

Dokumentnamn	Work environment policy		
Document owner	Adopted by	Date	Replaces doc. dated
<i>HR</i>	<i>Board</i>	<i>2023-10-18</i>	<i>2022-09-14</i>
INFORMATION CLASS GENERAL	Related steering documents		Publ. Intranet/Web
			<i>[Yes/No]</i>

Table of contents

1. Background and purpose.....	1
2. Regulatory framework.....	2
3. Division of tasks regarding work environment management	2
4. Social, organizational and physical work environment goals.....	3
5. Work with the social and organizational work environment.....	3
6. Work with the physical work environment	4
7. Work environment when working remotely.....	5
8. Monitoring and determination	5

1. Background and purpose

The purpose of this work environment policy is to promote a good work environment and prevent ill health and accidents in the workplace caused by organizational, social or physical factors.

The work environment policy applies to Norion Bank AB and its affiliates ("Norion Bank").

Work environment management at Norion Bank is a strategic issue as our employees are our most important asset in creating a profitable and sustainable business. Norion Bank works systematically with work environment and health issues as a natural part of the business and sees work environment management as an investment to achieve high job satisfaction, motivation and well-being employees. Norion Bank applies systematic work environment management (swe: "SAM"), which means, among other things, that Norion Bank (partly on its own and partly in collaboration with employees) investigates, risk

assesses, fixes and controls operations to prevent accidents and ill health. The starting points in the work environment management are current legislation and regulations as well as the internal guidelines that are established at any given time within Norion Bank.

The Board of Directors ("the Board") of Norion Bank has the overall and ultimate responsibility for maintaining a good working environment and for ensuring that this work environment policy is complied with. This responsibility has been delegated to the CEO within Norion Bank, who's delegated the responsibility to managers with personnel responsibility within Norion Bank. In order to succeed in creating a good working environment, close and continuous cooperation between Norion Bank's managers and employees is required. In addition, there is a great responsibility for all employees to be involved in creating a pleasant work environment and minimizing risks at work.

The HR department is responsible for reviewing this work environment policy at least annually and in the event of operational changes, carrying out new risk assessments and updating routines and action plans as necessary. There are more steering documents within Norion Bank that interact with this one, an overview of these is collected in the bank's Code of Conduct, and the HR department is involved in the review of these also in the parts relating to the employee's work environment and health.

2. Regulatory framework

This work environment policy has been designed in accordance with the Work Environment Act (1977:1160), the Work Environment Ordinance (1977:1166) and the Swedish Work Environment Authority's statute book. In the event that mandatory legislation in other countries where Norion Bank operates provides for a different regime than the one described in this policy, these will apply in the specific country.

3. Division of tasks regarding work environment management

Norion Bank AB shall apply the division of tasks of the work environment management, which means that the work environment tasks are distributed via the CEO to managers with personnel responsibility in the organization. The division of tasks aims to ensure that Norion Bank has a good working environment for each individual employee and that the work environment management can be followed up in an efficient and systematic manner.

All managers with personnel responsibility are responsible for working preventively to achieve a good work environment and ensure that their employees have the support and conditions they need to manage their assignment in a safe, efficient and well-functioning manner.

More detailed instructions can be found in the guideline *Uppgiftsfördelningen i arbetsmiljöarbetet*, which Chief HR is responsible for issuing. The HR department and the CEO is responsible for ensuring that work environment tasks are distributed to managers with personnel responsibility in the organization.

All employees are responsible for:

- contribute to continuous improvements in the work environment by taking responsibility for health and work environment and helping to eliminate risks at work;
- where applicable, report bullying, abuse, discrimination or harassment to the Chief HR;
- keep up to date with and follow Norion Bank's governing documents;
- report occupational injuries/accidents and incidents (events that could have led to injury or accident) to the immediate supervisor;
- participate in any rehabilitation measures; and
- as a new employee, undergo the mandatory training that Norion Bank offers at any given time, such as introduction, compliance and Code of Conduct training.

