



Wholeheartedly proud of OMX

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I am wholeheartedly proud of OMX

As experts in the exchange industry, we at OMX are part of developing financial markets in many regions around the world. The most important contribution we make to society is the creation and sustainability of efficient and fair marketplaces. That is crucial for growth and business diversity, and something we are proud of.

OMX operates the Nordic Exchange and provides exchange technology to over 60 organizations in more than 50 countries. Our customers include individual private investors, banks and brokerages and large international companies as well as major exchanges, clearing organizations and depositories. Our employees come from all parts of life, young and old, men and women, and from diverse cultures. Given our extensive reach and impact on society, we have an important responsibility.

Meeting a high standard of corporate social responsibility goes naturally with our strategies for long-term competitive strength. Our corporate culture combines an entrepreneurial spirit with technological expertise and a broad global perspective. We recognize that our success is tied to our commitment to social responsibility, marketplaces with integrity, equal opportunity, environmental sustainability and reliable communications. Owners, employees, customers, partners and suppliers should be proud to be associated with OMX – with regard to what OMX achieves, how we work and what we stand for.

Good ethics within an organization requires sound judgment and responsibility as well as openness and effective communications. In many cases there needs to be discussion, interpretation and debate of the consequences and rights and wrongs of a situation. Acknowledging the difficulties and promoting a dynamic discussion is the foundation of an ethical approach.

This document is a tool to reinforce OMX's values and involve the entire organization. We are guided by a shared interest to contribute towards the overall achievement of the company as a responsible participant in financial markets and in the world at large.

- **Employees and consultants** must work according to the principles set forward in this document.
- **Managers** have responsibility to develop, respond and follow up Corporate Social Responsibility - issues within their departments.
- OMX's **Marketing & Communications** department is responsible for providing the communications needed to support debate and development.
- OMX's **President and CEO** is responsible for driving the policy forward and reporting to the Board.
- **The Board** receives annually reports on the functioning and implementation of corporate policies."

This policy encompasses our views on our social responsibility. I am wholeheartedly proud of OMX, and I will do my part to make sure that the vision and guidelines embodied in this document are carried out.

Magnus Böcker
CEO of OMX



Corporate Social Responsibility Policy

Benefits of efficient securities transactions

There are many reasons to be proud of what we do at OMX. Some of them are the same as for any company striving for excellence and increased value for its stakeholders. But working in the exchange industry also carries a broader responsibility for the economic well-being of the community. The financial market plays a critical role in sustainable growth -- the exchange is the hub in the financial market.

In an efficient exchange:

- Enterprises raise capital for development and growth.
- Entrepreneurs can realize the potential of their businesses.
- Companies can gain exposure in a broader market.
- Savings can be turned into investments.
- Small savers can take part in the value growth of large corporations with the same right to information as large investors.
- Financial risks can be diversified and managed.
- Investors allocate capital to sectors, ideas, businesses where they discern potential value growth.
- Assets are valued continuously.
- Information is distributed to all participants at the same time.
- The cost of information is shared by many.
- The cost for each transaction is low due to benefits of scale and efficient trading technology.

Efficient securities markets are founded on fair play, transparency and trust, which are all also important to sound ethics. With the above, financial markets provide the basis for economic growth. This, in turn, helps to sustain fundamental services such as housing, schools, hospitals, arts etcetera which are so important to a flourishing society. This lies at the heart of work at OMX, and of which we take great pride in.

Some tools

1. OMX supports and shall follow the OECD's guidelines for multinational companies and the principles of the United Nations' Global Compact to the best of its capacity.
2. The Corporate Social Responsibility of OMX is especially applicable to our operations with regard to Marketplaces with integrity, Employer of choice, Proud partners, Environmental sustainability and Respectful communications, as outlined in this document.
3. Each employee is encouraged to report to OMX management any wrongdoings and failures to live up to the standards as outlined in this document.
4. Each employee is required to read and follow this policy. Failure to follow this policy may result in disciplinary actions and, in severe and repeated cases, it may result in termination of employment.



Marketplaces with integrity

As experts in the exchange industry, OMX carries a broad responsibility to the communities in which we operate. Since exchanges are a vital part of a regional financial infrastructure, specific ethical issues are raised in OMX's role as owner of Nordic Exchange and provider of technology to over 60 exchanges around the world.

It is widely recognized by that confidence in a marketplace is of the utmost importance for its efficiency. OMX has an important role in this aspect, since many of OMX processes, products and services are particularly aimed at creating confidence, transparency and visibility in the market. This would include, for example, market surveillance systems, information disclosure systems, etcetera. Transparency is important to ensure that information and data is available. Confidence ensures that the players trust each other and that trading is fair. Visibility for the listed companies attracts capital to finance growth.

