

# Welcome to a bank as it should be

Annual and Sustainability report 2024  
 Avanza Bank Holding AB (publ)



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*The English version of the Annual and Sustainability Report is a translation. In the event of any differences between the English version and the Swedish original, the Swedish version shall prevail.*

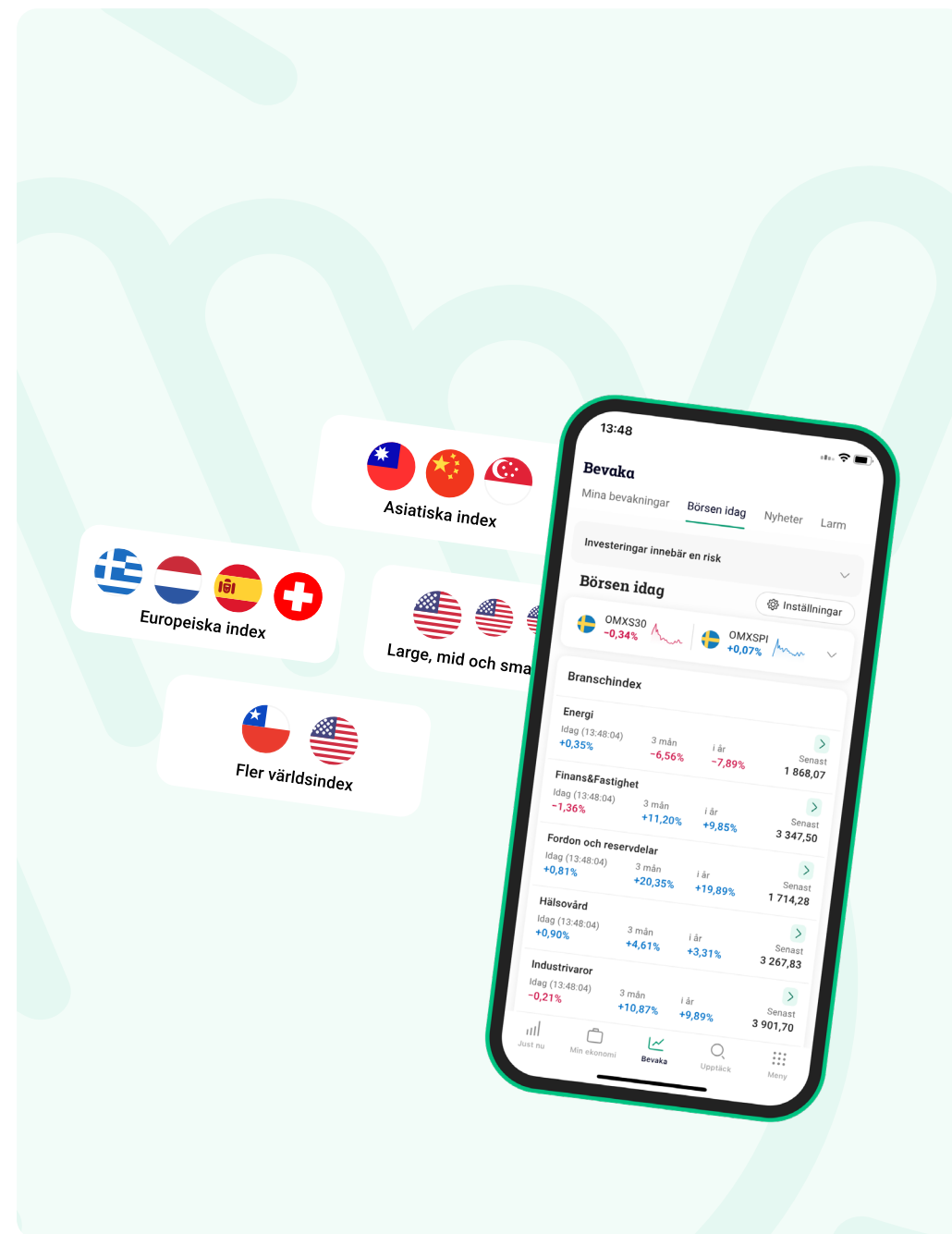
# Sweden's leading platform for savings and investments

Avanza was founded in 1999 to democratise stock trading for individual investors. Low fees, a broad range of savings products, and education and decision support for investments have since then been the basis of our offering. We believe in the individual's ability to make their own investment decisions with the right information and support, but are also investigating ways to broaden the offering to those who want more help. The Swedish savings and investment market is the largest in the Nordics and the most well developed in Europe. Here, Avanza is the clear market leading savings platform. We offer customers around 80,000 investment opportunities and our large fund offering includes 23 funds from our own fund company. Savings accounts, mortgages and occupational pension solutions are also available.

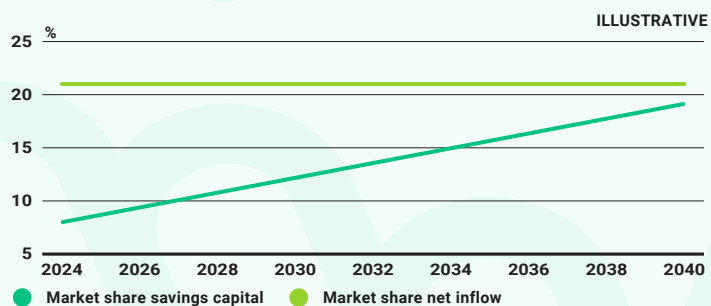
-  Over 2 million customers
-  Total savings capital of close to SEK 1,000 billion
-  Sweden's most satisfied savings customers for 15 consecutive years<sup>1)</sup>
-  The eighth highest considered company in Sweden and the highest considered in the financial industry<sup>2)</sup>

<sup>1)</sup> Swedish Quality Index 2024

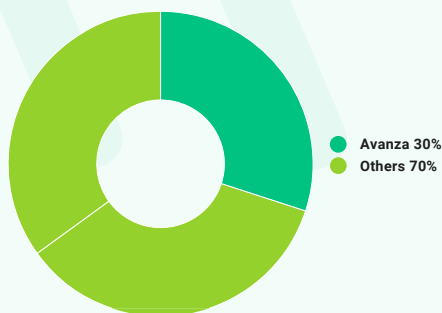
<sup>2)</sup> Verian reputation index 2024



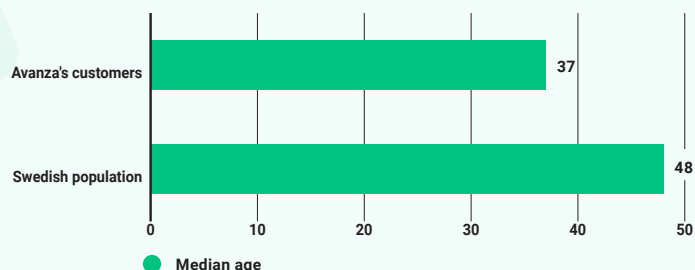
There is **large potential to continue growing market shares** – illustrated by the delta between front- and back-book market shares.



Two thirds of our customers' savings is estimated to be held with other institutions today. At least half is assessed addressable, meaning we have a **great opportunity to increase share of wallet**.



We have a **young customer base with great potential to grow their savings** with us as they grow older and in the intergenerational wealth transfer.



# An investment in growth

The Swedish savings market is large and advanced, and also has one of the highest growth projections in Europe. In the past ten-year period, the annual market growth has averaged 7 per cent. At the same time, structural trends in society are also placing growing responsibility on individuals for their financial well-being. In 2024, our share of the net inflow to the savings market was three times as high as our total market share<sup>1)</sup>.

Through 2030, we have a target to grow savings capital by an annual average of 15 per cent and reach over SEK 2,000 billion in total savings capital. To double the savings capital, we also need to retain and improve our scalability. We have set five strategic priorities to reach our targets until 2030.

## Strategic priorities 2030



Strengthen our leading position in the core business – savings and investments in Sweden



Achieve market leadership in Private Banking in terms of number of customers



Achieve market leadership regarding premium inflows within unit-linked occupational pension outside selection centre



Increase efforts to improve scalability, cost efficiency and flexibility to support continued strong growth



Geographical expansion to at least one additional European country

Read more about growth potential and our strategic priorities on pages 19–22.

<sup>1)</sup> Statistics Sweden, 30-09-2024 R12M

# Our vision is to create a better future for millions of people



## Basic offering

Our customers are offered around 80,000 investment opportunities through a wide range of securities. We also have savings accounts, mortgages and occupational pension – with no fixed fees and low prices.



## Guiding principles

Customer focus is the cornerstone of our offering and we work to constantly evolve it to become cheaper, better and simpler.



## Values & corporate culture

We have chosen to formulate our values, or guiding principles, in four short sentences: We help a colleague help a customer; We take responsibility; We challenge and think differently; We have fun together.



## Customer satisfaction

Doing what is best for our customers is central to everything we do. Avanza is driven by a constant focus on creating customer value.



## Employee engagement

Critical to achieve success, are our employees. Avanza is characterised by dedicated employees who want to make a difference. Ideas are listened to and enrich our development.



## Three overarching strategic areas

To live up to our guiding principles, we work with: 1) Customer focus 2) Innovation, Scalability & Efficiency 3) Sustainability.



## Long-term growth

We are convinced that satisfied customers, combined with engaged employees who enjoy and find it meaningful going to work, create long-term growth and shareholder value.



# A better future for millions of people



# Sweden’s most satisfied savers for 15 years in a row

Satisfied customers and a world-class customer experience are the core of Avanza’s business. Doing what’s best for our customers is central to everything we do. We want to offer a superior user experience and a broad product range. Our customers are both private and professional investors, as well as corporates such as entrepreneurs, asset managers and firms that want occupational pension for their employees.

## We take a long-term view of our offering with the customer in focus

The vision of a better future for millions of people is built on customer focus, a broad range of products, good decision support, and to increase knowledge about savings and investments. We want more people to feel smart, engaged and educated about their personal finances and savings. Satisfied customers and a world-class customer experience are the core of Avanza’s business.

A majority of our customers come to us by way of recommendation from another customer, which is a result of our strong customer focus and brand, but also because when we launch new products, we do it in our own way, by thinking innovatively.

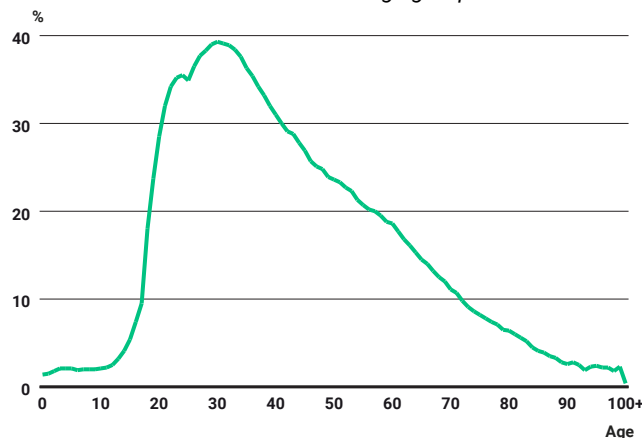
## A broad customer base with high market shares especially among young urbanites

Avanza’s customers mainly consist of private individuals, but we also have a small share of corporate customers such as entrepreneurs, asset managers and firms that want occupational pension for their employees. Customer growth in 2024 was 170,700 and the number of customers at year-end was 2,071,700.

If we compare those who became customers in 2024 to those who became customers in previous years, we see the same pattern when it comes to customer behaviour. The breakdown between new customers who own equities and those who own funds is also consistent from a historical perspective.

The share of net inflow from new customers was 25 per cent. Customers within the Standard segment accounted for the large majority of the year’s net inflow. Avanza continues to grow strongly among young customers and within urban areas. The market share of Sweden’s population was 19 per cent. The market share within ages 20–39 is significantly higher, around 35 per cent, and among men in the Stockholm area in the same age group it is over 45 per cent.

Avanza’s market shares in different age groups



Customer data	2024	2023	2022	2021	2020
Median age of the total customer base	38	37	37	37	37
Median age among new customers	30	31	31	31	31
Share of net inflow from new customers, %	25	24	88	50	37
Share of women among new customers, %	45	44	42	41	40
Customer churn, %	1.3	0.3	1.5	1.9	1.0

Number of customers at year-end 2024

**2,071,700**

Avanza’s customer base as a share of Sweden’s population

**19%**

Average number of daily active users 2024

**412,000**



### Private Banking and Pro customers are an important part of the customer base

Our Private Banking customers have a savings capital of at least SEK 3 million. Pro customers are the most trading active customers and many of them are professional day traders. As a Pro customer, you make at least two trades a day at the minimum brokerage fee or trade at least a volume of SEK 280,000 daily.

Private Banking and Pro customers account for just under 2 per cent of the number of customers and just over 40 per cent of the savings capital, as well as over 50 per cent of turnover in commission-generating securities. Together, they account for 25 per cent of brokerage income.

### Occupational pension customers

The number of occupational pension customers was 180,100 by year-end, an increase of 9 per cent during the year. We mainly target firms that do not have collective agreements. There are also large companies with collective agreements in the customer base that, for example, have signed up for earnings conversions or alternative ITP for their employees. Distribution is handled via Avanza’s own sales force or digitally through the platform. Just over 50 per cent of the agreements come through the website, without assistance from a sales representative.

### A world class user experience

We put a lot of effort into user experience early on, which serves us well today. Our strong customer experience is one of our most important competitive advantages. We believe in continuous innovation and product development to constantly improve the experience for our customers.

We have a broad product range, access to extensive market data, many different filtering tools and decision support, and not least a platform that is easy to use and navigate as well as quick and packed with real-time data. Our design system is well-developed and allows us to maintain consistency in the customer experience and roll out design changes within minutes. The key is to create an experience that empowers our customers to make well informed investment decisions. At [avanza.se/ir](http://avanza.se/ir), there is a presentation of our user experience and product range.

### Cheaper, better and simpler

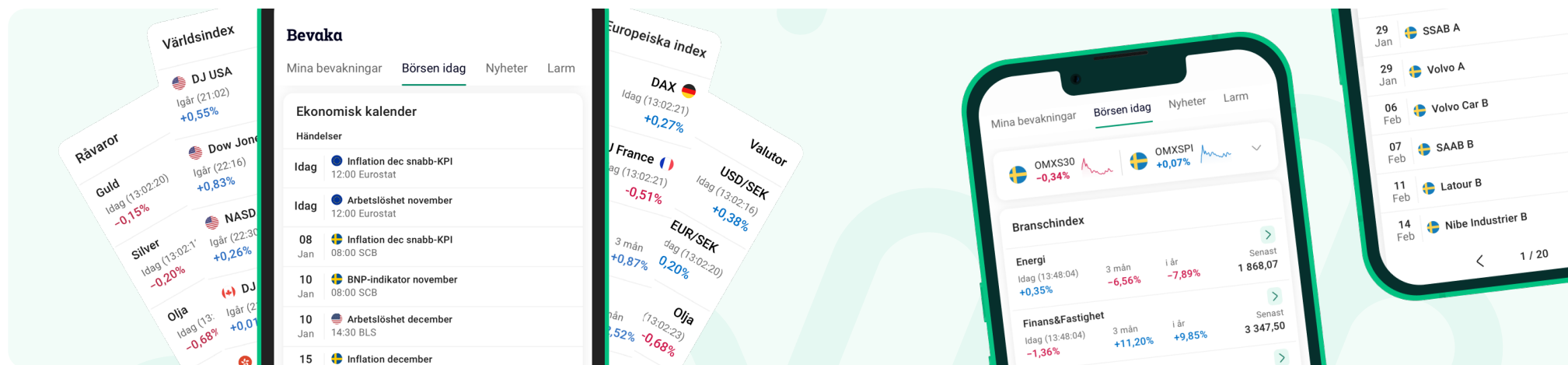
The promise to our customers is that they will have more money left in their pockets with Avanza than with any other bank or pension company. Since the beginning, we have worked for price transparency, and to reduce prices in the industry. We want low barriers to entry. When it comes to stock trading, we are the cheapest in the

industry for the majority of customers, and we offer very cheap and transparently priced funds.

### We develop the platform together with our customers

Our large customer base implies that no one in Sweden has as much data and knowledge about retail savings and investments as Avanza. This is utilised when we further develop our product.

Customers can sign up for beta functionality and become early test users of new features. We also have a feature called “feedback buddy” where it is possible to write feedback directly to the development teams through the app or website. When launching a new feature, we start with a limited release to gather customer input and make refinements before a broader rollout. We employ structured A/B testing, sharing insights across all development teams. On top of this, we conduct hundreds of customer interviews, user tests, and surveys each year.





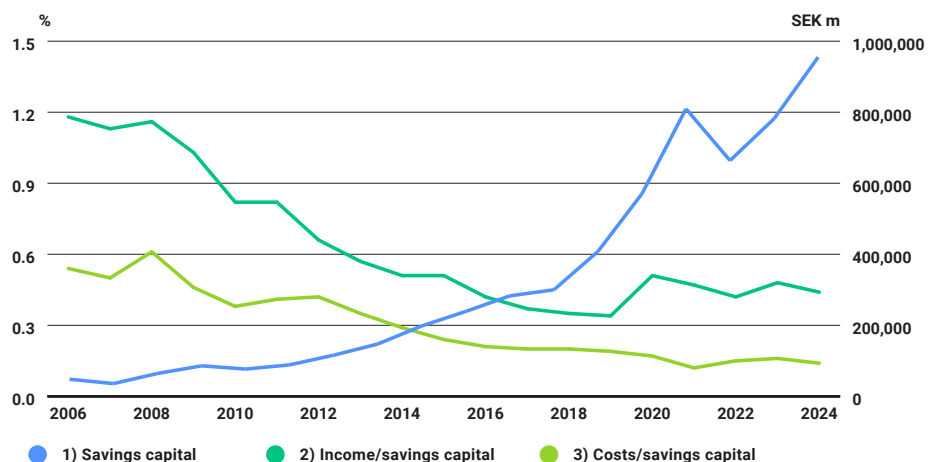
# Highlights from 2024



# Business model built on customer focus and scale

Strong savings capital and customer growth, combined with low costs and high cost efficiency, creates long-term growth in income and facilitates further development.

- 1) The inflow of savings capital is driven by existing and new customers, which places great importance on customer satisfaction. Satisfied customers are good ambassadors, talk about us, recommend us to others and want to stay with us.
- 2) The performance of income to savings capital ratio is a result of our pricing strategy to make the offer more attractive, but in later years mainly due to market trends including changing customer behaviours, the savings mix, trading activity, and not least the interest rate environment.
- 3) Our business is built on scale and we have a market leading cost efficiency today. This is an important competitive advantage, and one of our prioritised focus areas through 2030 is to further increase scalability. Our success in this respect is illustrated by the declining costs to savings capital ratio.



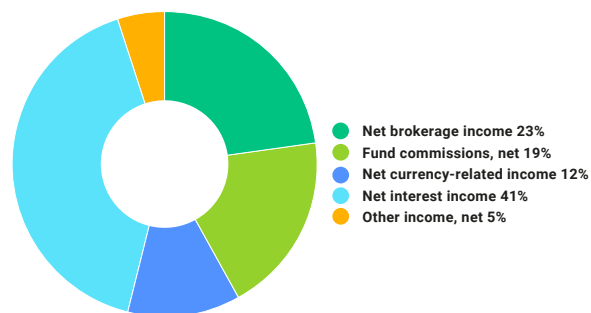
# Product areas and income streams

Avanza offers the market’s broadest range of savings products, competitive occupational pension solutions, margin lending and mortgages. Growth in savings capital drives income, which is also influenced by market conditions and their impact on trading activity and fund volumes, as well as interest rates and changes in deposit and lending volumes.

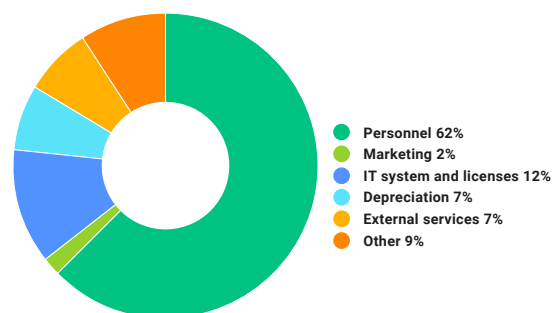
## A well-diversified income model

Our income model is well-diversified with several income streams that make it resilient to changing market conditions. This has certainly proven true during recent years’ macroeconomic fluctuations. Our expenses are to around 70 per cent personnel-related, and to ensure transparency we recognise all expenses, where possible, on the income statement.

Breakdown of operating income 2024



Breakdown of operating expenses 2024



Five-year summary	2024	2023	2022	2021	2020
Operating income, SEK m	3,900	3,437	2,973	3,301	2,349
Operating expenses, SEK m	-1,280	-1,148	-1,031	-864	-763
Operating profit, SEK m	2,621	2,292	1,940	2,437	1,576
Profit for the year, SEK m	2,254	1,982	1,666	2,047	1,335
Earnings per share before dilution, SEK	14.33	12.64	10.69	13.19	8.66
Operating margin, %	67	67	65	74	67
Return on shareholders’ equity, %	38	38	36	50	57
No. of new customers (net)	170,700	124,400	116,600	379,800	303,900
No. of customers	2,071,700	1,901,100	1,776,700	1,660,100	1,280,300
Net inflow, SEK m	85,800	72,300	23,600	89,800	76,300
Savings capital, SEK m	955,500	781,700	663,900	809,600	570,500
Income to savings capital ratio, %	0.44	0.48	0.42	0.47	0.51
Costs to savings capital ratio, % <sup>1)</sup>	0.14	0.16	0.15	0.12	0.17
Average no. of employees	674	654	622	560	478

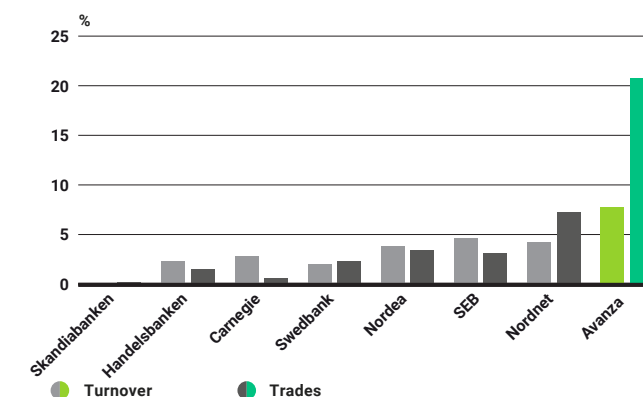
See definitions on pages 137–138.

## Brokerage income

Brokerage income is tied to trading activity, which in turn depends on market conditions and customers’ risk appetite. A strong stock market and high volatility tend to increase the risk appetite and activity among customers, while a more uncertain or declining market with low volatility has the opposite effect. High volatility combined with significant uncertainty can at the same time make customers more hesitant and reduce activity.

Shares can be traded in the Nordic region, on major stock exchanges in Europe, and in the U.S. and Canada through the platform. Most other markets can be traded on through brokers. We offer various brokerage fee classes to fit each customer’s trading activity. Customers choose the brokerage fee class they prefer; see also page 136. At the end of 2024, over 1.2 million customers owned shares, and during the year Avanza was the largest Swedish player on Nasdaq Stockholm including First North measured by both transactions and turnover.

Market shares in stock trading among Swedish firms 2024



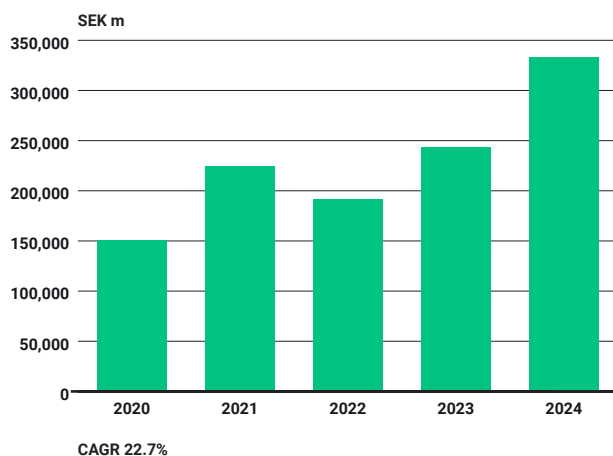
### Fund commissions

Fund commissions are impacted by the fund volume as well as how customers choose to allocate their fund capital and the management fee on these funds.

Over 1,400 funds from around the world can be traded on Avanza's platform, including 23 funds from our own fund company. At year-end, Avanza had over 1.2 million customers with fund holdings, and fund capital amounted to SEK 334 billion of which 37 per cent (36) was invested in our own funds. The net inflow to funds was the highest ever at SEK 41 billion. For several years, we have seen a trend towards a higher share of index funds, which continued during 2024. The share of fund capital in index funds was just under 49 per cent (44) at year-end.

Fund savings account for nearly 80 per cent of occupational pensions, which, as the pension business grows, is expected to provide more stable income and reduce sensitivity to market fluctuations. The occupational pension market can be divided into traditional insurance and unit-linked insurance. The proportion outside collectively bargained pensions, where Avanza competes, amounts to SEK 843 billion<sup>1)</sup>. Occupational pension capital at Avanza increased by 30 per cent during the year to SEK 76 billion at year-end.

### Fund capital development at Avanza

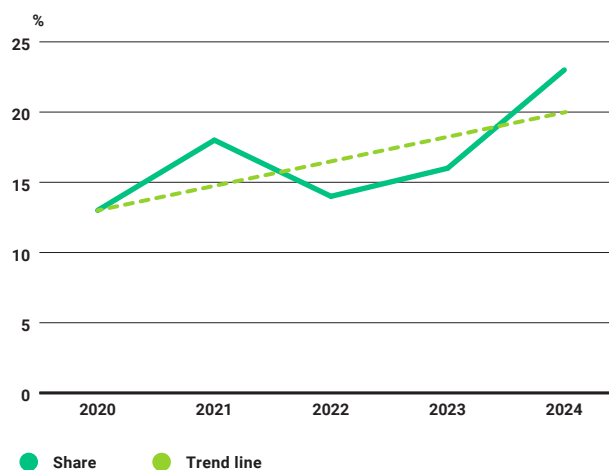


<sup>1)</sup> Insurance Sweden as of 31-12-2023

### Net currency-related income

Currency-related income is impacted by how large a share of customers' trades is in foreign securities. In 2024, the share of brokerage-generating turnover in foreign shares was 24 per cent (16), which was the highest level ever. Interest in international exposure increased towards the end of the year in connection with the U.S. presidential election, but the trend towards a more diversified portfolio and a higher share of international trading has been ongoing for long.

### Share of foreign trading of brokerage-generating turnover



### Net interest income

Net interest income is impacted by the interest rate environment and changes in deposit and lending volumes. An increased risk appetite during the year reduced liquidity to historically low levels.

### Interest expenses

The interest rate on deposits paid to customers is recognised as an interest expense, together with the deposit guarantee fee and resolution fee. At the end of the year, 60 per cent of deposits with Avanza were in interest-bearing accounts.

### Interest income

We generate interest income through lending on our balance sheet, which occurs via margin lending and mortgages, as well as through the return on surplus liquidity.

### Margin lending

Through margin lending, customers can borrow against their shares and funds and leverage their savings. Margin lending is used primarily by more experienced investors and the volume is largely impacted by stock market sentiment. During 2024, the volume increased by 32 per cent to nearly SEK 11 billion at year-end.

### Mortgages

Our internally financed mortgages are available only to Private Banking customers. The mortgage rate is fixed for three months and is tied to the Riksbank's policy rate.

Mortgage volume increased by 15 per cent during the year to just over SEK 13 billion at year-end.

### Surplus liquidity

Changes in the policy rate impact the return on the Treasury portfolio, i.e. surplus liquidity, which is invested mainly in covered bonds, deposits with the Riksbank and systemically important Nordic banks. The bond portfolio is tied to the 3M STIBOR.

### Other income

Mainly includes income from Avanza Markets and stock lending, but also Corporate Finance, various distribution income and income from ad sales, subscriptions and add-on services purchased by customers.



# CEO's statement

## **Impressive customer and employee engagement**

When I was six years old, I bought my first share with the help of my grandfather, in the shipping company Svea. As an 11 year-old, I bought my first bond, issued by Electrolux, and as a teenager my first call option. When Avanza was started 25 years ago and revolutionised securities trading, it did not take long before I became a customer. Since then, I have been impressed, as a customer, but also envious, as a competitor, at what Avanza has achieved. When I was asked by Sven Hagströmer and the Board of Directors in early 2024 if I wanted to become the CEO of Avanza, the answer therefore was simple. For nearly a year now, I have had the privilege of being CEO of the most exciting company in the financial industry.

Most of the work during my first year at Avanza has been close to what I expected in terms of getting to know customers, colleagues, processes and the organisation, putting my management team in place, and developing a strategy to move forward. Something that surprised me was the interest from the business press and the number of investor meetings. What has impressed me the most is the engagement of our customers. When we do something they appreciate, I hear about it, and if we do something less well, I hear about it even more. My passionate colleagues have made just as great of an impression through their unfailing customer focus and innovation. During my second week on the job, I was on a listening tour at customer service together with my fantastic colleague Malcolm, who besides an uncanny ability to guess a customer's dialect also demonstrated his intellect and attention to service. The visit to customer service is offered all new employees and is mandatory for everyone new to the Board and Group Management. It is one of several means to cement Avanza's strong customer focus.

## **“What has impressed me the most is my colleagues' unfailing customer focus and innovation”**

One area where I see potential to improve is how digital Avanza is on the inside. I think we have focused so much on delivering for customers that we have neglected to focus on automation and simplifying internal processes to also make things easier for us employees. Here, we can and will be better to ensure that we can effectively handle many more customers and transactions in the future.



*Gustaf Unger, CEO of Avanza*

## Still great growth potential in Sweden

The Swedish savings market grew by 11% annually according to the latest market figures, bolstered by a rising stock market and substantial new savings despite a national economy that limped along. Policy rate cuts, the introduction of tax-free savings in investment savings accounts (ISK) and endowment insurance, and expected real wage growth followed by lower inflation augur well for even stronger savings going forward.

## “Households want economic freedom to a greater extent which is positive for savings”

Furthermore, there are also strong long-term trends that favour the savings market. We are living longer and the state pension compensates less and less for the loss of income when we retire, meaning personal savings before retirement become increasingly important and are likely to grow. With house prices having risen in recent decades relative to disposable income, it is also becoming harder to enter the housing market and more savings are needed for a down payment on a home purchase. My view is that today, and even more so tomorrow, we want economic freedom to maximise our choices – which also requires more savings.

## Strategic priorities to double savings capital by 2030

The net inflow to Avanza amounted to SEK 86 billion in 2024, our second highest annual inflow ever. As of 30 September, our market share of the net inflow to the Swedish savings market was 20% annually. This compares to our overarching share of the Swedish savings market of 7.5%. To continue to attract a large share of the expected growth in the savings market and even better help more people save wisely and invest successfully, we, during the autumn, established our strategic priorities through 2030. In brief, they consist of five areas, of which three are focused on growth in Sweden.

- **Strengthen our leading position by nurturing and developing our core business** – savings and investments in Sweden – with focus on helping our existing customers become even better savers and move more of their capital to us. Avanza was launched for true stock market enthusiasts. They will always be our core business, but we also want to take steps to support those who need more help with their investments.

- **Grow within Private Banking and have the most customers** in the industry 2030. We have a digital offering that stands out with attractive prices. Among our Private Banking customers, we also see the highest likelihood in the industry to recommend Avanza to others. We are therefore convinced that we, with our strong innovation power, have an opportunity to revolutionise the traditional market for Private Banking and also compete for the SEK 1,000 billion that today lies within discretionary management. Here, the agreement to acquire Sigmastocks, and quickly gain access to advanced and scalable technology, is a first step on that journey.
- **Improve our occupational pension offering and become the leader** in terms of recurring premiums within non-collective occupational pensions for unit-linked insurance. We have a strong offering based on price, user experience and product range for the pension saver, but need to do more when it comes to the experience for the occupational pension company – something we are working on right now. The pension market is by many perceived as complicated and difficult to understand, but we have proven before that we are skilled at making the difficult simple, enjoyable and inspiring. We want to do this for every saver while enhancing the offering for those who need more help.
- **We will increase operational scalability** and move our production to the cloud to ensure that we can handle significantly higher volumes and transactions 2030, and that our costs to savings capital ratio continues to decrease over time. The cloud journey is also driven by our belief that future innovation to a higher extent will be in cloud-based solutions. Our data platform has been in the cloud for several years and we are now moving employee tools. Avanza has a modern, unified technology stack with one programming language, one API framework and one structure to build and launch new services, facilitating the cloud migration. During 2025, our new production applications will start being built in the cloud, and existing platforms will begin to migrate. We will then gradually move, by 2030, all services that are suited for the cloud.
- **Last but not least, we want to establish operations in at least one additional geographic market.** Establishing Avanza in another European country, with other saving habits and where saving and investing have not come as far, will be challenging and is something we certainly do not take lightly. At the same

time, Avanza is a leader in Sweden, which is the most highly developed, advanced and competitive market in Europe. I therefore strongly believe that we, given the way we work and our strong focus on the customer, have very good prospects for success outside Sweden's borders. I almost see it as our duty, both from a growth and shareholder perspective, as well as the savers' perspective.

## “We are driven by making saving and investing enjoyable and uncomplicated, and always with the customer's best interests in mind. This is critical going forward as we execute on our strategy”

### Strong growth and ambitions as we look ahead

At Avanza, we are driven by making saving and investing enjoyable and uncomplicated, always with the customer's best interests in mind. This is critical also going forward as we execute on our strategy, together with our ability to innovate the savings market through continuous improvements as well as groundbreaking changes. There is a great commitment internally to reach our ambitious targets. We want to continue to impress customers and our environment. In 2024, we grew the number of customers by 170,700.

The new external targets we launched in October to measure and monitor our performance relative to the strategic priorities include a new growth target to increase savings capital by an average of 15% per year. To deliver on this, we are maintaining our most important target, to have the most satisfied savings customers in Sweden, an award we received for the 15<sup>th</sup> year in a row in 2024! This feels fantastic and is a testament to the fact that our customer-centric culture delivers results. Passionate employees are also central to meet the needs of our customers today, but perhaps even more importantly, tomorrow's needs as well. Our eNPS, which measures our employees' willingness to recommend Avanza as an employer, landed at 59 in 2024, which is high and above our target. Employee churn is also at a healthy level. We have a strong brand in the labour market and manage to recruit really talented people. We have high ambitions for the development opportunities we offer our employ-

ees and we want, to an even greater extent than today, to be the company that everyone wants to recruit from.

## “To an even greater extent than today, we want to be the company that everyone wants to recruit from”

Our costs for the year came in slightly below the guidance we gave at the beginning of the year, adjusted for the additional one-off costs we had not planned for in the form of closing down Placera's editorial team and the fine from IMY related to a case from 2021. Our target going forward is an average annual cost increase of 8% up to and including 2030, but where cost growth will be higher at the beginning of the period due to accelerated cloud migration and strategic investments. The target is also a lower costs to savings capital ratio over time to demonstrate the scalability of the business, which is already industry-leading at 14 basis points. 2024 was a fantastic year where we reported our strongest results ever. It was mainly our trading related income and fund commissions that increased. The return on equity amounted to 38% and exceeded our target of 35%, despite that Avanza is very well-capitalised. Thanks to the margins to the capital requirements, the Board of Directors proposes to the Annual General Meeting a dividend of SEK 11.75 per share, corresponding to a payout ratio of 82%.

## Sustainability is a key strategic focus where we are especially engaged in the social aspect

Sustainability is and has always been an important part of Avanza's strategy and business. Since the start, we have worked to reduce prices, increase transparency and promote financial literacy. The importance of saving is becoming increasingly evident, at the same time that indebtedness in society is rising – especially among young people. Here we can contribute our expertise and do more.

In addition to all the activities internally, this year we started a collaboration with the organisation Ung Privatekonomi, which annually provides around 30,000 high school students with financial literacy education.

As a financial company, we have a significant role to play in making the green transition happen by helping to steer capital to sustainable companies. We are working actively to reach our long-term target of net zero emissions by 2045, in line with the 1.5°C target and the Paris Agreement. Here, we work to reduce our environmental impact by measuring and reducing carbon emissions both in our own operations and from customers' investments.

In 2025, we will continue to put our sustainability strategy into concrete action and update our overarching sustainability targets.

## Positive steps on the regulatory front, but there is more to be done

From 1 January 2025, up to SEK 150,000 can be saved tax-free in ISK and endowment insurance, which is both positive and necessary – and further reduces the barriers to start saving. Next year, the ceiling on tax-free savings will double to SEK 300,000. When it comes to the occupational pension market, which I personally consider the least developed part of the Swedish savings market and the part most in need of reform, there is still a lot for legislators to do. The right of savers to transfer their pension to a better provider exists on paper, but is far too complicated in practice, which means that too many Swedes today are stuck in expensive and questionable pension solutions. A good start would be to eliminate the requirement to have your former employer sign off on a transfer.

