



The Equator Principles are intended to serve as a common baseline and framework for financial institutions to identify, assess, and manage environmental and social risks when financing Projects. As an Equator Principles Financial Institution (**EPFI**), SEK has committed to implement the Equator Principles through internal environmental and social (**E&S**) policies, procedures and standards for financing Projects.

Reporting on Equator Principles Implementation 2025

Since 2017, SEK is a Signatory to the Equator Principles. Since then, routines and internal guidelines have been implemented and updated within SEK to ensure relevant application of the Equator Principles framework. During 2020, SEK updated its internal framework to align with Equator Principles IV.

✘ **Implementation:** SEK's general governance framework comprises policies, instructions, guidelines and supporting processes and tools on E&S and Human Rights due diligence and monitoring, which incorporates the requirements of both the OECD Common Approaches and the Equator Principles IV. The governance framework comprises pre-transactional actions (scoping, screening, due diligence review) which satisfies Equator Principles 1 – 8, and the post-transactional actions (monitoring and reporting) satisfying Equator Principle 9. This Implementation Report forms part of SEK's obligations under Equator Principle 10 (Reporting and Transparency) and as articulated in Annex B of the Equator Principles.

1.1.1 Roles and responsibilities: SEK's Sustainability Analysts within SEK's Sustainable Finance Department are professionally qualified to directly undertake and/or manage the necessary E&S due diligence and liaise with Project sponsors and/or exporters and SEK's decision-makers. The Sustainability Analysts are separate from the Account Managers and report to the Head of Sustainable Finance, who reports to the Head of Client Relationship Management and Sustainability (member of SEK's Executive Management) who in turn reports to the Chief Executive Officer.

✘ **Training:** Since SEK's adoption of the Equator Principles, Account Managers and internal supporting units have conducted the Equator Principles training program. Training and implementation of Equator Principles Loan Clauses have been undertaken with internal Legal Counsels. SEK has provided selected internal Equator Principles training to the Board of Directors, Executive Management, Account Managers, Legal, Risk, Compliance, Sustainability Analysts, other supporting units, and relevant staff, to ensure adherence to internal processes, raise awareness of the requirements of OECD Common Approaches, the Equator Principles and general E&S risk management.

✘ **Cooperation:** Since the adoption of the Equator principles in 2017, SEK has actively participated and contributed to the work performed by the Equator Principles Association, for instance, through its participation in the EP Association Annual Meetings and the EP workshops held for the occasion.

Description of SEK's organizational and governance structure for integrating the Equator Principles

Roles and responsibilities:

Head of Client Relationship Management and Sustainability	<ul style="list-style-type: none">✘ Member of the Credit Committee.✘ Responsible for ensuring that all lending operations generated within the Client Relationship Management and Sustainability are conducted in accordance with applicable laws, collective agreements, regulations, directives, SEK's articles of association, international guidelines and complies with the owner's stated expectation, relevant internal rules, as well as good practice or established standard.
Head of Sustainable Finance	<ul style="list-style-type: none">✘ Responsible for managing the daily operations of the Sustainability Analysts-team, ensuring qualitative assessments of Project-related transactions from an E&S risk and opportunity perspective.✘ Responsible for ensuring that SEK's management of E&S risks (impact out) is aligned with international guidelines and complies with the owner's stated expectation that SEK shall carry out its mandate on sustainable terms. This includes overseeing the implementation of relevant policies, monitoring risk assessments, and ensuring continuous improvement in sustainability practices across the organization.✘ Accountable for managing the strategic relationship with EP and EPFI.
Risk Department	<ul style="list-style-type: none">✘ Overall risk analysis of SEK's E&S risks as part of the second line risk oversight.✘ Performs independent control and follow-up of E&S risk management✘ Monitors that E&S risks are appropriately incorporated into SEK's risk framework and internal control framework.
Compliance	<ul style="list-style-type: none">✘ Follow up of adherence to internal and external regulations.
Account Managers	<ul style="list-style-type: none">✘ Screening transactions for identification of E&S risks and whether they fall within the scope of the Equator Principles.✘ Suggests categorization of Projects.✘ Transactional input to SEK:s Equator Principles-reporting.
Sustainability Analysts (Sustainable Finance Department)	<ul style="list-style-type: none">✘ Advise on proposed categorization of Projects.✘ Coordinate practical E&S risk cooperation with Projects, EPFI and IESC.✘ Perform E&S risk assessments for Projects, advise and follow up on action plans.
Legal Counsels (Legal Department)	<ul style="list-style-type: none">✘ Draft and advise on E&S covenants (including Equator Principles-covenants).

