively bringing Nykredit's expertise into play, stepping forward and shaping the agenda with a clear voice, when and where relevant. In addition, Press Relations should handle and respond to press inquiries with due consideration.

### 3.4 Public affairs

Public affairs is responsible for the structured dialogue with Nykredit's stakeholders and external relations, including aligning of expectations and influencing industry conditions. An essential part of the basis for dialogue is understanding Nykredit's and society's mutually beneficial relationship. Nykredit considers this relationship to be reciprocally binding. In its dialogue with external relations, Nykredit aims to act in a constructive, respectful and solution-oriented manner (see also Nykredit's Sustainability and Corporate Responsibility Policy).

### 3.5 Marketing

Nykredit's marketing activities are about creating a strong and differentiating position for the Nykredit Group and to support the business strategies of our individual brands through tactical initiatives and a strong digital presence. In our efforts to position Nykredit in the market, we are always aware of our duty to comply with current requirements and standards in the area. The risks and rewards of every single initiative are considered to ensure that we strike the right balance between promoting and protecting our brand and reputation.

Our focus is particularly directed towards market-related rules and requirements in the area, including GDPR, data and cookie policies, the Danish Marketing Practices Act, the Danish Quick Loans Act (kviklånsløven) as well as the Accessibility Directive's requirements on accessibility for persons with disabilities. Additionally, we maintain a strong focus on ensuring marketing that is accurate, transparent and not misleading. This applies across channels, platforms, and target audiences.

### **3.6 Customer communications**

Nykredit is the market leader in a sector where many products and services are complex to most customers. Therefore, Nykredit has a special responsibility for ensuring that communications to and with customers are as accessible and clear as possible, and that it provides customers with the knowledge they need to make the right choices for themselves, including legally required information. This applies to all forms of customer communications - oral as well as written (such as the online banking messages, newsletters, brochures, Nykredit's website etc).

### **3.7 Social media**

Nykredit is active on social media to brand Nykredit as the customer-owned, responsible financial provider and employer to attract more customers, and, in special circumstances, for crisis management purposes. Nykredit must always be seen as a proactive and knowledgeable conversation partner with a sincere interest in dialogue.

## **4. Governance, organisation and reporting**

The Group's Boards of Directors approve Nykredit's Communications and Marketing Policy annually, and, in this connection, compliance with the policy is also reported.

The Group Chief Executive has the overall responsibility for all corporate communications and marketing. Day-to-day responsibility for coordination of the Group's corporate communications and marketing is delegated to the Head of People and Identity, who reports to the Group Chief Executive.

The Executive Boards of the Nykredit Group companies and the management of the individual business units and specialist functions are responsible for ensuring that the policy is complied with in practice, and that communications and marketing targeted directly or indirectly at the Group's customers, shareholders, workforce or other large or significant stakeholders are coordinated with the Corporate Communications and Marketing unit at all times if likely to affect the Group's reputation and image.

It is a well-established practice that Communications and Marketing always coordinates messages and content in marketing materials with the Legal Affairs unit before they are published. The marketing area is also overseen by the Nykredit Group's compliance function.