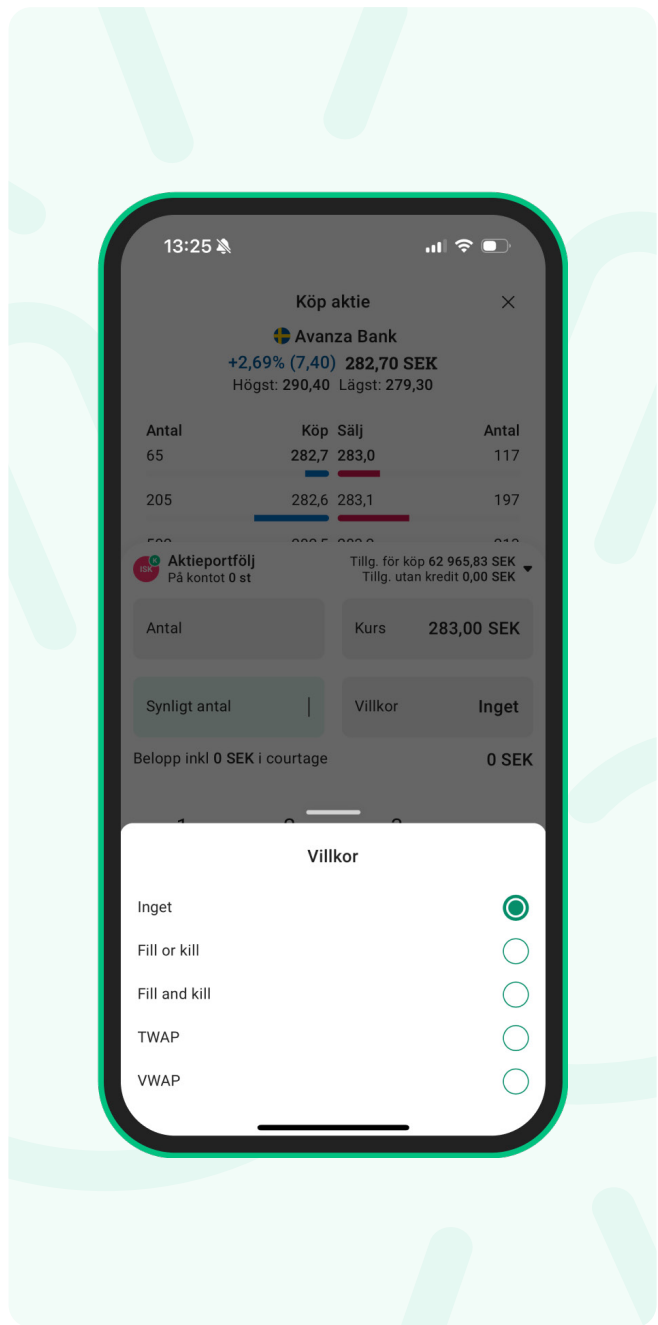
## “The pension market is the least developed part of the Swedish savings market and the part most in need of reform”

### Thank you for a fantastic 2024!

It has been a fantastic year and I am excited and enthusiastic about the steps we will be taking in 2025 to deliver on our Strategy 2030. I am also optimistic about the future from a pure macro perspective when it comes to the Swedish savings market – which is already among the most highly developed in Europe. However, there is still plenty to do. In December, Avanza celebrated 25 years, and I am convinced that our next 25 years will be just as packed with new innovations and growth. Thank you very much for your interest and engagement – all customers, investors and esteemed colleagues!

Stockholm, February 2025

Gustaf Unger, CEO



# A better future for millions of people

Through continuous innovation, with a focus on what is best for the customer, we create better opportunities to save, build trust and generate growth. We want to create the best tool for our customers to successfully manage their finances and inspire sustainable investment decisions.

## Cheaper, better and simpler

We follow a strategy to continuously make our offering cheaper, better and simpler. The promise to our customers is that they will have more money left in their pockets with Avanza than with any other bank or pension company. We concentrate on three areas to achieve this: 1) Customer Focus 2) Innovation, Scalability & Efficiency 3) Sustainability.

The key to success is our employees. The corporate culture draws its energy from a willingness to create change. Sustainability has always been deeply engrained in our culture and how we work. Since the start, we have been working to lower the thresholds to the financial market, reduce prices, increase transparency and educate the public on personal finances. We place great importance on maintaining a strong corporate culture where we are convinced that satisfied customers, combined with engaged employees who enjoy and find it meaningful going to work, create long-term growth and shareholder value.

## Customer focus is the cornerstone of our offering

Avanza's business is built on a strong customer focus with a world-class user experience and customer service. Doing what's best for our customers is central to everything we do. We believe our offering must stand the test of time and want a broad offering through continuous innovation and product development.

We believe in our customers own ability to make the best decisions and do not offer investment advice. Instead we want to inspire sound investment decisions by providing information, education and decision-making tools. We do not recommend specific products or services, either. Our offering is presented objectively with both pros and cons. Another important factor to make financially sustainable investment decisions is transparency, where the price and fee model are clearly shown and where it is easy to understand each product.

## Innovation, Scalability & Efficiency

Customer focus and paying attention to their needs is integral to our product development. All of our employees are potential product developers, although development is delegated to autonomous

teams with cross-functional competencies and expertise in their areas. This, coupled with a modern technological platform, facilitates a highly competitive rate of innovation and simultaneous development in all our channels. By concentrating our business and development in areas where we are, or can be, the best, we create the most value for our customers.

Innovation is also important from a cost perspective. Scalability and efficiency allow us to maintain price leading products. Continuous improvements to our systems also enable us to quickly respond to changing customer preferences. We constantly work to eliminate old technology that could slow development and evaluate new technology and update and modernise our systems. Our technological platform is among the industry's most modern. The strategy is to never put ourselves in a dilemma with old systems and to continuously automate and simplify our processes. By not planning too far into the future, we stay flexible and can respond to what happens around us. We update the site and apps with improvements and new functions on an ongoing basis through several of releases a day. Our systems provide stability, large capacity and economies of scale, and enable us to deliver high quality.

## Avanza should be the obvious choice for those who want to save sustainably

Since the start, we have worked to reduce prices, educate the public on saving and investing, and promote gender equality. We want to engage people and help them understand how to save. We also want to drive development in the industry and put focus on how fees impact the savings capital, while challenging established structures that disadvantage savers. For a sustainable development and business long-term, the environment and greater social engagement have become increasingly important. We therefore also want to encourage and inspire sustainable savings. Our sustainability work is focused on three areas.

## Sustainable investments

Our ambition is to facilitate and inspire sustainable savings. It should be easy for our customers to identify and invest in sustain-

able choices. This requires that our product range can be analysed based on ESG criteria. An important part of making financially sustainable investment decisions is transparency, where prices and fees are clearly spelled out and where it is easy to understand each product.

## Educate & Challenge

We want to be the obvious choice for those who want to learn more about personal finances and we want to contribute to a more gender equal savings market. By educating within personal finance and savings and investments, as well as driving opinion and challenging convention, we want to create opportunities for more people to be financially empowered. Contributing to greater gender equality in savings is a key element in our sustainability work and we work actively to reach women. Through information and inspiration we can also do more to encourage sustainable choices. We are continuously improving our decision support and want to give our customers opportunities to include sustainability preferences in their investment decisions.

## Sustainable organisation

We operate in an industry built on trust and ensuring good governance and control is part of our core business. Our governance is based on thorough processes, effective control and clear lines of responsibility. This gives our employees the best opportunity to act ethically and ensures a sound risk culture. Avanza should also be an attractive workplace for those who value gender equality and a limited carbon footprint. We work actively with diversity and want our organisation to reflect the diversity of society. We strive to become a net zero emitter of greenhouse gases in accordance with Science Based Targets initiative.





# Our targets

Growth is an important element in our business model. Performance on targets is therefore measured mainly by customer satisfaction, where our employees play a key role. Our sustainability targets are focused on creating opportunities for a better financial situation for each and everyone and on encouraging more sustainable investments.



## Customer satisfaction

With a business model built on growth, customer satisfaction is our most important target. To ensure that we have the most satisfied customers in the industry, our target is to each year win the award for Sweden's most satisfied customers by the Swedish Quality Index. The survey is conducted within the areas: image, expectations, product quality, service, and value for the money, ultimately resulting in customer satisfaction and loyalty.



## Engaged employees

Satisfied customers requires engaged employees. This, and a high recommendation rate is also important to keep and attract talent. Our annual target is to have an employee Net Promoter Score of at least 50.



## Long-term value growth

We are convinced that having the most satisfied customers in the industry together with having the most engaged employees is the key to building long-term growth and shareholder value, as well as fulfilling our financial targets:

- Grow our savings capital in Sweden by an annual average of 15 per cent
- Annual average cost growth of 8 per cent
- Decreased costs to savings capital ratio over time
- Annual return on shareholders' equity of at least 35 per cent
- Dividend of 70 per cent of net profit for the year



## Net zero emissions

Avanza has become a signatory to Business ambition for 1.5°C and Science Based Targets. This means we are committing to setting climate targets that align with the Paris Agreement. The target includes to halve our emissions by 2030 and reduce our emissions to net zero by 2045 the latest.



## Increase gender equality in savings

We work actively to reach broader target groups and promote savings among women. Today women save less, have lower savings capital and begin to save later.



## Strengthen the sustainability value in customers' investments

Avanza is a savings platform and the aim is to provide a wide range of investment alternatives. We do not offer investment advice, but want to inspire customers and make it easy to invest sustainably through clear information, decision support and education.



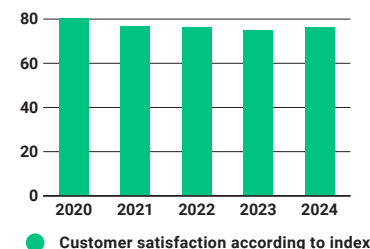
# Outcomes 2024

The targets were updated and adjusted in October 2024 as a part of the strategic overview. The new targets are set until 2030.

## Customer satisfaction

### Annual target: Sweden's most satisfied savers according to the Swedish Quality Index (SQI)

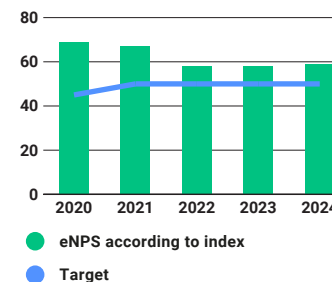
In 2024, Avanza won the award for the 15<sup>th</sup> consecutive year, and increased its lead in the industry. Avanza was ranked number one within all categories. Our score is the highest within product quality, loyalty and value for the money. As a whole, the score for 2024 amounted to 76.3 (74.6) on a scale of 0–100. The industry average also increased, but less than Avanza's score. SQI also measures customers' recommendation rate, Net Promoter Score (NPS), which amounted to 49 (33). NPS is measured on a scale of -100 to 100, where a result of 0 to 50 is good, and above that is extremely good and very rare. Avanza's score is the highest in the industry and shows a good margin to the industry average of 3 (-3).



## Employee engagement

### Annual target: Employee Net Promoter Score (eNPS) of at least 50

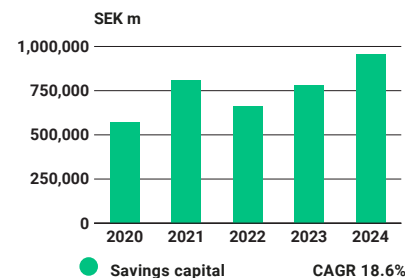
eNPS shows how willing our employees are to recommend Avanza as a place to work. The recommendation rate was measured three times during the year, and the score for 2024 was 59 (58). A result over 40 means the highest score. The target shows our high level of ambition in this area and how seriously we take our employees' well-being and work situation.



## Long-term value growth

### Grow the savings capital in Sweden by an annual average of 15 per cent (replaces the previous market share target)

There is a strong correlation between growth in savings capital and growth in income. The target was set as a part of the strategic overview in 2024 and applies from 2025 until 2030. Market appreciation is estimated to contribute by around 5 per cent per year and recurring net inflows by 3–4 per cent. The remaining 6–7 per cent are dependent on increasing market shares through customer growth and an increased share of wallet of the current customer base. During 2024, the savings capital at Avanza grew by 22 per cent.



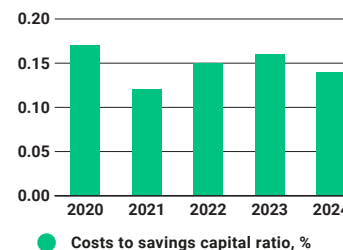
## Long-term value growth, continuation

### Average annual cost increase of 8 per cent (new)

The target was set as a part of the strategic overview in 2024 and applies from 2025 until 2030. It is excluding geographical expansion and costs are estimated to be higher at the beginning of the period due to an accelerated cloud migration and strategic priorities within Private Banking and occupational pension. The cost increase 2025 is estimated at 11 per cent. By 2030, the target is to reach a 5 per cent cost increase.

### Lower costs to savings capital ratio over time (adjusted from 12 basis points by 2025)

Avanza has an industry leading cost efficiency when it comes to costs to savings capital ratio. High cost efficiency remains a priority and makes Avanza resilient to various market conditions while at the same time it represents an important competitive advantage. The target is set knowing that individual years could be impacted by market conditions. Costs to savings capital ratio 2024 was 14 basis points (16).



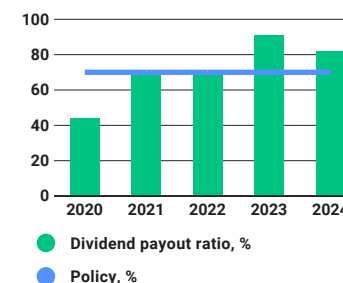
### Annual target: Return on shareholders' equity of at least 35 per cent

Our return on equity target ensures a continued focus on profitability, and demonstrates the low risk and capital efficient balance sheet. The return on shareholders' equity was 38 per cent (38) in 2024.



### Annual target: Dividend of 70 per cent of net profit for the year, taking into account the leverage ratio requirement, including the Pillar 2 guidance and internal buffer

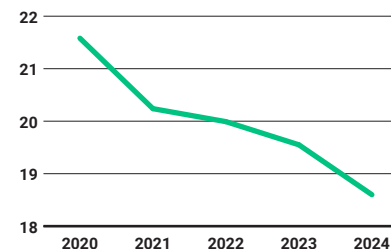
Avanza has a strong capital position with good margins to the regulatory requirements. However, the Swedish FSA's position on deposits through savings platforms has made it less attractive for our external savings account partners to gain deposits through our platform. We have therefore decided to stop offering these account, which will likely result in increased deposits on our own balance sheet. This would be positive for net interest income, but also increase leverage ratio requirements going forward. Despite this, the proposal for 2024 is a dividend of SEK 11.75 per share (11.50), corresponding to a dividend ratio of 82 per cent (91). By year-end, Avanzas leverage ratio for the consolidated situation was 5.0 per cent and the Common Equity Tier 1 ratio was 23.0 per cent, including the proposed dividend.



## Sustainability targets

### Strengthen the sustainability score of our customers' investments

We provide a very broad range of over 80,000 investment alternatives on the platform. We do not offer investment advice but try to inspire customers and make it easier to invest sustainably through providing clear information, decision support and education. During the year, Morningstar's sustainability rating for fund investments among Avanza's customers improved by decreasing from 19.6 to 18.6. The ratings are given on a 0–100 scale, where the goal is as low a score as possible.



### Increase gender equality in savings

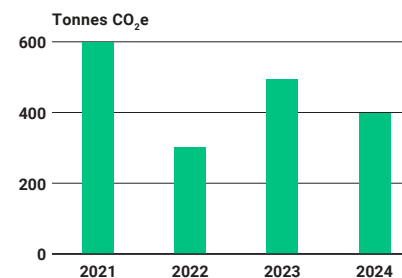
We work actively to reach broader target groups and promote savings among women. By the end of 2024, the share of women on Avanza's platform was 39 per cent, unchanged since 31 December 2023. The share of women among new customers increased to 45 per cent (44), and the share of savings capital held by women was unchanged at 26 per cent as of year-end.

Gender equality in savings	2024	2023	2022	2021	2020
Share of female customers, %	39	39	38	38	37
Share of women among new customers, %	45	44	42	41	40
Share of savings capital held by women, %	26	26	25	24	23

### Net zero emissions

Avanza works in line with the Paris Agreement to minimise our negative climate impact. We focus on measuring our most significant emissions in our value chain while also working on our transition. Each year a climate report is prepared with the help of an independent analysis tool based on the methodology in the Greenhouse Gas (GHG) Protocol. The report includes Scope 1, Scope 2 and partly Scope 3 emissions. This year's emissions totalled 397 tonnes CO<sub>2</sub>e, for which has been compensated.

In 2023, Avanza's climate targets were approved by Science Based Targets initiative and Business ambition for 1.5°C. The short-term emission targets are to reduce our direct and indirect emissions by 50 per cent by 2030, continue to run our office with 100 per cent renewable energy, and that at least 65 per cent of the capital in Avanza's own funds should be invested in companies with their own Science Based Targets at the latest by 2027. The long-term target is to be net zero, which means an emissions reduction of at least 90 per cent. This will be achieved as soon as possible, but by 2045 at the latest.



# Large growth potential in the Swedish savings market

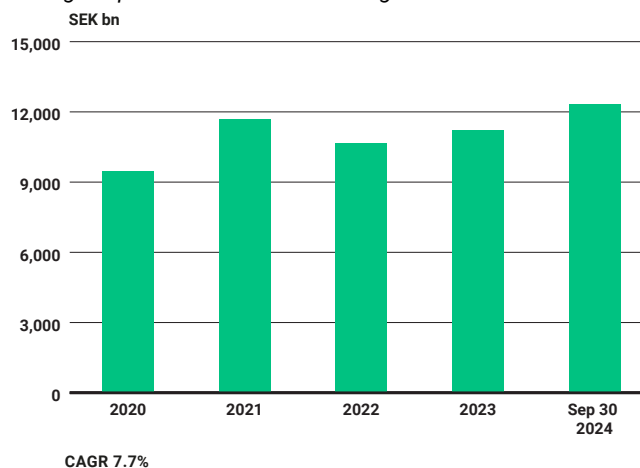
The Swedish savings market is the most highly developed in Europe and here, Avanza is by far the leading platform for savings and investments. Our share of the net inflow to the savings market was three times as high as our total market share in 2024. Intensified efforts to grow share-of-wallet with existing customers, and within Private Banking and occupational pension will ensure maintained strong growth also going forward.

## The Swedish savings market is large, advanced and growing

The Swedish savings market is the largest in the Nordic region and one of the most highly developed in Europe, but also one of the markets with the greatest growth projections. In the past ten-year period, the Swedish savings market has grown by an annual average of 7 per cent. At the same time, structural trends in society are placing growing responsibility on individuals for their financial well-being. Everyone needs a buffer for unforeseen events, and the structure of the housing market requires potential buyers to save for a down payment. The gaps in the pension system are large and the level of benefits paid out by the public pension scheme is expected to decline significantly in the coming decades, mainly as average life expectancy increases. The pension market accounts for a very large share of the Swedish savings market, but is the most conventional and the most in need of reform. In today's system, future pensioners will receive an estimated 59 per cent of their salary, assuming that all recipients begin taking their pension at age 65. For younger age groups the figure is even lower.<sup>1)</sup> The need for savings is large and expected to increase.

Sweden has a unique savings culture that stretches back to the late '70s, when tax-subsidised fund savings was introduced. Since then, equity investing has become widely popular. Seven out of ten Swedes personally own funds and about a fourth of the Swedish population owns equities. Nowhere else in the world are funds such a popular form of savings and equity investing continues to grow year after year, with young people accounting for a growing share of ownership.<sup>2)</sup>

Savings capital on the Swedish savings market



## Avanza has a strong brand and leading position in Sweden

Avanza is driven by creating customer value. Our aim to build a platform where we would want to be customers ourselves has led to a strong position as Sweden's leading platform for savings and investments. For 15 years, Avanza has won the Swedish Quality Index's (SQI) annual award for Sweden's most satisfied savings customers, which is our most important long-term target. The SQI

Avanza's share of the Swedish savings market<sup>3)</sup>

**7.5%**

Avanza's share of the net inflow to the savings market<sup>3)</sup>

**20%**



**Sweden's most satisfied savers for 15 consecutive years**

Swedish Quality Index, 2024



**Sweden's eight highest considered company and Sweden's highest considered bank**

Verian and Reputation&Trust 2024

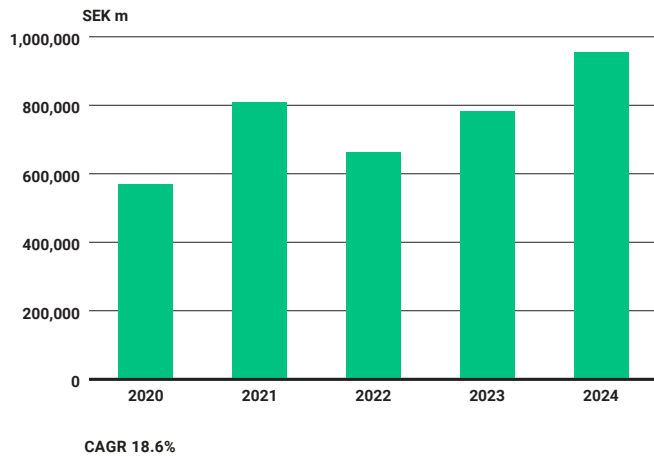
<sup>1)</sup> MinPension compensation report 2023

<sup>2)</sup> Euroclear

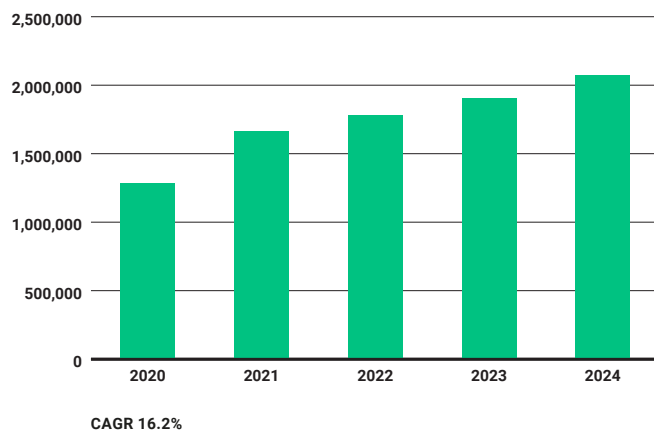
<sup>3)</sup> Statistics Sweden, 2024-09-30 R12M

also measures brand recognition among non-customers and here Avanza ranks highest in the industry when it comes to savings. Avanza is also ranked the highest considered company in the financial industry, according to Verian's annual reputation index, and the eighth highest considered company in Sweden in total. Avanza was also rated as having the highest reputation among banks in Reputation&Trust's survey.

**Savings capital at Avanza**



**Number of customers at Avanza**



**Strong growth opportunities in Sweden**

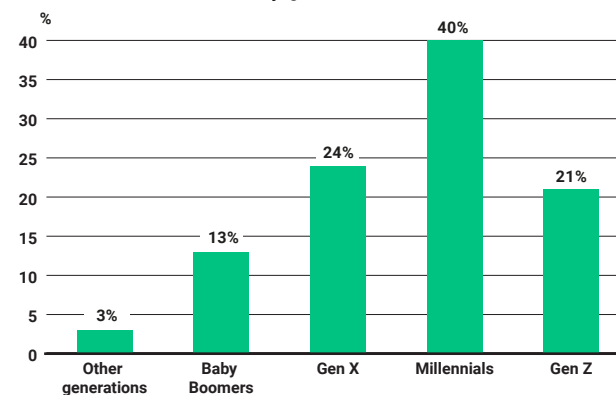
Avanza has grown strongly in the Swedish savings market for a long time. Today, we have a market share of 7.5 per cent of the capital, while an average of 20 per cent of all new savings goes to Avanza<sup>1)</sup>. Prospects for continued strong growth are good. It is estimated that two thirds of our customers' existing savings capital is currently invested with other firms, half of which is considered addressable for Avanza. This requires a continued customer focus and innovation, a superior customer experience and leading cost efficiency. Regardless of background or interest, Avanza is a natural platform for those who want to save. The offering is continuously being improved to attract both stock market enthusiasts and less engaged investors. Leading up to 2030 we have set five overarching strategic priorities to reach the target of a savings capital of SEK 2,000 billion.

**A) Strengthen our market leading position in Sweden with increased focus on share of wallet**

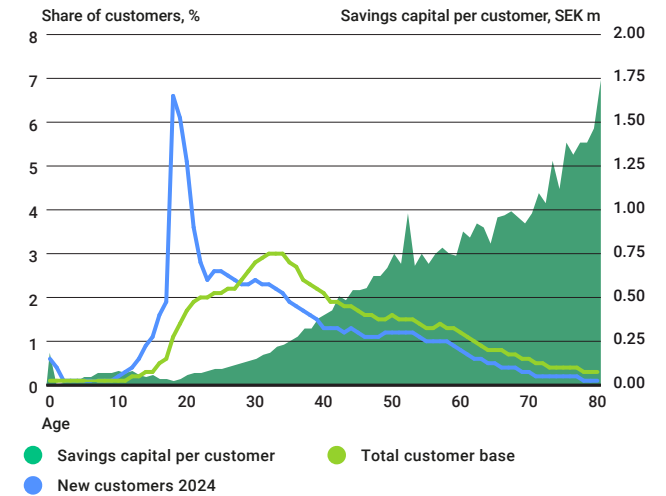
Our customers are an important source of future growth. Few customers leave Avanza and our customer churn is low. No one else in Sweden has as much data and knowledge of retail savings as Avanza, which we can use to create customer value by increasingly adapting the content of the platform to each customer and their savings preferences. A world-class user experience and a continuously improving and expanding offering will help to convince our existing customers to move a larger part of their savings to Avanza.

Much of the potential also lies in our young customers, who represent a large share of the customer base and who have learned about and become interested in savings and investments at an early age. They have good opportunities to grow their savings with us over time.

**Avanza's customer base by generation**

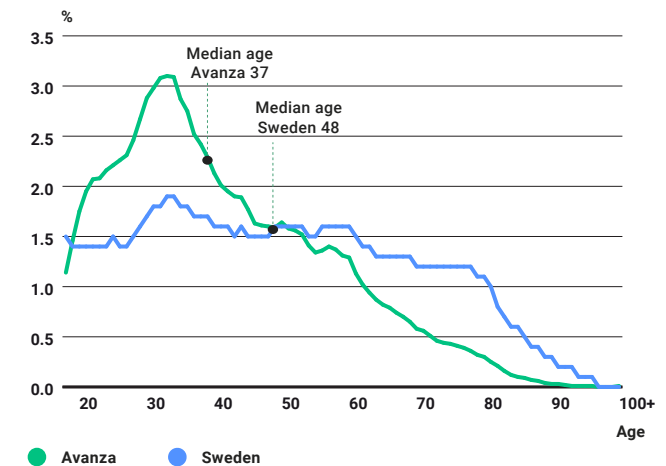


**Savings capital grows with age**



What's more, we face a great wealth transfer in the coming years. The large generation of baby boomers born in the 1940s and '50s has built up tremendous wealth and currently holds a major share of the total savings capital. Within a few years, these assets will be transferred from older to younger generations – generations that have their savings with Avanza.

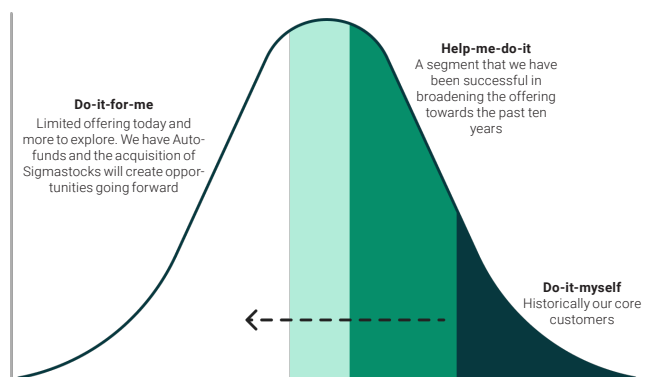
**Age distribution among Sweden's population and Avanza's customers**



<sup>1)</sup> Statistics Sweden, 30-09-2024 R12M

Since the start, we have been successful in reaching those who are interested and want to manage their savings on their own. In recent years we have been focused on, and effective in, broadening the offering to suit those who want more help and decision-making tools. Going forward, however, there is a large share of savings capital that could be addressable if we manage to reach those who want even more help with their savings – the “do-it-for-me” segment. Today, we have our Autofunds and see opportunities to develop various types of portfolio solutions and more decision-making tools. Our experience in making savings more available and simple, in combination with our innovative capabilities, creates opportunities to revolutionise the more traditional part of the savings market as well, where discretionary investment management and advice often play a key role in winning savings capital.

**Growth potential in the Do-it-for-me segment**



Women are also an important target group who today save a smaller share of their salary compared to men and to a greater extent in savings accounts. The pay gap between men and women persists, at the same time that the share of women who pursue college and university studies is higher than among men, which could mean a change in the pay gap in the future. We are also seeing the number of female shareholders grow year after year in Euroclear’s surveys and among Avanza’s customers. The increasing interest in stock investing among women is positive for both the individual and society as a whole. Contributing to greater gender equality in savings is critical for Avanza, and we work actively to reach broader target groups and encourage women to save; for more information on these activities, see page 38–39.

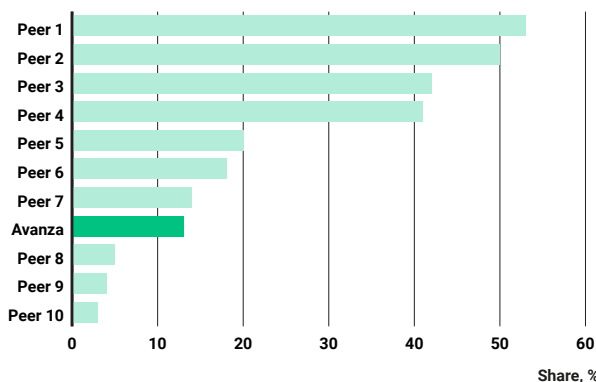
**B) Gain market leadership in Private Banking based on number of customers**

Growth potential in Private Banking is high if we succeed in increasing our brand awareness as a Private Banking provider. In Prospera’s survey we rank first in likelihood to recommend among these clients, but eighth in brand awareness. Our current Private Banking clients are in other words the most likely in the industry to recommend us, but few know what we offer. Improving and diversifying our Private Banking offering is therefore a priority looking ahead to 2030.

**Highest likelihood to recommend in the industry among Private Banking clients**



**Low brand awareness**



We also know that many of our Private Banking clients only use Avanza for part of their investments, i.e. the share they manage themselves. A large percentage is with traditional discretionary investment management and advisory firms. The discretionary investment market within Private Banking is estimated at SEK 1,000 billion. In December, we announced that we have made an agreement with the current owners of Sigmastocks to acquire the company. This is a step towards offering a digital discretionary mandate service. Sigmastocks’ current solution is a partly customised discretionary equity portfolio, based on each client’s preferences. Building a discretionary solution is time consuming, and through the acquisition we get access to a technical platform that we will further develop, and over time also plan to adapt to suit other customer segments. The acquisition is conditional upon an ownership assessment by the Swedish FSA and is expected to close in May 2025.

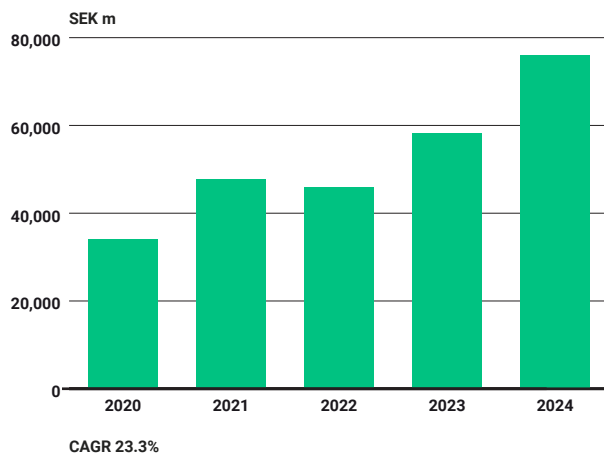


**C) Leader in non-collectively agreed occupational pensions in unit-linked insurance**

It should be easy to be an occupational pension customer at Avanza. We want customers to understand their pension and we want to help them make informed investment decisions. Pensions are perceived complicated by many. Here we, with our experience in making difficult topics easy, enjoyable and understandable, have an opportunity to make a difference.

Since the start, Avanza has offered no-fee occupational pension savings and contributed to lowering fees in the industry. We also have good analysis tools to help with diversification and cost analysis. Not everyone sees our large range of investment options as a benefit, it can also be considered too broad, making it difficult to choose. We therefore have to make it even easier and develop better decision support for occupational pension customers. Our offering is designed not only for individual pension savers but also companies with occupational pensions for their employees. Here we have great potential if we develop our product to make occupational pension plans easier for companies to administer.

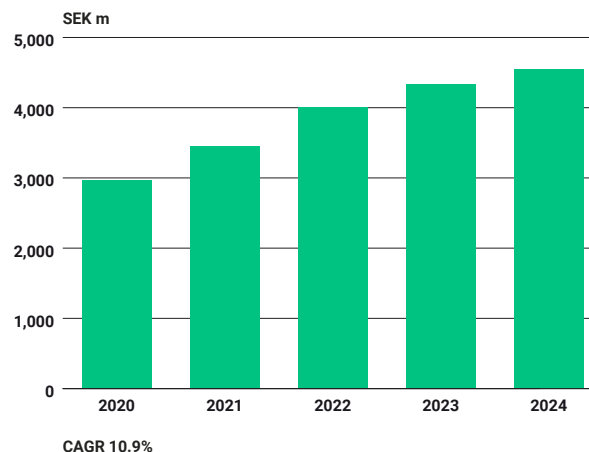
**Occupational pension capital development at Avanza**



The pension business has more stable earnings and net inflow than other areas, since companies pay occupational pensions to their employees regardless of market conditions, even though growth can be affected by layoffs in the labour market. At this point, only 9 per cent of our customer base is occupational pension customers, so the potential to grow is great. Our aim by 2030 is to be the market leader in premium inflow within unit-linked insurance outside

collectively bargained occupational pensions. We currently rank fourth in premium inflow, which means that we have to become almost twice as large.

**Development of the premium inflow to Avanza**



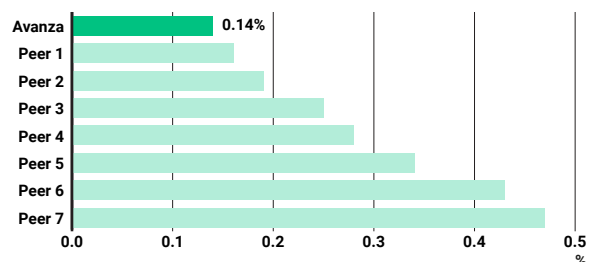
Avanza's market share of premium inflow

11%

**D) Increase scalability, cost efficiency and flexibility to support continued strong growth**

Cost efficiency is critical, both to live up to our customer promise and to create shareholder value. It also serves as an important competitive advantage. Avanza already has a market leading cost efficiency in the industry based on costs to savings capital ratio.

**Costs to savings capital ratio compared to peers**



To retain our cost leadership, we need to ensure that we are constantly improving our operational efficiency by making small changes to our processes. We are also increasing our focus to become as digital internally as we are externally towards customers.

To create even better possibilities for further growth, we are accelerating our cloud migration. Our belief is that the future lies in the cloud and that a migration will provide faster access to new technology and better scalability through more efficient development, for example.

**E) Potential outside Sweden's borders**

Avanza is today by far the leading platform in the Swedish savings market, which is one of the most highly developed and competitive markets in Europe. Over the past 25 years we have democratised the savings market and driven development in Sweden through our leading user experience, broad product range and unique customer-driven development process. We therefore consider opportunities to also succeed and make a difference for savers in a market outside Sweden's borders to be good.

Growth potential in Sweden remains strong and the purpose of an international expansion is to further increase our addressable market and enable continued growth in the long term. It also diversifies our revenue streams and makes Avanza less dependent on and exposed to a single economy. Looking ahead to 2030, the goal is to be established in at least one other European country.





## Focus from investors in 2024

- Market conditions, customer activity and revenue distribution.** We have a strong business model with multiple revenue streams, where net interest income will remain a significant contributor, even when interest income is squeezed by lower market interest rates. Historically, lower interest rates have led to higher customer activity and trading-related revenue. Customer activity is primarily a reflection of market conditions in general as well as stock exchange volatility and turnover. This was evident in 2024 in the form of increased risk tolerance among customers as macroeconomic conditions improved and higher trading activity in conjunction with major stock market events. Our fund business, where pensions play a big role, is a less volatile source of income that is growing strongly and where growth potential is high.
- Can we do more to increase customer activity?** Our focus is on long-term customer relationships, why we work with education and to develop effective tools to encourage a long-term perspective, diversification and wise investment decisions. Customers want more information and better decision support. During 2024, we maintained a fast pace of development and launched, among other things, expanded reporting data, a separate analysis page with historical data, increased access to advanced technical analysis and improved market data on exchange-traded funds. We have also expanded access to algorithmic order placement. All features that have been requested by customers and that were well received, which in the long run is what creates customer value and high engagement.
- Competition in the savings market and whether we are experiencing any price pressure.** Sweden has a mature savings market with a strong interest in savings and investments. Because of this potential, new players are trying to enter the market, especially to attract high-net-worth clients and active traders. So far, we have not noticed the increased competition. We operate in an industry built on trust and building a brand takes time. Avanza's strong position is the result of 25 years of hard work. We are confident that our customer focus, which we are strongly committed to, has gotten us where we are today, and that it will ensure our continued success. When it comes to pricing, the Swedish savings market already has very low prices. Here, Avanza played an important role early on in driving down prices. Our view so far is that the competition today is mainly about user experience and customer satisfaction. That said, we monitor market developments to make sure that we stay on our toes and that our offering remains at the forefront. We have a very competitive offering today. When it comes to stock trading, we are the cheapest in the industry for the majority of customers, and we offer very cheap

and transparently priced funds. Our large customer base and high trading turnover are unique advantages, especially regarding the most trading active customers, since internal trades allow them to take precedence over other buyers and sellers on the exchange, resulting in faster executions – which is difficult for others to compete with.

