

Competence requirements, good practice and ethical conduct

Area	Comprised	Contents	Documentation	Legislative basis
Whistleblower scheme	All employees (clients use the usual complaint procedures in the sector)	At the home page of the Group's intranet, all employees have single access to report (suspicion of) unlawful acts, serious offences or irregularities. Reporting can be anonymous if requested.	Reports under the scheme are registered via an online portal and handled by the head of the compliance division. There is no systematic publication.	Establishment of a whistleblower scheme is included in the recommendations from the Committee for Good Corporate Governance
Grievance reporting	All employees	At the home page of the Group's intranet, all employees have single access to report both physical and mental occupational injuries. In an annual survey among all employees, it is also possible to report harassment and other types of disrespectful conduct. The Group has clear policies that prevent all types of problems in the working environment	Reports of physical and mental occupational injuries are registered and handled in the Group's OHS organisation, where both employer and employees are represented. Reporting takes place annually to the Employee Committee	This area is regulated partly by Danish OHS law and partly by agreements and collective agreements between employers' and employees' organisations. The area is also subject to control by the Danish Working Environment Authority
Money laundering and the financing of terrorism	All employees	Scaled as required based on work function, all employees complete relevant courses on combating money laundering and financing of terrorism, e.g. KYC (Know Your Customer)	This is logged in the Group's LMS system for all employees	The EU's 4th Anti-Money Laundering Directive, the Money Laundering Act
Anti-bribery and anti-corruption policy	All employees in the Group	The Group Executive Board has adopted an anti-bribery and anti-corruption policy applicable to the entire Group with relevant specifications for particularly affected units and areas	The policy is implemented via the management system with review of joint instructions for handling attempts at bribery or corruption, e.g. gifts and benefits in kind	The policy covers, inter alia, statutory requirements in pursuance of MiFID II
Anti-trust and anti-competitive behaviour	All employees in the Group, extra requirements for employees in functions involved in cooperative projects with competitors (e.g. in IT)	The Group policy on anti-trust and anti-competitive behaviour requires employees to periodically complete training in do's and don'ts in the area	The training is logged in the Group's LMS system for all employees	The Danish Competition Act

Processing of personal data	All employees	All employees have completed a relevant and mandatory course on the General Data Protection Regulation.	This is logged in the Group's LMS system for all employees	General Data Protection Regulation
IT security and IT risk management	All employees	All employees must take an introduction course on IT security. Moreover, special work functions are subject to special areas of responsibility (for instance IT operations and development) where training in IT security is adjusted to requirement	This is logged in the Group's LMS system for all employees	There are references to IT security in the Danish Financial Business Act and in the Danish Executive Order No. 1026, appendix 5
Insider trading	All employees in the Group, extra requirements for employees in functions with high risk of contact with clients who may engage in insider trading	The Group has established detailed policies and business procedures for handling internal knowledge. At the home page of the Group's intranet, all employees have single access to the relevant policies and business procedures. Training in risks, rules and procedures is mandatory for employees in functions with high risk of contact from clients who may engage in inside trading	Lists are kept of insiders, and compliance with and the current relevance of the lists are verified continuously. Completed training activities are logged in the Group's LMS system	Market abuse regulation (MAR)
Tax and good practice – in general	Advisers and other employees with client contact	The Group is committed to providing clients with competent and professional advisory services. The advisory services are provided on the basis of adequate information about the client's financial situation and willingness to take risks. The adviser must know the purpose of the financial service on which advice is given and adjust the advisory services to the client's experience with the service. At the same time, the Group is obliged by law to demonstrate good practice in connection	Depending on specialist field, see below. In the Group's LMS system, the implementation of a mandatory e-learning module on relevant legislation and good practice is logged for all new employees affected. The Group's standard agenda for advisory meetings also includes an account of important elements in good practice	Various legislation, see below

		with the provision of advisory services and provide Danish tax advice on the products and services offered to the clients. In the below areas, more specific competence requirements are stated in the legislation		
Advisory services on investment for retail clients - products with low/medium risk and low complexity	All employees providing advisory services on investment products with yellow or green risk mark	<p>Competence requirements include adequate knowledge of:</p> <ul style="list-style-type: none"> • Legislation on investment • Products and tools • Financial and economic insight <p>As a main rule, the requirements are considered to be fulfilled when the adviser has six months' practical advisory experience. Advisory services based on fixed concepts are mandatory and ensure compliance with requirements for good practice, contents and documentation of the advisory services</p>	As part of the annual personal development interview, the required competences are followed up on. It is agreed and documented individually without central reporting whether the competence should be developed. Agreed measures are logged in the LMS system	MiFID II Danish Ministerial Order on Investor Protection and Danish Ministerial Order on the Execution of Orders by Securities Traders
Advisory services on investment for retail clients – products with high risk and/or high complexity	All employees providing advisory services on investment products with red risk mark	The affected employees must be certified in the red investment products on which they provide advisory services. Certification is obtained by passing a controlled test, which is valid for a 3-year period	In the Group's LMS system, the certifications are logged for all affected employees and advisory services are not provided until after certification	MiFID II Danish Ministerial Order on Investor Protection and Danish Ministerial Order on the Execution of Orders by Securities Traders
Advisory services on and procurement of home credit agreements	All employees providing advisory services on or procurement of home credit agreements	<p>Competence requirements comprise sufficient knowledge to be able to:</p> <ul style="list-style-type: none"> • Analyse the client's need to enter into home financing agreements • Present and explain possible and appropriate solutions to the client's 	As part of the annual personal development interview, the required competences are followed up on. It is agreed and documented individually without central reporting whether the competence	The home credit directive, the Executive Order on Good Business Practice for Home Credit

		<p>need to enter into a home financing agreement</p> <ul style="list-style-type: none"> • Give instructions about how the various products work • Calculate the financial consequences of the various solutions <p>As a main rule, the requirements are considered to be fulfilled when the adviser has a financial education. Advisory services based on fixed concepts are mandatory and ensure compliance with requirements for good practice, contents and documentation of the advisory services</p>	<p>should be developed. Agreed measures are logged in the LMS system</p>	
Arrangement of insurance	Account managers and wealth management advisers	<p>The affected employees must be certified in the insurance products on which they provide advisory services. Certification is obtained by passing a controlled test, which is valid for a 3-year period. Account managers must fulfil the competence requirements in profile 4 of the directive while wealth management advisers must fulfil the requirements in the more demanding profile 5. Until 2021, the requirements may be fulfilled by documented practical advisory experience</p>	<p>In the Group's LMS system, the certifications are logged for all affected employees and advisory services are not provided until after certification. Up to 2021, the necessary practical experience is registered instead</p>	Insurance Distribution Directive (IDD)