4. Social, organizational and physical work environment goals

Norion Bank has the following social, organizational and physical work environment goals:

- zero tolerance for bullying, victimization, discrimination and harassment;
- drug-free work environment;
- clear management and governance;
- good knowledge among managers and employees of the business's goals, vision and values;
- good collaboration between employees and managers in work environment management;
- competent and trained managers with good knowledge in the field of occupational safety and health;
- competent employees who have properly appropriate resources to be able to perform their work in an efficient, safe and well-functioning manner;
- reasonable requirements and healthy workload;
- an open climate where everyone respects each other;
- safe working environment, where the right tools are available for employees to perform their tasks in the best way;
- a physical work environment that is safe, inspiring and creative;
- work adaptation and rehabilitation issues should be included as an important part of the work environment management – the goal is for the employee to return to work as soon as possible; and
- healthy and motivated employees with low sick leave.

5. Work with the social and organizational work environment

The social and organizational work environment includes the employee's mental health and well-being, which more concretely means conditions for communication, management and control, distribution of tasks, resources, responsibility, workload, stress, social interaction, social support from managers and colleagues, and work against threats and violence.

Norion Bank shall maintain a good social and organizational work environment by:

- the HR department convenes quarterly work environment committee meetings, where overall and principled issues regarding the work environment are raised. The committee consists of both employees and employer representatives;
- the HR department, together with an appointed representative from the Work Environment Committee, conducts annual follow-up of the systematic work environment management;
- the HR department regularly conducts employee surveys in order to evaluate the organization's work environment and, together with management and managers, actively work with the results to change and improve the parts that can be considered to be lacking;
- the responsible manager actively works to identify any need for, and early on, implement rehabilitation measures to prevent ill health and sick leave as far as possible;
- the HR department ensures that clear and at all times current action plans are in place in the event of bullying, victimization, discrimination, threats and violence or harassment;
- management together with the HR department ensures uniform, clear and visible leadership;
- management shall continuously inform employees about Norion Bank's goals, visions and strategies;
- the responsible manager is responsible for ensuring that there are clear role descriptions for each function at all times that indicate tasks, responsibilities and authority;
- the responsible manager is responsible for ensuring a clear introduction for their new employees. Through, among other things, the mandatory training in the form of introduction and compliance training;
- the HR department ensures that clear and at all times up-to-date routines and guidelines for drug and addiction problems are in place, which all employees are aware of;
- the responsible manager ensures that the employee has sufficient resources to be able to perform his or her work in the form of work tools, working method, competence and the opportunity to influence their work;
- the HR department is responsible for ensuring that managers with personnel responsibility receive adequate training in, and knowledge in, the work environment area; and
- managers conduct individual performance reviews with all employees at least once a year, which takes place in addition to the continuous dialogue between employees and managers.

6. Work with the physical work environment

Norion Bank will work systematically with the physical work environment and when designing the office premises, the focus is on taking into account the organization's changing needs and creating a safe, inspiring and creative work environment:

- managers and employees must work together to identify risks in the physical work environment and actively work with the results to change and improve the parts that can be considered lacking;
- Norion Bank shall promote good ergonomics in screen work through, among other things, appropriate design of the technical equipment, workplace and light environment;
- Norion Bank shall offer tools and aids that can facilitate employees in their work;
- when designing offices, Norion Bank shall create spaces for relaxing breaks in quiet environments and offer rooms to rest in (applies to offices with more than 50 employees);

- Norion Bank shall ensure good acoustics in office spaces by using materials that are sound-absorbing, such as sound-absorbing textiles; and
- Norion Bank shall offer benefits to promote health.

7. Work environment when working remotely

Working remotely entails demands on both Norion Bank and its employees. Remote work requires that there is an ongoing dialogue between the employee and the responsible manager regarding the social, organizational and physical work environment and that the employee is transparent about their well-being and any needs.

8. Monitoring and determination

This policy shall be adopted by Norion Bank's Board at least once a year, even if no changes are made.

The HR department is responsible for updating the policy prior to the Board's approval.