- What we will do to grow in the Do-it-for-me segment and if we plan to offer advice in the future.** Through our Autofunds, we have a solid offering today for those who want automatic fund savings, but there is not really a good solution that includes stocks. We therefore reached an agreement in December to acquire Sigmastocks, which provides digital discretionary share portfolio management primarily to high-net-worth individuals, with a partially personalised portfolio based on the customer's preferences. A service that we will build on to reach a wider target group. We believe that young people today, who are used to doing all their banking digitally, will not want traditional Private Banking with an advisor in the future.
- Can we grow the pension business faster with the help of brokers?** We currently collaborate with a few brokers that are not paid commissions and would be happy to add more collaborations where commissions do not factor into the choice of insurance company, and the customer instead is recommended the insurance company that best meets their needs. The disadvantages of expanding distribution through brokers are that we do not directly dialogue with the customer and that we have to pay commissions to the brokers, which with our fee structure, without insurance-related fees, would be challenging.
- Thoughts about taking Avanza abroad.** Growth potential in Sweden remains high and Avanza is the leader in Sweden, one of the most advanced savings markets in Europe and perhaps the world. Our view is that we miss out on valuable growth opportunities by not going abroad and that we have a chance to make a difference for savers outside Sweden's borders, where savings options often are lacking. In the short term, we believe in expansion through a smaller acquisition and begin to learn the market and what customers want, before integrating such a business technologically a few years later. With an acquisition we can also benefit from the licenses that the acquired company has. If we are talking about an expansion in a few years, we could do it organically, which would be easier when we have come further in our cloud journey and made more progress on our other strategic priorities.
- The cloud journey, what we plan to migrate and the estimated costs.** We believe that the future lies in the cloud, which is why we want to accelerate our move there. The cloud migration is included in our overall cost target and annual guidance. We are

starting from a strong base, since we have a modern, standardised and homogeneous platform that creates efficiencies and facilitates migration. We have only one programming language, one API framework and one way to deploy services. Our data platform, which is successfully being used in a growing number of applications such as analysis, business intelligence, reporting, third-party integration and critical business flows, is already migrated and 85% of our systems are cloud ready. Everything will not have to be in the cloud. The deciding factor of what we migrate is what we want to achieve; it must be impactful and practical. We expect to have both on-prem and the cloud for the foreseeable future.

- What applications we envision for AI going forward.** We are limited only by our imagination. There are interesting opportunities in internal efficiency and to further improve our offering, the information provided to customers and personalisation. Our extensive customer database and savings expertise are competitive strengths that create future potential.
- CEO succession and many new members of Group Management, and how that has impacted the corporate culture.** There is a special corporate culture at Avanza based on very strong customer focus and a desire to create change and value for our customers. Many that apply to work at Avanza do it because of our values. Most of us who work here and who apply for jobs also use and like our product and are customers. In 2023, we won the Swedish Quality Index (SQI) customer satisfaction award for the 14<sup>th</sup> time, but our ratings dropped in several categories. This was unacceptable and spurred us to improve. During 2024, we have worked hard and with purpose to strengthen our offering, especially for stock market enthusiasts, which are historically our core customer group. During the year we were able to celebrate both product launches and major awards. Despite churn in Group Management, there has never been any question of what we stand for and what we will do. This year we won the SQI award for the 15<sup>th</sup> time while improving significantly and finishing number one in every category. The culture is strong and not dependent on individual people; it is something we have built together over a long period of time.
- Capitalisation and whether we are considering to issue AT1 capital.** This is something we are continuously looking at as an alternative to more efficiently manage capital. Given that we have made the decision to phase out external savings accounts, it is likely that customer deposits on our own platform and balance sheet will increase. As a result of this, our leverage ratio would decrease and the need to strengthen our capitalisation with Additional Tier 1 capital would increase.

# The share and our shareholders

## Share information

Avanza Bank Holding AB (publ) is traded on the Nasdaq Stockholm Large Cap. Avanza is included in the Financial Services sector under the ticker symbol AZA. In total, the average turnover was 850,831 Avanza shares per day, equivalent to a volume of SEK 200,721,465. In 2024, Avanza's share price rose by 17 per cent to SEK 272.90.<sup>1)</sup> Including the dividend paid, the total return on the Avanza share was 21.8 per cent.

## Ownership

At the end of the year, Avanza had 75,232 shareholders. The ten largest registered owners accounted for 50 per cent of the total number of shares and votes. Foreign ownership amounted to 29 per cent (31) at year-end and was highest in the U.S. and UK at 10 and 4 per cent respectively.<sup>1)</sup> Avanza did not own any repurchased shares as of 31 December 2024.

## The Avanza share's total return relative to index



## Share capital and incentive programme

The share capital and number of outstanding shares remained unchanged due to the warrant programme exercisable 2024 expiring worthless. Avanza's outstanding warrant programmes comprise a total of 3,151,346 warrants, which entitle holders to subscribe for an equal number of shares, divided among three programmes, each of which run for three years. The warrant programme is offered to all permanent employees and is issued on market terms. The Black & Scholes model is used to determine the value of the warrants. There is a risk for the employee of losing money if the company and the share do not perform well enough. For more information on the outstanding programmes, see page 65 and Note 28 Equity.

## The Board of Directors proposes increased dividend

The dividend policy stipulates a dividend of 70 per cent of profit for the year. In light of Avanza's strong capitalisation, and the likelihood that deposits on our own balance sheet will increase as a result of us no longer offering external savings accounts, the Board of Directors proposes a dividend of SEK 11.75 per share (11.50), corresponding to a dividend ratio of 82 per cent (91) of profit for the year. This ensures a continued good buffer to the capital requirements of a total leverage ratio of 3.5 per cent and total risk-based capital of 18.2 per cent. The requirements mean that the risk-based capital requirement could determine Avanza's capitalisation, although the leverage ratio is a more sensitive measure of deposit fluctuations. As of 31 December, Avanza's leverage ratio for the consolidated situation was 5.0 per cent, including the proposed dividend. This means that deposits can increase by SEK 34 billion without risking to fall short of the requirement including guidance. Avanza's capital structure is continuously evaluated from a capital efficiency perspective in part to identify opportunities to issue Additional Tier 1 capital. See also the Board of Directors' statement on the allocation of profits proposal on page 87.

Share data	31-12-2024
Share capital, SEK	78,618,474.50
No. of outstanding shares	157,236,949
Quotient value, SEK	0.50
Market cap, MSEK	42,900
Share price, SEK	272.90
Highest closing price (28-05-2024), SEK	278.00
Lowest closing price (22-01-2024), SEK	204.40
P/E multiple	19
Dividend yield, %	4.31
Turnover rate, %	136
Earnings per share before dilution, SEK	14.33
Earnings per share after dilution, SEK	14.32
Shareholders' equity per share before dilution, SEK	40.19
Proposed dividend per share, SEK	11.75
No. of outstanding warrants	3,151,346

<sup>1)</sup> Source: Modular Finance. For definitions see pages 137–138.

## Change in share capital

Year	Change	Change in number of shares	Total number of shares	Changes in sharecapital, SEK	Total sharecapital, SEK
2001	New issue	4,425,907	25,415,478	11,064,767	63,538,695
2001	New issue	1,207,396	26,622,874	3,018,490	66,557,185
2005	New issue	842,800	27,465,674	2,107,000	68,664,185
2007	Repurchase of own shares	-305,674	27,160,000	-	68,664,185
2008	Withdrawal of repurchased shares, 2007	-	27,160,000	-764,185	67,900,000
2008	New issue	435,843	27,595,843	1,089,608	68,989,608
2008	Repurchase of own shares	-18,233	27,577,610	-	68,989,608
2009	Withdrawal of repurchased shares, 2008	-	27,577,610	-45,583	68,944,025
2010	New issue	379,860	27,957,470	949,650	69,893,675
2011	New issue	580,603	28,538,073	1,451,507	71,345,183
2011	Repurchase of own shares	-275,524	28,262,549	-	71,345,183
2012	Withdrawal of repurchased shares, 2011	-	28,262,549	-688,810	70,656,373
2012	New issue	611,198	28,873,747	1,527,995	72,184,368
2015	New issue	470,341	29,344,088	1,175,852	73,360,220
2016	New issue	494,834	29,838,922	1,237,085	74,597,305
2017	New issue	157,300	29,996,222	393,250	74,990,555
2018	New issue	276,774	30,272,996	691,935	75,682,490
2019	Share split	121,091,984	151,364,980	-	75,682,490
2019	New issue	2,421,342	153,786,322	1,210,671	76,893,161
2020	New issue	1,167,688	154,954,010	583,844	77,477,005
2021	New issue	617,748	155,571,758	308,874	77,785,879
2022	New issue	1,047,269	156,619,027	523,634.50	78,309,513.50
2023	New issue	617,922	157,236,949	309,061	78,618,474.50

The ten largest shareholders, 31-12-2024 <sup>1)</sup>	Country	No. of shares	Share of capital and votes, %
Sven Hagströmer (incl family and company)	Sweden	15,990,000	10.2
Creades AB	Sweden	15,862,000	10.1
AMF Tjänstepensioner & Fonder	Sweden	14,193,464	9.0
Sten Dybeck (incl family and company)	Sweden	6,490,308	4.1
Vanguard	U.S.	5,096,288	3.2
SEB Investment Management	Sweden	4,832,537	3.0
Andra AP-fonden	Sweden	4,513,574	2.9
Cliens Fonder	Sweden	3,850,394	2.5
Alecta Tjänstepension	Sweden	3,650,000	2.3
Fjärde AP-fonden	Sweden	3,450,236	2.2
Other owners		79,308,148	
<b>Total</b>		<b>157,236,949</b>	<b>100.0</b>

Concentration (by group of owners), 31-12-2024 <sup>1)</sup>	Share of capital and votes, %
The 10 largest owners	49.6
The 20 largest owners	64.0
The 100 largest owners	72.4

Distribution of shares, 31-12-2024 <sup>1)</sup>	No. of shareholders	Owners, %	No. of shares	Shares, %
1 - 100	54,433	72.4	1,514,421	1.0
101 - 1,000	17,085	22.7	5,558,001	3.5
1,001 - 10,000	3,317	4.4	9,536,352	6.1
10,001 - 100,000	309	0.4	7,786,334	5.0
100,001 - 1,000,000	63	0.1	18,537,576	11.8
> 1,000,001	25	0.0	106,972,468	68.0
Anonymous ownership			7,331,797	4.7
<b>Total</b>	<b>75,232</b>	<b>100.0</b>	<b>157,236,949</b>	<b>100</b>

<sup>1)</sup> Source: Modular Finance, Monitor.

# A simple balance sheet with low risk

Avanza operates in an industry built on trust. Clearly defined risk ownership and a sustainable risk culture are essential to our business. We value a simple, transparent and capital-efficient balance sheet with low risk. Our position in the Swedish savings market is strong.

## Low financial risks

Avanza's financial risks are limited. We do not offer traditional consumer credits or engage in proprietary trading. The balance sheet consists largely of assets and liabilities in the insurance business, where the policyholders bear the direct investment risk and retain the yield on the assets. The value of insurance liabilities tracks the value of insurance assets. Avanza Pension does not offer any insurance products with a guaranteed return.

The liability side of the balance sheet consists mainly of customer deposits. Avanza is self-financed through equity and deposits from customers. Only a limited share of deposits is used for lending with longer contractual maturities, which creates a low liquidity risk.

All lending is collateralised by liquid financial assets with good collateral margins or Swedish residential properties with a low average loan to value (LTV) ratio. Avanza has no confirmed credit losses attributable to events after 2011. Margin lending requires collateral in listed securities, where an assessment of an appropriate LTV is made based on among other things the liquidity, volatility and company-specific aspects of the security. The average LTV for margin lending is low. The mortgage offering is designed for high-net-worth Private Banking customers with at least SEK 3 million in total savings on the platform, as well as for employees. Private Banking customers are permitted a low maximum LTV of 50 per cent when the loan is granted. The low LTV ratio makes the loan book resilient also with respect to potential climate-related risks. In the case of the external mortgage offering, we are only a distributor, which means that the loans do not affect the balance sheet or entail a credit risk for Avanza.

Surplus liquidity is managed effectively with low risks and costs, within the framework of the limits set by current capital adequacy regulations. The surplus liquidity is invested mainly in covered bonds, municipal bonds, Riksbank certificates and as deposits with the Riksbank and systemically important Nordic banks. The liquidity portfolio is managed with a balanced maturity structure from an annual, a quarterly and to some extent even a monthly perspective, and with maturities of up to five years. The average interest term is a maximum of three months. Larger negative changes in surplus liquidity are normally covered by ongoing maturities. Avanza is also a monetary counterparty to the Riksbank and all bonds are normally pledged to the Riksbank. Consequently, the risk of having to sell bond holdings prematurely at a lower market value is limited. Surplus liquidity as of 31 December amounted to SEK 49 billion (48).

For further information, see Note 34 Financial risks. For more information on liquidity and capital management, see from page 83 in the administration report and Note 33.

## Earnings risk

An important part of our risk management is to evaluate and challenge the business model when it comes to earnings risks. Earnings risk is managed by continuously improving and broadening the offer to ensure high customer value and broader, more diversified earnings. Consistently strong growth in savings capital and the number of customers, along with high cost efficiency, improves economies of scale and makes Avanza more competitive. We continuously monitor the market and its pricing in order to respond to changes in customer preferences.

Avanza's income is greatly impacted by market conditions, customers' trading activity, the interest rate environment and changes in deposit and lending volumes. A strong stock market and high volatility tend to increase customers' risk willingness and activity, while a more uncertain or declining market with low volatility has the opposite effect. High volatility combined with uncertainty can at the same time make customers more cautious and reduce activity.

Sensitivity caused by a decline in savings capital following a market downturn is difficult to assess, since income is partly dependent to how customers choose to invest their capital. There is a strong correlation between savings capital and income, and the brokerage portion of Avanza's income will always be volatile and raise Avanza's profit when market conditions are favourable.

Market conditions in recent years have underscored the strength of multiple revenue streams. Periods with higher or rising market interest rates positively affect Avanza's net interest income, at the same time that securities trading may slow down. An increased risk appetite in 2024 positively affected our commission income and trading-related income, while falling market interest rates began to put pressure on net interest income. Historically, falling market interest rates have led to an increased risk appetite and trading activity, offsetting lower interest income. Net fund commissions have grown in recent years as a proportion of total income, contributing to more stable earnings, despite a shift in the mix of fund savings with a higher proportion of index funds. The pension business, which is less sensitive to external factors, also contributes here.

### Low risk loan book

	31-12-2024	31-12-2023	31-12-2022
Lending in relation to deposits, %	36	32	35
Average LTV for margin lending, %	39	41	38
Average mortgage LTV, %	26	26	28
Credit loss level, %	0.00	0.02	0.00



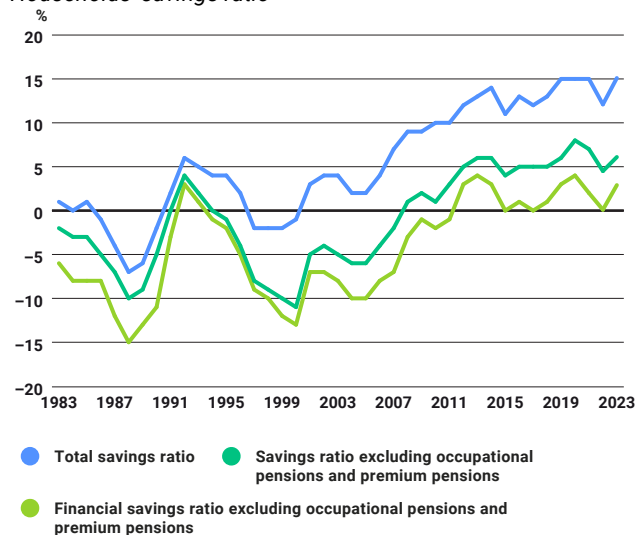
## Growth risks for Avanza in the Swedish savings market

The Swedish savings market is one of the most highly developed in Europe and there is strong growth potential for Avanza. In the short term, however, the growth rate could be impacted by market conditions and other global factors.

### Delayed recovery in the Swedish economy could impact the ability of households to save

Monetary policy measures in recent years have had a positive effect on inflation, which has decreased and is now near the inflation target. At the same time, the financials of many households have been affected by lower real wages, sharply rising mortgage rates, a weakened Swedish krona and generally higher costs. The economic outlook for Swedish households is significantly brighter with higher expected GDP growth, tax reliefs, declining interest rates and thereby increasing real wages. It is positive that households are adjusting and adapting their finances to current economic conditions, and an improved macro environment going forward can positively impact the savings market and the financial sector. Many are also well aware of the greater responsibility for personal finances as the social safety net deteriorates. However, there is a risk of delay in the economic recovery.

### Households' savings ratio<sup>1)</sup>



<sup>1)</sup> Ekonomifakta.se

### Geopolitical concerns lead to uncertainty about the global economy

Sweden has a fundamentally strong economy with good public finances and households that understand the importance of continuously saving. The business sector is strong with well-managed companies and a wealth of innovation. Sweden is a small, open economy, however, and is particularly vulnerable to downturns in the global economy, and we face geopolitical uncertainty. There are no signs yet that the invasion of Ukraine is nearing an end, and the situation in the Middle East escalated during the year. At the same time, we see tensions around China, where the threat of a Chinese invasion of Taiwan remains. China's economy is critical to global manufacturing chains and a war could have major global economic effects, with the risk of a protracted recession. There is also a risk of new trade tariffs from the U.S. that could damage global supply chains and increase inflation.

### Regulatory impact

Avanza is well-positioned with regard to regulations promoting consumer protection and transparency around commissions and independent advice. For us, it is central to put the customers' interests first. We have always advocated for low fees and a long-term approach, and refrained from commission-driven advice, instead developing tools on the platform that help our customers build savings based on their individual needs. For more information about regulatory uncertainties, see the administration report on page 84.

### An inflexible occupational pension market

For several years, the government has aimed to streamline the pension transfer market in Sweden, which has been done by expanding transfer rights and capping the fees charged to transfer occupational pensions. At the same time, the complicated and administratively time-consuming processes around the transfer itself remain in place, and more work is needed to create a well-functioning and less restrictive pension market.

Avanza advocates that insureds should be able to decide over their occupational pension when their employment ends. About 25 per cent of all initiated transfers to Avanza are stopped because the previous employer did not consent to a transfer. New legislation that abolishes the requirement for the previous employer's signature, and allows the individual to sign with BankID, would greatly facilitate

the transfer process. Such a legislative change is expected to positively impact Avanza's net transfer flows. Awareness of pension savings among the general public is however low in some areas, and there is a risk that many people start to think about, and make active choices regarding, their pensions too late in life. It is difficult to create engagement and interest in saving for retirement, which can affect the growth rate of Avanza's pension business. There is also a long-standing narrative from major insurance companies and brokers that pensions are complicated products requiring advice, which could further impede the transfer market.

### Increased competition in the savings market

The realisation of the potential for personal savings, along with the strong interest in savings, has increased competition in the savings market, particularly for high-net-worth clients and active traders. Fund investing also stands out as an area where several players have emerged in Sweden offering either robo-advisory or fund marketplaces with lower fund fees, where the customer instead pays a platform fee. Many depend on venture capital and struggle to become profitable. At the same time, competition is also increasing from insurance brokers in the occupational pension market, which offer companies efficient administration and pension savers advice.

Depending on how many of these players gain a foothold in the market, it could pose a risk to Avanza's growth rate in the long term. However, Avanza has a very competitive offering today. When it comes to stock trading, we are the cheapest in the industry for the majority of customers, and we offer very cheap and transparently priced funds. Our large customer base and high trading turnover are unique advantages, especially regarding the most trading active customers, since internal trades allow them to take precedence over other buyers and sellers on the exchange, resulting in faster executions – which is difficult for others to compete with. The platform is comprehensive, with a superior user experience that has been built over many years. At the same time, we continue to develop and improve the offering to maintain our leading position.

# Sustainability in Avanza

Sustainability is a central part of our operations and where we focus on the areas in which we think that we can have the greatest impact. By integrating sustainability throughout our whole value chain, we want to contribute to a better future for millions of people.

## A sustainable business model

Our vision to create a better future for millions of people is the backbone of our business and the foundation for our approach to sustainability as a natural and integral part of our strategy, business model and overarching targets. We want to create long-term value for customers, employees, shareholders and society as a whole and thereby promote sustainable development.

Our economic, environmental and social responsibility is rooted in the Paris Agreement's 1.5°C target and the UN's Sustainable Development Goals and includes governance-related and ethical aspects.

## Sustainability management

### Board of Directors

The Board of Directors is ultimately responsible for ensuring that Avanza's sustainability strategy is an integral part of the overarching strategy, and for adopting Avanza's sustainability targets. The Board receives continuous updates on the work with sustainability and the sustainability targets.

Avanza's sustainability and environmental policy is adopted by the Board of Directors and serves as the basis of the Group's sustainability work. It sets the direction for the work and for how Avanza will act responsibly and contribute to sustainable value creation. The policy also governs Avanza's environmental work and the aim to reach net zero emissions. The policy is complemented by the Internal Governance Policy for the Avanza Group as well as by more thematic governance documents.

The Board's Risk, Capital and Audit Committee considers sustainability issues within the framework of an Internal Capital Adequacy

Assessment Process (ICAAP) and Own Risk & Solvency Assessment (ORSA), where various climate scenarios are evaluated in relation to Avanza's income statement and balance sheet. A determination is made by the Board of Directors.

The Board of Directors together with the CEO annually approve Avanza's sustainability report in connection with its signing.

To ensure that sustainability is central to the entire organisation as well as our strategic decisions, the Board of Directors and Group Management both take part in ongoing training in the sustainability area. This includes education on current and future regulations.

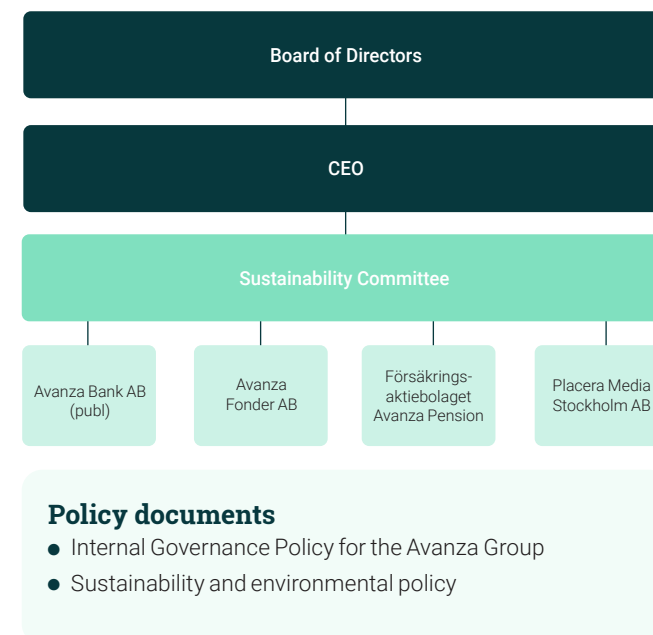
### Sustainability work at an operating level

The CEO of Avanza Bank Holding has overarching responsibility for integrating sustainability in the Group's operations. Avanza's sustainability work is decentralised and coordinated by Avanza's Head of Sustainability, who reports to the Chief Communications & IR Officer in Group Management.

### Sustainability Committee

The Head of Sustainability is the Chairman of the Group's Sustainability Committee, which consists of decision makers from the entire organisation, including the CEOs of the subsidiaries Avanza Pension and Avanza Fonder as well as the Group's Chief Risk Officer. Several members of the committee are also part of Group Management. The committee meets at least four times a year and is tasked with analysing and coordinating Avanza's sustainability work. The committee discusses and makes proposals for decision on issues related to sustainability direction, development of sustainability strategy and sustainability targets as well as implemen-

tation of new and amended regulations in the sustainability area, while informing about and, when necessary, discussing the interpretations and assumptions that the business has made regarding these regulations. The committee can also raise and pursue issues that pose a potential sustainability risk for Avanza, which is an integral part of Avanza's risk assessment.



### Sustainability work connected to new regulations

Avanza will report according to the Corporate Sustainability Reporting Directive (CSRD) in the financial year 2025. During 2024, the focus has been to strengthen the internal work so that sustainability work will have even greater impact going forward. Avanza’s material sustainability matters have been decentralised to operations to bring sustainability matters closer to customers and business operations.

### Strategy, business model and value chain

Sustainability is integrated in Avanza’s overarching strategy and constitutes one of three main focus areas. Read more about these on page 14.

Our value chain is the foundation for analysing impacts, risks and opportunities in close consultation with stakeholders. Our sustainability work is actively pursued across the entire value chain. We will minimise negative impacts upstream and downstream and proactively contribute to sustainable development with increased value creation for our stakeholders.

### Material impacts, risks and opportunities

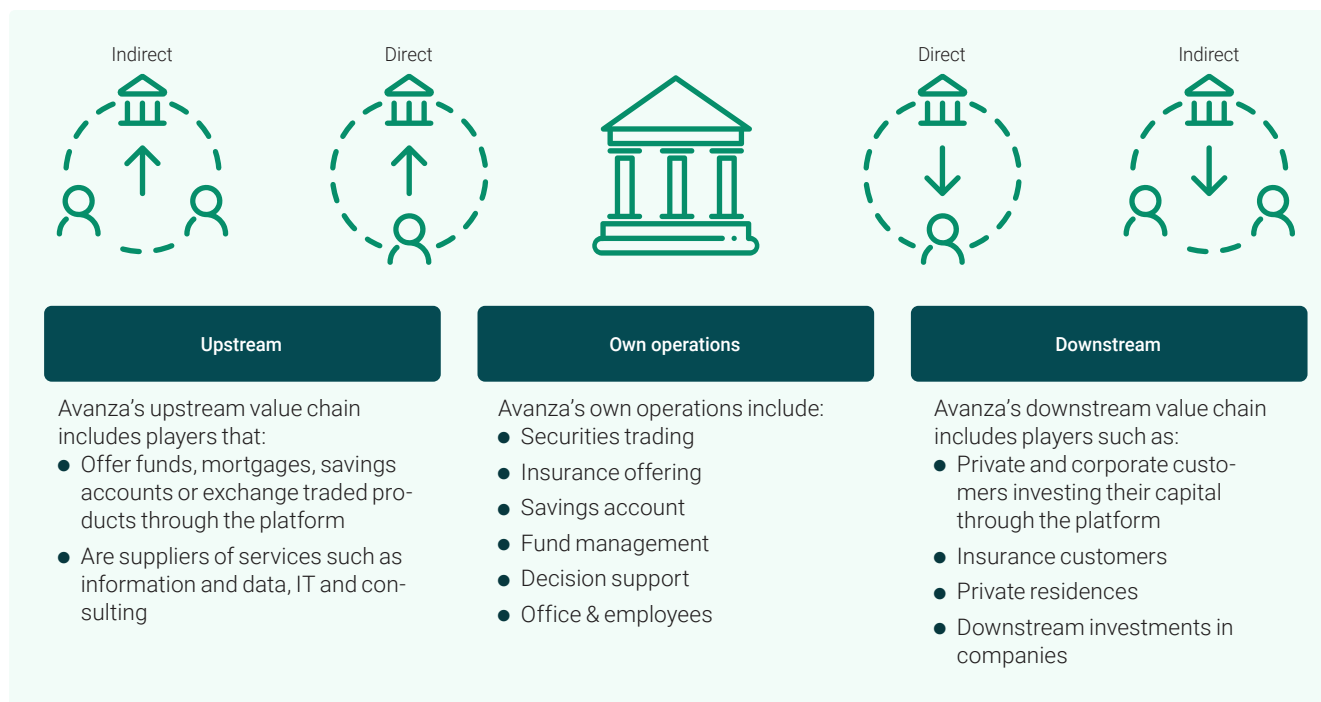
In 2023, a double materiality assessment was conducted. It identified the material matters where Avanza, through its operations or main value chains, has the greatest impact on people and the environment, as well as related risks and opportunities.

The Board of Directors decided in 2024 on the double materiality assessment and the material sustainability matters. Avanza intends to carry out annual updates of the analysis, which began in autumn 2024 and will conclude in 2025.

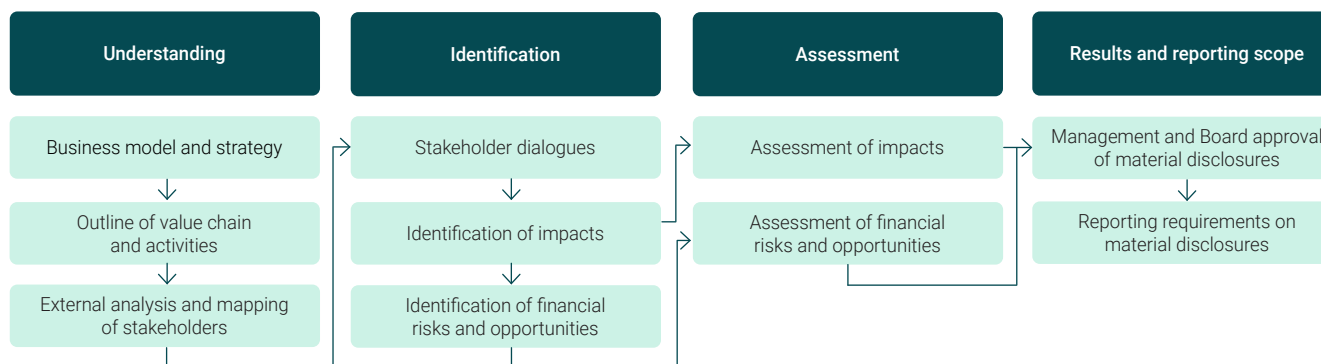
The sustainability matters have been categorised within three overarching strategic focus areas – Sustainable investments, Educate & Challenge and Sustainable organisation. Targets have been set for the material matters and they have been decentralised to operations, so that the work will have a greater impact going forward. The areas considered material to Avanza are:

- E1 Climate Change
- S1 Own Workforce
- S4 Consumers and End Users
- G1 Business Conducts

### Value chain



### Materiality assessment process



# Our success requires listening to our customers

The longevity of Avanza's business is tied to our ability to deliver what our stakeholders want. Listening to our customers and meeting their needs improves our offering and gives us new perspective.

## Key focus areas are identified in dialogue with our stakeholders

We continuously dialogue with various stakeholders to gain a deeper understanding of which sustainability matters are important to Avanza and society. This ensures that we develop our business in line with stakeholders' expectations.

The dialogue takes place in various ways, including through customer surveys, employee surveys, investor meetings, industry forums and discussions with relevant authorities. We dialogue more in-depth with our most important stakeholders: customers, employees and owners, or potential owners. They are the ones who are materially impacted by and/or impact Avanza's business. This is in addition to partners, suppliers, authorities, legislators and the media.

Transparency, innovation, user experience, availability, sustainability, and working effectively with IT security are areas that customers, employees and owners all mention, but what they mainly emphasise is our strong customer focus.

There are also areas more specific to each stakeholder group, as illustrated on the next page. These are important parts of our strategy and development work, and encompass the entire organisation without exception.

## Thanks to close dialogue, we have had Sweden's most satisfied savings customers 15 consecutive years

Everything we do begins and ends with our customers. Avanza's business is built on a strong customer focus with a world-class user experience and customer service. We believe our offering will stand the test of time and want to offer a broad range of products and services through innovation and product development.

We dialogue with customers by phone and email, through social media, customer meetings and customer surveys. We periodically send out customer surveys, both general in nature and for more specific products, tools and functions.

Prior to product launches, development goes through several steps. We conduct customer interviews and user testing and look at feedback on old pages and functions. We also go through quan-

titative data on how customers interact with the page or function as well as conduct structured A/B testing. In connection with major changes, we release a beta version to a limited number of customers for feedback in a real environment, so we can then make additional adjustments. Customers can decide for themselves whether they want to become a test user for new features. Our customers are highly engaged so we also receive feedback through tens of thousands of messages to customer service, social media and app reviews, which we consider when developing new functionality or new products. We also have a tool called "Feedback Buddy," where customers can leave comments directly to the development teams.

Each year we send out a number of surveys on the range of products and services we offer, including an open question on what would make Avanza perfect. After speaking to customer service, customers are automatically called back and given an opportunity to answer a brief survey to ensure that we have provided the best possible service. This enables us to measure customer satisfaction, receive feedback and respond to customers if needed. There are many of us who pick up on feedback from customers. Our customer service has a special team responsible for coordinating and forwarding customers' opinions and suggestions to product teams and management. Improvements to our offering are made continuously through updates to the site as well as our apps and infrastructure, largely based on responses from customers and changes in user preferences. All this, together with our market analysis, is important when improving the offering.

## An open work environment and creative dialogue encourage employee engagement

Our employees are driven by our vision and by creating change, at the same time that they want to develop professionally and have fun on the job. An open work environment is essential to capitalise on ideas and create engagement, which increases our innovative capacity. We track how our employees feel about the work envi-

ronment through anonymous pulse surveys. They are conducted three times a year and focus on the work environment, leadership and engagement and have a response rate of around 90 per cent. The surveys are used to identify what is working and what is not, and whether we are improving over time. Employees are also encouraged to discuss what they feel needs to improve or change to make them happier and more engaged. The results are monitored and presented to the entire company at an overarching level. Management reviews the results for each unit to monitor changes and development. Each unit holds workshops regarding their own results and draw up action plans for improvements.

Performance reviews between employees and their managers are conducted periodically. They provide an opportunity to identify needs, opinions and wishes; to directly monitor and provide feedback on the employee's personal development and performance; and to ensure that leadership, the culture and personal responsibilities are meeting expectations. During their first three months, new employees are asked to fill out a follow-up survey from HR, and when an employee leaves the company they are asked to respond to an anonymous quantitative exit survey to identify the reason why they are leaving. This is an important way to get honest opinions about Avanza as an employer, our leadership and whether the employee felt that they were able to influence their work situation. HR compiles a semi-annual report for Group Management on areas of improvement.

In addition to this and day-to-day communication, there are a number of ways to strengthen this dialogue and ensure that employees are being heard. For example, we hold monthly meetings where the whole company gathers together to discuss what the company is doing and everyone has the opportunity to ask questions directly to the CEO and Group Management. The meetings are held in person and are also live-streamed. We work in an open office concept, which creates a closeness and familiarity designed to foster internal dialogue.



In autumn 2024, a pulse survey specifically on the theme of sustainability was conducted that all employees had the opportunity to answer. The responses show that our employees value sustainability highly and expect Avanza to actively promote financial literacy and gender equality in the savings market. There is also an expectation that we offer, and continuously improve our offering of, sustainable products and decision support.

### Transparency to create understanding and give a fair view of Avanza to our owners

In addition to our financial reports and press releases, we publish monthly statistics and provide historical financial data dating back to 2001. We communicate regularly with analysts, owners and potential investors. In 2024, we held over 160 investor meetings. Moreover, Avanza took part in several roadshows and investment seminars during the year. We have 15 analysts who follow Avanza. Investors and analysts want transparency and availability to understand the decisions we make, for the industry as a whole and for our financial reporting. We strive to be as transparent and available as possible to provide an accurate picture of Avanza. Through this dialogue and communication, and by listening to opinions, we also try to build trust among owners, potential owners and analysts. Reporting and information disclosures should reflect our progress in meeting targets and priorities, and enable thorough analysis and well-informed investment decisions.

### Suppliers & counterparties

Avanza buys goods and services from a large number of suppliers. With our most important suppliers and counterparties we maintain a continuous dialogue, primarily concerning security and data processing. There is also a code of conduct for suppliers to clarify how critical sustainability is to Avanza and the expectations we have with regard to our counterparties.

### Authorities

Avanza is in continuous dialogue with supervisory authorities, decision makers and other regulatory bodies on matters concerning the current sustainability agenda. Dialogue is held directly between us and the authorities as well as collaboratively with others in the financial industry through the various trade associations that Avanza is a member of, including the Swedish Securities Markets Association, the Swedish Investment Fund Association and the Swedish Bankers' Association.

### Sustainability analysts

In addition to traditional market research, independent ESG analysis is becoming more common. The analyses are performed by independent research firms, index providers and trading platforms such as Nasdaq. The evaluation usually combines an extensive

questionnaire with a screening of the bank's annual and sustainability report. During the year Avanza responded to around ten evaluations, questionnaires and surveys from various international and national players.

## Important for all stakeholders

Strong customer focus, user experience and availability, IT security, transparency, and innovation

### Specific among customers

Simple and smart tools & decision-making support

Easy to navigate user experience

High service level

Broad product range & product development

Low prices

### Specific among employees

Live our vision

Values-based culture

Clear communication and transparency

Good leadership

Stimulating work environment with flexibility and good development opportunities

Sustainability

Equality in the workspace

Have fun at work

### Specific among owners

Growth

Scalability and cost efficiency

Low risk taking

Performance on targets

Engaged management

Strong ownership

More about customers on pages 5–6 and 38–39

More about employees on pages 33–37

More about owners on pages 24–25

# Social sustainability

Our employees are the driving force behind our vision to create a better future for millions of people. Since the start, we have worked to reduce prices, increase transparency and promote financial literacy. Our belief is that by educating and inspiring, we give more people an opportunity to improve their financial situation and contribute to more people investing sustainably. Furthermore, we want to drive the development towards a more equal financial market.

## This section covers:

- Our employees
- Financial literacy
- Financial inclusion and gender equality

### Policy documents

- Sustainability and environmental policy
- Diversity and gender equality policy
- Recruiting policy
- Anti-discrimination and harassment policy
- Instruction on occupational health and safety policy
- Remuneration policy
- Code of Conduct
- Instruction on managing complaints
- Instruction on NPAP approvals
- Instructions on product governance

### Partnerships, memberships and networks

- Swedish National Network on Financial Education
- Ung Privatekonomi
- ECPAT Sweden
- Introduce a Girl to Engineering Day
- Women Engineering Day



# Engaged and innovative employees who are motivated to make a difference

Avanza is a company of dedicated employees driven by the vision to create a better future for millions of people. The foundation of the corporate culture is that we think what we accomplish is meaningful and important.