Risk governance:

- ✘ SEK manages environmental, climate and social impact-related risks in lending through its framework for risk of negative impact, as governed by the Policy for Sustainable Finance and related instructions and methods. Project-related E&S risks are categorized as material risks in SEK's overall business risk analysis.
- ✘ According to SEK's framework for risk of negative impact, Projects need to meet the relevant requirements of the Equator Principles or OECD Common Approaches (as applicable).

Description of SEK's internal process flow for identifying, assessing and managing transactions in line with the Equator Principles

1. For all lending transactions, a Transaction Team ("TT") is formed, consisting of (inter alia) the respective Account Manager, a Financial Crime Prevention Analyst, a Credit Officer, a Legal Counsel, and, when relevant, a Sustainability Analyst.
2. When a new potential transaction is identified, the Account Manager screens the transaction for climate, environmental and social risks and identifies (inter alia) whether the transaction falls within the scope of the Equator Principles framework. The Account Manager assesses the potential transaction in a structured and organized manner with a supporting screening tool and obtains expertise Equator Principles-advise from the Sustainability Analyst throughout the entire process if needed.
3. The risk screening of transactions and preliminary risk categorization (A, B, or C) of Projects is carried out by the Account Manager, with additional expertise support and advise from the Sustainability Department, which reviews and validates all transactions screenings and Project categorizations. If the Account Manager and Sustainability Analyst cannot agree on a Project category, the decision will be escalated to the Credit Committee.
4. In line with the requirements of Equator Principle 2, SEK requires clients to conduct an E&S assessment of proposed Projects of Category A and Category B. This includes demonstrating measures to minimize, mitigate, and compensate/offset/remedy adverse impacts and risks and for this to be monitored, information to be disclosed, and relevant stakeholder engagement to be conducted, as well as establishing grievance mechanisms (as appropriate). For certain transactions, enhanced assessments of climate change risk, and human rights risks may be required. SEK may, with support from independent third-party E&S experts, evaluate the clients' proposed fulfillment of the Equator Principles requirements.
5. All transactions that qualify within the scope of the Equator Principles and that are categorized as Category A or B+ Projects must be escalated to SEK's Credit Committee before potential credit approval. In addition, transactions categorized as Category A Projects also need to be further escalated to SEK's Board Credit Committee for final approval. Credit memos contain a specific section dedicated to E&S risks, where it is required to specify whether a transaction

falls within the Equator Principles or OECD Common Approaches (as applicable) framework or not. A summary of the outcome from the E&S assessment and additional information, including proposed E&S-covenants, is mandatory for transactions that fall within the Equator Principles or OECD Common Approaches (as applicable) framework. The assessment, validation, and approval process is performed within SEK's lending and credit process. This follows SEK's usual process for all types of lending transactions. Head of Client Relationship Management and Sustainability takes part in SEK's Credit Committee, including in all decisions concerning A and B+ Projects.

6. After credit approval, relevant E&S covenants are included into the loan documentation by the TT with applicable expertise and advice from the Legal Counsel as well as the Sustainability Analyst. This process and supporting routines, intends to ensure that relevant E&S covenants are correctly implemented and adhered to.
7. A lending transaction's continuing compliance with applicable E&S standards and Equator Principles requirements is monitored by the TT and with expert advice from the Sustainability Analyst and Legal Counsel, if necessary. The policies and processes implemented to ensure Equator Principles-application are integrated into SEK's general policy framework for climate, environmental and social risk. The monitoring and reporting requirements are implemented throughout the credit process and credit cycle.



Independent Review of EP Implementation

During 2024, SEK carried out an Independent Review in alignment with EP Guidance Note on Independent Review of Equator Principles Implementation dated January 2024. SEK's internal procedures and a representative sample of transactions triggering the Equator Principles were reviewed by officers from SEK's internal independent control functions (Risk Control and Compliance) between March 2024 and November 2024. The sample EP transactions consisted of transactions reported in the 2023 annual report to the Equator Principles Association. The EP Checklist was used for the review.

No material deficiencies in the implementation process were identified. The recommendations for improvement provided by the control functions are included in SEK's continuous improvement process in order to address these over time. A further Independent Review of EP Implementation will be conducted within 3 years of the 2024 review.

Further information is available at: <https://www.sek.se/en/sustainability/>

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