

Swedbank AB
U.S. Reduced Resolution Plan
Public Section
Triennial Reduced Plan
July 1, 2022

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Introduction

Swedbank AB (“Swedbank” or the “Bank”, and together with its subsidiaries, the “Swedbank Group” or “Group”) is filing both the public and confidential sections of the U.S. Reduced Resolution plan (the “Reduced Plan” or the Plan”) as required by Regulation QQ, 12 CFR Part 243 and to fulfill the requirements of section 165(d) of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) and its implementing regulations (the “Final Rule”) promulgated by the Board of Governors of the Federal Reserve System (the “Federal Reserve”) and the Federal Deposit Insurance Corporation (the “FDIC”).

Section 165 (d) of the Dodd-Frank Act and the Final Rule require any foreign bank or company that is a bank holding company or treated as a bank holding company under Section 8(a) of the International Banking Act of 1978 (the “IBA”) and that has \$50 billion or more in total consolidated assets to submit to the Federal Reserve and the FDIC its plan for rapid and orderly resolution of its U.S. operations in the event of material financial distress or failure.

On May 24, 2018, Economic Growth, Regulatory Relief, and Consumer Protection Act (“EGRRCPA”) amended provisions in the Dodd-Frank Wall Act as well as other statutes administered by the Federal Reserve. EGRRCPA increased the asset threshold above which a Foreign Bank Organization (“FBO”) is required to file a resolution plan under section 165(d) from \$50 billion to \$250 billion. As a result of the enactments of EGRRCPA, the Federal Reserve and the FDIC adopted a revision to the rule 165(d) pertaining to the increase in the asset threshold which a FBO is required to file a resolution plan under Section 165 (d) of Dodd-Frank. In addition, the agencies stated that any FBO with total global assets of \$250 billion or more and not subject to category II and III FBO standards would be required to file a reduced resolution plan every three years (Triennial Reduced Filers).

Category II pertains to FBO with \$700 billion or more average combined U.S assets or \$100 billion or more average combined U.S. assets and \$75 billion or more in average cross-jurisdictional activity. Category III pertains to FBO with \$250 billion or more and less than \$700 billion average combined U.S. assets; or \$100 billion or more average combined U.S. assets and \$75 billion or more in any of average nonbank assets, average weighted short-term wholesale funding (wSTWF), or average off-balance sheet. The agencies further provided guidance pertaining to the information that must be included in the Triennial Reduced Resolution Plan.

Based on the above guidance, Swedbank qualifies to file a Triennial reduced resolution plan. The bank is considered as a covered company pursuant to EGRRCPA based on the bank’s most recent annual Capital and Asset Reports on Form FR Y-70 with the Federal Reserve which is in excess of \$250 billion for each of the four most recent quarters. As a result, Swedbank is filing the Triennial

Reduced Resolution Plan.

Overview of The Bank

Swedbank is a public limited liability bank company (Sw: Bankaktiebolag) incorporated under the laws of the Kingdom of Sweden with its registered office in Stockholm. Swedbank's shares are listed on NASDAQ OMX Stockholm. As of December 31, 2021, the Group served a total of 7.4 million private customers and more than 620,000 corporate and organizational customers through approximately 350 branches in 11 countries, primarily in its principal markets of Sweden, Estonia, Latvia and Lithuania. To support business in these markets, the Group has established branches in neighboring markets such as Finland, Norway and Denmark, as well as in major markets of financial importance such as China and the United States (where the Group has a branch). The Group also has a branch in Luxembourg and representative offices in Spain and South Africa.

The Group offers a broad range of financial products and services, including retail banking, corporate and investment banking, asset management and insurance products, with most of the Group's income being derived from its Swedish retail banking services.

The Group has four business areas (Swedish Banking, Large Corporates & Institutions, Baltic Banking and Group Functions & Other) and employs approximately 14,600 full-time employees.

Swedbank, New York Branch (the "Branch" or "NY Branch") was established 1991. The Branch is not a separate legal entity and as such forms part of Swedbank AB, Sweden as an integral part of *business area* Large Corporates & Institutions ("LC&I"), International Branches. The NY Branch conducts operations mainly through three functions: Treasury, Corporate Banking and Commercial Real Estate. The NY Branch does not engage in retail banking with private individual customers and is not allowed to offer deposits insured by the FDIC. The NY Branch is licensed by the New York State Department of Financial Services ("NYSDFS") and is regulated by the Federal Reserve Bank as well as NYSDFS.