## A customer-centric corporate culture

Avanza was started with a simple idea – to build a company where we would want to be a customer. In the same way, we want to be a company where people thrive and want to work. Our position as a challenger and our employees' willingness to create change have shaped the culture, which is characterised by customer focus, collaboration, humility, constantly challenging ourselves to think differently and shared responsibility. We have chosen to formulate our values, or guiding principles, in four short sentences. We help a colleague to help a customer. We take responsibility. We challenge and think differently. We have fun together.

## Our employees in brief

- Average age 38
- The majority have a college or university education, usually in systems science, computer engineering, programming or business/economics
- Usually with a background in tech or finance

Employee key ratios	2024	2023	2022	2021	2020
Average no. of employees	674	654	622	560	478
of which women, %	38	38	37	36	36
Women in Group Management and managers with personnel responsibility, %	50	46	47	46	47
Average age	38	37	36	36	36
Employee turnover, %	10.5	13.1	15.3	12.0	12.6
Internal mobility, % (replaces internal movement)	25	28	32	22	32
Redundancies, no. of	13 <sup>1)</sup>	1	1 <sup>2)</sup>	–	1 <sup>3)</sup>
Recommendation rate (eNPS)	59	58	58	67	69
Leadership index	86	87	82	88	87
Occupational health and safety index	84	84	85	82	82
Engagement index	82	83	80	85	83

<sup>1)</sup> Dismantling of the editorial team at Placera in connection with entering into a new collaboration with Affärsvärlden

<sup>2)</sup> The legal consequence when an employee declines a replacement offer is redundancy due to labour shortage

<sup>3)</sup> Shutdown of office in Gothenburg



## Engaged employees who thrive and develop

We have high engagement and a high recommendation score among our employees. The main reasons why Avanza is recommended as an employer are strongly tied to our corporate culture, where we feel pride and responsibility for Avanza, our products and our offering, and that there is a sense of freedom, variation and responsibility associated with our jobs. Having employees who are strong ambassadors is valuable as an employer.

To ensure an attractive workplace and open dialogue on how we feel on our job, pulse surveys are conducted three times a year. The questions are tied to engagement, leadership and work environment, and the target is a score of 80 in each area. These areas, along with an eNPS of at least 50, are cornerstones to create a strong and engaged culture. In the 2024 surveys we scored above our target of 80 in all three areas, and reported an average eNPS of 59 (58). The response rate for our pulse surveys has been at around 90 per cent for several years, indicating a high level of reliability.

## Strong leadership creates employee engagement

The single most important reason for high employee engagement and why employees stay with an employer is leadership. All leaders at Avanza are expected to understand and take responsibility for the business, be a good communicator and ambassador, and have the skills to coach others and help them develop. Leaders are an important part of Avanza's development and success. This is why we are very thorough in management appointments and prioritise leadership development. To ensure that everyone has the skills and tools they need as leaders, training is provided on a regular basis. We have leadership programmes designed to suit various needs – from new managers to those who are senior in their roles. In addition to the leadership programmes, we offer a number of modules on

practical leadership: labour law, occupational health and safety, competence-based interviewing techniques, discrimination and harassment, salary audits and reviews, and performance reviews and feedback. We also hold annual leadership days and recurring management forums.

## An innovative environment with development opportunities

Avanza is constantly developing. Our view is that there are always things that can be improved and new products and interfaces to develop. This has given us a unique position as Sweden's leading platform for savings and investments – a platform that is not only technologically advanced but also deeply anchored in our customers' needs and wants.

Our product organisation uses an agile, solutions-focused structure. We believe that high development speed and an environment that encourages creativity and innovation are critical. Our product and platform teams are divided into various areas, e.g. securities trading, fixed income products, pensions and personalisation. The priorities in these areas are data-driven based on insights and key performance indicators tied to customer benefits and business value. There are also teams focused on scalability and efficiency. Our technology platform teams ensure that we stay on the forefront of technology and offer scalable platform solutions for performance, security and short lead times.

To promote an innovative culture and capitalise on our employees' creativeness, we hold annual hackathons, called "Brainy Days", where all employees are welcome to present new ideas outside their daily work. Many of the initiatives have become successful additions to our offering and helped to improve how we work.

Avanza's success is reliant on a combination of technological knowhow and understanding, as well as a passion for and attention to our customers' needs. We are convinced that the key to continue strengthening our position and create shareholder value is to put customers and employees first.

## We want to give our employees the best opportunities to achieve their full potential

Skills are taught on a daily basis on the job as well as through internal and external training. Helping employees to develop in their roles is important, and all employees have a personal development plan followed up three times a year through Avanza's performance reviews.

Internally, we regularly provide training where employees from various parts of the organisation teach colleagues about their speciality. In this way, all employees have an opportunity to learn our business. All employees also receive training in regulatory issues, risk management and IT security as well as internal governance and control. Certain positions require SwedSec licensing, which includes annual knowledge updates on financial services. New employees receive introductory training on Avanza's business, strategy, goals, vision and product areas, along with the role of control functions and security. All new employees also receive mandatory regulatory training. The introductory training includes Avanza's culture and values as well.

New hires in customer service start with a three-week introduction with both practical and theoretical sections, where they learn everything they need to know about Avanza as a company, our product range, savings and investments, and customer care. After this, in-depth training is provided as needed and based on years of employment.



## How we attract talent

Avanza offers secure employment and a safe workplace. The best way to create engagement and participation, we feel, is by hiring in-house rather than relying on consultants. We take an open and trusting approach to remote work, depending on the position and role. At the same time, we have a strong corporate culture and want to create a workplace where we are comfortable and want to spend time. Cooperation and communication between colleagues create the best opportunities to do a good job and strengthen the culture.

### Recruitment and employer branding strategy

Avanza's attractiveness as an employer is a key to our success. Competition for talent is fierce, especially in tech. Through corporate culture, values and the way we work, we strive to be an attractive workplace. We want to find employees with ambition and the drive to push the business forward, and that also wants to contribute to the culture.

In the competition for talent, a strong employer brand is crucial. Our work with employer branding has produced tangible results in the form of more candidates who visit our career page and apply for advertised job openings as well as higher external rankings. In Unipersum's "Attractive employers" survey, we ranked 11<sup>th</sup> (3) among business students and 19<sup>th</sup> (14) among IT students. Among those with 1–8 years of work experience, Avanza ranked 16<sup>th</sup> (11) in the Business category and an industry-best 7<sup>th</sup> (9) in IT. The long-term internal target is to rank in the top ten in all four categories. During

the year, we recruited for a limited number of positions designed for recent graduates. The focus has mainly been on attracting more senior tech personnel, which is reflected in our results. In 2024, Avanza was once again named one of Sweden's most attractive employers by Karriärföretagen.

### Succession planning and critical competence

Each manager is responsible, with support from HR, for staffing their teams and working groups with the right talent. To ensure continuity and safeguard business-critical processes, a structured mapping of critical competence is conducted each year. To facilitate a smooth transition when employees in senior positions move on to other roles, internal candidates are also identified as part of succession planning.

### Low employee turnover

Employee turnover at Avanza was 10.5 per cent in 2024. The target is to be between 11 and 13 per cent.

A successful recruiting process has a direct impact on employee turnover. HR supports recruiting managers to ensure that the right people are hired in terms of expectations and development potential, and that candidates have the right skills and fit into the culture. We also closely monitor internal mobility and strategic recruiting needs. Our culture and values are strong benefits that help us succeed in attracting and retaining employees.

Salary data	2024	2023	2022	2021	2020
Women's salary as a proportion of men's salary	89	91			
Group Management (excluding CEO), %	87	87	84	82	91
Managers (excluding Group Management), %	101	102	103	101	103
Senior specialists (excluding Group Management), %	99	99	100	102	102
Other employees, %	89	92	90	94	94
Median salary, men, SEK <sup>1)</sup>	57,000	55,000	53,600	49,800	47,000
Median salary, women, SEK <sup>1)</sup>	50,500	50,000	47,000	48,000	46,000

<sup>1)</sup> There are more women hired in positions with a lower Global Grade, i.e. complexity in the work, which is lowering the median salary for women.

### Remuneration and ensuring equal pay

Avanza pays fixed remuneration, with the exception of a few employees in Corporate Finance and Brokerage, who also have the opportunity to receive variable remuneration. The CEO or the Board of Directors decide on variable remuneration. Avanza works continuously to ensure equal pay, including through position evaluations used in connection with new hires and internal mobility. HR is involved to ensure a fair, equal and quality-assured payroll process. The annual salary audit covers current conditions, an analysis of proposed wage adjustments during the audit and a summary of the final outcome. Differences based on subjective grounds are investigated before the audit is approved. In Sweden, a wage mark is set by the unions, which serves as an overarching salary benchmark for the Swedish labour market, as for Avanza. The bargaining process for 2025 is still ongoing, but the total salary adjustments at Avanza are estimated at 4 per cent.

Avanza also offers warrant programmes with the opportunity for all permanent employees to become shareholders of the company.

#### Benefits<sup>1)</sup>

Group insurance <sup>2)</sup>	For everyone
Occupational health care	Work related injuries
Crisis management support	For everyone
Parental leave with salary over and above compensation from the Swedish Social Insurance Agency <sup>3)</sup>	For everyone
Occupational pension	For everyone > 25 years
Warrant programme	For everyone
Health insurance	For Group Management

<sup>1)</sup> Reported KPIs refer to permanent employees. In addition, we have a large number of fixed-term employees to staff areas of the business. The part-time employees are mainly students who work extra. They are also a natural and productive recruiting base for Avanza.

<sup>2)</sup> Comprises life, health and disability, and child insurance.

<sup>3)</sup> In addition to compensation for parental leave of up to 18 months, the public social insurance system in Sweden provides compensation for care of close relatives, sick leave and care of a sick child.

## Differences contribute to a better corporate culture

At Avanza, we welcome you as you are. We have an open and inclusive corporate culture where diversity is welcomed and contributes to an equal workplace free from harassment, as stated in the diversity policy. The CEO has overarching responsibility for the work with diversity and gender equality, which is addressed systematically through documentation and mapping, analyses, active measures, evaluations and monitoring.

Avanza's diversity plan clarifies how we work strategically to ensure diversity. We have an unbiased and quality-assured recruitment process and all ads for open positions are formulated from a diversity perspective to avoid discrimination and attract candidates with a range of qualifications. Reference checks are digital, structured and standardised to eliminate cognitive bias, subjectivity and gut instinct. Personal letters have been replaced by skills-based screening questions, and in the recruiting system, candidates can be anonymised. We regularly offer managers internal training on competence-based and unbiased recruiting.

In an inclusive and transparent culture, it is also a matter of course to maintain contact with employees on parental leave, so that they are kept informed and are part of the team to the extent they want to be. They also have the opportunity to apply for open positions and participate in our activities while on leave.

Assembling the right teams with a good group dynamic is an important management responsibility and a natural component of long-term HR management. In recruiting for senior management, gender equality is an important parameter. We also monitor gender differences in sick leave. Our annual pulse survey on work envi-

ronment includes a number of questions where we systematically monitor gender equality, diversity and any instances of discrimination. The results are followed up by senior management and HR, and every manager is responsible for reviewing their team's results. Our goal is to achieve gender parity in management and for our staff as a whole. The Allbright Report listing Sweden's most equal companies ranks Avanza on its Yellow List 2024 because Group Management consisted of more women than men when the survey was conducted. Women are underrepresented in IT/Tech and we work actively to broaden the range of candidates we recruit. By participating in various events and activities such as WEday (Women Engineering day) and IGEDay (Introduce a Girl to Engineering day), Avanza plays a role in getting young women interested in engineering.

## A positive work environment is critical for high engagement among employees

Avanza has an occupational health and safety committee of representatives from both the employer and employees who work together to improve the work environment. Action plans and routines are in place to manage incidents that can affect our employees, including cases of discrimination and harassment. During the year, we have not had any whistleblowing incidents related to discrimination and harassment.

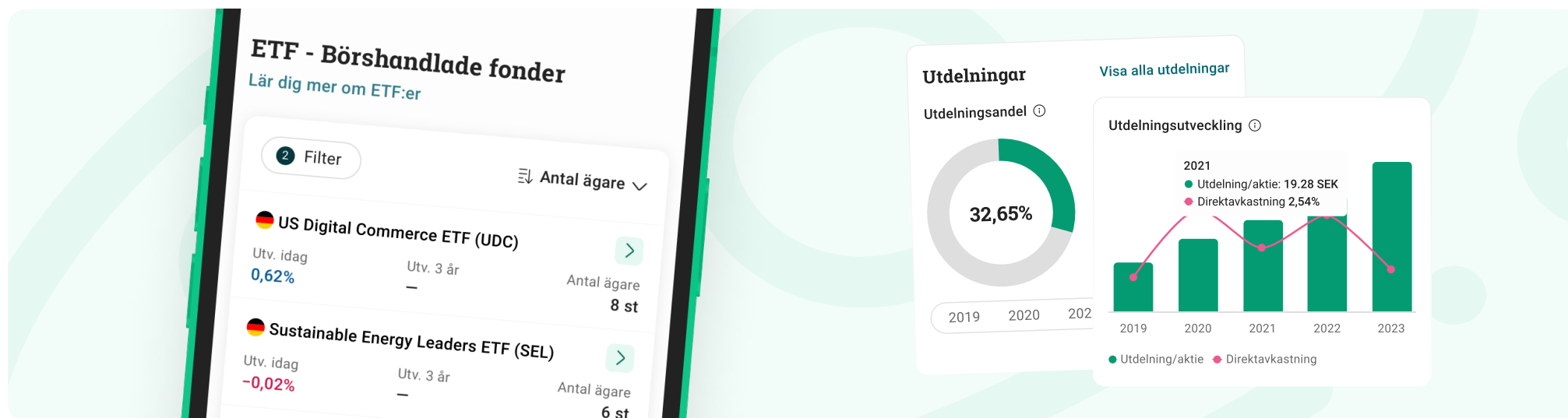
We continuously monitor sick leave absences, both short and long term as well as at a functional level, to ensure that we proactively identify any needs. To promote a work-life balance, wellness allowances are offered along with activities through our sports

club, with everything from lunchtime yoga to various group exercise and running.

Having fun and taking part in activities together contributes to the culture. A padel tennis tournament and golf tournament are arranged each year. There is a choir and a band that often plays at various internal events. Interest in savings and investments is an important part of the culture. Once a month, in connection with paydays, our savings economist arranges a meeting at the office where all employees who want, and have the opportunity to, meet to discuss savings and what is happening in the stock market. There is also an internal initiative to encourage women to save, "Mind the gap", which has created great engagement with activities among our employees.

Avanza offers parental benefits, crisis management assistance, and health and rehabilitation insurance. We also provide professional support to managers to proactively communicate with employees who need help with any form of addiction. A work-life balance is important and requires managers with the skills and ability to develop and create a positive work environment.

Avanza supports the rights of its employees to unionise and collectively bargain. We believe at the same time in the abilities and involvement of the individual and have chosen not to enter into collective agreements. The HR unit has a high level of competence and experience in labour law and union negotiations, along with sophisticated procedures and processes to comply with current laws. Avanza stays up to date on the terms of relevant collective agreements to ensure that we offer comparable terms.



Employee key ratios <sup>1)</sup>	2024	2023	2022 <sup>2)</sup>	2021 <sup>2)</sup>	2020 <sup>2)</sup>
Average no. of employees	674	654	622	560	478
of which no. of fixed-term employees	6	7	6	7	14
of which women, %	38	38	37	36	36
of which 0–29 years, %	17	19	20	23	22
of which 30–50 years, %	72	71	70	69	73
of which 51–years, %	11	10	10	8	5
Average no. of employees within IT	231	214	209	184	148
of which women, %	19	20	20	22	21
of which managers, %	10	8	8	8	9
of which female managers, %	48	44	44	47	49
Average no. of full-time employees	651	637	603	525	439
of which women, %	38	38	37	36	35
No. of recruitments	93	104	115	137	126
of which women, %	32	44	44	39	42
of which 0–29 years, %	30	29	33	42	46
of which 30–50 years, %	61	66	58	53	51
of which 51–years, %	9	5	9	6	3
No. of completed employments	70	87	92	65	60
of which women, %	31	36	42	43	43
of which 0–29 years, %	16	26	35	38	42
of which 30–50 years, %	71	63	62	55	55
of which 51–years, %	13	11	3	6	2
Sickness absence, % <sup>3)</sup>	2.4	2.6	3.5	3.3	2.5
of which women, %	2.3	3.3	3.6	3.6	4.4
of which men, %	2.5	2.2	3.5	3.2	1.1
Average no. of parental leave	29	34	34	22	13
of which women, %	39	43	42	43	42

Continued in the right column

Continuation from the left column

Employee key ratios <sup>1)</sup>	2024	2023	2022 <sup>2)</sup>	2021 <sup>2)</sup>	2020 <sup>2)</sup>
No. of directors at the Board	9	10	9	9	9
of which women, %	44	40	44	22	22
of which 0–29 years, %	–	0	0	0	0
of which 30–50 years, %	56	50	56	44	44
of which 51–years, %	44	50	44	56	56
No. of employees in Group Management	10	9	10	9	9
of which women, %	50	56	50	44	44
of which 0–29 years, %	–	0	0	0	0
of which 30–50 years, %	30	44	60	44	56
of which 51–years, %	70	56	40	56	44
No. of managers	87	82	81	70	65
of which women, %	52	46	47	46	49
of which 0–29 years, %	1	1	1	3	2
of which 30–50 years, %	71	75	74	79	86
of which 51–years, %	28	24	25	19	12
Distribution of employment level					
Employees in entry and mid-level positions, %	91	89	89	90	89
of which women, %	37	37	37	35	34
Employees in senior and executive positions	9	11	11	10	11
of which women, %	52	49	47	46	48

<sup>1)</sup> Refers to permanent employees, hourly employees excluded. Of the Group's total number of employees, 16 per cent are paid on an hourly basis, 1 per cent are fixed-term employees and 0 per cent are temporary positions.

<sup>2)</sup> Age intervals are calculated based on the ranges 0–29 years, 30–49 years, and 50+ years for periods before 2023.

<sup>3)</sup> Avanza has chosen to only report sickness absence, since accidents and injuries are not relevant to our type of working environment. Sickness absence is calculated in relation to normal working hours.

# Financial literacy and responsible guidance

Since the start, Avanza has worked to reduce prices and increase transparency in the financial market and to promote financial literacy. Our belief is that through responsible products and terms, user-friendly tools, and by educating and inspiring, we help more people become financially independent.

## Financial literacy

Individuals today are expected to take a great personal responsibility for their finances. Raising awareness and understanding of personal finance is therefore growing in importance. In a report from 2023, the Swedish FSA notes that while financial skills in general are high in Sweden, one out of four adults lacks basic math skills or an understanding of risk diversification and socioeconomic connections. Nearly one third are also worried about their finances.

Avanza contributes to financial literacy in society. By providing education on personal finance, savings and investments, as well as advocating for change and challenging established structures that do not benefit savers, we want to create opportunities for more people to build financial independence.

## Activities during the year

We work daily to teach financial skills to the public. By providing free and open education on savings and investments, we make it possible for anyone to learn how to become more financially independent and build a secure future. Our savings economists bring issues involving savings, investments and personal finance to the media's attention and make these questions become part of the public debate. In addition, many Avanza employees with specialised expertise are invited to contribute to our various channels. On the site, we educate and inspire in among other ways through the Avanza Academy, the Avanza blog and the Avanza podcast.

The Avanza Academy serves as a how-to savings guide containing basic knowledge about financial concepts, terms and trends as well as timeless information to guide our customers on what to consider when choosing stocks, funds and other securities, as well as how to build various types of portfolios. There are also answers to questions on taxes, mortgages, cryptocurrencies and sustainable savings.

In the Avanza blog and the Avanza podcast we blend in-depth information with basics for beginners. The content changes based on what is happening at the moment in order to build a broader understanding of what to think about when economic conditions change. Novelty and variation in the content keep us relevant for every level of knowledge, whether active investors or new savers.

We always strive to be as close to our customers as possible, why we maintain an active presence on social media. We communicate daily with customers via X, Facebook, Instagram, YouTube and TikTok. On Instagram, we have 106,000 followers and work extensively with educational material, both images and videos. To maximise the impact of our content, we publish summaries of selected blog posts with channel-specific graphics and text. We also publish interactive quizzes and Q&As to strengthen the relationship with our followers. We have also increased the video content on our social media channels by publishing short clips from our YouTube channel mainly on Instagram and TikTok. Activity on X, where Avanza has over 65,000 followers, is high and in 2024 we responded to nearly 4,500 messages on Avanza's official account. Including our other social media, we responded to over 7,500 messages from our official accounts. On top of this, our savings economists and other employees also interact with our customers through their social media.

Avanza is a member of the programme board of the National Network on Financial Education, which is coordinated by the Swedish FSA to spread financial literacy through various information and educational activities. In December, we also decided to become a head sponsor for Ung Privatekonom, which is an organisation that works to inspire and educate Swedish high school students in private economy and savings.

## Financial inclusion and gender equality

Contributing to gender equality in savings is central to Avanza, and increased gender equality in the savings capital is one of our overarching targets. We work actively to reach out to broader target groups and to encourage women to save. While stock ownership among women is increasing, 6 out of 10 shareholders in Sweden are still men, according to Euroclear. These differences are also evident at Avanza. In 2024, women's monthly savings was 25 per cent lower than men's and the savings gap<sup>1)</sup> was on average SEK 670. Women's total savings capital was 45 per cent lower than men's and the capital gap<sup>1)</sup> was on average SEK 207,000. Also, survey's show that women have lower confidence when it comes to investments.

Mentions of our spokespersons in media

1,102

Views on the Avanza Academy

1,868,588

Views on the Avanza blog

4,343,201

Streams of the Avanza podcast

1,132,403

<sup>1)</sup> The savings gap refers the difference between men's and women's recurring monthly savings

<sup>2)</sup> The capital gap refers to the difference in total savings capital between men and women



### Activities during the year

We have increased our focus on creating content on TikTok, since it is a channel where women are overrepresented. Internally, we have expanded our analysis of gender-based data to better understand different needs and adapt our products, services and communication to meet them. We have also worked with analysis of savings habits by gender to identify and communicate differences, hopefully encouraging people to reflect – and in the long run, change. Twice in 2024, Avanza arranged financial webinars for women that were broadcast live, one for beginners and one for more experienced savers. Both broadcasts were seen by over 1,000 participants live and has been viewed around 5,000 times since.

During the year, we also partnered with Economista and contributed regularly to the community's Facebook group with over 135,000 women interested in personal finance. We have also participated in several of Feminvest's events for female entrepreneurs and investors to focus attention on savings issues and female ownership. Another initiative to encourage women to invest is our participation in the #honinvesterar event arranged by DNB.

We have published educational content on the importance of economic independence and on relationship economics in general through social media and blog posts. We also work with the issue by adapting marketing, content and education to suit and attract more people.

Equality data	2024	2023	2022
Women's share of the savings capital, %	26	26	25
Share of women of the customer base, %	39	39	38
Share of women among new customers, %	45	44	42

### Products and services available to all

We are working to create a better future for millions of people and want to make our products and services available to as many as possible. The Act on Accessibility to Digital Public Services takes effect in June 2025 for certain products and services and we are devoting great energy to ensure that everyone, regardless of circumstances, can make well-informed financial decisions. To achieve this, we have a working group to actively develop guidelines and provide our employees with accessibility training. The group focuses among other things on:

- Guidelines, standards and tools to create accessible interfaces
- Understanding how users with disabilities navigate online
- Industry best practices

We continuously adapt our user interfaces so that everyone, including individuals with visual, motor or cognitive impairments, should easily be able to use our products and services.

### Product development to simplify and improve

The goal of Avanza's offering is to get more people to feel smart, engaged and educated about their personal finances and savings. An important and obvious aspect of product development is to respond to our customers' wishes and try to meet them. This also gives us new perspectives. Our belief is that we create the most value for our customers by concentrating our business and development in areas where we are, or can be, the best. The savings market is constantly changing, and we operate under the assumption that there is always something we can do better – we are never done. Following is a sample of improvements made during the year.

To improve the experience of more active customers, we have added the option to activate news alerts and receive notifications directly by mobile phone. The stop loss feature was improved and a new, easier-to-navigate list of options and futures was launched. By trading through Nasdaq's Nordic@Mid Darkpool, customers can now take advantage of the benefits of market anonymity and trade larger volumes without affecting the share price. Advanced ordering options were expanded with algorithmic ordering, TWAP and VWAP. A separate analysis tab with more report data and historical performance indicators was added, along with access to advanced technical analysis via TradingView's charting platform. Additionally, market data was improved for exchange traded funds through a new supplier, which means better quality and an even broader range. A new fund marketplace with non-listed assets was launched for Private Banking customers. Furthermore, Private Banking and Pro customers can now have stocks in their pension account while it is under payout. Additionally, the media website Placera was re-launched in an exclusive collaboration with Affärsvärlden to meet customer demand for more decision support.

On the theme of internal efficiency, existing corporate customers can now apply for endowment insurance without any manual processing, providing a more convenient customer experience at the same time that manual steps and internal involvement are reduced and the risk of errors is minimised. The status of mortgage applications is continuously updated, which improves the customer experience and reduces the workload for customer service. Amortisation amounts and autogiro payments for Private Banking mortgages can also be changed digitally, which previously required a printed form. Additionally, the first AI application was launched to compile the many comments and suggestions submitted by customers through the "Feedback buddy" feature.

The external mortgage offering through Landshypotek was expanded to include loans for condominiums with loan-to-value ratios of up to 75 per cent. In keeping with tradition, "Your 2024" was launched to provide customers with a summary of their savings and performance in relation to indices and the average Avanza

customer. The feature also contains information and insight into market fluctuations, risk diversification and the importance of thinking long term. The search feature was improved to provide more relevant results, and several smart new features were added to the account pages for a more personalised experience. There were also a number of improvements made to help customers start saving.

A page on [avanza.se](https://www.avanza.se) provides updated information on product news to make it easier to follow all of our launches.

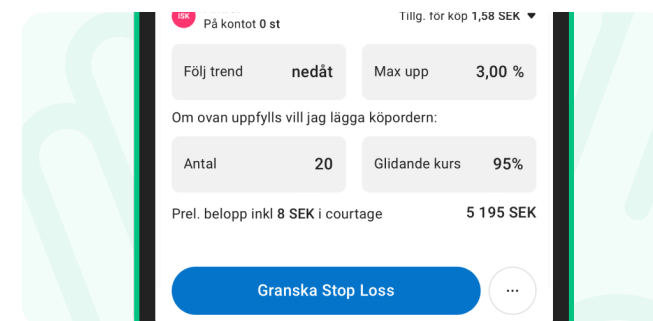
### Cheaper offers to fulfill our customer promise

Fees are critical to performance and we want the barriers to entry for savings to be low. Avanza does not charge fixed fees. This also applies to occupational pensions. The price list is based on the customer's level of activity and amount of capital in order to benefit each individual customer. To help more people start saving, Avanza has since 2016 a Start offer with free stock trading on the Stockholm Stock Exchange, and since 2021 funds are included as well. Start is available to customers with savings capital of less than SEK 50,000. In connection with our 25<sup>th</sup> anniversary in December, customers were offered free international trading for one day.

The interest rate on our own savings account was 2.25 per cent as of 31 December. While we also paid interest on savings in other accounts before rate cuts began accelerating during the year, that now applies only to our more active trading customers.

The terms of our internally financed mortgage are directly tied to the Riksbank's policy rate. Despite this, we waived one of the hikes at the beginning of the year, and our offering is among the most attractive in the country. Our external mortgage partners are also offering attractive rates.

Endowment insurance customers can earn a higher return by lending of their shares via Morgan Stanley. When this happens, the customer earns money. Stock lending customers received a total of just under SEK 57 million for 2024.



# Environmental sustainability

As a financial company, we play a key role in the fight against climate change through our indirect impact. We see this as an opportunity to make a difference. A central part of our climate work is actively supporting our customers in making sustainable choices and investing in future solutions. By offering green and responsible investments we contribute to a more sustainable world.

## This section covers

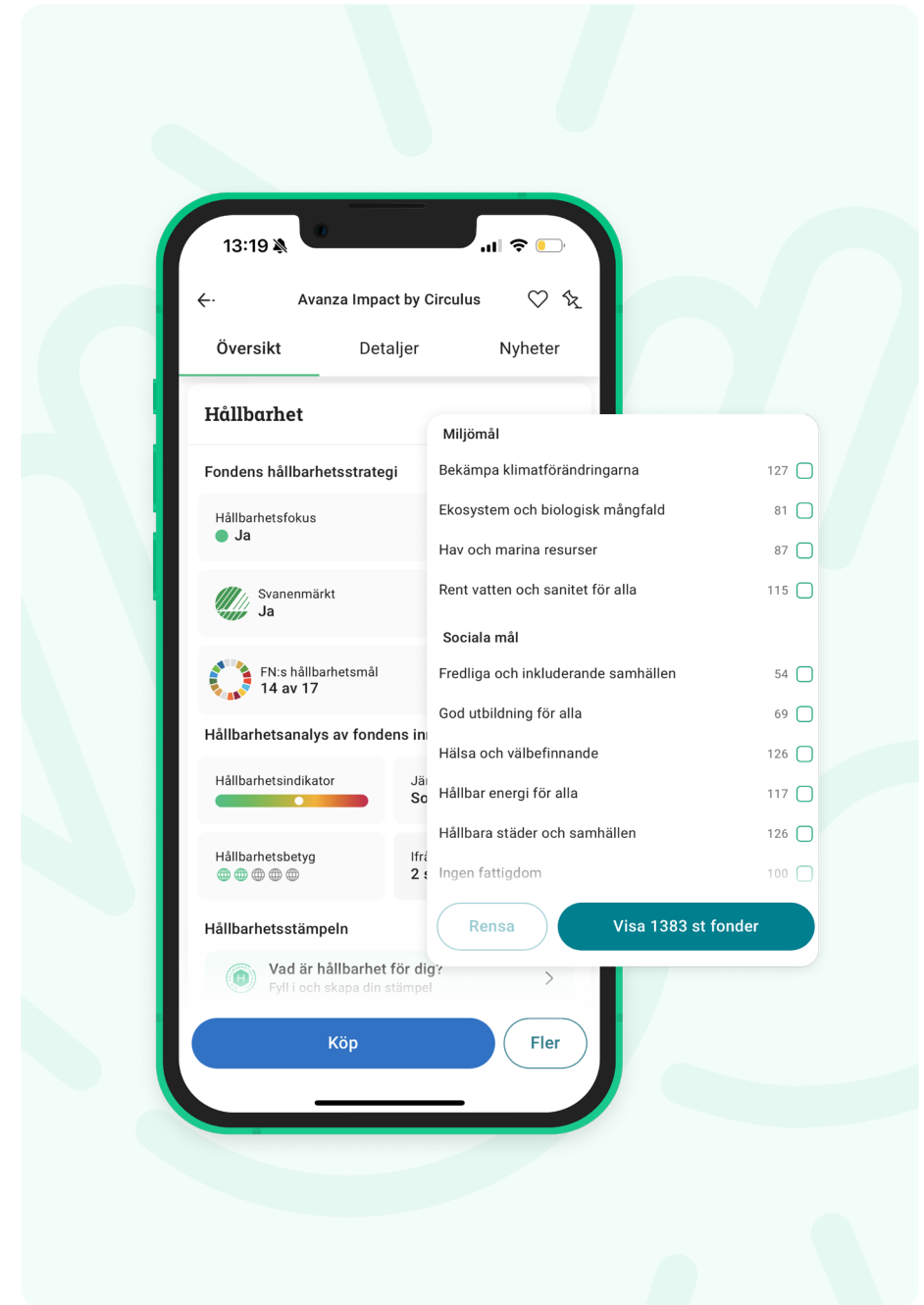
- Limiting climate change
- Sustainable investments
- TCFD reporting
- Taxonomy

### Policy documents

- Sustainability and environmental policy
- Supplier Code of Conduct
- Instruction on responsible investments

### Partnerships, memberships and networks

- Science Based Targets Initiative
- UN Principles for Responsible Investments (Avanza Fonder)



# We work to limit our climate impact

The financial industry, with its ability to steer capital, has a key role to play in the transition to a sustainable economy. As a responsible bank, we work in line with the Paris Agreement to minimise direct and indirect emissions tied to our operations.

## Minimise environmental and climate impacts

Climate change is one of the greatest challenges of our time. In line with the Paris Agreement, we are working to limit and adapt our negative impact on the climate and to achieve net zero emissions by 2045 at the latest. To ensure we reach our long-term emission reduction target, we have joined the Business Ambition for 1.5°C and set interim Science Based Targets (SBTs). These targets were validated by the Science Based Targets initiative (SBTi) in November 2023.

We focus on measuring the most significant emissions in our value chain while also working on our transition. Our transition strategy will be further developed in 2025. As a financial company, our indirect impact on the climate is assessed the biggest. A key aspect of our work with climate issues is therefore to actively support our customers to make sustainable investment decisions. For investments made through our platform, we want to inspire sustainable choices and offer decision support that enables customers to factor climate aspects into their decision making. Read more about this on page 43.

## Climate impact in Avanza Fonder

The fund company has established a target that 65 per cent of the capital in funds that directly invest in shares will come from companies with their own SBTs by 2027 and 75 per cent by 2030.

Avanza Fonder	2024	2023	2022	Baseline year 2021
Total fund capital, SEK m	145,500	106,900	77,700	82,000
Share of fund capital subject to the target, %	70	45	45	49
Share of capital invested in companies with own SBTs, %	62	60	51	46

## Measures

In 2024, the fund company contacted selected companies that had not yet established their own SBTs to encourage them to do so. Moreover, we exclude companies with significant revenue from

extraction or production of fossil fuels from all Article 8 and Article 9 funds. During the year, the fund company made changes to the comparative indices for three index funds that account for a significant share of the assets under management. As a result, the funds' management will be based on a Paris Aligned Benchmark Index going forward and their investments will align with the targets in the Paris Agreement.

## Our own environmental and climate impacts

Avanza is a resource-efficient organisation and our direct environmental impact is low. The head office is our only physical office and our business model means that we maintain contact with customers digitally or by phone. The aim is to reduce our direct emissions by 50 per cent by 2030 and run our office on 100 per cent renewable energy. As far as possible, we source renewable energy for our server rooms.

Climate-related target (SBT): Reduce Avanza's Scope 2 by 50% by 2030	2024	2023	2022	Baseline year 2021
Scope 2, tonnes CO <sub>2</sub> , location based	23	31	24	32
Energy-related target (SBT): Power Avanza's office with 100% renewable energy	2024	2023	2022	Baseline year 2021
Share of renewable energy, %	100	100	100	100

## Measures

Internal environmental work is continuously improved to minimise our environmental impact and reach our targets. We aim to further improve resource efficiency and recycling and to take environmental impacts into account in our procurement and travel. We also aim to reduce water consumption and to sort and recycle waste.

Waste, kg	2024	2023	2022	2021
<b>Combustible</b>				
Household waste	46,920 <sup>1)</sup>	45,126 <sup>1)</sup>	11,220	23,550
<b>Recycled</b>				
Paper	12,528	8,256	17,318	19,020
Paper, confidential	5,100	3,257	–	–
Plastics	1,922	1,542	3,489	450
Glass	3,458	1,922	1,472	570
Metal	148	173	138	360
Electronics	180	478	927	570
Bulc waste	3,524	4,758	7,916	–

<sup>1)</sup> Estimate since Stockholm Vatten och Avfall no longer weighs the waste.

Water consumption	2024	2023	2022	2021
Water consumption, m <sup>3</sup>	1,966	1,856	1,681	1,068

## Reuse and recycling of IT equipment

To promote a circular economy and resource efficiency, we resold old IT equipment such as computers, laptops and monitors in 2024; 96 per cent was in good enough condition to be reused, while 4 per cent was recycled.

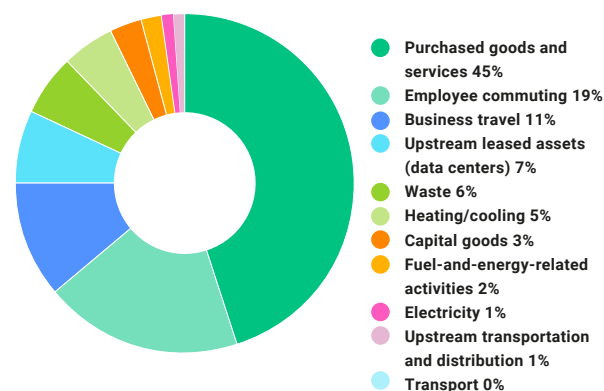
## Supply chain

Climate and environmental aspects are important to our supplier evaluations. Through our supplier code of conduct, we among other things strongly encourage suppliers to set science-based climate targets. We are further developing our counterparty and supplier assessment of sustainability issues. In 2025, we will also further measure emissions related to sourced products and services and set emission reduction targets connected to these.

### Emissions by Scope according to GHG Protocol, tonnes CO<sub>2</sub>e

We annually report our greenhouse gas emissions according to Greenhouse Gas (GHG) Protocol. To calculate our greenhouse gas emissions, we use conversion factors that include all relevant greenhouse gases as far as possible, i.e. carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), and perfluorocarbons (PFCs).

For 2024, our total emissions amounted to 397 tonnes CO<sub>2</sub>e (494).



