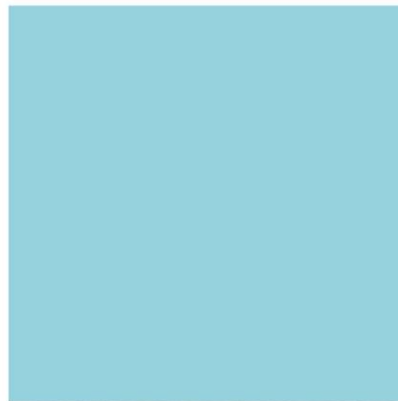


Nykredit



Totalkredit



Corporate Communications and Marketing Policy

December 2022

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

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 vested with the Head of People and Identity, who reports to the Group Chief Executive.

If likely to affect the Group's reputation and image, any corporate communications and marketing targeted directly or indirectly at the Group's customers, shareholders, workforce or other large or significant stakeholders must be coordinated with the Corporate Communications and Marketing unit at all times. Management of the individual business units and management support functions are charged with ensuring such coordination as well as compliance with the Corporate Communications and Marketing Policy.

BACKGROUND, PURPOSE AND APPROACH

Nykredit is Denmark's largest credit provider, the largest lender to homeowners, one of the largest lenders to small and medium-sized businesses and one of the largest wealth and asset managers and as such 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, Totalcredit and Sparinvest partners, society, colleagues, shareholders and investors. Our strategy lays out a shared course for all at Nykredit.

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
- Provide timely responses – in a clear language
- 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 and internal rules.

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

KEY CORPORATE COMMUNICATIONS DISCIPLINES

Nykredit's key corporate communications and marketing disciplines primarily comprise the following key areas, which overlap, supplement and strengthen each other in our day-to-day work.

Internal communications

Nykredit's internal communications are a key management tool for strengthening the organisation's focus on value, strategic and business priorities, promoting the necessary cultural cohesion and execution powers and supporting the Group's management in their communications with the workforce. Nykredit's internal communications must at all times come across as current, relevant, balanced and credible in order to be perceived as effectful by the workforce.

Employer branding

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 perception 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.

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.

Public affairs

Public affairs is tasked with maintaining a 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 the world, Nykredit aims to act in a constructive, respectful, interested and well-informed manner (see Nykredit's Corporate Responsibility Policy).

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. In our efforts to position Nykredit in the market, we are always aware of our compliance duties and responsibilities in the area. The gains and risks of every single initiative are considered to ensure that we strike the right balance between promoting and protecting our brand. 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) and not least towards avoiding accusations of greenwashing, pinkwashing etc.

Customer communications

Nykredit is the market leader in a sector where products and services are complex to most customers. Therefore, Nykredit has 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 necessary for them to make the best choices. 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).

Social media

Nykredit's social media presence is motivated by a wish to deliver customer service and engage in dialogue with users that might otherwise be outside our reach. We are there to brand Nykredit as the customer-owned, responsible financial provider and employer to

generate leads, 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.

Approved by the Boards of Directors of

- Nykredit A/S (8 December 2022)
- Nykredit Realkredit A/S (8 December 2022)
- Totalkredit A/S (31 October 2022)
- Nykredit Bank A/S (31 October 2022)
- Nykredit Portefølje Administration A/S (27 October 2022)
- Nykredit Leasing A/S (25 October 2022)
- Nykredit Mægler A/S (27 October 2022) October 2022

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