Some tools

5. OMX shall strive to develop and maintain the integrity and fair play of all the markets we are involved in.
6. OMX's ambition is to create marketplace efficiency and build credibility and trust wherever we are involved along the value chain, including technology and service solutions for fair trading and post trading, information dissemination, market surveillance, and etcetera.
7. OMX Nordic Exchange develops, implements and monitors certain rules and regulations for listed companies to meet for admittance to trading and on-market. The rules and regulations are available at www.omxgroup.com and not included in this document.
8. Even though a company may fulfill listing requirements, OMX Nordic Exchange has the right to refuse the application if the listing is considered to potentially damage confidence in the exchange or the securities market in general.
9. Companies that through their operations risk or commit serious or systematic violation of human rights or other ethical international norms shall be carefully investigated in conjunction with a listing on OMX Nordic Exchange. This means, for example, that companies that manufacture arms can be investigated as to their observation of conventions against the manufacture of chemical weapons and land mines. In the same spirit, companies can be investigated in terms of their observation of the International Labor Organization conventions against the exploitation of children.
10. OMX shall work to ensure ongoing discussions of the role of the financial markets for growth and prosperity.
11. All OMX employees shall act in strict accordance with all applicable insider trading rules, and are consequently not allowed to directly or indirectly buy or sell securities in any publicly traded company while in possession of insider information. For certain positions, stricter rules apply.

Employer of choice

OMX aims to be an attractive employer by providing a healthy and stimulating work environment characterized by openness and cooperation between management and employees as well as respect and confidence in the individual. Because we are a knowledge-based company, our ability to develop and retain our employees is a key success factor in our competitiveness.



Equality and diversity are an integral part of OMX's culture. This encourages an atmosphere of creativity, productivity and motivation. We welcome the uniqueness of each employee and work actively to promote equality and diversity throughout the entire company. We aim as well to maintain a balance of men and women.

The financial industry is inherently high paced, and thus working for OMX can be very demanding. Employees are expected to be intensely involved in their work. For this reason, OMX takes the long-term view with regard to the well-being, health and personal development of the individual.

In addition, working in the financial industry brings many responsibilities to all individuals with regard to the way information, intangible assets, company assets etcetera are handled.

Some tools

12. OMX shall promote an open atmosphere of diversity and equality with respect to all individuals, with equal opportunity regardless of age, gender, race, ethnic background, nationality, religious belief, disability or sexual orientation.
13. OMX shall live up to the Global Equal Opportunity Plan wherever we work. The plan has been developed for the group as a whole, except for the US which is dictated by its own national requirements. The Global Equal Opportunity Plan also includes the Swedish Equal Opportunity Plan that describes the organization's goals and activities on gender issues in accordance to Swedish law.
14. Discrimination on the basis of basis of age, gender, race, ethnic background, nationality, religious belief, disability or sexual orientation is not permitted at OMX.
15. Harassment, on the basis of the above mentioned grounds or other, is unacceptable anywhere within OMX.
16. Each individual shall know where to turn if he or she experiences any discrimination or harassment.
17. OMX shall be a workplace that is accessible to people with disabilities, as regard to new recruits as well as to employees who become disabled in any way while employed by OMX.
18. OMX has defined routines and procedures to handle potential crises, and shall handle potential crisis situations with respect for the individual.
19. OMX communications tools, such as internet, email, phone etcetera, shall be used in a way that adheres to the principles of this document. It is unacceptable to access, display, store, print or otherwise disseminate any information that is fraudulent, harassing, threatening, illegal, racial, sexually oriented, obscene, intimidating, defamatory or otherwise inconsistent with professional conduct.
20. OMX shall support the individual in his or her endeavors to development personally and to acquire new skills and knowledge related to his or her work situation.
21. OMX shall have a program for all employees who, for any reason, cannot be offered continued employment within the company.
22. Each employee should be able to participate financially in OMX's value growth, regardless of position in the organization.
23. OMX's salary and remuneration program shall be well-grounded and based on results achieved, work duties, experience and position held.
24. OMX shall provide transparency in relation to remuneration paid to its Board of Directors and



senior management.

25. OMX shall proactively work to reduce the risk for health issues and co-operate with leading experts in the field of occupational health, particularly in the area of stress-related health care.
26. OMX shall support managers in maintaining the highest levels of professionalism, integrity and cultural understanding.
27. Recruitment activities shall reflect OMX's openness for diversity and equality.
28. All employees shall responsibly use and protect the company tangible assets as well as intangible assets that may include customer relations, knowledge, brand, intellectual property, internal processes etcetera.
29. All employees shall share knowledge and information internally and thereby contribute to a culture of knowledge and competence. At the same time, consideration should be given to confidentiality where it may apply.

Proud partners

Working in the exchange industry carries a broad responsibility, to our customers, our employees and the communities in which we operate. We understand that our success is tied to this responsibility, and that it requires a commitment from everyone to always strive towards optimum solutions, for all parties involved, with respect to the individual and the environment.