### Climate finance

Avanza contributes to a sustainable future by supporting effective climate solutions beyond our own value chain. Since 2019, we have offset our emissions by purchasing highly rated carbon credits. Avanza has committed to offsetting Scope 1 and 2 emissions as well as business travel. Since 2023, we have collaborated with Milkywire to reinvest this money in effective climate solutions through their Climate Transformation Fund. The fund has three central areas: carbon capture and storage, nature conservation and restoration, and decarbonisation. In 2023 and 2024, together with other companies, we helped to finance over 43 projects worldwide through the fund, which drives technological innovation and has positive impacts on biodiversity and local communities.

Emissions by Scope according to GHG Protocol, tonnes CO <sub>2</sub> e <sup>1)</sup>	2024	2023	2022	2021
<b>Scope 1</b>				
Transport	0	0	0	0
<b>Total Scope 1</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Scope 2</b>				
Electricity	4	4	4	5
Heating/cooling	19	27	20	27
<b>Total Scope 2, location based</b>	<b>23</b>	<b>31</b>	<b>24</b>	<b>32</b>
<b>Scope 2</b>				
Electricity	–	–	–	–
Heating/cooling	19	27	20	27
<b>Total Scope 2, market based</b>	<b>19</b>	<b>27</b>	<b>20</b>	<b>27</b>
<b>Scope 3</b>				
Purchased goods and services <sup>2)</sup>	180	98	115	358
Capital goods <sup>3)</sup>	12	229	31	70
Fuel-and-energy related activities	7	7	6	7
Upstream transportation and distribution	5	2	10	47
Waste	23	27	6	12
Business travel	45	15	38	5
Employee commuting	76	73	70	67
Upstream leased assets (data centers)	26	12	–	–
<b>Total Scope 3</b>	<b>374</b>	<b>463</b>	<b>276</b>	<b>566</b>
<b>Total Scope 1, 2 &amp; 3, location based</b>	<b>397</b>	<b>494</b>	<b>300</b>	<b>598</b>
<b>Total Scope 1, 2 &amp; 3, market based</b>	<b>393</b>	<b>490</b>	<b>296</b>	<b>593</b>
<b>Avanza's energy consumption, MWh (location based)</b>	<b>2024</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>
Electricity	310	323	369	379
Whereof renewable, %	70	84	84	75
District heating	553	678	693	642
Whereof renewable, %	80	72	82	86
Whereof renewable or recycled energy, %	97	97	97	98
<b>Total</b>	<b>863</b>	<b>1 001</b>	<b>1 062</b>	<b>1 021</b>
<b>Avanza's energy consumption, MWh (market based)</b>	<b>2024</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>
Share of renewable electricity	100%	100%	100%	100%

<sup>1)</sup> Certain comparables for 2022 have been adjusted from the previous year's annual report due to changes in the methodology used to calculate emissions.

<sup>2)</sup> A portion of the Group's purchases, such as laptops, monitors, keyboards, mobile phones and office supplies, is recognised in the category.

<sup>3)</sup> Capital goods refer to purchases of office equipment.

## Sustainable investments

The financial industry, through its ability to steer capital to sustainable businesses, plays a key role in achieving the Sustainable Development Goals and the Paris Agreement’s climate targets. We want Avanza to be the obvious choice for those who want to invest sustainably and we are convinced that investments in responsible and sustainable business models will generate the highest returns over time.

Avanza does not offer advice. Customers make all the investment decisions and consequently, we do not control how customers choose to invest. Our job is to inspire and make it easy to find sustainable products to invest in. This requires that our fund range can be analysed based on sustainability criteria, and over the years we have developed and implemented a number of tools and made sustainability data available on the platform. Our fund company, Avanza Fonder, is the only part of the Group with its own capital management and which can integrate sustainability in its investment decisions.

### Sustainability on the platform

We want to enable more customers to save sustainably by providing a wide range of sustainable investment alternatives, as well as by facilitating and simplifying sustainable choices through tools, decision support and education.

### Demands on fund companies on the platform

We offer nearly 1,400 funds. The fund management companies periodically undergo due diligence where each company’s sustainability work is analysed. The fund companies on our platform must sign the Principles for Responsible Investments (PRI) and, in line with PRI’s guidelines, work to integrate sustainability issues in their investment and decision-making processes. We also continuously monitor that the fund companies have a sustainability strategy and take concrete action to reduce sustainability-related risks.

### Decision support to facilitate sustainable choices

We want to facilitate our customers’ transition to a more sustainable economy by inspiring and simplifying sustainable choices. We do so through tools and decision support that enable customers to adapt their choices based on their personal sustainability preferences. Examples include:

- **Filters** make it possible to identify funds based on whether their investments align with the SDGs or whether it is an Article 9 or 8 fund according to the EU’s Disclosure Regulation.
- **ESG Score** is a visualisation tool in the fund list where customers can clearly and easily compare funds. Scores are on a scale of 0–100, where a lower number means a lower sustainability

risk. The score a fund receives depends on whether it invests in companies that embrace sustainability and report their ESG work. The analytics firm Sustainalytics provides the company analyses and Morningstar then calculates an aggregate score for the fund.

- **Morningstar’s Sustainability Globes** are displayed on the platform and can be used to evaluate how the holdings in a fund manage ESG risks relative to other funds in the same global category.
- **Nordic Swan ecolabel** is displayed on the platform for funds that qualify. At year-end, there were 13 funds on Avanza’s platform with the Nordic Swan ecolabel.
- **Fund portfolio analysis** is a tool where customers can analyse their existing fund holdings by sector and individual holding, as well as how the fund companies work with ESG issues.
- **KPI’s associated with sustainability on the stock pages** simplify sustainable investment decisions on stocks. There is information on whether the companies have revenues from economic activities that contribute to the SDGs and whether the company has revenues from controversial industries. There is also sustainability data on how far the companies have come in terms of gender equality of their boards, management and workforce in general.

### Activities during the year

The sustainability area is constantly evolving, not least in terms of data quality and comparability. We continuously look for ways to improve sustainability data on the platform and further support our customers in their investment decisions and increase transparency. We also want educate on sustainable investments and build interest and engagement in the issues. On the platform and in the blogs and Avanza Academy there are sections on saving sustainably.

### Distribution of capital on the platform

At year-end, 3 per cent (3) of the total fund of volume on Avanza’s platform was invested in Article 9 funds according to the EU’s Sustainable Finance Disclosure Regulation; 84 per cent (72) was invested in Article 8 funds.

No. Sustainability Globes	0	1	2	3	4	5
Share of fund capital, %	3	2	22	33	21	19

### Article 9 funds

Funds that have sustainable investments or reduced carbon emissions as a stated objective.

### Article 8 funds

Funds where the investments promote environmental or social objectives.

### Nordic Swan ecolabel

The official ecolabel of the Nordic countries which ensures that a fund is committed to working with sustainability. The Swan is established by the government as an unaffiliated nonprofit.

### Morningstar’s Sustainability Globes

Based on analyses by Sustainalytics and illustrate the funds’ sustainability ratings on a score of 1–5 “globes”, which measure how well companies and other holdings in the fund’s portfolio manage risks associated with the environment, labour conditions and ownership matters (ESG) relative to other funds in the same category. Five globes is the highest sustainability rating and means the lowest sustainability risk.

### Responsible investments in our fund company

Avanza Fonder’s goal is to be a responsible investor and support businesses and initiatives that make the world more sustainable. The fund company takes into account sustainability risks and the investments’ negative consequences for sustainable development. The fund company has signed PRI, the UN’s responsible investment initiative. This means that it has committed to incorporating environmental, social and governance aspects in its investments.

Avanza Fonder manages a total of 23 funds with diverse management strategies and investment approaches. Of these funds, 19 are classified as Article 8 in accordance with the Disclosure Regulation. Two of the funds are classified as Article 9. One of them also has the Nordic Swan label and therefore meets the stringent requirements for Nordic Swan funds.

To limit the investments’ negative impact on sustainability factors, as well as sustainability risks as a whole, and to contribute to more sustainable development while creating better opportunities for higher fund returns, Avanza Fonder utilises the Opt-in, Opt-out and Impact methods. The method, or combination of methods, that is applied to mitigate and limit sustainability risks and the impact on

sustainability factors varies depending on the fund's management approach, which asset classes it invests in and which specific strategy for responsible investments that the fund applies.

#### **Opt-in**

Avanza Fonder seeks to invest in – opt-in – companies and financial products that promote sustainable development.

#### **Opt-out**

All Article 8 and 9 funds exclude companies whose products and services are likely to cause significant negative consequences for sustainability factors and significant sustainability risks. The exclusions can take various forms depending on the specific fund's character, but on an overarching level include companies that are involved in controversial businesses which are considered to have especially high sustainability risks as well as companies that violate international norms and conventions. To limit sustainability risks as well as the negative impacts on climate change, the environment, people and society, the fund company opts out of certain investments based on established criteria, where at a minimum businesses associated with the following products and services will be avoided:

- Companies with revenue from controversial weapons
- Companies with revenue from nuclear weapons
- Companies that generate over 5 per cent of their revenue from tobacco, gambling, pornography and fossil fuels (coal, oil and gas, and at a minimum thermal coal as well as unconventional oil and gas)
- Companies that fail to comply with the UN Global Compact and the OECD Guidelines for Multinational Enterprises and at least companies that are not considered to be taking action to address identified problems

In 2024, the fund company implemented changes in comparative indices for three funds that account a significant share of the fund company's assets under management. Because of the changes, management of the funds will be based on a Paris Aligned Benchmark Index going forward. Accordingly, these funds' investments align with the targets in the Paris Agreement.

#### **Impact through active ownership**

Avanza Fonder engage in advocacy in relation to companies that its funds are direct investors in. The focus is mainly on companies where the fund company has a large holding and the advocacy includes voting at general meetings as well as direct dialogue with managements. The fund company also dialogues with the manag-

ers of the underlying funds in Avanza Fonder's funds-of-funds. In the case of feeder funds, advocacy work is done by the fund company that manages the master fund.

### **Detailed information on climate risks based on the TCFD recommendations**

Climate change poses a risk to many parts of society and also impacts the financial sector. It is important to understand how climate change can affect Avanza's operations and our customers' savings in the short and long term. Besides the risk, there are also opportunities, where political decisions, technological advances and demand from stakeholders will have a great impact. Regulatory changes and social activism targeted at unsustainable business models could also affect Avanza's reputation.

Climate risks are usually divided into physical and transition risks. Physical risks are the risks of physical destruction due to the effects of climate change such as droughts, floods and forest fires. Transition risks are risks of negative financial consequences from society's transition to become more sustainable.

Avanza's climate and sustainability-related financial and non-financial risks are reported in accordance with the recommendations of the Task Force for Climate-related Financial Disclosures (TCFD).

#### **Governance**

Governance of climate-related risks and opportunities begins with the Board of Directors, which among other things decides on issues concerning Avanza's strategic direction, including the sustainability strategy and targets. This also includes policy documents, which together with the sustainability strategy provide the basis for Avanza's sustainability work. The CEO is responsible for day-to-day management, and to support the sustainability work the CEO has established a sustainability committee.

#### **Strategy and risk management**

Risks and opportunities have been identified in operations, as well as the potential effect they could have in the short and long term. This is part of the assessment of whether Avanza's strategy aligns with among other things the Paris Agreement. The climate- and sustainability-related risks that Avanza has identified are described below, as well as how they are assessed and managed.

#### **Climate and sustainability risks associated with the balance sheet**

On the asset side, Avanza has exposure to municipalities in the form of the municipal bonds in the company's management of sur-

plus liquidity. If a municipality incurs higher climate-related costs, thereby affecting its credit worthiness and credit spread, it could adversely impact the market value of the bonds. The exposure to municipal bonds is limited in terms of both amount (max 20 per cent) and rating (AAA/A1). The duration of the holdings is normally short and is maximised at three months on average.

Also in the credit portfolio, sustainability- and climate-related risks are considered low. The loan value in the mortgage portfolio is low and mortgage customers are usually over-collateralised. If the underlying collateral decreases significantly in value, it is captured in the annual revaluation, which can trigger an amortisation requirement. If the underlying collaterals for Avanza's mortgages are in geographically vulnerable areas, climate-related events such as recurring floods or elevated water levels could adversely impact the value of the collateral.

Avanza also has lending collateralised by securities. Transition- and climate-related risks that an issuer is exposed to through its business model could have a negative impact on the collateral's value. Furthermore, political risks and more stringent regulatory requirements could potentially have major consequences for an issuer's business model, growth and profitability, and thereby impact the value of the collateral. These are therefore taken into account in the assessment of the value of the collateral. Increased volatility triggers a re-evaluation of the LTV ratio, which if necessary is lowered for the individual issuer.

The relevant governing documents in the area are the Guidelines on liquidity and market risk management, the Instruction on liquidity and market risk management, the Guidelines on lending and the Instruction on lending.

#### **Risk that customers reduce the green investments in their portfolios**

Customers of Avanza make their own investment decisions and are therefore also responsible for their own investment risk. Avanza strives to promote green investments by providing decision support, information and inspiration, but we are not able to ultimately determine how customers choose to invest. Not having an easily accessible sustainable offering that meets the expectations of customers and other stakeholders can pose a reputational risk for Avanza. More information on the sustainability support available to customers is provided on page 43. Currently, Avanza's customers do not have large amounts invested in brown investments. The relevant policy in the area is the Sustainability and environmental policy.

**Stress tests ensure that Avanza’s strategy and business model are resilient in the event of more negative climate scenarios**

Within the framework of Avanza’s work with stress tests, the strategy and business model are challenged based on various climate scenarios. The results are reported to Group Management, the Board’s Risk, Capital and Audit Committee, and the boards of Avanza Bank Holding AB and Avanza Bank AB, and are included in the annual own risk and solvency assessment (ORSA), which the Board establishes and which is submitted to the Swedish FSA. The Paris Agreement Capital Transition Assessment (PACTA), an open platform to measure whether an investment portfolio aligns with the commitments of the Paris Agreement, is used for the stress test. With the help of PACTA, customers’ investments are categorised into climate-related sectors such as energy, oil & gas, and coal mining.

The internal capital adequacy assessment process (ICAAP) for the consolidated situation has been based on three climate- and sustainability-related scenarios inspired by the Network for Greening the Financial System (NGFS) – “Highway to Paris”, “Sudden Wakeup” and “Low Policy Ambition” – where the outcomes have been modelled between 2025–2035.

For Avanza, “Highway to Paris” is the most favourable scenario. A more climate-positive energy leads to lower energy costs and lower inflation. Major investments and political incentives to transition to a sustainable economy contribute to economic development and

benefit the stock market. As Avanza’s customers have very little exposure to assets threatened by climate change, the transition risks in the scenario are limited.

“Low Policy Ambition” is the most negative scenario. It assumes that inflation will be higher, as non-renewable energy sources have a higher average production cost than renewables, leading to higher inflation, higher market interest rates, higher risk premiums and poorer outcomes for savings capital. At the same time, Avanza’s net interest income is affected positively by higher interest rates.

Despite conservative assumptions about net inflows, credit growth and costs, Avanza remains profitable and grows under all scenarios and time horizons.

The Avanza Group has studied externally available climate scenarios and based on this, together with certain qualitative assessments, has determined how asset prices will perform in each scenario. Projected returns in each scenario have been made based both on assumptions that customers are passive and continue to hold onto the same assets as well as that customers are active and act rationally by reweighting from the four categories – Energy/ Other, Oil & Gas, Coal, and Materials production – to more sustainability categorised assets, over a five-year period. The business plan is followed to 2027 in terms of volumes, earnings and costs per transaction, and insurance capital. From 2028 and beyond, the net inflow is assumed to be zero. Revenues and expenses are held constant in line with 2027 and all generated profit is distributed to

the shareholders. This is done to avoid inflating the balance sheet and to isolate the climate effect.

The stress tests showed that the direct exposure to physical risks due to climate change was very limited. The transition to a more sustainable, fossil-free economy creates transition risks for Avanza, since our earnings are largely tied to the value of customers’ investments and how actively they trade. In both the passive and active scenarios, the stress test showed very little effect. The low exposure to directly affected industries is an important reason. Even if the analysis itself shows very little effect, sustainable assets are likely to generate fairly different returns in each scenario. While this is only marginally captured in the analysis, it is considered to have a relatively big impact on customers’ savings capital and Avanza’s earnings over the time period. The scope is highly uncertain, however. Individual customers may have a greater exposure to particular sectors, why it is important that Avanza continues to offer sustainable investment alternatives, and informs and inspires customers to make sustainable choices.

**Target and measure**

Avanza tracks a number of key performance indicators linked to our operations and sustainability work, which are based on three focus areas. For more information, see page 18.

**Private Equity** ⓘ

	<b>Nordea Sp inv - Global Privat Eq BK SEK</b>		
Global	Mid to large cap		
Utv. 1 år	Avgift	Låspanod	Minsta köp
<b>9,31%</b>	<b>3,89%</b>	<b>36 månader</b>	<b>100 000 kr</b>

	<b>Schroders SCSL Circular Economy Priv PI A Acc SEK</b>
Artikel 9	

# Reporting according to the EU Taxonomy

One of the key elements of the EU's action plan on financing sustainable growth is the EU Taxonomy (EU) 2020/852, a uniform classification system for environmentally sustainable economic activities. The Taxonomy entails information requirements at a company and product level, and its aim is to enable investors to identify environmentally sustainable investments.

## Avanza's Taxonomy reporting 2024

According to the Non-Financial Reporting Directive (NFRD), public interest entities, with more than 500 employees, since 2021 report in accordance with the Taxonomy Regulation. The disclosure requirements have been implemented gradually and for the financial year 2024 financial institutions such as Avanza must report the percentage of assets on their balance sheet that align with the EU's Taxonomy and its environmental objectives. For an economic activity to be classified as Taxonomy-aligned, it must meet all of the following criteria. It must:

- Substantially contribute to one or more of the EU's six defined environmental objectives in accordance with the EU Taxonomy
- Do no significant harm to any of the other environmental objectives
- Be carried out in compliance with certain minimum safeguards

As more detailed reporting requirements are phased in, the content of the sustainability report will gradually become more detailed and transparent, enabling investors and stakeholders to better understand and monitor Avanza's sustainable transition efforts.

## The EU Taxonomy in Avanza's business strategy and the impact on products

The vision of a better future for millions of people is the basis of Avanza's business and the foundation for our approach to sustainability. A significant part of this is the goal set by the Board of Directors to promote a net zero economy aligned with the Paris Agreement's 1.5°C target. For Avanza as a whole, this means designing products and services that enable our customers to reallocate their investments. For more information, see pages 40–45

Avanza's business model is based on customers' savings and investments, which differs from traditional banks with central lending operations. Avanza primarily serves retail customers residing in Sweden, but also has small businesses who use Avanza's platform for savings and investments. Total assets are primarily comprised of customers' deposits and consist of liquid assets waiting to be

invested in securities. Only a limited share of deposits is used for lending, where Avanza provides mortgage loans and margin lending. Margin lending means that customers can borrow against their assets to leverage their savings and is not subject to the Taxonomy. Avanza's limited corporate lending consists of portfolio lending and currently is not subject to the Taxonomy either.

Surplus liquidity, i.e. what is not lent out, is primarily invested in covered mortgage bonds, as deposits with the Riksbank or in liquid assets with systemically important Nordic banks, and to a lesser extent in bonds issued by the Swedish government and municipalities. The aim is to maintain stable liquidity while meeting regulatory requirements with the same targets. Surplus liquidity management is required because of Avanza's limited lending, and the aim is primarily to be able to react to fluctuations in customers' deposits and lending. This limits to some extent the opportunity to increase the green exposure in the portfolio, though we are working actively to increase the share of green assets.

Avanza sees the EU Taxonomy specifically as a means to identify environmentally sustainable investments and increase transparency. Transparency is a cornerstone for Avanza and our ambition is to offer decision support that enables customers to integrate ESG aspects in their investment decisions. Customers' investments are not included in Avanza's Taxonomy reporting but are an area that could have a significant impact. Avanza does not offer advice, however, and therefore has only a limited opportunity to influence customers, who make their own investment decisions. The Taxonomy is regularly evaluated to determine to what extent it can provide adequate decision support our customers. As the Taxonomy evolves, there is the potential that it could impact and lead to further development in more product areas.

## Methodology description

Avanza's Taxonomy reporting relates to the consolidated situation, which comprises Avanza Bank AB, Avanza Fonder AB and Avanza Bank Holding AB but excludes Försäkringsaktiebolaget Avanza Pension and Placera Media Stockholm AB. This conforms

to Regulation (EU) No 575/2013 of the European Parliament. The Taxonomy reporting is based on the requirements in Article 8 of the Taxonomy Regulation and complementary regulations. The Taxonomy reporting has been based on Avanza's interpretation of the regulatory requirements, and changes in the requirements and clarifications that are published are continuously monitored

Avanza mortgages are eligible for the Taxonomy, while margin lending to households is not.

Exposures to companies can be found in the credit portfolio in the form of portfolio lending primarily to sole proprietorships or limited partnerships, in lending to credit institutions and in interest-bearing securities in the treasury portfolio. The analysis of exposures to companies is done in two stages. First, it is determined whether the company is eligible for the Taxonomy based on number of employees and whether it is publicly listed. If it is eligible, it is then determined whether the company is financial. Avanza has no exposure to non-financial undertakings, but there are exposures to financial undertakings that are eligible for the Taxonomy. For financial undertakings, reported GAR has been used. Data for these companies is based on reported data in annual reports for 2023. If the exposure relates to a special purpose in the form of a green covered bond, it is assumed that the exposure is eligible for the Taxonomy and consequently finances environmentally sustainable activities.

## Substantially contribute to Climate Change Mitigation

Household exposures collateralised by residential immovable property are evaluated based on current criteria. Lending to energy class A housing is the only one that meets the technical screening criteria and is considered to contribute to climate change mitigation.

Avanza's surplus liquidity is mainly invested in covered bonds, with the Riksbank and in liquid assets with systemically important Nordic banks. In 2024, all covered bonds with environmentally related content were reviewed based on the technical screening criteria that have been published. The results showed that 10 per cent of Avanza's bonds in taxonomy relevant sectors can be classified as environmentally sustainable based on the issuers' framework, prospectus and criteria for exclusion.



### Do no significant harm to any of the other environmental objectives

Climate-related risks for the mortgage portfolio are considered low, even in cases where the underlying collateral is located in geographically vulnerable areas.

The portion of Avanza's surplus liquidity that is invested in covered green bonds is not considered to do significant harm to other environmental objectives based on the issuers' frameworks and the bond prospectuses.

### Minimum safeguards

Avanza works actively to ensure minimum safeguards in human rights, anti-corruption and bribery, taxes and fair competition.

Avanza follows the OECD's guidelines and supports fair working conditions and equal treatment. Avanza has zero tolerance for corruption and bribery and takes the necessary measures to mitigate such behaviour. To promote fair competition, unethical business methods are avoided and competitive regulations are followed. Taxes are an important part of Avanza's social responsibility, and all taxes are reported and paid in accordance with current laws. Households are exempt from the minimum safeguard criteria

### Limitations of the data

Financial undertakings that are eligible for NFRD have begun reporting their Taxonomy alignment, but there is still a great deal of uncertainty surrounding how the regulations will be interpreted

and the data that serves as a basis for the companies' reporting. The Taxonomy report for 2023 showed a variation in interpretations, and further clarification is needed to ensure uniform reporting. It should also be noted that the data that serves as a basis for the reporting has a one-year lag in terms of exposures to financial undertakings that are eligible for NFRD.

### Presentation of activities that are eligible for and potentially aligned with the Taxonomy

The following table provides explanations and assumptions behind the calculations of the economic activities that are eligible for and potentially aligned with the Taxonomy.

Reporting by exposure category	Explanation of reported gross carrying amount	Taxonomy-eligible activities	Taxonomy-aligned activities	Limitations of the data
Exposures to financial undertakings	Avanza's exposure to financial undertakings refers to the book value of loans to credit institutions as well as bonds and other interest-bearing securities issued by financial undertakings eligible for NFRD.	The reported gross carrying amount multiplied by each company's percentage of Taxonomy-eligible assets according to reported data for 2023.	Loans to companies that have reported taxonomy alignment. Green bonds that have been shown to be Taxonomy aligned	The bonds that Avanza buys are covered and issued by mortgage lenders that do not have their own Taxonomy reporting, so the calculations are based on Taxonomy data from each lender's parent company.  For 2023 financial undertakings have not reported Taxonomy alignment.  For green bonds issued by mortgage lenders there is no way to ensure that the issue proceeds finance economic activities that are fully Taxonomy aligned.
Exposures to non-financial undertakings eligible for NFRD	Avanza has no loans to undertakings eligible for NFRD and, consequently, no exposure to non-financial NFRD undertakings.  Avanza's corporate lending consists solely of loans collateralised by securities which in accordance with contractual terms may only be used for margin lending. An activity not eligible for the Taxonomy.	N/A	N/A	The assessment that Avanza does not have any exposure to NFRD undertakings is based on information from external databases. In individual cases additional information has been obtained directly from the counterparties' annual reports.
Exposures to households	The book value of loans to households collateralised by residential immovable property or securities.	Loans to households collateralised by residential immovable property.	Loans to households collateralised by energy class A residential immovable property	As an alternative to basing the calculations of Taxonomy alignment on meeting energy class A criteria, one method is to base them on the 15 per cent most energy-efficient residential properties in Sweden. However, reliable data on this is lacking at the time of reporting.  In the coming years, Avanza's risk analysis of the requirement that the properties do not harm other environmental targets will be further refined.
Exposures to local governments	Gross carrying amount is comprised of the book value of bonds issued by local governments, where the use of proceeds is known. For bonds and other interest-bearing securities issued by local governments where the use of proceeds is not known, the gross carrying amount is reported under Central governments and supranational issuers, which is not included in covered assets.	Loans to municipalities and counties where the use is known	Loans to municipalities and counties where the use is known and contributes to the EU's climate targets in accordance with the Taxonomy Regulation	Municipalities and counties do not report according to Taxonomy.  For green bonds issued by municipalities and counties there is no way to ensure that the issue proceeds finance economic activities that are fully Taxonomy aligned.

**Green Asset Ratio**

Assets that finance environmentally sustainable activities amounted to SEK 1,257 million as of 31 December, which means that the Green Asset Ratio (GAR) was 1.91 per cent. The share of assets that are Taxonomy eligible consists of mortgages and exposures to financial undertakings (surplus liquidity). Taxonomy relevant assets as a share of total assets amounted to 40 per cent at year-end. Of the Taxonomy relevant assets, green assets accounted for 4 per cent. This compares to 32 per cent and 0.2 per cent, respectively, in 2023. The increase is because a large proportion of covered bonds have been classified as green

**The Taxonomy's quantitative indicators**

- Total green asset ratio = Taxonomy-aligned exposures in relation to all covered assets
- Total covered assets = Gross carrying amount of total assets excluding exposures to central banks, central governments and supranational issuers, and regional issuers where use of the proceeds is unknown.
- Coverage ratio = Taxonomy-aligned exposures in relation to gross carrying amount of all assets

**Tables for Taxonomy reporting**

The following reporting is presented in accordance with Annex VI of the delegated regulations (EU) 2021/2178 and (EU) 2023/2486. Avanza does not offer financing to companies that are subject to NFRD, because of which the calculations of the KPIs for turnover and capex are identical. The absence of corporate financing also makes Table 2 irrelevant, so it is omitted from the reporting. Table 5 is also omitted as Avanza does not have any off-balance sheet exposures.

## Disclosures according to Annex VI - templates for the KPIs of Credit institutions

### 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation

2024		Total environmentally sustainable assets*, SEK m	KPI turnover, %	KPI CAPEX, %	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	1 257	1.91	1.91	86.73	20.68	13.27
2024		Total environmentally sustainable activities, SEK m	KPI turnover, %	KPI CAPEX, %	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	8	0.04	0.04	24.37	1.49	-
	Trading book	N/A	N/A	N/A			
	Financial guarantees	N/A	N/A	N/A			
	Assets under management	N/A	N/A	N/A			
	Fees and commissions income	N/A	N/A	N/A			

\* Total environmentally sustainable assets are identical for KPIs turnover and CAPEX.

## 1. Assets for the calculation of GAR

As a result of Avanza not having any lending to corporations covered by NFRD, the calculations regarding GAR assets are identical for the turnover and CAPEX KPIs, and therefore only one version of the table is presented.

		31-12-2024																	
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Total (CCM + CCA)							
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)							
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)							
SEK m	Total gross carrying amount	of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which enabling			of which Use of Proceeds	of which transitional	of which enabling			of which Use of Proceeds	of which transitional	of which enabling		
<b>GAR – Covered assets in both numerator and denominator</b>																			
1	<b>Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>	60,318	30,411	1,257	1,257	100	-	-	-	-	-	-	-	-	30,411	1,257	1,257	100	-
2	<b>Financial undertakings</b>	33,549	17,041	1,128	1,128	-	-	-	-	-	-	-	-	-	17,041	1,128	1,128	-	-
3	Credit institutions	33,549	17,041	1,128	1,128	-	-	-	-	-	-	-	-	-	17,041	1,128	1,128	-	-
4	Loans and advances	2,386	561	28	28	-	-	-	-	-	-	-	-	-	561	28	28	-	-
5	Debt securities, including UoP	31,163	16,480	1,100	1,100	-	-	-	-	-	-	-	-	-	16,480	1,100	1,100	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	22,740	13,270	29	29	-	-	-	-	-	-	-	-	13,270	29	29	-	-	
25	of which loans collateralised by residential immovable property	13,270	13,270	29	29	-	-	-	-	-	-	-	-	13,270	29	29	-	-	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	<b>Local government financing</b>	4,029	100	100	100	100	-	-	-	-	-	-	-	100	100	100	100	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	4,029	100	100	100	100	-	-	-	-	-	-	-	100	100	100	100	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

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		31-12-2024														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Total (CCM + CCA)				
		of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)					of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)					of which environmentally sustainable (Taxonomy-aligned)				
SEK m	Total gross carrying amount	of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling				
<b>GAR – Covered assets in both numerator and denominator</b>																
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	5,629	-	-	-	-	-	-	-	-	-	-	-	-	-	
33	Financial and Non-financial undertakings	2,925														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	1,368														
35	Loans and advances	1,183														
36	of which loans collateralised by commercial immovable property	-														
37	of which building renovation loans	-														
38	Debt securities	-														
39	Equity instruments	185														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,557														
41	Loans and advances	1,557														
42	Debt securities	-														
43	Equity instruments	-														
44	Derivatives	-														
45	On demand interbank loans	-														
46	Cash and cash-related assets	-														
47	Other categories of assets (e.g. goodwill, commodities etc.)	2,703														
48	Total GAR assets	65,946	30,411	1,257	1,257	100	-	-	-	-	-	-	-	30,411	1,257	
49	Assets not covered for GAR calculation	10,093														
50	Central governments and Supranational issuers	1,899														
51	Central banks exposure	8,194														
52	Trading book	-														
53	Total assets	76,040	-	-	-	-	-	-	-	-	-	-	-	-	-	
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>																
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
56	of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
57	of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

## 1. Assets for the calculation of GAR

As a result of Avanza not having any lending to corporations covered by NFRD, the calculations regarding GAR assets are identical for the turnover and CAPEX KPIs, and therefore only one version of the table is presented.

		31-12-2023												
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Total (CCM + CCA)				
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				
SEK m	Total gross carrying amount	of which Use of Proceeds	of which transitional	of which enabling	of which Use of Proceeds	of which enabling	of which Use of Proceeds	of which enabling	of which Use of Proceeds	of which transitional	of which enabling			
<b>GAR – Covered assets in both numerator and denominator</b>														
1	<b>Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>	48,067	22,125	41	41	-	-	-	-	22,125	41	41	-	-
2	<b>Financial undertakings</b>	29,286	10,638	-	-	-	-	-	-	10,638	-	-	-	-
3	Credit institutions	29,286	10,638	-	-	-	-	-	-	10,638	-	-	-	-
4	Loans and advances	1,314	336	-	-	-	-	-	-	336	-	-	-	-
5	Debt securities, including UoP	27,972	10,302	-	-	-	-	-	-	10,302	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	18,681	11,486	41	41	-	-	-	-	11,486	41	41	-	-
25	of which loans collateralised by residential immovable property	11,486	11,486	41	41	-	-	-	-	11,486	41	41	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	<b>Local government financing</b>	100	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	100	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

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		31-12-2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Total (CCM + CCA)			
		of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)				of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)				of which environmentally sustainable (Taxonomy-aligned)			
SEK m	Total gross carrying amount	of which Use of Proceeds	of which transitional	of which enabling	of which Use of Proceeds	of which transitional	of which enabling	of which Use of Proceeds	of which transitional	of which enabling	of which Use of Proceeds	of which transitional	of which enabling
<b>GAR – Covered assets in both numerator and denominator</b>													
32	<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	4,491	-	-	-	-	-	-	-	-	-	-	-
33	<b>Financial and Non-financial undertakings</b>	2,273	-	-	-	-	-	-	-	-	-	-	-
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	1,094	-	-	-	-	-	-	-	-	-	-	-
35	Loans and advances	901	-	-	-	-	-	-	-	-	-	-	-
36	of which loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-
37	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-
38	Debt securities	-	-	-	-	-	-	-	-	-	-	-	-
39	Equity instruments	192	-	-	-	-	-	-	-	-	-	-	-
40	Non-EU country counterparties not subject to NFRD disclosure obligations	1,179	-	-	-	-	-	-	-	-	-	-	-
41	Loans and advances	1,179	-	-	-	-	-	-	-	-	-	-	-
42	Debt securities	-	-	-	-	-	-	-	-	-	-	-	-
43	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-
44	<b>Derivatives</b>	-	-	-	-	-	-	-	-	-	-	-	-
45	<b>On demand interbank loans</b>	-	-	-	-	-	-	-	-	-	-	-	-
46	<b>Cash and cash-related assets</b>	-	-	-	-	-	-	-	-	-	-	-	-
47	<b>Other categories of assets (e.g. goodwill, commodities etc.)</b>	2,219	-	-	-	-	-	-	-	-	-	-	-
48	<b>Total GAR assets</b>	52,559	22,125	41	41	-	-	-	-	-	22,125	41	41
49	<b>Assets not covered for GAR calculation</b>	16,452	-	-	-	-	-	-	-	-	-	-	-
50	Central governments and Supranational issuers	7,822	-	-	-	-	-	-	-	-	-	-	-
51	Central banks exposure	8,630	-	-	-	-	-	-	-	-	-	-	-
52	Trading book	-	-	-	-	-	-	-	-	-	-	-	-
53	<b>Total assets</b>	69,011	22,125	41	41	-	-	-	-	-	22,125	41	41
<b>Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations</b>													
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-
56	of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-
57	of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

## 3. GAR KPI stock based on turnover

		31-12-2024														
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)						Proportion of total assets covered
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)						
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)						
% (compared to total covered assets in the denominator)		of which Use of Proceeds	of which transitional	of which enabling	of which Use of Proceeds	of which transitional	of which enabling	of which Use of Proceeds	of which transitional	of which enabling	of which Use of Proceeds	of which transitional	of which enabling	of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	46.11	1.91	1.91	0.15	-	-	-	-	-	46.11	1.91	1.91	0.15	-	91.46
2	<b>Financial undertakings</b>	<b>25.84</b>	<b>1.71</b>	<b>1.71</b>	-	-	-	-	-	-	<b>25.84</b>	<b>1.71</b>	<b>1.71</b>	-	-	<b>50.87</b>
3	Credit institutions	25.84	1.71	1.71	-	-	-	-	-	-	25.84	1.71	1.71	-	-	50.87
4	Loans and advances	0.85	0.04	0.04	-	-	-	-	-	-	0.85	0.04	0.04	-	-	3.62
5	Debt securities, including UoP	24.99	1.67	1.67	-	-	-	-	-	-	24.99	1.67	1.67	-	-	47.26
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	<b>20.12</b>	<b>0.04</b>	<b>0.04</b>	-	-	-	-	-	-	<b>20.12</b>	<b>0.04</b>	<b>0.04</b>	-	-	<b>34.48</b>
25	of which loans collateralised by residential immovable property	20.12	0.04	0.04	-	-	-	-	-	-	20.12	0.04	0.04	-	-	20.12
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	<b>Local government financing</b>	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	-	-	-	-	-	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	-	<b>6.11</b>
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	0.15	0.15	0.15	0.15	-	-	-	-	-	0.15	0.15	0.15	0.15	-	6.11
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
32	<b>Total GAR assets</b>	<b>46.11</b>	<b>1.91</b>	<b>1.91</b>	<b>0.15</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>46.11</b>	<b>1.91</b>	<b>1.91</b>	<b>0.15</b>	<b>-</b>	<b>100.00</b>

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

## 3. GAR KPI stock based on turnover

		31-12-2023												
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				Proportion of total assets covered
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)				
% (compared to total covered assets in the denominator)		of which Use of Proceeds		of which transitional		of which enabling		of which Use of Proceeds		of which transitional		of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	42.10	0.08	0.08	-	-	-	-	-	-	-	-	-	91.45
2	<b>Financial undertakings</b>	<b>20.24</b>	-	-	-	-	-	-	-	-	-	-	-	<b>55.72</b>
3	Credit institutions	20.24	-	-	-	-	-	-	-	-	-	-	-	55.72
4	Loans and advances	0.64	-	-	-	-	-	-	-	-	-	-	-	2.50
5	Debt securities, including UoP	19.60	-	-	-	-	-	-	-	-	-	-	-	53.22
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	<b>21.85</b>	<b>0.08</b>	<b>0.08</b>	-	-	-	-	-	-	-	-	-	<b>35.54</b>
25	of which loans collateralised by residential immovable property	21.85	0.08	0.08	-	-	-	-	-	-	-	-	-	21.85
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-
28	<b>Local government financing</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0.19</b>
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	0.19
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
32	<b>Total GAR assets</b>	<b>42.10</b>	<b>0.08</b>	<b>0.08</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>100.00</b>

