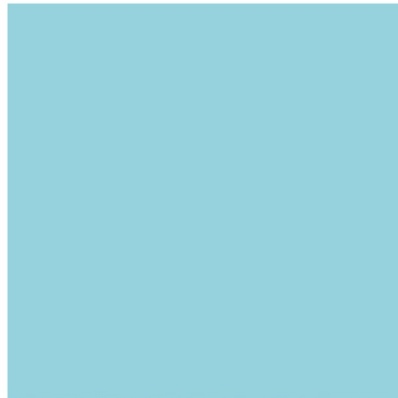


**Nykredit**



Totalkredit



## Communications Policy

November 2021

## 1. BACKGROUND AND PURPOSE

Nykredit is Denmark's largest credit provider, the largest lender to homeowners and one of the largest lenders to small and medium-sized businesses and as such plays a key role in Danish society. Nykredit therefore has a special obligation to communicate actively with the world that surrounds us.

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

## 2. GOVERNANCE AND ORGANISATION

The Group Chief Executive has the overall responsibility for all communications. Day-to-day responsibility for coordination of the Group's communications is vested with the Head of People & Identity, who reports to the Group Chief Executive.

Communications targeted directly or indirectly at a significant proportion of the Group's customers, shareholders, staff or other large or important stakeholders must be coordinated with Corporate Communications. The same applies to communications of material importance to the Group, or communications which may significantly affect the Group's reputation. Management of the individual business units and management support functions are charged with ensuring such coordination as well as compliance with the Communications Policy.

## 3. NYKREDIT'S GENERAL COMMUNICATIONS APPROACH

The purpose of Nykredit's internal and external communications is always to support the Group's existing business strategy and core values, as expressed in The Story of Nykredit: Nykredit in Denmark. Our stakeholders, including our customers in particular, always lie at the heart of Nykredit's communications.

However, 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.

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

## 4. KEY CORPORATE COMMUNICATIONS DISCIPLINES

Nykredit's key corporate communications disciplines include:

### ***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 staff. Nykredit's internal communications must at all times come across as current, relevant, balanced and credible in order to be perceived as effectful by staff.

### ***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).

### **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 a responsible financial mutual, 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 (3 November 2021)  
Nykredit Realkredit A/S (3 November 2021)  
Totalkredit A/S (2 November 2021)  
Nykredit Bank A/S (1 November 2021)  
Nykredit Portefølje Administration A/S (1 November 2021)  
Nykredit Leasing A/S (1 November 2021)  
Nykredit Mægler A/S (4 November 2021)

Document owners: Trine Ahrenkiel/Jonas Rømer Haugegaard, Group and WM Communications