1. Names Of Material Entities

Under the Final Rule, a "Material Entity" means a subsidiary or foreign office of the covered company that is significant to the activities of a critical operation or core business line. Swedbank has determined that it has no core business lines and no critical operations for purposes of the Final Rule. Accordingly, the Bank has no material entities, as defined in the Final Rule.

2. Core Business Lines and Critical Operations

Core business lines is defined in the Final Rule as the business lines of the covered company which are conducted in whole or material part in the U.S., and the failure of which would result in a material loss of revenue, profit or franchise value to the covered company. Critical operations are defined in the Final Rule as those operations of the covered company, including associated services, functions and support, the failure or discontinuance of which, in the view of the covered company or as jointly directed by the Agencies, would pose a threat to the financial stability of the United States. Swedbank has determined that it has no core business lines for purposes of the Final Rule. Additionally, Swedbank has determined that it has no critical operations for purposes of the Final Rule. Analyses included a combination of quantitative and qualitative judgments along with a comparison to the list of critical operations (as identified by the Agencies) and a review of market share and customer profiles.

Under the Final Rule, the Agencies have the authority to jointly designate an operation of a covered company as a critical operation. No operations of Swedbank have been designated by the Agencies as critical operations for purposes of the Final Rule.

3. Principal Officers as of December 31, 2021

Group Executive Committee member	Position
Jens Henriksson	President and CEO
Tomas Hedberg	Deputy President and Deputy CEO
Mikael Björknert	Head of Swedish Banking
Anders Karlsson	Chief Financial Officer
Lars-Erik Danielsson	Chief Credit Officer
Kerstin Winlöf	Head of Group Products and Advice
Pål Bergström	Head of Large Corporates & Institutions
Erik Ljungberg	Head of Group Brand
Charlotte Rydin	Chief Legal Officer and Head of Group Legal
Ingrid Harbo	Chief Compliance Officer
Anders Ekedahl	Head of Anti-Financial Crime
Rolf Marquardt	Chief Risk Officer
Lotta Lovén	CIO and Head of Digital Banking
Jon Lidfelt	Head of Baltic Banking
Carina Strand	Head of Human Resources

4. Resolution Strategy

Recovery and resolution planning involves several levels of Swedbank's corporate structure. Ultimate responsibility for all corporate governance of Swedbank resides with the Swedbank Board of Directors but it may delegate its authority and oversight responsibilities. Generally, the Swedbank Board delegates responsibilities to a specific committee, which in turn may delegate responsibility to individual employees at Swedbank, or relevant, committee chairman or individuals at its subsidiaries or branches. Regarding resolution planning for the U.S. operations, Swedbank has established a governance framework at both the group level and U.S. operations level to ensure that all aspects of resolution planning receive appropriate attention by the designated Board of Directors and Executive Committees.

The Board of the Bank has laid down key principles for the structure which comprise of three primary levels:

- Board level oversight,
- Group level executive management oversight, and
- Business level executive management monitoring and oversight.

The governance framework establishes the roles and responsibilities of committees for the global and local management of recovery and resolution planning. The "Recovery and Resolution Planning" requirement that describes the roles and responsibilities around recovery and resolution planning was adopted by the Swedbank board on October 21, 2016. Different functions within the Bank and the U.S. operations own the content, and thus are responsible for reviewing the Resolution Planning and providing relevant information to the Group. The NY branch is governed by its General Manager. While the daily management of Swedbank is the responsibility of the General Manager, he is supported by several key committees, which review and evaluate the different areas relating to NY Branch business, tasks and responsibilities. The plan does not assume any extraordinary assistance during the resolution process, whether from New York State, the United States or any supervisory authority. Although it is implausible that Swedbank would permit the NY Branch to reach a state of financial distress that would prompt intervention by U.S. Authorities, the plan addresses the resolution of U.S. operations involving US resolution proceedings which may involve the Superintendent of the NYS DFS. The NY Branch will follow the agency's resolution process. Swedbank is assuming for purposes of this resolution plan that the Bank's resolution strategy for its U.S. operations, in the event of a material financial distress or failure of the Bank, would be to pursue an orderly liquidation of all assets of the NY Branch. Swedbank's operations in the U.S. will be subject to several different insolvency regimes in the event of a failure or resolution of Swedbank. Sweden has adopted the legislative act implementing the European

Parliament's and the Council's Bank Recovery and Resolution Directive (the "BRRD") into local legislation, and the recovery and resolution planning requirements of the BRRD are effective since February 1, 2016.

5. Approval of the Bank's U.S. Resolution Plan

Swedbank's 2022 U.S. Resolution plan was approved by the delegee, CEO of the bank who is authorized by the Board of Directors to approve the resolution plan.