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data



## 3. GAR KPI stock based on CAPEX

		31-12-2024														
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)						Proportion of total assets covered
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-eligible)						
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)						
% (compared to total covered assets in the denominator)			of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>																
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	46.11	1.91	1.91	0.15	-	-	-	-	46.11	1.91	1.91	0.15	-	91.46	
2	<b>Financial undertakings</b>	<b>25.84</b>	<b>1.71</b>	<b>1.71</b>	-	-	-	-	-	<b>25.84</b>	<b>1.71</b>	<b>1.71</b>	-	-	<b>50.87</b>	
3	Credit institutions	25.84	1.71	1.71	-	-	-	-	-	25.84	1.71	1.71	-	-	50.87	
4	Loans and advances	0.85	0.04	0.04	-	-	-	-	-	0.84	0.04	0.04	-	-	3.62	
5	Debt securities, including UoP	24.99	1.67	1.67	-	-	-	-	-	24.99	1.67	1.67	-	-	47.26	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	<b>Non-financial undertakings</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	<b>Households</b>	<b>20.12</b>	<b>0.04</b>	<b>0.04</b>	-	-	-	-	-	<b>20.12</b>	<b>0.04</b>	<b>0.04</b>	-	-	<b>34.48</b>	
25	of which loans collateralised by residential immovable property	20.12	0.04	0.04	-	-	-	-	-	20.12	0.04	0.04	-	-	20.12	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	<b>Local government financing</b>	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	-	-	-	-	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	<b>0.15</b>	-	<b>6.11</b>	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	0.15	0.15	0.15	0.15	-	-	-	-	0.15	0.15	0.15	0.15	-	6.11	
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
32	<b>Total GAR assets</b>	<b>46.11</b>	<b>1.91</b>	<b>1.91</b>	<b>0.15</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>46.11</b>	<b>1.91</b>	<b>1.91</b>	<b>0.15</b>	<b>-</b>	<b>100.00</b>	

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

## 3. GAR KPI stock based on CAPEX

		31-12-2023													
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				Proportion of total assets covered	
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)					
% (compared to total covered assets in the denominator)			of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling		
<b>GAR - Covered assets in both numerator and denominator</b>															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	42.10	0.08	0.08	-	-	-	-	-	42.10	0.08	0.08	-	-	91.45
2	<b>Financial undertakings</b>	<b>20.24</b>	-	-	-	-	-	-	-	<b>20.24</b>	-	-	-	-	<b>55.72</b>
3	Credit institutions	20.24	-	-	-	-	-	-	-	20.24	-	-	-	-	55.72
4	Loans and advances	0.64	-	-	-	-	-	-	-	0.64	-	-	-	-	2.50
5	Debt securities, including UoP	19.60	-	-	-	-	-	-	-	19.60	-	-	-	-	53.22
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	<b>Non-financial undertakings</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	<b>Households</b>	<b>21.85</b>	<b>0.08</b>	<b>0.08</b>	-	-	-	-	-	<b>21.85</b>	<b>0.08</b>	<b>0.08</b>	-	-	<b>35.54</b>
25	of which loans collateralised by residential immovable property	21.85	0.08	0.08	-	-	-	-	-	21.85	0.08	0.08	-	-	21.85
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	<b>Local government financing</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>0.19</b>
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.19
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
32	<b>Total GAR assets</b>	<b>42.10</b>	<b>0.08</b>	<b>0.08</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>42.10</b>	<b>0.08</b>	<b>0.08</b>	<b>-</b>	<b>-</b>	<b>100.00</b>

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

4. GAR KPI flow based on turnover

		2024															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total new assets covered
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)					
% (compared to flow of total eligible assets)		of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling		of which Use of Proceeds	of which transitional	of which enabling					
<b>GAR - Covered assets in both numerator and denominator</b>																	
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	48.33	0.04	0.04	0.04	-	-	-	-	-	48.33	0.04	0.04	0.04	-	48.33	
2	<b>Financial undertakings</b>	<b>27.12</b>	-	-	-	-	-	-	-	-	<b>27.12</b>	-	-	-	-	<b>27.12</b>	
3	Credit institutions	27.12	-	-	-	-	-	-	-	-	27.12	-	-	-	-	27.12	
4	Loans and advances	5.68	-	-	-	-	-	-	-	-	5.68	-	-	-	-	5.68	
5	Debt securities, including UoP	21.44	-	-	-	-	-	-	-	-	21.44	-	-	-	-	21.44	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	<b>Non-financial undertakings</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	<b>Households</b>	<b>21.21</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>21.21</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>21.21</b>	
25	of which loans collateralised by residential immovable property	21.21	0.04	0.04	0.04	-	-	-	-	-	21.21	0.04	0.04	0.04	-	21.21	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
28	<b>Local government financing</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	
32	<b>Total GAR assets</b>	<b>48.33</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>48.33</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>48.33</b>	

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

4. GAR KPI flow based on CAPEX

		2024															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total new assets covered
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding Taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding Taxonomy-relevant sectors (Taxonomy-aligned)					
% (compared to flow of total eligible assets)		of which Use of Proceeds		of which transitional		of which enabling		of which Use of Proceeds		of which enabling		of which Use of Proceeds		of which transitional		of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>																	
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	48.33	0.04	0.04	0.04	-	-	-	-	-	-	48.33	0.04	0.04	0.04	-	48.33
2	<b>Financial undertakings</b>	<b>27.12</b>	-	-	-	-	-	-	-	-	-	<b>27.12</b>	-	-	-	-	<b>27.12</b>
3	Credit institutions	27.12	-	-	-	-	-	-	-	-	-	27.12	-	-	-	-	27.12
4	Loans and advances	5.68	-	-	-	-	-	-	-	-	-	5.68	-	-	-	-	5.68
5	Debt securities, including UoP	21.44	-	-	-	-	-	-	-	-	-	21.44	-	-	-	-	21.44
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial undertakings</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	<b>21.21</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>21.21</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>21.21</b>
25	of which loans collateralised by residential immovable property	21.21	0.04	0.04	0.04	-	-	-	-	-	-	21.21	0.04	0.04	0.04	-	21.21
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	<b>Local government financing</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>
32	<b>Total GAR assets</b>	<b>48.33</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>48.33</b>	<b>0.04</b>	<b>0.04</b>	<b>0.04</b>	<b>-</b>	<b>48.33</b>

The columns for environmental targets three to six (WTR, CE, PPC, and BIO) are not reported due to lack of data

# Corporate ethics and governance

Trust is the cornerstone of our business as a company in the financial industry. Everything we do is built on our customers', investors' and society's trust in our ability to act responsibly, transparently and with a long-term view. Being a responsible business is central to our sustainability work, and our operations are distinguished by transparency, continuous dialogue and high ethical standards.

## This section covers

- Responsible business
- Financial crime
- Cybersecurity
- Data protection
- Suppliers and responsible procurement

### Policy documents

- Sustainability and environmental policy
- Policy on anti-money laundering and counter-terrorism financing
- Anti-bribery policy
- Information security policy
- Policy on operational risks
- IT operations policy
- Conflict of interest policy
- Code of Conduct
- Whistleblower instruction
- Supplier Code of Conduct
- Policy on counterparty assessments

### Partnerships, memberships and networks

- Swedish Bankers' Association
- Swedish Securities Markets Association
- Swedish Investment Fund Association



# Good corporate ethics and governance is central to everything we do

Acting responsibly is critical to gain trust and to succeed in living up to our vision of creating a better future for millions of people. Our operations are distinguished by transparency, continuous dialogue and high ethical standards.

## Corporate culture and corporate ethics

Avanza encourages good ethical behaviour. Good corporate governance is an integral part of our business. Our governance is based on thorough processes, effective control and clear lines of responsibility. This gives our employees the best circumstances to act ethically and ensures a sound risk culture.

There are internal policies within Avanza, adopted by the Board of Directors and the CEO, which describe our shared view of and approach to corporate ethics. Our internal rules are available to all employees, who are all responsible for staying updated on the laws and regulations that impact and are relevant to our work. Avanza's control functions regularly monitor operations and annually review the internal policy documents.

## Conflicts of interest, corruption, bribes and undue influence

Avanza's business requires processing of sensitive personal data and, consequently, we need to maintain public trust. Avanza strongly opposes all types of corrupt behaviour and works diligently to promote sound business practices and fight corruption.

### Measures

Avanza has established procedures to address conflicts of interest in order to avoid negatively affecting the interests of customers.

The bank's policy on bribes sets out the rules of conduct that the Avanza Group has established for fighting corruption. Employees may never engage in actions that could entail bribes or other undue influence. The policy and Avanza's code of conduct are included in the mandatory regulatory training for new employees and can be found at [avanza.se/ir](http://avanza.se/ir).

## Whistleblower protection

Acting ethically and taking measures to prevent unethical or illegal behaviour are an important part of Avanza's culture.

### Measures

In Avanza's code of conduct, adopted by the Board of Directors, all employees are encouraged to report actions that could be considered unethical or illegal. Moreover, the CEO lays down a more detailed whistleblower instruction to clarify how responsibility is delegated, privacy is maintained and incoming reports are handled. Reports can be submitted anonymously through an external whistleblower tool where the information is encrypted. The system is available to everyone within Avanza regardless of form of employment. During the year, 0 potential violations (0) were reported through this system.

## Fighting financial crime

Being an active participant in the financial market entails a risk that our products and services will be exploited by criminals for money laundering or terrorist financing, fraud, undue influence or insider trading. Financial crime is a serious threat to the financial system and thus to society as a whole. As a responsible bank, preventing financial crime and mitigating this risk is our highest priority.

### Measures

Avanza's work to prevent being exploited for money laundering or terrorist financing is risk-based and begins with the Board of Directors, which at least once a year conducts a general risk assessment to identify, analyse and manage the various risks that the bank faces.

A specially appointed executive is delegated responsibility by the Board to annually implement and update the general risk assessment of how the bank's products and services can be exploited for money laundering or terrorist financing. Based on this risk assessment, the CEO and the Board of Directors adopt Group-wide policies for combating money laundering and terrorist financing, which serve as the framework for Avanza's work.

The Board of Directors has appointed the Head of Compliance as the officer responsible for controlling and reporting obligations, who monitors and controls that Avanza is compliant with internal

and external regulations and is responsible for reporting to the Financial Intelligence Unit of the Swedish police (FIPO). An independent audit function regularly reviews and evaluates Avanza's internal processes and procedures as well as the work of other control functions, and is part of the internal audit function.

An important preventive activity is the KYC ("Know Your Customer") process, which precedes every business relationship and continues on an ongoing basis to ensure that the information is up-to-date and sufficient. The process is risk-based and more extensive controls are performed for customers in areas where higher risk is identified, e.g. when the customer is a politically exposed person (PEP). As needed, customers are escalated to an authorised decision-maker, specially appointed executive or our Customer Committee. The risk that Avanza could be the target of financial crime is limited, since we only serve the Swedish market and our customers are required to have an account with another Swedish bank.

Another important activity is the monitoring of financial sanctions and transactions to detect suspicious or unusual customer behaviour. The Financial Crime Intelligence (FCI) department is responsible for updating and developing the Group's risk assessment models. Transaction monitoring is continuously improved and suspicious transactions or behaviour are reported to FIPO. FCI is also responsible for investigating and reporting suspicions of market abuse as well as coordinating Avanza's response if it suspects that a customer has been exposed to, or is currently being exposed to, fraud.

For financial crime prevention to succeed, all employees must share responsibility as far as possible for preventing the company from being exploited by criminals. This requires competence and awareness, which is why we conduct annual internal training programmes to ensure that employees have sufficient knowledge. The training programmes are adapted to each employee's duties and function and contain relevant sections of current regulations, the business operator's general risk assessment, procedures and guidelines to prevent money laundering and terrorist financing.

## Cybersecurity

Avanza's operations are largely digital with high demands on security, stability and availability. Protecting customer privacy, our information assets and our IT environment as well as exercising control of outsourced activities are critical to maintain the trust of customers.

The policies established by the Board of Directors on information security, IT operations, and management and control of operational risk provide a framework for this work. Furthermore, the CEO establishes instructions on the division of responsibilities for maintaining information security in accordance with the policies. The bank's information security management system is based on the current standards of the NIST cybersecurity framework.

### Measures

The work is conducted in a structured and systematic way in accordance with current laws and other industry standards. This is integrated in business operations across the three lines of defence and all employees at Avanza are responsible for maintaining information quality and security. To ensure employees' competence and awareness in this area, all employees, including consultants, when hired and annually, receive security training based on relevant parts of Avanza's Security Handbook and governing documents. The Board of Directors and Group Management also receive training.

A prerequisite to counter cyberattacks is our use of secure coding practices. To ensure that employees are properly skilled in this area, Avanza, together with an external supplier, has developed specific training in secure coding for software developers. All software developers at Avanza at least once a year receive the training, which is updated continuously and where theory is blended with practical application.

The resilience of the platform and our services is ensured in part by having redundant, geographically dispersed data centres, continuous central monitoring, and regular testing of services in accordance with a comprehensive testing framework. We work proactively to continuously replace hard- and software with more modern solutions in order to avoid technical debt. Continual updates and improvements of the platform and the apps also help to further reduce operational risks. Avanza worked intensely during the year to implement the EU's new Digital Operational Resilience Act (DORA), which applies as of 17 January 2025. As part of this process, several processes and functions have been centralised and improved, creating a more effective and comprehensive approach to security that will be future-proof. The availability of Avanza's platform was 99.9 per cent (99.8) during the year.

## Data protection

Our customers, employees and partners should feel secure with how Avanza handles their personal data. Our work with data protection and processing personal data is continuous to ensure compliance with the General Data Protection Regulation (GDPR).

Avanza's internal governance organisation is established to meet legal requirements. The policy and instruction on personal data clarify the basic principles and requirements that apply to data protection work in the company.

### Measures

To tie governance to the day-to-day work, processes and procedures have been put in place to provide guidance on how personal data is processed. Employees receive continuous training on issues related to data protection and processing personal data.

In addition to a clear distribution of roles within the company, Avanza has appointed a data protection ombudsman, who monitors the processing of personal data and compliance in the organisation. The role is independent and has a mandate to carry out inspections and reviews. An important part of the work is also to train, inform and provide advice to the organisation.

Transparency in the processing of personal data is of utmost importance, and customers and employees have access to clear information on how Avanza processes personal data as well as the rights they have. During the year, Avanza reported 0 personal data incidents to the Swedish Authority for Privacy Protection (IMY). The case involving Avanza's reported incident from 2021 has been closed with a fine of SEK 15 million.

## Suppliers, Third Party Players and significant counterparties

Avanza's efforts to promote high ethical standards, sustainability, respect for human rights, and fair and safe working conditions stretch beyond the organisation. By setting demands, influencing, and evaluating our counterparties, we encourage high ethical standards in society and in our supply chain.

### Measures

Avanza's code of conduct for suppliers is based on internationally accepted standards such as the UN Global Compact and the OECD Guidelines for Multinational Enterprises, and defines the expectations we place on our suppliers with regard to environmental, social and governance-related aspects. The code also states that suppliers in turn are responsible for applying the same principles to their supply chains. Suppliers are evaluated through Avanza's procurement process, which is utilised in all procurement situations within the Group. This ensures professional and ethical conduct.

The majority of Avanza's counterparties are providers of financial products and services, which are governed by the Swedish FSA or similar foreign authorities and/or are subject to the rules of various stock exchanges. To better understand the counterparty, and thereby identify and minimise any business, sustainability, or reputational risks, we work systematically to control and monitor Third Party Players and other significant counterparties. We have established routines for evaluating and selecting suppliers based on economic, environmental, social, and governance-related aspects. Counterparty assessments are conducted for among other reasons to ensure that the counterparty has the correct authorisation for its business and is not involved in any legal disputes or face financial enforcement actions, and that it has a strong focus on IT and information security. In certain cases, more detailed reviews and supplier visits are also carried out. Follow-ups are done according to a risk-based approach and always when there is an indication of a change in risk level. Among the most significant Third Party collaborations are external fund companies, savings account and mortgage partners, and Avanza Markets.

In connection with transactions such as an IPO or rights issue, Avanza works exclusively with established counterparties in the Swedish financial market. In transactions where Avanza is the lead and only advisor, thorough due diligence is performed to ensure that the company's operations align with Avanza's sustainability view, that its representatives have not been sanctioned or convicted of serious or financial crime, and that the company is in compliance with stock exchange rules and listing requirements.



# Sustainability related risks

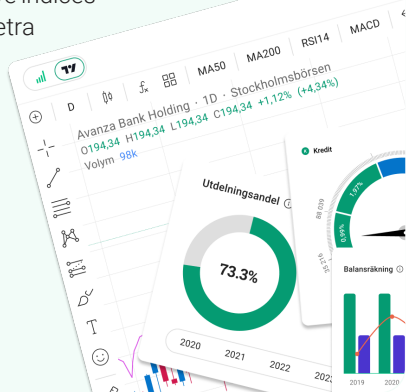
Risk area	Risk description	Measures to minimise risks
Risks associated with social aspects	The risk that Avanza's operations, business relations and business commitments have a negative impact on personnel, customers or outside parties with regard to social conditions or human rights.	<p><b>General Data Protection Regulation (GDPR)</b> Avanza has established procedures to protect personal data. Avanza's Data Protection Officer conducts periodic reviews and annually compiles a report for management and the Board of Directors to inform them what is happening in the data protection area and how well Avanza is following GDPR.</p> <p><b>Digital operational resilience</b> The availability of the platform and Avanza's services is ensured in part by having three redundant, geographically dispersed data centres and continuously upgrading hardware and software to avoid technical debt. Weekly launches and continuous updates of the website and the apps reduce operational risks. We invest continuously to protect against cyberthreats and test technical and organisational protections on a regular basis.</p> <p><b>Sustainable workplace</b> Avanza works systematically with occupational health and safety, diversity and gender equality in line with our occupational health and safety policy, diversity and gender equality policy, recruiting policy and Code of Conduct. To ensure an unbiased and quality-assured recruiting process, open positions are formulated from a diversity perspective, skills-based screening questions replace personal letters, and candidates can be anonymised in selection processes, among other things. Annually, managers are offered internal training to better understand competence-based and unbiased recruiting. Gender equality is considered when recruiting for management positions, in salary audits and when analysing sick leave to ensure that there are no gender pay gaps.</p>
Risks associated with climate and environment	Physical risks refer to direct impacts of climate change that give rise to financial costs and risks, e.g. physical impact on properties due to climate change. Transition risks are financial risks related to the transition to a less fossil fuel-based economy.	<p><b>Products and services on the platform</b> Decision support and sustainability data are provided to help customers make sustainable investment decisions. Only a small part of customers' holdings as of year-end was invested in oil- and gas-related assets.</p> <p><b>Fund management</b> In an effort to limit sustainability risks in its investments, the fund company utilises the Opt-in, Opt-out and Impact methods. The fund company applies, among other things, minimum criteria for exclusions in all Article 8 and Article 9 funds where, at a minimum, companies with revenues from activities associated with controversial weapons, nuclear weapons, gambling, pornography and fossil fuels as well as companies that fail to comply with international norms and conventions are avoided.</p> <p><b>Lending and management of surplus liquidity</b> The loan-to-value ratio in the mortgage portfolio is low and mortgage customers are usually over-collateralised. If the underlying collateral decreases significantly in value due to climate-related events, it is captured in the annual revaluation, which can trigger an amortisation requirement. In the case of lending collateralised by securities, an indirect assessment is made through the asset's volatility which is taken into account in the assessment of the LTV ratio of the security. Increased volatility triggers a re-evaluation of the LTV ratio, which if necessary is lowered for the individual issuer. The exposure to sustainability risks in the management of surplus liquidity is considered very low. The portfolio has a short fixed interest rate duration and the holdings are liquid, have high ratings and can be pledged to the Riksbank.</p>
Risks associated with governance including bribery and corruption, cybersecurity and financial crime	The financial sector is tightly regulated and instances of non-compliance can lead to sanctions or a revoked license. Good internal governance, risk management and a sound risk culture are critical and all employees have a responsibility to follow current rules.	<p><b>Compliance</b> Avanza places the highest priority on lawful and ethical conduct and has established internal rules, routines and processes to ensure that it complies with regulations. All employees have a clearly delineated responsibility to follow these rules, routines and processes. A key element of compliance work is good internal governance, risk management and control, as well as a sound risk culture, which the Board of Directors and the CEO are ultimately responsible for.</p> <p><b>Anti-corruption and bribery</b> Avanza has zero tolerance for corruption and has a policy on bribery that complies with Swedish law. The policy and Avanza's Code of Conduct are included in the mandatory regulatory training. Avanza places the same high demands on its suppliers and partners.</p> <p><b>Anti-money laundering and financial crime</b> Financial crime is a threat to all of society. Avanza has implemented control measures that include risk classification of customers and transactions, daily monitoring, continuous KYC updates and reporting of suspected crimes to FIPO. Employees receive annual training to ensure that they are adequately informed.</p> <p><b>Cybersecurity</b> Digital safeguards are developed continuously to ensure adequate protection against cyberthreats. Technical and organisational protections are tested and evaluated on a continuous basis. Avanza's employees receive training in risk management and security. Training in cybersecurity as well as risk management and security for employees, including onboarding for new employees, ensures the right level of awareness and competence.</p>



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# Chairman's comment

Before Gustaf Unger took over as CEO on 25 March 2024, I characterised Avanza to him as a waterfront renovation. I said, "You shouldn't assume that there isn't lots to do in terms of both improvements and developing new products. This despite that we were named Sweden's best savings company for the 14<sup>th</sup> consecutive year and that our profitability is good. In other words – both customers and owners have reason to be pleased." Unger the Builder and his 680 colleagues took on the project with energy and enthusiasm. The result was another year as Sweden's best savings company. This is due in no small part to the major development work done in 2024. To the left is a list of the most important news and updates. Product launches are a key part of our marketing. We usually say that our customers, now numbering over 2 million, are our most important marketers. In other words, satisfied customers are the cornerstone of growth, since a recommendation from a friend is worth many times more than advice from an ad. According to the latest survey, our NPS, which measures the likelihood that our customers will recommend us, is 49. This is the highest in the industry and far above the industry average, which is 3. On the other hand, our customers are not lifetime employees, and if they are not pleased, things can quickly go downhill. I cannot think of a better incentive to stay on our toes.

**"We have over 2 million marketers. Satisfied customers are the cornerstone of growth"**

In 2024, Avanza celebrated 25 years, but was it really just 25 years? Personally, I think it is more like 43. I feel that Avanza's roots date back to 1 June 1981, when I started Sven Hagströmer Fondkommission. More important than who started the firm once upon a time is that Avanza is a bank that never stops evolving through our many former and current employees. With energy and enthusiasm, they have never rested on their laurels and always tried to give our customers better experiences and tools to manage their savings

and their investments. It does not have to be boring and complicated to save for a goal or a better pension. I would really like to thank all our employees for your fantastic efforts over the years. Not least for the unique corporate culture we have built together. It is usually said that leadership is a combination of carrots and sticks. At Avanza there are only carrots.

**"We never rest on our laurels and always try with energy and enthusiasm to give our customers better experiences and tools"**

Someone asked me in the early 2000's how many customers I thought we could eventually reach. I replied cheekily that 300,000 might not be entirely impossible in the not-too-distant future. Had I said 2 million by 2024, I would probably have been sent for a mental health exam or accused of delusions of grandeur. Now we have 2,071,700 customers as of 31 December 2024, with a 7.5 per cent share of the Swedish savings market. Obviously, we are both proud and thankful to have come this far, but the targets for 2030 are even more ambitious. Through the strategic priorities we have set, the target is to more than double the savings capital on Avanza's platform to SEK 2,000 billion by 2030.

**"We are both proud and thankful to have come this far, and the targets for 2030 are even more ambitious"**

Many have wondered why we have not expanded abroad yet. This is because of our relatively modest share of the Swedish savings market in combination with a substantially higher share of the net inflow, which according to the latest market figures was 20 per cent annually. There has therefore been more than enough reason for us to continue to focus solely on Sweden. We still think that the potential in Sweden is high, but that does not prevent us from planning to expand our geographical range by 2030. Considering the journey we have made over the years, we see our opportunities beyond Sweden's borders as very good. We are aware of the difficulties, however, and intend to proceed cautiously but decisively, and it is still too early to set a clearer timeline. One of the benefits we see is that we would be able to further scale our operations, which we will be even better at after the cloud migration and an increased focus on operational efficiency – one of our five priority areas. I also see operational efficiency as critical in order to continue to grow.

## **"I see operational efficiency as critical in order to continue to grow"**

I rarely comment on the market but am prepared to make an exception this year. For the first time in over 50 years the aggregate value of U.S. tech stocks exceeded the value of all European stocks, reaching approximately 17 per cent of the global market capitalisation. If we look back to 2007, the corresponding figure for the tech stocks was approximately 5 per cent while European stocks represented 35 per cent of the global market capitalisation. This is an astounding change. Hopefully, it gives politicians and business leaders in Europe not only something to think about but something to act on. The power shift is at odds with the EU's grandiose plans for Europe as the world's economic centre. One of the causes that is increasingly cited is the regulatory fervour in the EU, but of course you have to remember that regulations usually do not lead to growth and perhaps at best prevent a repeat of the last crisis, at the same time that we instead will face new unforeseen crises.

The main reason is that U.S. companies such as the Magnificent 7 have created more or less an oligopoly with a large home market as its base. This does not totally explain the major revaluation,

however. One of the ideas behind the EU was in fact to create a home market that could provide European companies with a competitive advantage versus the U.S. The market seems to believe that U.S. dominance will also apply to AI, which is unlikely but not impossible. The race has just begun. With the U.S. in the lead...

At the beginning of 2024, a valiant attempt was made to map out Sweden's needs for economic renewal. The government's productivity commission presented a report with proposals for better infrastructure, increased new home construction, extensive regulatory reforms and a world-class educational system. All the proposals are important for a country that must stay on top. What has happened since? The only thing we know for sure is that Avanza

with Gustaf Unger at the helm is working relentlessly to build our company. What will be done about Sweden will be possible will be possible to vote about in 2026.

Stockholm, February 2025



Sven Hagströmer  
Chairman of the Board



Sven Hagströmer, Chairman of the Board

# Corporate governance report

We want to create a better future for millions of people. The key to success is a high level of trust and the most satisfied customers. It is our firm conviction that it is through customer value that we create the best shareholder value.

Avanza's corporate governance report has been prepared in accordance with the Swedish Annual Accounts Act (1995:1554) and the Swedish Code of Corporate Governance (the Code). Avanza Bank Holding AB (publ), hereafter "Avanza", does not deviate from the Code. As a publicly listed Swedish limited liability company, Avanza's operations are also governed by other laws and regulations, including the Swedish Companies Act (2005:551), Nasdaq's Nordic Main Market Rulebook for Issuers of Shares and the International Financial Reporting Standards (IFRS). The operating subsidiaries are subject to the supervision of the Swedish FSA, which requires strict application of various financial and ethical rules and guidelines based on Swedish and European law and the Swedish Securities Markets Association's guidelines.

The Avanza Group is driven with strong customer focus and a long-term vision. We want to create a world-class user experience and customer service. Through inspiration and education, we increase financial literacy and help customers to make informed investment decisions. We do not offer investment advice. The promise to our customers is that they will have more money left over with Avanza than with any other bank or pension company. In the long term, what we do benefits the Swedish savings market and the industry's development, which in turn has a positive effect on

society as a whole. From a societal and sustainability perspective, we promote financial inclusion, gender equality and diversity, and an increased share of sustainable investments. We value transparency, low thresholds, education, and work to enable sustainable investment choices. Another important part of the work is to be a sustainable organisation with thorough oversight and control.

Our opportunities to achieve our vision of creating a better future for millions of people and promoting a better savings market in the long term is based on a dialogue with and listening to our stakeholders. We have to earn their trust every day and ideally surpass their highest expectations. These stakeholders include customers, employees, owners, partners, media, suppliers, authorities and legislators, all of whom affect and are affected by our operations.

## A. Ownership and voting rights

The share capital consists of one class of shares. All shares confer the same rights. There are no limitations on the right to transfer shares or how many votes a shareholder may cast. The share is listed on Nasdaq Stockholm's Large Cap list. The share capital at the end of 2024 amounted to SEK 78,618,474.50, represented by 157,236,949 shares and votes. An ownership distribution is presented on page 25. The largest shareholders are represented on the

Nomination Committee; see below. Avanza has three outstanding warrant programmes comprising warrants with the right to subscribe for 3,151,346 new shares. Non-allocated warrants have been maculated. Upon full exercise of the above mentioned warrants, the dilution will be 2.0 per cent. Of the total number of outstanding warrants, 79 per cent had been transferred to employees at year-end. For further information on the Avanza share, see pages 24–25 and Note 28 Equity.

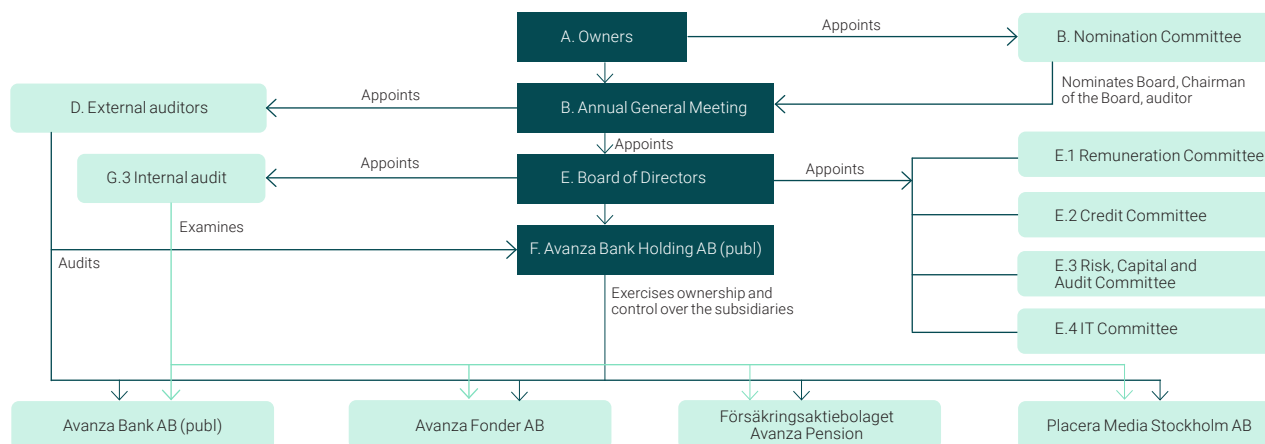
## B. Annual General Meeting (AGM)

Shareholders exercise influence over Avanza through participation in the AGM, Avanza's most senior decision-making body. In accordance with the Articles of Association, the AGM elects the Company's Board and appoints Avanza's auditor. Additionally, decisions are taken on adoption of the income statement and balance sheet, consolidated income statement and consolidated balance sheet, dividends and other profit distributions, discharge from liability of the members of the Board and the CEO, the instruction for the Nomination Committee, remuneration guidelines for senior management, and other important issues.

To exercise their vote at the AGM, shareholders either have to be present at the meeting in person or by proxy or have exercised their voting rights by voting in advance by mail. Additionally, they must be registered in their own name in the share register on the specified date prior to the meeting and have notified their participation as set out in the notice.

The AGM's resolutions normally pass with a simple majority, i.e. more than half of the total number of votes cast, unless otherwise specified by the Swedish Companies Act. Shareholders wishing to add a matter to the agenda at the AGM may submit a written request that must be received by the date indicated on [avanza.se/ir](http://avanza.se/ir), which for the AGM 2025 is 6 March 2025. Requests should be sent to [arsstamma@avanza.se](mailto:arsstamma@avanza.se) or to:

Avanza Bank Holding AB  
F.A.O: Bolagsjuridik  
Box 1399  
111 93 Stockholm



The date and time of the next AGM, and information on how shareholders can exercise their right of initiative, are posted on [avanza.se/ir](http://avanza.se/ir) under the Governance section in conjunction with the publication of the third interim report of the year preceding the AGM. Minutes and supporting documentation from previous AGMs are also available in the same section.

Extraordinary General Meetings may be held if the Board deems necessary or if the Company's auditor or a shareholder holding at least ten per cent of the shares requests such a meeting.

At the AGM on 11 April 2024, 393 shareholders were represented with a holding corresponding to approximately 71 per cent of the total number of shares and votes.

Besides the recurring items, the following resolutions were adopted by the AGM 2024:

- authorisation for the Board of Directors to acquire the company's own shares and transfer the company's own shares as well as resolve on new share issues
- decision to issue warrants intended for employee incentive programme
- approval of guidelines for remuneration to senior executives

### C. Nomination Committee

The AGM 2023 decided on an instruction for the Nomination Committee in which the nomination process for the election of Board members and the auditor as well as the procedure to appoint the Nomination Committee are specified. The instruction applies until further notice.

The names of the Nomination Committee's members, and the shareholders they represent, were made public on 15 October 2024, just over six months before the date of the AGM 2025. The Nomination Committee consists of one representative from each of the four largest shareholders wishing to appoint a representative, based on ownership interests known immediately before the announcement. The Nomination Committee is the shareholders' governing body with the sole purpose of preparing the AGM's resolutions on elections and fees.

The Nomination Committee is mandated to serve until a new committee is appointed. In accordance with the instruction for

the Nomination Committee, the Chairman of the Committee is the member representing the largest shareholder, unless the Nomination Committee has agreed otherwise. A shareholder who after the announcement is no longer among the four largest shareholders must make their seat available in favour of the shareholder who became one of the four largest. Marginal changes do not have to be considered. Shareholders that have appointed a representative to the Committee have the right to dismiss this representative and appoint a replacement. All changes to the composition of the Committee shall be publicly announced.

The Nomination Committee's proposals for resolution leading up to the AGM include:

- Chairman of the Meeting
- Board of Directors and Chairman of the Board
- Board fees
- auditor and fees for the Company's auditors
- if applicable, changes to the procedure for appointing the Nomination Committee

The Nomination Committee's proposal to the Board of Directors is presented in its entirety to ensure that the composition of the Board meets competence, diversity and independence requirements. Shareholders with views on the Board's composition or proposals for new members shall submit them to the Nomination Committee well in advance of the AGM, which prior to AGM 2025 should be not later than 27 January 2025. Nomination proposals are reviewed as part of the nomination process. Proposals shall be sent to [valberedningen@avanza.se](mailto:valberedningen@avanza.se) or to:

Avanza Bank Holding AB  
F.A.O.: Valberedningen  
Box 1399  
111 93 Stockholm

Although Committee members are not remunerated for their work, Avanza refunds reasonable costs deemed necessary for them to fulfil their duties. The Committee has agreed that Erik Törnberg, Creades AB, will remain in the position of Chairman of the Committee. Erik Törnberg is also a member of the Board of the wholly

owned subsidiary Avanza Fonder AB. While this does not deviate from point 2.4 of the Code, Avanza is disclosing the situation for the sake of transparency.

The Nomination Committee's proposal, as well as a reasoned opinion on the proposal and a report on the Committee's work, are published in conjunction with the notice of the AGM. When preparing its proposal for Board fees, the Nomination Committee uses comparisons to companies operating in similar spheres and with similar size and complexity. Proposed fees will be market rate based on the responsibility and work required and on the contribution that the Board can make to the Company's development.

As a diversity policy, the Nomination Committee has applied point 4.1 of the Code. The Nomination Committee's aim in applying the diversity policy has been to achieve an appropriate Board composition distinguished by diversity and breadth, and to achieve a gender balance among AGM-elected Board members. As of AGM 2024, the Board of Directors consisted of five men and four women. For more information, see section E. Board of Directors.

The Nomination Committee held 4 meetings in 2024, at which all members were present, in addition to regular contact. The Nomination Committee also conducted an evaluation of the Board and its work, which included the Board's size, composition, industry experience and competence.

### D. External auditor

The external auditor is an independent reviewer of Avanza's financial statements and determines whether they in all material respects are accurate and provide a fair presentation of the Company and its financial position and results.

The AGM 2024 re-elected KPMG AB as the auditor until the conclusion of AGM 2025 and noted that KPMG AB appointed Dan Beitner as Auditor-in-Charge.

The auditor presents the AGM with an audit report on Avanza's Annual and Sustainability Report and consolidated financial statements, the appropriation of the Company's profit or treatment of its loss, and the administration of the Board and the CEO, and offers an opinion on the corporate governance report. In addition, the auditor submits reports on day-to-day management and internal control, in writing as well as orally to Avanza's Board and/or Audit Committee at least twice a year and delivers an audit report on the annual accounts and annual report.

The audit is conducted in accordance with the International Standards on Auditing (ISA), issued by the International Federation of Accountants (IFAC). The auditor's fees are paid based on approved invoices. In 2024, fees paid to KPMG for auditing services totalled SEK 4,177 thousand. Total remuneration paid is shown in Note 9 Auditors' fees and reimbursement of expenses.

#### Valberedningens sammansättning

Name	Representing	Holding 30-09-2024	Holding 31-12-2024
Erik Törnberg (Chairman of the Nomination Committee)	Creades AB	15,862,000 (10.1%)	15,862,000 (10.1%)
Sven Hagströmer (Chairman of the Board of Avanza)	Hagströmer family and companies	15,990,000 (10.2%)	15,960,000 (10.2%)
Dick Bergqvist	AMF Tjänstepensioner & Fonder	15,566,573 (9.9%)	14,193,464 (9.0%)
Magnus Dybeck	Sten Dybeck with family and companies	6,490,308 (4.1%)	6,490,308 (4.1%)

## E. Board of Directors

The Board of Directors sets forth the business framework, appoints the CEO and exercises control over the Company's management. The Board's duty is to manage the Group's affairs in the best interests of Avanza and its shareholders in order to create the best conditions for a sustainable business. The duties of the Board are governed by the Swedish Companies Act, the Code and the formal plan that the Board has established for its work.