Within our responsibility, we aim to achieve satisfied partners in the financial communities while at the same time following clear procedures when choosing partners and in the marketing of our services and technology. Our working partners – technology customers, suppliers, exchange members and listed companies – should be proud to be associated with OMX.

OMX's fundamental position is that companies with which OMX cooperates must follow the global ethical norms as expressed in the United Nations conventions relating to industry. OMX also has a duty to ensure that suppliers have good ethics and maintain acceptable working conditions.

Some tools

30. OMX shall always strive to reach the highest levels of customer satisfaction. By delivering or exceeding the customer promise, we build long term relationships.
31. OMX employees, especially sales professionals, shall be familiar with and follow the International Chamber of Commerce's Rules of Conduct and Recommendations to Combat Extortion and Bribery.
32. OMX will refuse to cooperate with partners – customers or suppliers – whose business model or practices are suspect.
33. OMX will be particularly mindful to ensure that UN conventions are observed by suppliers operating in countries with poor human rights legislation.
34. OMX will not cooperate with customers or suppliers who systematically violate or, because of the nature of their operations, seriously risk violating basic human rights or in any other way strongly conflict with the ethical principles that characterize OMX.
35. In choosing between commercially comparable suppliers, OMX's preferred choice will be the supplier with a value system that most closely mirrors OMX's own values. Consequently, in longer-term partnerships OMX will demand to know the supplier's views on ethics, diversity, social and environmental responsibility.



Environmental sustainability

Environmental issues are important to us at OMX and we work to minimize our effects on the environment. OMX strives to continuously develop environmental awareness and constantly meet or exceed legal environmental requirements. As primarily a service provider, our main organizational impact on the environment is the way we run our offices and travel frequency.

In the financial world, sustainability issues are of increasing importance. We recognize the legitimate interest from investors and the public in the environmental performance of our company.

Some Tools

36. OMX shall encourage and support customers willing to integrate environmental considerations into their marketplace.
37. As a supplier of technology to energy exchanges, OMX shall strive to make energy markets more efficient to the benefit of the environment.
38. OMX shall identify opportunities to reduce the resources we consume including energy, water and other natural resources, and minimize the amount of waste we produce. Where practical, we shall reuse materials, recycle waste and procure recycled products.
39. We shall endeavor to comply with all relevant environmental legislation and regulations. Moreover we shall treat these as the minimum standard and seek to exceed expectations wherever possible.
40. Due to the global nature of our business, OMX employee's travel frequently to meet with customers, partners and colleagues. Prior to booking travel, other tools of communicating such as video conferencing shall be considered. Environmentally friendly means of travel should be chosen when appropriate.

Respectful communications

As expert in the exchange industry, OMX shall behave and communicate in such a way as to promote neutral and unbiased marketplaces. On a broader scale, a program for consistent, reliable and open communications will ensure understanding of our vision, strategies, operations and our values. Therefore OMX's internal and external communications activities are based on the following principles:

- Pro-activity – A communications plan must be considered in all decisions, whether they involve board, company or departmental issues.
- Timeliness – Information must be provided promptly.
- Openness – OMX is always responsive and will comment on its strategy and business. To maintain credibility, relevant information must be provided continuously in a balanced way.
- Reliability – Information must be factual, accurate and not misleading. Therefore, we have internal approval procedures, including legal opinion, to appraise the content of our communications messages.

Working in the financial industry entails far-reaching responsibilities with regard to the way each and every one of us treat information, how it is protected, communicated and disseminated.



Some Tools

OMX's Corporate Communication Policy is an integrated part of Wholeheartedly Proud of OMX and intended to create a clear, consistent understanding of OMX and what we represent. The Corporate Communication Policy contains specifics on spokespeople, communications structure and channels.

41. OMX has external spokespeople, designated based on responsibility and knowledge.
42. Internal information is an integrated part of the managerial responsibility. The manager must adopt and communicate OMX's vision, business concept and strategies.
43. All employees are responsible for actively obtaining information about the company and their unit by, for example, reading OMX's Intranet Insite and attending relevant information meetings. Employees also have a responsibility to communicate with their managers and colleagues. Keeping up-to-date is part of the employment contract.
44. All OMX communications activities must be carried out in accordance with exchange rules and regulations.
45. OMX does not provide investment advice or give day-to-day comments on financial market developments. Nor do we comment on the general operations of competitors, customers or partners unless it impacts or relates to OMX operations.
46. OMX strives to treat all media equally. The goal is to respond to requests by the media as quickly and professionally as possible. As a general rule, OMX does not comment on rumors, speculation or hypothetical questions.
47. While providing and promoting an open atmosphere, OMX treats certain information as confidential, for example commercially sensitive information, third party issues or information of any kind that might intrude upon the personal integrity of an individual.
48. All employees shall protect confidential and proprietary information, including that of our customers.