Anti-Bribery and Corruption Policy (ABC Policy) at the Jyske Bank Group

Contents

1. Policy Objective

The Policy on Anti-Bribery and Corruption (ABC Policy) applies to the following companies of the Jyske Bank Group:

- Jyske Bank A/S
- Jyske Realkredit A/S
- Jyske Finans A/S
- Jyske Invest Fund Management A/S

This Policy shall be adopted by the executive boards of the respective companies.

The objective of the Policy is to establish principles against bribery and corruption at the Jyske Bank Group and to ensure that the Group conducts its business in accordance with applicable legislation and international standards for the prevention of corruption and bribery.

The Policy applies to all employees, executive management and Supervisory Board members of the Jyske Bank Group across all areas of activity and expertise.

The Policy supports the Jyske Bank Group's efforts to ensure and promote a healthy corporate culture among all employees of the Jyske Bank Group and should be read in conjunction with the Policy Promoting a Healthy Corporate Culture in the Jyske Bank Group.

2. Risk Tolerance and Risk Assessment

The Jyske Bank Group maintains a strict zero-tolerance approach to corruption in any form. Corruption is defined as abuse of a position of trust for personal gain.

The principles and rules of the Policy cover all forms of corruption, including but not limited to bribery, fraud, embezzlement, and extortion. The Policy also covers corruption in the form of gifts given or received, political contributions, nepotism, etc. The list is not exhaustive.

No customer or business partner is so valuable or important that the Jyske Bank Group will compromise its zero-tolerance policy.

In Denmark, the extent of corruption, including bribery in the private and public sectors, is considered low. Denmark ranks among the countries at the top of the list of the least corrupt countries in the world.

The largest risk of corruption in the Jyske Bank Group is considered to relate to the receipt of gifts, benefits in kind, and participation in customer/supplier-paid events.

3. Guidelines for Gifts, Benefits in Kind, and Events

It is not permitted to accept money (either physically or electronically), return commission, personal discounts, customer-paid travel, or other benefits that could create a presumption of a relationship of dependency to the detriment of the Jyske Bank Group and/or the employee.

Particular attention must be paid when participating in events, trips, etc. arranged and paid for by suppliers, customers, or through professional networks. This applies, for instance, to events that include sports activities, wine tastings, restaurant visits, and cultural events where the experiential value outweighs the professional value.

Gifts and benefits in kind from customers and business partners may be accepted if they are not of significant value. The Jyske Bank Group has business procedures that clearly describe the Group's framework for receiving gifts and benefits in kind.

When assessing whether a gift, benefit, or event is acceptable, the following principles must always be followed:

1. The Jyske Bank Group wishes to avoid conflicts between the personal interests of its employees and the interests of the Jyske Bank Group.
2. No dependencies may be created that are detrimental to the Jyske Bank Group.
3. The Jyske Bank Group expects its employees to act with honesty and integrity.
4. The Jyske Bank Group strives to promote a healthy risk culture characterised by openness and accountability, where employees feel comfortable discussing risks.

4. Special Provisions for Entities with Supplier Contact for Investment Products

Entities that are in contact with suppliers of investment products must, in addition to the other rules of this policy, comply with special provisions for receiving benefits in kind, in accordance with the MiFID rules and the Executive Order on Third-Party Payments.

It is only permitted to receive benefits in kind from parties other than customers (or customer representatives) as long as the benefit is of minor value and is designed to improve the quality of the services provided by Jyske Bank to the customer. The Jyske Bank Group has business procedures that clearly describe the Group's framework for receiving benefits in kind in connection with investment services.

Employees who perform investment services and who receive benefits in kind – regardless of type and scope – are required to report this immediately to their superior.

5. Gifts and Benefits in Kind Offered by The Group

The Jyske Bank Group has business procedures clearly describing the Group's framework for gifts and benefits in kind to external parties.

To support and signal honest and professional conduct, you must:

- pay special attention when gifts are given to persons acting on behalf of third parties (e.g. executive directors, finance directors, and public-sector employees);
- respect the rules, including the code of conduct, to which recipients of gifts are subject;
- work to ensure the right balance between professional content and benefits in kind at professional events.

As regards public-sector employees in particular, you must make sure not to offer or give gifts which may cause embarrassment or suspicions of attempted bribery to be raised against the employee or the Jyske Bank Group.

6. Awareness and Training

It is ensured that all employees, managements and supervisory boards of the Jyske Bank Group are informed about the Group's rules on anti-bribery and anti-corruption.

7. Process for Deviations from Policy

Zero tolerance for corruption means that any employee who suspects or becomes aware of deviations from this Policy is obliged to report this to their immediate superior, who must report the matter to the

Group's Money Laundering Reporting Officer (MLRO) and to the respective Group Company's MLRO. The same applies if you are offered or encouraged to offer bribes or similar benefits. If the matter falls within the scope of the Jyske Bank Group's whistleblower scheme, anonymous reports may be made via the whistleblower scheme.

In the event of material breaches of the Policy, the executive board of the relevant Group Company must be notified without undue delay. Violations of this Policy may result in disciplinary action.

8. Control, Accountability, Updating, and Reporting

The companies of the Jyske Bank Group shall ensure that internal control and settlement procedures are organised in such a way as to provide optimal opportunities for detecting irregularities.

The Group MLRO is responsible for anti-bribery and anti-corruption and shall ensure that this Policy is updated when necessary and reviewed at least annually.

Reporting on anti-bribery and anti-corruption, including compliance with this Policy, must be made to the relevant members of the Group Executive Board and, in specific cases, also to the Executive Boards of the Group Companies.

9. Approval

This Policy has been approved by:

The Group Executive Board of Jyske Bank A/S
Silkeborg, 19.02.2026

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