The Board takes decisions on matters concerning Avanza's strategic direction, major investments, acquisitions and divestments. Furthermore, each Group company's Board establishes policies and guidelines, as well as the rules of procedure for the CEO. Where applicable, subsidiaries also establish rules of procedure for the control functions Risk Management, Compliance, Internal Audit and the Actuarial function.

The AGM 2024 re-elected previously elected Board members except Catharina Eklöf, Sofia Sundström and Hans Toll, who declined re-election. Additionally, Julia Haglind and Lisa Åberg were elected as new members in accordance with the Nomination Committee's proposal. According to the Articles of Association, the Board shall consist of no fewer than five and no more than ten members. Avanza's Board consisted by year-end 2024 of nine AGM-elected members and no deputies, who elected until the next AGM. The Chairman of the Board is Sven Hagströmer and the Deputy Chairman is John Hedberg. The Board held its first meeting following election on 12 April 2024.

### Diversity and suitability

The policy on suitability assessments sets forth how Avanza evaluates appointees for their assignments, how conflicts of interest are addressed and how a suitably diverse Board is achieved. The Board's composition of individuals of varying age, with a goal of gender parity, and with varying educational and professional backgrounds will help to ensure that the Board collectively has the ability to critically review and understand relevant regulations and can identify the risks caused and faced by the Company. New members are also evaluated in terms of the number of positions they hold, to ensure they have the time needed for the Board's work. These assessments are conducted in conjunction with new appointments and followed up at least annually. Based on the suitability assessments and the Board evaluation, annual training plans are formulated. Background checks were made of all Board members in 2024. Information on the Board's composition, age and background is shown on pages 73–74.

The Boards of the subsidiaries Avanza Bank AB, Avanza Fonder AB and Försäkringsaktiebolaget Avanza Pension follow the Group's

### Members of the Board of Directors 2024

Board member*	Elected to the Board	Risk, Capital and Audit Committee	Remuneration Committee	IT Committee	Credit Committee	In relation to the company and its management	In relation to the company's largest shareholders
Sven Hagströmer, Chairman	1997		Member	Member	Member	Independent member	Not independent member
John Hedberg, Deputy Chairman	2023		Chairman			Independent member	Not independent member
Magnus Dybeck	2020			Chairman		Independent member	Independent member
Julia Haglind	2024	Member				Independent member	Independent member
Jonas Hagströmer	2015	Member			Chairman	Independent member	Not independent member
Linda Hellström	2022			Member		Independent member	Independent member
Johan Roos	2020	Chairman	Member		Member	Independent member	Independent member
Leemon Wu	2021	Member				Independent member	Independent member
Lisa Åberg	2024					Independent member	Independent member

\* Catharina Eklöf, Sofia Sundström and Hans Toll resigned as board members, as well as members or chairpersons of committees at the AGM 11 April 2024

### Attendance at recorded Board meetings 2024<sup>1</sup>

Board member	Board meetings	Risk, Capital and Audit Committee <sup>2</sup>	Remuneration Committee <sup>3</sup>	IT Committee <sup>4</sup>	Credit Committee <sup>5</sup>
Sven Hagströmer, Chairman	23/23		7/7	4/4	12/12
John Hedberg, Deputy Chairman	23/23		7/7		
Magnus Dybeck	23/23			4/4	
Julia Haglind <sup>6</sup>	15/23	7/10 <sup>7</sup>			
Jonas Hagströmer	23/23	10/10			7/12 <sup>7</sup>
Linda Hellström	23/23			2/4 <sup>7</sup>	
Johan Roos	23/23	10/10	7/7		12/12
Leemon Wu	23/23	7/10 <sup>7</sup>			
Lisa Åberg <sup>6</sup>	15/23				

<sup>1</sup> Catharina Eklöf, Sofia Sundström and Hans Toll resigned as board members, as well as members of committees at the AGM 11 April 2024. Sofia Sundström and Hans Toll attended all board meetings before resigning. Catharina Eklöf attended 7/8 board meetings before resigning

<sup>2</sup> Hans Toll attended all 3 committee meetings before resigning as board member

<sup>3</sup> Catharina Eklöf attended all 2 committee meetings before resigning as board member

<sup>4</sup> Sofia Sundström attended all 2 committee meetings before resigning as board member

<sup>5</sup> The committee is only for Avanza Bank AB. Hans Toll attended all 5 committee meetings before resigning as board member

<sup>6</sup> Julia Haglind and Lisa Åberg joined the Board at the AGM on 11 April 2024

<sup>7</sup> Appointed a member of the committee at inaugural Board meeting on 12 April 2024

policy on suitability assessments adapted to the requirements of a suitable composition and collective competence for the Board of each company. The subsidiary Boards consist of members with varying experience and education, which contributes to a suitable composition of competencies for the business in question.

### Formal work plan of the Board of Directors

The Board follows a formal work plan it adopts on an annual basis, which regulates the division of duties, decision-making, meeting procedures and the Chairman's duties. It also covers the Board's

responsibilities and duties as well as how to identify and manage potential conflicts of interest.

The Board's work follows an annual plan that meets the Board's information needs and is otherwise governed by established procedures for dividing duties between the Board and the CEO. The Company's auditor attended and presented the audit to the Board at 1 Board meeting and attended 7 meetings of the Risk, Capital and Audit Committee in 2024. Company employees participate in the Board's meetings as rapporteurs and secretary.

### Work of the Board in 2024

During the year, the Board held a total of 23 meetings, including 13 regular meetings, 1 inaugural meeting, 5 extra and 4 by telephone/mail. Board meetings by telephone/mail mainly address decisions relating to Avanza's incentive scheme. At scheduled meetings, the following are discussed:

- financial reporting
- operational reporting
- reporting by the Board's committees
- credit- and liquidity reporting for the subsidiary Avanza Bank

The control functions Risk Management, Internal Audit and Compliance report quarterly.

In addition to the recurring items on the agenda, the Board addressed during the year the matters shown in the illustration on the previous page. The Board also focused on the Group's implementation of and alignment with new and amended regulations affecting various aspects of operations.

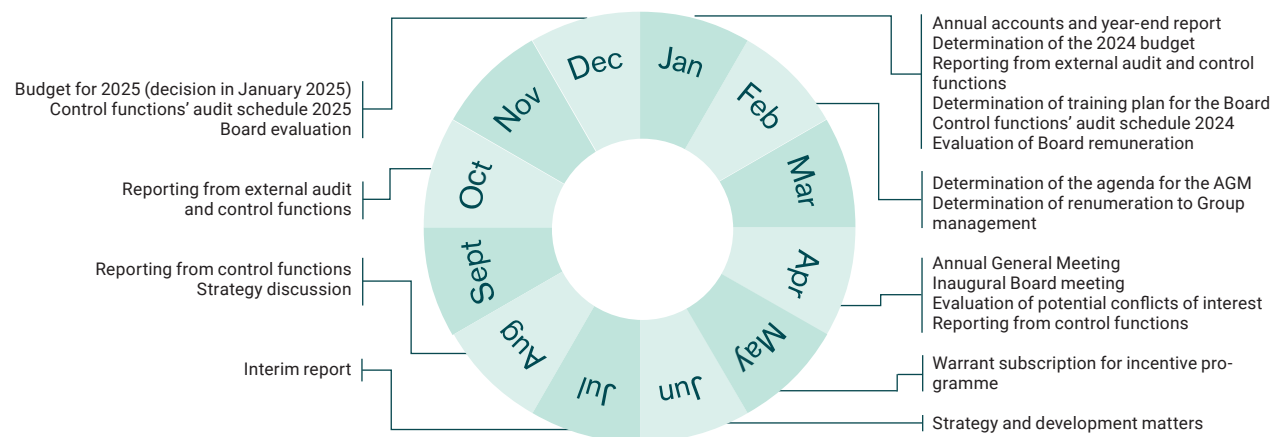
The Board also worked on and participated in strategic business planning in order to continuously adapt and improve Avanza's customer offering and ensuring further growth.

At the end of each calendar year, an evaluation is undertaken to improve the Board's work procedures and competence. The evaluation is conducted by having the Board members evaluate their own and the Board's collective competence as well as the Board's work and work procedures. The results are communicated to the Nomination Committee and compiled in a report, which then forms the basis for any changes or training.

### The Board of Directors' competence training

Each year the Board establishes a training plan to give members a better understanding of various operating areas, relevant rules and risks that affect the business as well as new products and services that Avanza is launching. The Board's training needs are reviewed and specific measures are taken as needed to provide information and improve competence in special areas. In 2024, the Board underwent training focused on information and communication technology (ICT), security and resilience, the AI Act, the Corporate Social Responsibility Reporting Directive (CSRD), Nasdaq/NGM's regulations, the Markets in Financial Instruments Directive (MiFID) and regulations on anti-money laundering and counter-terrorism financing. New Board members receive introductory training to gain an overview of the Group and its operations and an understanding of Avanza's governance, control and risks as well as values and culture.

### Board meetings 2024



### Remuneration resolved by the AGM 2024

Board member*	Board work	Risk, Capital and Audit Committee	Remuneration Committee	IT Committee	Credit Committee	Total, SEK
Sven Hagströmer, Chairman	412,000		49,500	58,000	61,000	580,500
John Hedberg, Deputy Chairman	412,000		49,500			461,500
Magnus Dybeck	412,000			58,000		470,000
Julia Haglind	514,000	130,000				644,000
Jonas Hagströmer	412,000	130,000			61,000	603,000
Linda Hellström	514,000			58,000		572,000
Johan Roos**	514,000	300,000	49,500		61,000	924,500
Leemon Wu	514,000	130,000				644,000
Lisa Åberg	514,000					514,000
<b>Summa, kronor</b>	<b>4,218,000</b>					<b>5,413,500</b>

\*Board members who receive salary due to employment in the company are not entitled to other remuneration for Board work. In 2024, no Board members have been employed by the company. For more information, see Note 8 Employees and personnel costs

\*\* The board member has also been remunerated for Board work in a subsidiary

### Remuneration for Board members and attendance at Board meetings

The AGM 2024 resolved remuneration according to the above table. Total remuneration to the Board is stated in Note 8 Employees and personnel costs.

Board work requires all members to engage and participate in issues concerning the Company's and the Group's organisation and management of its affairs, establishment of qualitative and quantitative operating goals, and approval of the Company's strategy to achieve these goals. This is in addition to Avanza's long-term financial interests, the risks Avanza and its subsidiaries are and may

potentially be exposed to, and the capital required to cover these risks. The duties of the Board are delegated to committees. The committee meetings and decisions are recorded in the minutes and shared with the Board at each subsequent scheduled Board meeting.

On issues that require specific expertise and independence, the Board discusses which of its members are the best qualified to oversee or investigate them. The Board continuously evaluates the competence needs of each committee.

Board members have no individual areas of responsibility beyond this and the committee work specified below.

## E.1 Remuneration Committee

The Board appoints the Remuneration Committee, which prepares proposals on remuneration for Group Management and the managements of the subsidiaries Avanza Bank AB, Avanza Fonder AB and Försäkringsaktiebolaget Avanza Pension, for the heads of the control functions Risk Management, Internal Audit, Compliance and the Actuarial function, as well as for identified risk-takers. Remuneration is approved by the board of each Group company. The Committee also prepares issues relating to the CEO's terms of employment and benefits for approval by the Board.

## E.2 Credit Committee

The Board of Directors of Avanza Bank AB appoints the members of the Credit Committee. The Committee is tasked with taking decisions on credit matters, with the exception of credits to related parties, which the entire Board decides on.

## E.3 Risk, Capital and Audit Committee

The Board appoints the Risk, Capital and Audit Committee, which supports the Board on risk and capital issues and serves as a forum for analysis and in-depth discussion of the company's risk taking and capital requirements. In its capacity as audit committee, the committee also monitors that the financial reporting maintains high quality, receives reports from the auditor, reviews and monitors the auditor's impartiality and independence, evaluates the auditing performance and provides input to the Nomination Committee on the AGM proposal on the auditor's election. The committee's members meet the independence requirements of the Swedish Companies Act and the Code, as well as accounting or auditing competence requirements.

The external auditor attended 7 of the Risk, Capital and Audit Committee's 9 regularly scheduled meetings and reported on the audit on 2 occasions in 2024. Internal Audit participated at all of the regularly scheduled meetings and has reported its independent observations on a quarterly basis. The quarterly reporting was also provided to the Board.

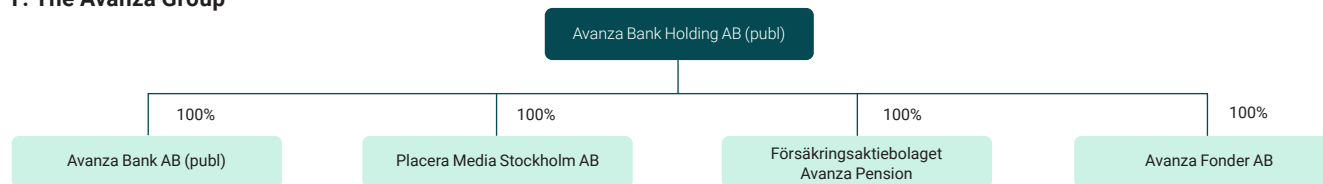
## E.4 IT Committee

The Board of Directors appoints the IT Committee, which is tasked with monitoring and reviewing critical projects with a high IT content, as well as preparing issues in advance of the Board's decisions on such projects.

## F. Avanza Group

Avanza strives to maintain a clear and transparent organisational structure. Reporting from subsidiaries is done on a monthly basis. The members of Avanza's Board of Directors are also members of the Board of the subsidiary Avanza Bank AB. The Boards of other subsidiaries consist of both internal and external members.

## F. The Avanza Group



## CEO and Group Management

The CEO is responsible for the day-to-day management of the company in accordance with the Swedish Companies Act and Avanza's CEO instruction, which is adopted by the Board. The CEO is responsible for keeping the Board informed of the Company's operations and ensuring that Board members have all the information they need. The CEO also keeps the Chairman updated on the Group's development.

In February 2024, the Board of Directors appointed Gustaf Unger as the new CEO. Gunnar Olsson, who had served as Acting CEO since November 2023, stepped down from his post in March 2024 and resumed his role as Deputy CEO. Karin Åge, Chief Human Resources Officer; Erik Gjötterberg, Chief Business Development Officer; and Fredrik Broman, Chief Technology Officer, joined Group Management in 2024. Also, Olov Eriksson was recruited as Chief Product Officer. He started his position in February 2025. Group Management members Camilla Hedenfelt, Chief Human Resources Officer; Peter Almqvist, Chief Information Officer; and Anders Karlsson, Chief Product and Technology Officer, left Avanza. Gunnar Olsson, Deputy CEO and Chief Operating Officer, announced in September that he will leave Avanza. He remained the Deputy CEO and co-opted member of Group Management until the end of the year.

Avanza's Group Management consisted at year-end 2024 of:

- Gustaf Unger, CEO of Avanza Bank Holding AB (publ)/Avanza Bank AB (publ)
- Anna Casselblad, Chief Financial Officer (CFO)
- Jesper Bonnivier, CEO of Avanza Fonder AB
- Fredrik Broman, Chief Technology Officer (CTO)
- Erik Gjötterberg, Chief Business Development Officer (CBDO)
- Åsa Mindus Söderlund, CEO of Försäkringsaktiebolaget Avanza Pension
- Teresa Schechter, Chief Legal Officer (CLO)
- Sofia Svavar, Chief Communications & IR Officer (CCIO) and Group Head of CSR
- Karin Åge, Chief Human Resources Officer (CHRO)

More information on Group Management is available on the website, [avanza.se/ir](https://www.avanza.se/ir), and on pages 70–71.

Group Management holds formal meetings every two weeks and informal meetings as needed. The meetings address Avanza's results, strategy, priorities and the status of major projects and initiatives, with regular reports from the Group functions.

## Suitability assessment

Avanza has internal policies for suitability assessments of the CEO, other members of Group Management, the heads of control functions and those responsible for the Group's AML work. The assessments are made in conjunction with new appointments and followed up at least once a year as regards the CEO and Deputy CEO and at least every two years as regards other members of Group Management, the heads of control functions, the appointed officer for controlling and reporting obligations and the specially appointed executive. In the assessment it is determined whether the person in question has adequate knowledge, insight, experience and is suited to the role. Potential conflicts of interest are evaluated as well. Background checks are conducted at least once a year and training plans are set annually.

## Remuneration to Group Management

Group Management's remuneration shall reflect each person's experience, competence and performance. Remuneration comprises a fixed salary and the opportunity to purchase warrants in the incentive programme available for all employees.

Members of Group Management have acquired warrants on prevailing market terms as part of outstanding incentive programmes. In contrast to other employees, Avanza's Group Management receives financing to acquire warrants for an annual one-time payment of 10 per cent of their base salary. The financing is contingent on the amount being invested in Avanza's incentive programmes and may be subject to repayment if pre-emptive rights are exercised to purchase warrants in accordance with the pre-emptive rights agreement for the warrants.

Avanza's remuneration policy can be found at [avanza.se/ir](https://www.avanza.se/ir) under

Governance, along with the remuneration report approved at the latest AGM.

The remuneration report presented at the AGM 2025 will be published after the AGM has approved it. Questions concerning the CEO's terms of employment, remuneration and benefits are prepared by the Remuneration Committee and approved by the Board. Remuneration to other members of Group Management is determined by the Board, based on the Committee's proposal, following consultation with the CEO. Remuneration guidelines for senior management are adopted by the AGM and presented in Note 8 Employees and personnel costs.

### Corporate culture and policies

The Avanza Group's corporate culture is based on a vision to create a better future for millions of people. The key is to create value for our customers. The corporate culture is characterised by collaboration, humility and an aim to constantly challenge ourselves to think differently. Decision-making channels are short and there is room for different opinions.

Avanza has a Group-wide instruction on diversity and inclusion, which can be found at [avanza.se/ir](https://www.avanza.se/ir). For Avanza, diversity means utilising everyone's knowledge, experience and views to enrich, create dynamism and influence every part of the Company. The policy also ensures that all employees are treated equally in accordance with labor laws and that there is no discrimination. The CEO has overarching responsibility for diversity and gender equality. The work is done systematically with updated documentation, analyses, active measures, evaluations and monitoring. Equality issues are tracked through employee surveys. Parity between women and men is measured in Group Management and among managers with personnel responsibility. Avanza's Group management at the end of 2024 was comprised of 5 women and 4 men. Among managers, 52 per cent are women.

Occupational health and safety is a priority within the Avanza Group. Healthy and engaged employees make for a better and more effective organisation and create shareholder value. The overarching goal of our health and safety work is to create and maintain an environment where employees have the right opportunities given their position and goals. Avanza has a dedicated committee that deals with the overall structure for systematic occupational health and safety and equality issues.

The Avanza Group has low total absenteeism rate of 2.4 per cent, equally divided by gender, and a high recommendation rate among employees as indicated by an eNPS score of 59. The high level of engagement is reflected in the high response rate of around 90 per cent in all pulse surveys.

For more information, see pages 33–37.

### Regulatory training

All new employees receive training on relevant regulations, which is followed up on a regular basis to ensure that the employees stay updated on the regulations and any revisions. Compliance training includes anti-money laundering and terrorist financing, central laws and rules for the regulated operations of Group companies, and other key internal rules. Additionally, individual departments arrange targeted, in-depth training in specific areas. All employees undergo regular web-based training in GDPR, IT and information security, anti-money laundering and counter-terrorist financing, and anti-corruption. Supplemental training is provided every three years for all employees.

The Avanza Group's internal regulations are available to all employees on the intranet. All employees of the Avanza Group have a responsibility to understand and stay updated on the laws and internal rules that affect and are relevant to their work. Avanza is also affiliated with SwedSec, which strengthens competence and consumer protection in the financial industry by maintaining high proficiency, compliance and ethical standards. By year-end, 129 of the Avanza Group's employees were licensed in one of the following categories: mortgages, advisors, information providers, specialists, management and control functions. Furthermore, 71 of the Avanza Group's employees were licensed for insurance distribution. Licenced employees receive annual knowledge updates and pledge to follow Avanza's and SwedSec's regulations and applicable external rules.

### G. Internal control and risk management

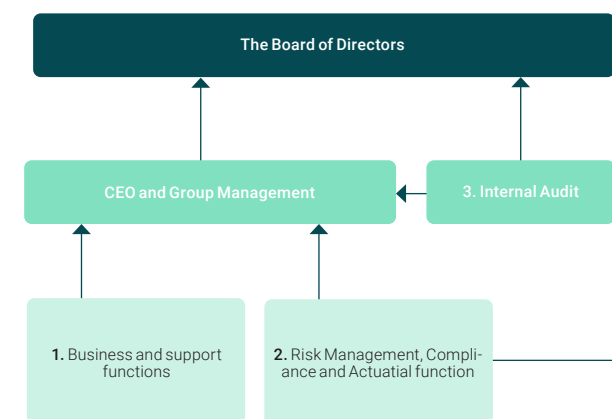
The Avanza Group is distinguished by good internal governance, risk management and control, and operates in an ethically responsible and professional manner with clearly defined roles and areas of responsibility. The risk management framework is effective and purposeful and is managed by an independent risk management function with responsibility for governance, monitoring and reporting on the Group's collective risks.

As a rule, the subsidiaries apply the same principles for governance, risk management and control at a company level as those at the Group level. Exceptions are made for specific legal or supervisory requirements and, in terms of proportionality, for the subsidiary's operations, scope and/or complexity, as well as where specific types of risk exist only in a single subsidiary.

#### Three lines of defence principle

Risk management and risk control in the Group and its subsidiaries are based on the three lines of defence principle. The first line of defence is comprised of business and support functions.

### G. Internal control and risk management, Three lines of defence



#### 1. First line of defence – risk management in the business operations

Risk management primarily takes place in the first line of defence, which consists of business and support functions with specific responsibility for each department.

#### 2. Second line of defence

The second line of defence is comprised of the Risk Management function and Compliance as well as, for Försäkringsaktiebolaget Avanza Pension, the Actuarial function, which are independent of each other and independent of other operations.

#### 2.1 Risk Management function

An important part of risk management is to promote a sustainable risk culture and risk-taking that does not threaten the Company's survival. The culture is derived from governance and decision-making by the Board and management. Within the framework of the Group's financial capacity, the Board has formulated a risk appetite, which has been further broken down in the form of CEO limits. To ensure that risk-taking stays within the risk appetite and limit structures, risk management and control processes have been put in place to identify, evaluate, manage, monitor and report every type of risk that the Group and its subsidiaries are exposed to.

Risk control and monitoring are performed in among other ways by limiting and measuring financial risks, self-assessments of non-financial risks, incident reporting and monitoring, and risk analysis and opinion statements from the control functions before management decides on major changes. The risk management function provides an overview of the Group's risk exposure and limit



utilisation to management on a monthly basis and to the Board on a quarterly basis. Additionally, the Chief Risk Officer reports on a continuous basis directly to the CEO and the Chairman of the Board as needed. The Chief Risk Officer (CRO) is directly subordinate to the CEO and regularly reports at the Board's scheduled meetings and to Group management, as well as directly to the CEO and the Chairman of the Board as needed.

## 2.2 Compliance

Compliance is responsible for verifying that businesses subject to licensing requirements comply with applicable laws, regulations and internal directives, and that the internal directives are appropriate and effective. Compliance is also responsible for supporting operations by providing advice on compliance issues and by identifying relevant compliance risks related to the operations in question. Furthermore, Compliance is responsible for keeping the persons concerned informed of new or revised rules for businesses subject to licensing requirements.

The Head of Compliance is directly subordinate to the CEO of each subsidiary and reports on a monthly basis to management and on a quarterly basis to the Board, in addition to reporting directly to the CEO and the Chairman of the Board as needed.

## 2.3 Actuarial function

The Actuarial function is responsible for formulating and verifying that the actuarial calculations by Försäkringsaktiebolaget Avanza Pension meet established limits, and assists the Board and the CEO on matters involving methods, calculations and assessments of technical provisions and insurance risks as well as reinsurance protection and other risk reduction techniques.

The Actuarial function is subordinate to the insurance company's CEO. The Actuarial function regularly reports at the Board meetings of Försäkringsaktiebolaget Avanza Pension.

## 3. Third line of defence – Internal Audit

The third line of defence is comprised of Internal Audit, which is an independent internal audit function appointed by and directly under the supervision of the respective Board of directors within the Group. Internal Audit's work is based on a risk-based audit plan established by each Board. The plan is based on a thorough risk analysis, and the audit work includes examining and assessing governance and internal control, examining and assessing whether the Company's organisation, governance processes, IT systems, models and routines are appropriate and effective, and examining and regularly evaluating the reliability and quality of the work performed by other control functions. Internal Audit issues recommendations after each review and then regularly verifies that the recommendations have been acted on.

Internal Audit provides internal auditing services to all Group subsidiaries with licensing requirements by having the subsidiaries outsource this function to the Parent Company.

The results of the internal audits are reported quarterly, both in writing and orally, at the meetings of the Board and the Audit Committee as well as to the CEO. Internal Audit also reports on a continuous basis directly to the CEO, the Chairman of the Risk, Capital and Audit Committee, and the Chairman of the Board as needed.

## Board of Directors' report on internal control over financial reporting

The Board is responsible, under the provisions of the Swedish Companies Act (2005:551), the Swedish Annual Accounts Act (1995:1554) and the Swedish Code of Conduct for Corporate Governance ("the Code"), for internal control for both Avanza and the entire Avanza Group. This description is limited to internal control over financial reporting.

### System of internal control and risk management over financial reporting

Internal control over financial reporting is a process, the purpose of which is to ensure compliance with the established principles for internal control and financial reporting, and that the financial reporting is prepared in accordance with laws, regulations, applicable accounting standards and generally accepted accounting principles, as well as all other requirements for companies with transferable securities listed for trade in a regulated market.

### Control environment

The keys to Avanza's internal control over financial reporting are the control environment described in this corporate governance report, a clear and transparent organisational structure, the distribution of responsibilities, and governing internal documents such as policies, guidelines and instructions.

Another component of the control environment is risk assessment, i.e. identification and management of the risks that can affect the financial reporting, as well as the control activities to prevent, identify and rectify errors and discrepancies.

### Risk management

Management of risks related to the financial reporting is proactive and emphasises continuous assessments, controls and training. Avanza applies available techniques and methods in a cost-effective manner. Risk management is an integral part of the business operations.

### Control activities

Control activities are integrated into the financial reporting process. They include both general and more detailed controls, which are designed to prevent, identify and rectify errors and discrepancies. Control activities are formulated and documented at a Company-wide and department level, based on a reasonable level of the risk of errors and their impacts. Each department manager has primary responsibility for managing the risks associated with the department's operations and financial reporting processes.

A high level of IT security is also crucial to effective internal control over financial reporting. For this reason, rules and guidelines have been established to ensure the availability, accuracy, confidentiality and traceability of the information in the business systems.

### Information and communication

The information and communication channels are designed to promote thoroughness and accuracy in the financial reporting. Governing documents applying to the financial reporting have been made available and known to appropriate employees through the Company's intranet and have been supplemented with relevant routines and process descriptions.

Continuous information, dialogue, training and controls ensure that the employees are aware of and understand the internal regulations. This ensures a high standard of financial reporting. The entire Group applies the same system for financial reporting.

### Monitoring

Avanza's Controller function compiles and reports financial and operating data and analyses to department managers, Group Management and the Board. Moreover, the accounting and controller departments actively monitor operating expenses in relation to budgets and forecasts. This work is undertaken in close cooperation with Group Management and managers in the organisation.

The control functions Risk Management, Compliance and Internal Audit monitor compliance with policies, guidelines and instructions.

The Board receives monthly financial reports, and the financial situation is addressed at every Board meeting. The Board receives quarterly reports from the control functions Risk Management, Compliance and Internal Audit. All of these reports are based on an evaluation of the Group's activities and cover the entire organisation.

The Board also reviews the quarterly financial reports and annual accounts, as well as the observations and conclusions of the external and internal auditors.

The Group's information and communication channels are monitored on a regular basis to ensure they are appropriate for the financial reporting.

**Assessment and position on internal audits**

Internal Audit's audit plan includes reviewing and evaluating governance and internal control, reviewing and evaluating that the Company's organisation, governance processes, IT systems, models and routines are appropriate and effective, as well as issuing recommendations and monitoring that the recommendations are implemented.

# Board of Directors and Auditors



## Sven Hagströmer, Chairman

**Born:** 1943

**Elected:** 1997

**Committees:** Remuneration Committee, Credit Committee, IT Committee

**Education:** Studies at Stockholm University

**Contribution to Board's work:** Over 40 years of experience from the financial industry. Highly skilled business executive and entrepreneur who has founded several companies and co-financed others outside the financial industry. Strongly engaged in various social projects and projects involving gender equality and diversity. Thorough knowledge of and keen feel for the financial markets.

**Relevant employment history:** Founder of Sven Hagströmer Fondkommission AB 1981. Chairman of Avanza's Board of Directors since 1999

**Other significant assignments:** Chairman of Creades AB and Biovestor AB

**Holdings on 31 December 2024** (incl. family and companies): 31,852,000 (of which Creades 15,862,000)



## John Hedberg, Deputy Chairman

**Born:** 1972

**Elected:** 2023

**Committees:** Remuneration Committee

**Education:** M.Sc. Business Administration and Economics, Stockholm School of Economics

**Contribution to Board's work:** Extensive experience and knowledge in capital markets and strategy, and from executive positions. Thorough understanding of Avanza's operations from following Avanza closely for many years as CEO of Creades AB and as a former board member of Försäkringsaktiebolaget Avanza Pension and former board member of Avanza Fonder AB.

**Relevant employment history:** 2016–present CEO of Creades AB. 2021–2024 CEO of Creaspac AB. 2011–2016 Director/Principal/Partner, Nordic Capital. 2007–2011 Senior Vice President/CEO Relacom AB, Relacom Group. 2003–2006 Director/Head of Business Development, Bonnier Newspapers. 1997–2002 Associate Principal, McKinsey & Co

**Other significant assignments:** Board member of StickerApp Holding AB, Instabee Holding AB and MARGE Arkitekter Aktiebolag

**Holdings on 31 December 2024** (incl. family and companies): 25,000 and holdings via Creades



## Magnus Dybeck

**Born:** 1977

**Elected:** 2020

**Committees:** IT Committee

**Education:** MSc Engineering, KTH Royal Institute of Technology in Stockholm

**Contribution to Board's work:** Operational experience from the financial industry in analysis and asset management as well as in the fintech development.

**Relevant employment history:** 2012–2017 HiQ, Fintech Specialist. 2010–2011 Öhman, Head of Private Wealth Management. 2007–2010 EFG Bank, Analyst

**Other significant assignments:** Board member of Investment AB Öresund and DBT Capital AB

**Holdings on 31 December 2024** (incl. family and companies): 4,507,000



## Julia Haglind

**Born:** 1978

**Elected:** 2024

**Committees:** Risk, Capital and Audit Committee

**Education:** B.Sc., major in Behavioural Science, Psychology, Stockholm University

**Contribution to Board's work:** Extensive senior leadership experience from highly regulated and license required industries and financial markets which has established a deep commitment to operational resilience, rigorous risk management, and robust governance practices. Compliance, strategy and fostering a positive corporate culture are also particular areas of expertise.

**Relevant employment history:** 2019–2022 Avonova Holdco AS, Board member. 2017–2021 Nasdaq Clearing AB, CEO. 2013–2017 Nasdaq Clearing AB, CTO and later COO. 2013–2017 Nasdaq Operations, Various leading positions within Market Operations. 2005–2007 Nasdaq Hong Kong, Market & Clearing Specialist

**Other significant assignments:** CEO and Co-founder of North House AB

**Holdings on 31 December 2024** (incl. family and companies): 800



## Jonas Hagströmer

**Born:** 1982

**Elected:** 2015

**Committees:** Credit Committee, Risk, Capital and Audit Committee

**Education:** MBA, Lund University. Studies at Hong Kong University of Science and Technology

**Contribution to Board's work:** Experience from corporate finance, investment companies and board assignments for a number of companies. Broad knowledge of the financial market. Contributes an investor's and shareholder's perspective as well as expertise in the inner workings of the financial services sector.

**Relevant employment history:** 2012–present Creades AB, Investment Manager. 2007–2011 Keystone Advisers (later MCF Corporate Finance), Corporate Finance Associate and analyst

**Other significant assignments:** Chairman of Inet AB and Inet Group AB, Board member of Apotea AB, StickerApp Holding AB and Biovestor AB

**Holdings on 31 December 2024** (incl. family and companies): Indirect holdings via Biovestor and Creades



## Linda Hellström

**Born:** 1974

**Elected:** 2022

**Committees:** IT Committee

**Education:** M.Sc. in Business Administration from the Stockholm School of Economics

**Contribution to Board's work:** Highly experienced in creating growth through customer centricity and data-driven marketing for Nordic and global companies. Focus on personalisation at scale, customer acquisition, engagement and loyalty through leveraging customer data, marketing technology, new media channels and strategy. Has driven a number of digital transformation programs within retail, telecom, media and finance during the last 20 years.

**Relevant employment history:** 2013–2022 Kaplan (part of Accenture Interactive), Co-CEO/Managing Director. 2009–2012 Lernia, CMO. 2004–2009 Differ, Partner. 2003–2004 Henkel Norden AB, Nordic Brand Manager, Consumer Retail. 2000–2003 Accenture, Management Consultant

**Other significant assignments:** CEO and Board member of Sift Lab AB

**Holdings on 31 December 2024** (incl. family and companies): 1,511



### Johan Roos

**Born:** 1968

**Elected:** 2020

**Committees:** Remuneration Committee, Credit Committee, Risk, Capital and Audit Committee

**Education:** Auditor exam, MBA with specialisation in accounting from Uppsala University

**Contribution to Board's work:** Extensive experience and knowledge in accounting and auditing. 20 years in senior management positions and subsidiary boards as well as operational experience in banking and insurance. Deep knowledge of developing efficiency and reliability in corporate processes and internal control with a strong customer focus. Extensive experience developing and enforcing good corporate governance and evaluation of corporate strategies.

**Relevant employment history:** 2019–present Independent consultant. 2016–2018 RSA Scandinavia (Codan/TryggHansa), CFO. 2007–2016 SEB, CFO. 2001–2007 Hewlett-Packard Sweden, Finance Director. 1991–2001 PricewaterhouseCoopers Sweden, Authorised Public Accountant and regional partner

**Other significant assignments:** Board member of SaveLend Group AB, Stabelo Group AB and The Intelligence Company AB

**Holdings on 31 December 2024** (incl. family and companies): 9,361



### Leemon Wu

**Born:** 1975

**Elected:** 2021

**Committees:** Risk, Capital and Audit Committee

**Education:** M.Sc. Business Administration and Economics, Stockholm School of Economics

**Contribution to Board's work:** Extensive experience in equity research, portfolio management and investments, as well as board experience from fund companies and digital business models.

**Relevant employment history:** 2022–present C WorldWide Asset Management, Portfolio Manager. 2018–2022 Moor Holding, Chief Investment Officer. 2007–2016 C Worldwide Asset Management, Portfolio manager. 2001–2007 Carnegie Investment Bank, Equity analyst. 1999–2001 AB Custos, Investments analyst

**Other significant assignments:** Board member of Acast AB

**Holdings on 31 December 2024** (incl. family and companies): 12,665



### Lisa Åberg

**Born:** 1970

**Elected:** 2024

**Committees:** –

**Education:** M.Sc. Business Administration and Economics, Stockholm School of Economics

**Contribution to Board's work:** Extensive experience from strategic and operational work with banks and other financial institutions in Europe, the US, and Africa. Has worked with large incumbent banks and insurance companies as well as digital tech-/fintech companies. Has developed and supported the implementation of, for example, organic/inorganic growth strategies, digital transformations, development of new customer offerings and integration of completed M&A transactions.

**Relevant employment history:** 1998–2023 McKinsey & Company, Management consultant, of which 2019–2023 Senior Partner

**Other significant assignments:** Board member of Swegon Group AB, SATS ASA, Caljan A/S, Haarslev Industries A/S, BRP Systems Holding AB and Ardyh TopCo AB

**Holdings on 31 December 2024** (incl. family and companies): 505



### Auditors

**KPMG AB**

Auditor-in-Charge:

Dan Beitner

Born: 1974

Authorised Public Accountant

# Group Management



## Gustaf Unger, CEO

**Born:** 1973

**Employed:** 2024

**Education:** M.Sc. in Business Administration and Economics, Stockholm University. M.Sc. in Engineering, KTH Royal Institute of Technology. PhD in Operations Research and Mathematical Finance, ETH Zürich

**Employment history:** 2022–2024 Nordnet AB, Board member. 2021–2024 Intelligent Debt Financing AB, Co-founder. 2017–2021 Nordea, of which 2017–2018 Head of Nordea Life & Pension; 2019–2019 Co-head Nordea Wealth Management and 2020–2021 Head of Nordea Private Banking & Solutions. 2006–2017 SEB, of which 2006 SEB Private Banking, Head of Business Development & IT; 2007–2010 SEB Wealth Management, Senior Manager; 2010–2013 SEB Enskilda Corporate Finance Frankfurt & Stockholm, Managing Director and 2014–2017 SEB Investor Services, Head of Investor Services. 2000–2005 McKinsey & Co, of which 2000–2003 Associate, Zürich and 2003–2005 Engagement Manager, Stockholm. 1999–2000 Investor AB, Research associate

**Other significant assignments:** Member of Nasdaq Committee of European Trading Services

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 4,499

*Warrants* (corresponding number of shares): 127,307



## Anna Casselblad, CFO

**Born:** 1981

**Employed:** 2012

**Education:** M.Sc. Business Administration and Economics, Stockholm School of Economics

**Employment history:** 2012–2020 Avanza Bank AB, of which 2012–2017 Operational responsibility Compliance, 2016–2017 Group leader Compliance and 2017–2020 Head of Compliance for the Avanza Group. 2005–2012 PwC AB, Auditor in Financial Services.

**Other significant assignments:** –

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 2,750

*Warrants* (corresponding number of shares): 34,645



## Jesper Bonnavier, CEO Avanza Fonder AB

**Born:** 1974

**Employed:** 2019

**Education:** Business administration Linköping's and Mälardalen's Universities. Certified Financial Analyst, Stockholm School of Economics

**Employment history:** 2011–2018 Länsförsäkringar Fondförvaltning AB, Deputy CEO and Head of Asset Management. 2009–2010 Länsförsäkringar AB, Head of Securities Administration. 2007–2008 Länsförsäkringar Fondförvaltning AB, Deputy CEO and Head of Fund Analysis and Valuation

**Other significant assignments:** Board member Swedish Investment Fund Association and StockRepublic

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 300

*Warrants* (corresponding number of shares): 20,965



## Fredrik Broman, Chief Technology Officer (CTO)

**Born:** 1971

**Employed:** 2024

**Education:** M. Sc., Computer Science, KTH Royal Institute of Technology

**Employment history:** 2020–2024 Tink, of which 2020–2021 Engineering Director and 2021–2024 VP of Engineering. 2019–2020 Nexus Group – Global, VP of Engineering. 2014–2018 Klarna, of which 2014–2016 Product Manager Post purchase services; 2016–2018 Product Manager Engineering efficiency and 2018 Acting Domain Lead Engineering efficiency. 2009–2014 Aktieinvest, Chief Technology Officer. 2007–2009 Netgiro Systems AB, Product Manager. 1996–2007 SmartTrust, of which 1996–1997 Developer R&D; 1997–1999 Project Manager; 1999–2000 Team Manager R&D; 2000–2001 Business Development Manager; 2001–2003 Head of Product Marketing; 2003–2006 Solution Marketing Manager and 2006–2007 Senior Director, Business and Technical Consultant

**Other significant assignments:** –

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 1,500

*Warrants* (corresponding number of shares): 0



## Erik Gjötterberg, Chief Business Development Officer (CBDO)

**Born:** 1966

**Employed:** 2024

**Education:** M.Sc. Business Administration and Economics, Stockholm School of Economics

**Employment history:** 2011–2024 Nordea, of which 2011–2014 Head of Group Processes; 2014–2017 Head of Banking Operations; 2018–2020 Head of Business Support Wealth Management and 2020–2024 Head of Strategy and Governance Life & Pensions. 2008–2011 Stockholm County Council, New Karolinska Solna, Administrative Director. 2007–2008 SEB, Operative Programme Manager. 2003–2007 Stockholm County Council, Head of Group Controlling department. 2001–2003 Huddinge University Hospital, Head of Finance and Accounting. 2000–2001 Capital Cube, start-up. 1992–2000 McKinsey & Co., Management consultant

**Other significant assignments:** –

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 2,000

*Warrants* (corresponding number of shares): 0



## Åsa Mindus Söderlund, CEO Försäkringsaktiebolaget

### Avanza Pension

**Born:** 1965

**Employed:** 2017

**Education:** B. Sc. Financial Economics and Business Administration, Stockholm School of Economics

**Employment history:** 2017–2018 Avanza Fonder, CEO. 2012–2017 SPP, CEO SPP Consultant and member of Group Management SPP Pension & Insurance. 2010–2012 mindUS Consulting, Project leader with focus on international outsourcing within the fund and asset management industry. 2005–2010 Atos Consulting, Director and CEO. 1998–2005 Capgemini Ernst & Young, Senior Manager Ernst & Young Management Consulting. 1991–1997 Ministry of Finance, Head of Section

**Other significant assignments:** –

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 334

*Warrants* (corresponding number of shares): 22,681



### **Teresa Schechter, Chief Legal Officer (CLO)**

**Born:** 1970

**Employed:** 2006

**Education:** LL.M. School of Business, Economics and Law at the University of Gothenburg

**Employment history:** 2006–2017 Avanza Bank AB, Head of Compliance, Legal and Surveillance. 2004–2006 Aktieinvest FK AB, Compliance Officer and Corporate counsel. 2002–2004 Swedish Shareholders' Association, Legal Counsel. 1999–2001 Aktiesparinvest / HQ.se AB, Corporate Counsel

**Other significant assignments:** –

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 500

*Warrants* (corresponding number of shares): 30,456



### **Sofia Svavar, Chief Communications & IR Officer (CCIRO),**

**Group responsible for CSR**

**Born:** 1972

**Employed:** 2015

**Education:** DIHM Business Communication, IHM Business School, and Business administration, FEI

**Employment history:** 2015–2022 Avanza Bank AB, Head of Investor Relations. 2009–2015 Swedbank AB, Investor Relations Manager. 2000–2009 Carnegie Investment Bank, Corporate Communications and Investor Relations with responsibility for the Group's internal communication, branding as well as external and internal websites.

**Other significant assignments:** –

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 17,000

*Warrants* (corresponding number of shares): 21,441



### **Karin Åge, Chief Human Resource Officer (CHRO)**

**Born:** 1974

**Employed:** 2024

**Education:** M.Sc. Business Administration and Economics, Stockholm School of Economics. Advanced Management Program, Columbia Business School

**Employment history:** 2019–2024 Navigio, Partner and Head of Executive Search. 2015–2018 Egon Zehnder, Consultant. 2007–2015 SEB, of which 2007–2010 Manager Operational Excellence; 2010–2011 Head Business Development Commodities; 2011–2012 Global Head of Sales and Relations, Asset servicing and Cash Management towards institutions and 2013–2015 Head of Strategy and Business Development for SEB Norway. 2000–2007 Accenture, Manager. 1999–2000 Arla, Trainee

**Other significant assignments:** Board member of Svevik Industri AB

**Holdings on 31 December 2024** (incl. family and companies):

*Shares:* 1,294

*Warrants* (corresponding number of shares): 5,256

**Stockholm, 20 February 2025**

Sven Hagströmer  
Chairman of the Board

Magnus Dybeck  
Board member

Julia Haglind  
Board member

Jonas Hagströmer  
Board member

John Hedberg  
Board member

Linda Hellström  
Board member

Johan Roos  
Board member

Lisa Åberg  
Board member

Leemon Wu  
Board member

Gustaf Unger  
CEO

**The auditor's examination of the corporate governance statement**

To the general meeting of the shareholders in Avanza Bank Holding AB, corporate identity number 556274-8458

***Engagement and responsibility***

The Board of Directors is responsible for that the corporate governance statement on pages 65–77 has been prepared in accordance with the Annual Accounts Act.

***The scope of the audit***

Our examination of the corporate governance statement is conducted in accordance with FAR's auditing standard RevR 16 The auditor's examination of the corporate governance statement. This means that our examination of the corporate governance statement is different and substantially less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinions.

***Opinions***

A corporate governance statement has been prepared. Disclosures in accordance with chapter 6 section 6 the second paragraph points 2-6 of the Annual Accounts Act and chapter 7 section 31 the second paragraph the same law are consistent with the other parts of the annual accounts and consolidated accounts and are in accordance with the Annual Accounts Act and the Annual Accounts Act for Credit Institutions and Securities Companies.

Stockholm, 20 February 2025

KPMG AB

Dan Beitner  
Authorised Public Accountant

# Administration report

The Board of Directors and the CEO of Avanza Bank Holding AB (publ), Corporate Identity Number 556274-8458, hereby present the Annual report for 2024. The Corporate governance report is provided separately from the Administration report on pages 65–72. Avanza's Annual report is available on [avanza.se/ir](https://avanza.se/ir).

## Group structure

Avanza Bank Holding AB (publ) is the Parent Company of the Avanza Group. The operational activities are conducted by the wholly-owned subsidiaries Avanza Bank AB (publ), Försäkringsaktiebolaget Avanza Pension ("Avanza Pension") and Avanza Fonder AB, the operations of which are supervised by the Swedish FSA. Placera Media Stockholm AB is also included in the Group, a media company editorially independent from Avanza. In 2024, the editorial team at Placera was terminated and all editorial content is now purchased from external sources. The subsidiary Avanza Förvaltning AB is responsible for acquiring and transferring warrants in the warrant programmes resolved by the general meeting.

## Description of the operations

Avanza is Sweden's leading platform for savings and investments. Avanza offers the market's widest range of savings products, competitive occupational pension solutions, margin lending and mortgages. Avanza challenges established structures of large banks and pension providers in the Swedish savings market and drives forward the long-term development of financial products and services. Customers are offered to save in Swedish and foreign securities and in savings accounts at very low fees and to competitive rates. Avanza serves individual investors, professional traders and corporate customers, such as entrepreneurs, asset managers and firms that want occupational pension for their employees.

## Market and sales

The Swedish savings market amounted to SEK 12,300 billion as of 30 September 2024, an increase of 10 per cent since the end of 2023. During the same period, Avanza's savings capital increased by 19 per cent. Avanza's share of the Swedish savings market increased, mainly as a result of higher volumes in shares and mutual funds. The market share of net inflow also increased.

Market shares	Oct 2023– Sep 2024	Oct 2022– Sep 2023	Jan 2023– Dec 2023
<i>The Swedish savings market <sup>1)</sup></i>			
Market share at the end of the period, %	7.5	6.5	7.0
Net inflow, %	20.0	12.1	18.2
<i>The Swedish life insurance market</i>			
Premium inflow, %	9.4	9.1	9.2
Premium inflow for non collectively agreed occupational pension in unit-linked insurance, % <sup>2)</sup>	11.0	10.7	10.9

<sup>1)</sup> SCB has revised historical data, resulting in adjustments to the comparative figures.

<sup>2)</sup> Previously, defined contribution traditional insurance was included in the reported market share. Currently, only unit-linked insurance is included in accordance with Avanza's strategic priority.

Pension and insurance savings, i.e. the life insurance market, is the single largest savings segment and amounts to nearly SEK 5,700 billion, corresponding to just under half of the Swedish savings market. The occupational pension market increased by 9 per cent to SEK 4,310 billion.<sup>1)</sup> During the same period Avanza's occupational pension capital increased by 24 per cent. Avanza is active within unit-linked insurance outside of collectively agreed occupational pensions, which amounted to SEK 843 billion at the end of 2023. Avanza's market share was 6.9 per cent (6.3).<sup>3)</sup> The total premium inflow to the unit-linked insurance market was SEK 47 billion (44), which reflects the stability in this segment of the savings market. Avanza's market share increased to 11.0 per cent (10.7). With respect to premium inflows to the competitive pension and life insurance market, including endowment insurance, the market share increased to 9.4 per cent (9.1). The increase was mainly due to higher inflows to endowment insurance.<sup>1)</sup>

According to data from the Swedish Fund market Association, the fund market reported a net inflow for the full year of SEK 181 billion compared to SEK 67 billion in the previous year.<sup>4)</sup> Avanza's net inflow to funds rose and amounted to nearly SEK 41 billion.

2024 was distinguished by war, geopolitical uncertainty, inflation and policy rate cuts. Volatility decreased compared to 2023 while OMX Stockholm Gross Index grew by nearly 9 per cent. Trading activity was in line with 2023 in terms of both number of transactions and turnover on the Stockholm Stock Exchange including First North. Among Avanza's customers, on the other hand, the number of transactions and turnover both increased by 8 per cent on these marketplaces, which increased Avanza's market shares. Avanza remained by far the largest Swedish player measured by both number of transactions and turnover.

Market shares	2024 Jan–Dec	2023 Jan–Dec
<i>Nasdaq Stockholm and First North</i>		
No. transactions %	20.7	19.1
Turnover, %	7.7	7.0
<i>The Swedish fund market (excl. PPM)</i>		
Net savings, %	22.9	35.2

The policy rate was all together lowered by 1.25 percentage points during the year with the first decrease in May. The policy rate was 2.75 per cent as of 31 December 2024. The rate was cut by an additional 0.25 percentage points in both January and February 2025. While the Riksbank's forecast is that the policy rate will be held unchanged during the remainder of the forecast period, it is prepared to act if the outlook for inflation and economic activity changes.

The total number of customers increased by 170,700 to 2,071,700 as of 31 December. In occupational pension the number of customers increased by 14,800, which corresponds to a growth of 9 per cent to 180,100.

<sup>1)</sup> Statistics from the Savings barometer (SCB) and Swedish Insurance as of 30-09-2024.

<sup>2)</sup> Statistics from SCB as of 30-09-2024.

<sup>3)</sup> Based on statistics from Swedish Insurance as of 31-12-2023.

<sup>4)</sup> Swedish Investment Fund Association as of 31-12-2024.



Customers' savings capital increased in 2024 driven by higher valuations due to the upturn in share prices but also net inflows. As of 31 December, the savings capital amounted to SEK 955 billion, an increase of 22 per cent from the beginning of the year. The net inflow to Avanza was SEK 86 billion, which was 19 per cent higher than in 2023. Fund capital also increased. Deposits as a share of the savings capital decreased during the year and amounted to nearly 12 per cent as of 31 December. The savings capital in occupational pensions increased by 30 per cent.

Lending increased by 13 per cent during the year, mainly as a result of higher margin lending volumes due to increased risk willingness. The mortgage volumes also increased.

Net inflow, SEK m	2024	2023	Change %
Standard	77,460	65,870	18
Private Banking	7,550	4,770	58
Pro	790	1,660	-52
<b>Net inflow</b>	<b>85,800</b>	<b>72,300</b>	<b>19</b>
Equity-, fund-, and savings accounts	68,700	62,100	11
Pension- & insurance-based accounts	17,100	10,200	68
of which, endowment insurance	10,000	3,510	185
of which, occupational pensions	6,790	6,340	7
<b>Net inflow</b>	<b>85,800</b>	<b>72,300</b>	<b>19</b>

No. customers, savings capital and lending, SEK m (unless otherwise stated)	31-12-2024	31-12-2023	Change %
Standard, no.	2,031,380	1,865,590	9
Private Banking, no.	36,600	31,900	15
Pro, no.	3,720	3,610	3
<b>No. customers</b>	<b>2,071,700</b>	<b>1,901,100</b>	<b>9</b>
of which occupational pension customers, no	180,100	165,300	9
Standard	538,200	446,500	21
Private Banking	352,600	285,600	23
Pro	64,200	49,600	29
<b>Savings capital</b>	<b>955,000</b>	<b>781,700</b>	<b>22</b>
Equity-, fund-, and savings accounts	679,000	559,600	21
Pension- & insurance-based accounts	276,000	222,100	24
of which endowment insurance	180,800	147,400	23
of which occupational pensions	76,000	58,300	30
<b>Savings capital</b>	<b>955,000</b>	<b>781,700</b>	<b>22</b>
Equities, bonds, derivatives, etc.	511,500	432,500	18
Mutual funds	333,500	243,100	37
Deposits	110,000	106,100	4
of which savings account	32,500	26,800	21
of which external deposits (Savings account+)	42,700	42,700	0
<b>Savings capital</b>	<b>955,000</b>	<b>781,700</b>	<b>22</b>
Internally financed lending	23,900	19,600	22
of which margin lending	10,700	8,100	32
of which mortgages (for Private Banking)	13,300	11,500	16
External mortgages (Bolån+)	21,200	20,300	4
<b>Lending</b>	<b>45,100</b>	<b>39,900</b>	<b>13</b>
Deposits/Savings capital, %	12	14	-2
Return, average account since 1 Jan, %	11	7	4
OMX Stockholm GI since 1 Jan, %	9	19	-10

For definitions see pages 137–138.

## Seasonal effects

Avanza has no major seasonal variations. The third quarter is typically characterised by lower personnel costs due to the summer vacation as well as normally lower Corporate Finance activity. Marketing costs are usually higher during the first and third quarters, although this may be affected by product launches in other quarters. Avanza's financial results are rather impacted by the stock market, volatility and the policy rate. Customer growth and net inflow are normally higher at the beginning of the year.

## Business development and investments

Avanza's offering is continuously updated with new features and improvements. The external mortgage offering through Landshypotek was expanded to include loans for tenant-owned apartments with loan-to-value ratios of up to 75 per cent. In keeping with tradition, "Your 2024" was launched to provide customers with a summary of their savings patterns and performance during the year in relation to the index and the average Avanza customer. The feature also contains information and insight into market fluctuations, risk diversification and the importance of thinking long term. The search feature was improved and several smart new features were added to account pages for a more personalised experience.

To improve the experience of more active customers, we have added the option to activate news alerts with notifications directly by mobile phone. The stop loss feature was improved and a new, easier-to-navigate list of options and futures was launched. By trading through Nasdaq's Nordic@Mid Darkpool, customers now can take advantage of the benefits of market anonymity and trade larger volumes without influencing the share price. Advanced ordering options were expanded with algorithmic ordering, TWAP and VWAP. A separate analysis tab with more report data and historical performance indicators was added, along with access to advanced technical analysis via TradingView's charting platform. Additionally, market data was improved for over 1,200 exchange traded funds through a new supplier, which means better quality in pricing and an even broader range. A new fund marketplace with non-listed assets was launched for Private Banking customers. Now Private Banking and Pro customers can have stocks in their pension account while it is under payout. Furthermore, the media website Placera was re-launched in an exclusive collaboration with Affärsvärlden to meet customer demand for more decision support. A number of improvements were also made to help customers start saving.

On the theme of internal efficiency, existing corporate customers now can apply for endowment insurance without manual processing, which also creates a more convenient customer experience. The status of mortgage applications is continuously updated,

which improves the customer experience and reduces the workload for customer service. Amortisation amounts and autogiro payments for internal Private Banking mortgages can also be changed digitally after previously requiring a printed form. Additionally, the first AI application was launched to compile the many comments and suggestions submitted by customers through the "Feedback buddy" feature.

The new page [avanza.se/produktyheter](https://www.avanza.se/produktyheter) provides updated information on product news to make it easier to follow all of Avanza's launches.

## Results

Operating profit increased by 14 per cent compared to 2023. Both operating income as well as operating expenses rose. The operating margin was basically unchanged at 67 per cent, as was return on shareholders' equity at 38 per cent.

Operating income increased by 13 per cent mainly due to higher net brokerage income, net currency-related income and fund commissions. Net interest income was basically unchanged, while other income decreased.

Net commission income include net brokerage, currency-related and fund commission as well as other commission income.

Net brokerage income increased by 26 per cent as a result of higher customer activity and income margin. Brokerage-generating turnover increased by 18 per cent and the number of brokerage-generating notes increased by 13 per cent. Gross brokerage income per brokerage-generating turnover increased to 11.3 basis points (10.8), mainly due to increased trading in foreign markets.

Net currency-related income increased by 58 per cent as a result of higher turnover in brokerage-generating foreign securities, which increased by 70 per cent.

Net fund commissions increased by 26 per cent due to 37 per cent higher fund capital, while average income per SEK of fund capital decreased from 27.5 to 25.9 basis points, a result of a higher share of capital in index funds. Income per SEK of fund capital was 25.3 basis points at the end of 2024. Net inflow to funds was SEK 41 billion.

Other income decreased by 21 per cent due to customer compensations related to tax on investment savings accounts of SEK 29 million, see more on page 78, section Significant risks and uncertainty factors. Costs for payment commissions also increased and amounted to SEK 117 million (94). Income from stock lending decreased to SEK 38 million (59), while income from Avanza Markets increased to SEK 179 million (142).

## Five-year overview, summary of the Group's performance

Income Statements, SEK m	2024	2023	2022	2021	2020
Net commission	2,309	1,864	2,181	2,980	1,998
Net interest income	1,580	1,574	789	321	283
Other income	11	-1	3	0	67
<b>Total income</b>	<b>3,900</b>	<b>3,437</b>	<b>2,973</b>	<b>3,301</b>	<b>2,349</b>
Operating expenses before credit losses	-1,280	-1,148	-1,031	-864	-763
<b>Operating profit before credit losses</b>	<b>2,620</b>	<b>2,289</b>	<b>1,941</b>	<b>2,437</b>	<b>1,586</b>
Credit losses, net	0	3	-1	0	-4
Profit/loss from participations in associated companies	-	-	-	-	-6
<b>Operating profit</b>	<b>2,621</b>	<b>2,292</b>	<b>1,940</b>	<b>2,437</b>	<b>1,576</b>
Taxes	-367	-310	-274	-390	-242
<b>Profit for the year</b>	<b>2,254</b>	<b>1,982</b>	<b>1,666</b>	<b>2,047</b>	<b>1,335</b>

Balance Sheets, SEK m	31-12-2024	31-12-2023	31-12-2022	31-12-2021	31-12-2020
Cash and balances with central banks	8,194	8,630	4,915	2,939	1,428
Treasury bills eligible for refinancing	1,899	4,698	802	2,523	245
Loans to credit institutions	4,007	2,599	2,052	2,508	2,272
Loans to the public	23,924	19,583	19,259	20,300	16,287
Bonds	35,192	31,195	31,789	25,854	25,572
Shares and participations	146	154	237	237	244
Assets in insurance operations	266,491	213,713	180,337	218,990	155,931
Other assets	3,761	1,881	1,699	5,731	2,796
<b>Total assets</b>	<b>343,614</b>	<b>282,453</b>	<b>241,091</b>	<b>279,082</b>	<b>204,775</b>
Deposits and borrowing from the public	66,862	61,728	54,308	53,659	43,987
Liabilities in insurance operations	266,493	213,715	180,339	218,992	155,933
Other liabilities	3,939	1,178	1,493	1,732	1,683
Shareholders' equity	6,320	5,832	4,951	4,700	3,172
<b>Total liabilities and shareholders' equity</b>	<b>343,614</b>	<b>282,453</b>	<b>241,091</b>	<b>279,082</b>	<b>204,775</b>

For definitions see pages 137–138.

**Five-year overview, summary of the Group's performance, cont.**

Key ratios	2024	2023	2022	2021	2020
Operating margin, %	67	67	65	74	67
Profit margin, %	58	58	56	62	57
Earnings per share before dilution, SEK	14.33	12.64	10.69	13.19	8.66
Earnings per share after dilution, SEK	14.32	12.64	10.67	13.00	8.58
Return on shareholders' equity, %	38	38	36	50	57
Return on assets, %	0.7	0.8	0.7	0.8	0.8
Credit loss level, %	0.00	0.02	0.00	0.00	-0.03
Income to savings capital ratio, %	0.44	0.48	0.42	0.47	0.51
Costs to savings capital ratio, % <sup>3)</sup>	0.14	0.16	0.15	0.12	0.17
Net brokerage income per trading day, SEK m	3.7	2.9	3.8	5.8	4.4
No. brokerage-generating notes/trading day	152,200	134,900	161,100	234,300	163,100
Turnover in brokerage-generating securities/trading day, SEK m	3,790	3,200	4,260	5,930	4,600
Turnover in brokerage-generating foreign securities/trading day, SEK m	860	510	610	1,040	570
Gross brokerage income/turnover in brokerage-generating securities, %	0.113	0.108	0.104	0.114	0.111
No. trading days	248.5	249.0	251.0	250.5	250.0
Average no. employees	674	654	622	560	478
Platform operational availability, %	99.99	99.75	99.91	99.93	99.90

Key ratios	31-12-2024	31-12-2023	31-12-2022	31-12-2021	31-12-2020
Shareholders' equity per share before dilution, SEK	40.19	37.09	31.61	30.21	20.47
Cash dividend per share, SEK (2024; proposal) <sup>1)</sup>	11.75	11.50	7.50	9.20	3.80
No. shares, thousand	157,237	157,237	156,619	155,572	154,954
Average no. shares before dilution, thousand	157,237	156,754	155,916	155,150	154,150
Average no. shares after dilution, thousand	157,386	156,838	156,209	157,456	155,581
Market capitalisation, SEK m	42,900	36,700	35,000	51,700	36,100
Share price, SEK	272.90	233.50	223.60	332.20	233.00
No. employees	679	661	635	603	510

<sup>1)</sup> Dividend for 2020 includes an extra dividend.

For definitions see pages 137–138.

Net interest income was marginally higher. The return on the Treasury portfolio increased to SEK 1,792 million (1,548) due to higher volumes of surplus liquidity and higher credit spreads. Income from internally financed lending increased to SEK 917 million (800). The average interest rate on internally financed lending rose to 4.22 per cent (4.12) and volumes increased by 22 per cent. Interest expenses for deposits amounted to SEK 1,076 million (737). The average annualised interest rate on deposits increased to 1.64 per cent (1.21).

Operating expenses increased by 11 per cent, mainly due to higher personnel costs and other expenses. Personnel costs increased by 12 per cent as a result of a higher number of employees, the annual salary review and expenses attributable to management changes. This also includes a one-off cost of SEK 11 million related to the termination of the editorial team at Avanza's media company Placera. The average number of employees increased by 3 per cent. Other expenses increased by 13 per cent mainly due to higher costs for licenses and consultants as well as increasing information costs. The administrative fine of SEK 15 million from the Swedish Authority for Privacy Protection related to a breach of the General Data Protection Regulation (GDPR) in 2021 also contributed to increased other costs. Excluding the administrative fine and costs for Placera, the cost increase was 9.2 per cent, slightly below the cost guidance of 9.5 per cent increase for 2024.

The costs to savings capital ratio decreased to 14 basis points (16). The long-term target to display focus on efficiency and costs is to reduce the costs to savings capital ratio over time. Avanza today has a market leading cost efficiency and intends to maintain this position. Over the years, this has contributed to Avanza's resilience in various market conditions, while at the same time represented an important competitive advantage.

The target through 2030 is an average annual cost increase of 8 per cent, including the strategic priorities in Sweden. The cost increase shows commitment to growth and will be higher at the beginning of the period. The goal is to reach a cost increase of 5 per cent 2030. During 2025, the cost increase is estimated at 11 per cent, mainly due to the accelerated cloud migration and investments to fuel growth within Private Banking and occupational pensions. Total salary adjustments are estimated at 4 per cent.

Reported credit losses are attributable to calculations of expected credit losses according to IFRS 9. For more information, see Note 18 Loans to the public.

The effective tax rate amounted to 14.0 per cent (13.5). The fluctuation in the tax rate between quarters depends on how large a share of income generates corporate tax versus yield tax. The bank pays standard corporate tax, whereas the majority of the insurance company's income is subject to yield tax, which reduces the effective tax rate.

### Net interest income sensitivity

Policy rate changes affect the return on the Treasury portfolio, i.e. surplus liquidity, which mainly is invested in covered bonds, as deposits with the Riksbank and with systemically important Nordic banks. The bond portfolio is tied to the 3M STIBOR. The portion invested in Riksbank Certificates and as deposits with the Riksbank is linked to the policy rate. Avanza's internally financed lending is comprised of mortgage loans to Private Banking customers and margin lending. The mortgage rate is tied to the policy rate. The interest rate on margin lending is based on demand and the competitive landscape.

The cost side of net interest income mainly consists of interest payments on customer deposits. Avanza pays interest on deposits in savings accounts, but on investment savings accounts (ISK) and endowment insurance only for Private Banking and Pro customers, and on equity and fund accounts only for Pro customers. Deposits in these accounts represent 60 per cent of customers' total deposits excluding external savings accounts as of 31 December 2024. Deposits in Avanza's own savings account amounted to SEK 32 billion.

All else being equal, without accounting for changes in volume or customer behaviour, the competitive landscape or the bond portfolio's interest rate duration, a 1 percentage point decrease or increase of the policy rate would affect full-year net interest income by between SEK -360 million and SEK 730 million. The calculation is based on rates by the end of the year and only highlights the sensitivity in net interest income. On the upside, Avanza has absorbed the entire increase without sharing it with customers, which would be implausible, and on the downside lowered rates on both deposits as well as lending.

### Future outlook

Avanza, with its strong customer-centric corporate culture and passionate employees, is well-positioned to capitalise on future opportunities in the savings market and to adapt to changing market conditions. The target is to grow savings capital by on average 15 per cent per year and reach over SEK 2,000 billion in savings capital 2030.

Economic cycles, geopolitics and stock market sentiment impact Avanza's income. At the same time, there are structural trends and changes that benefit the savings market and Avanza long-term. In recent years, households possibility to save as well as their risk willingness have changed due to high inflation and rising interest rates. At the same time, this increases the understanding of and underscores the need for savings. Lower inflation and rate cuts this year have contributed to increased optimism and customer activity. The outlook for 2025 is positive, with tax cuts also contributing to real household wage growth.

### Continuously strong growth opportunities in Sweden

Sweden has a unique culture of stock investing – nowhere else in the world are funds such a popular form of savings and about a fourth of the population is invested in stocks. Based on number of customers, Avanza has a market share in Sweden of 20 per cent, but the potential remains great – especially when it comes to attracting a larger share of customers' savings. Avanza's share of the savings capital on the Swedish savings market was 7.5 per cent as of 30 September, while the share of the net inflow was 20 per cent for the last 12-month period. Surveys show that approximately two thirds of customers' savings is held outside Avanza, half of which is estimated to be addressable. To attract this capital, Avanza will develop its offering a step further for those who want more help and support with their savings. Avanza's growth ambitions also include developing new and improving existing products to attract more customers, with an emphasis on Private Banking and occupational pension.

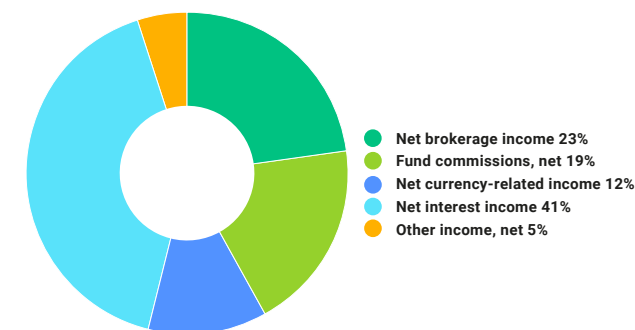
### Greater individual responsibility for personal finances

Individuals are expected to take on greater responsibility for their financial well-being. The need for private pension savings is great and is expected to remain that way with replacement rates likely to decline in the coming decades. For the individual this means either delaying retirement or compensating for the difference through personal savings. Another example is the structure of the housing market, where nearly 80 per cent of homeowners in Sweden have a mortgage. High housing prices, lower disposable incomes and high mortgage rates have increased the incentive to save for a cash down payment.

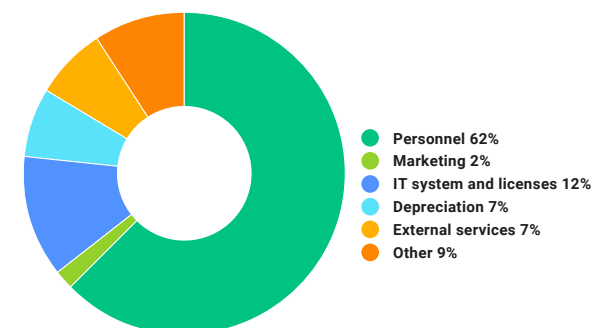
### Low customer churn with great potential among young customers

The big generation born in the 1940s and 50s has built up tremendous wealth and today owns a large share of the total savings capital on the market. Within a few years there will be a great wealth transfer from older to younger generations. Avanza has a large share of young customers. The median age is 37 – eleven years younger than the population as a whole. Younger customers generally have fewer economic resources than older customers, so savings capital and income grow over time. If Avanza continues to create attractive offerings and good reasons for customers to stay on the platform, there is great potential in these young savers, who have learned about and become interested in savings and investments early in life. Avanza has a low customer churn of around 1 per cent.

### Breakdown of operating income 2024



### Breakdown of operating expenses 2024



### Increased addressable market through geographic expansion

Sweden is one of the most well-developed and advanced markets in Europe and Avanza is by far the most successful savings and investment platform. Having been able to reach such a position in Sweden suggests that Avanza has excellent opportunities to succeed in other countries. The aim is to be established in one or more European markets outside Sweden before the end of 2030. This will provide advantages in the form of larger growth opportunities with an expanded addressable market and lower risk through diversification.

### Our position provides competitive advantages

Digitalisation has led to a more agile financial market with a wider range of competitively priced products and services as well as higher demands on the user experience. This, along with insight on the potential for personal savings, has increased competition in the savings market – particularly for high net worth individuals and active traders. Avanza's strong brand, competitive offering, high customer satisfaction and scalability and cost control are important strengths. As Sweden's largest platform for savings and investments, Avanza also has a solid database and extensive expertise in personal savings, a competitive advantage in the development of new products that can contribute to personalised services as well as create opportunities with AI. Avanza's large customer base also provides an attractive platform for interesting collaborations that can further strengthen the offering and user experience.

### Well-positioned in relation to new regulations

Avanza is well-positioned for rules on increased transparency, improved customer protection and digital development. Avanza has always advocated low fees and a long-term approach and avoided commission-driven advice, instead developing tools that help customers make their own investment decisions and save based on their own needs. With Avanza, the customer's interests come first, right along with clarity and transparency.

For several years, the Swedish government has tried to simplify pension transfers, but complex and administratively demanding processes remain in place, and more work is needed to create a well-functioning market. If the transfer market is simplified, Avanza's competitive pension offering without platform fees, and with a wide range of investment opportunities and world-class user experience is expected to have an even greater impact.

Investment savings accounts and endowment insurance have become the most popular forms of investment accounts in Sweden and have simplified investing in stocks and lowered the barriers to entry. In January, the government's proposal of a tax-exempt ceiling of SEK 150,000, in the above mentioned account types, took effect

and in 2026 the ceiling will be raised to SEK 300,000, further reducing the barriers to entry. This is positive for savers and Avanza.

### Avanza should be the obvious choice for sustainable savings

The financial industry, with its ability to steer capital to sustainable economic activities, has a key role to play in the transition to a sustainable economy. Women save relatively less and put more money into savings accounts than men, and the savings gap needs to be reduced. For Avanza it is also important to offer sustainable alternatives and decision support in order to enable customers to integrate ESG in their investment decisions. This will be an increasingly important competitive advantage as demand for sustainable savings products increases. It also aligns with the EU Action Plan on Financing Sustainable Growth and the many sustainability regulations that have been implemented in recent years, and will enhance the basis for the tools and information available on Avanza's platform.

Read more about Avanza's growth potential on pages 19–23 and more about risks on pages 26–27 and 62.

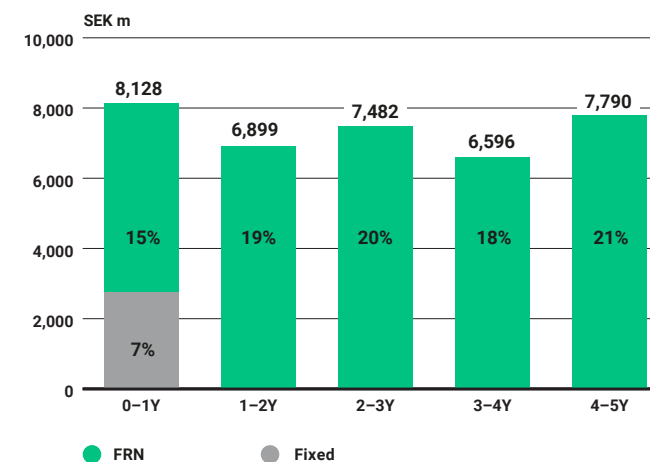
### Financial position

Avanza's capital and liquidity situation is strong. Shareholders' equity amounted to SEK 6,320 million (5,832). Besides the net profit for the year, the change is due to the dividend of SEK 1,808 million paid to shareholders, as well as issuance of warrants within the framework of employee incentive programmes.

Avanza is self-financed through equity and customer deposits. The majority of deposits and borrowings from the public are covered by the government deposit guarantee and are spread across a very large number of households. Deposits increased by 8 per cent during the year and amounted to SEK 66.9 billion as of 31 December 2024. The increase was a result of net inflow. Customers continued to net buy securities. Loans to the public increased by 22 per cent to SEK 23.9 billion as of 31 December 2024. Lending as a share of deposits amounted to 35.8 per cent as of 31 December 2024. All lending is secured by listed securities or pledges on homes or tenant-owned apartments, and the credit quality is assessed to be good. By the end of the year, the average loan-to-value ratio for mortgages amounted to 39 per cent and for margin lending to 26 per cent. Between 2001 and 2024, actual and expected credit losses amounted to SEK 13 million, or an average of 0.02 per cent per year. Avanza has no actual credit losses attributable to events after 2011.

Surplus liquidity, which as of 31 December 2024 amounted to SEK 49.3 billion, is mainly invested in covered bonds, Riksbank Certificates and as deposits with the Riksbank and systemically important Nordic banks, and to a lesser extent bonds issued by the Swedish government and municipalities.

All of Avanza's assets have high liquidity and all covered bonds have the highest bond rating with Standard & Poor's (AAA) or Moody's (AAA). The average fixed interest term regarding interest-bearing securities is a maximum of 3 months. Interest-bearing securities with fixed interest terms, excluding Riksbank Certificates with just one week's fixed interest term, constituted 4 per cent of all interest-bearing securities as of 31 December 2024. Interest rate risk is limited as Avanza intends, and normally has the capacity, to hold its bonds to maturity. To cope with short-term fluctuations in deposits and lending from/to the general public, a significant share of the assets is held on account and is disposable immediately or the following business day. Avanza strives for a bond portfolio with an even maturity structure annually, quarterly and to a certain extent monthly, meaning that large negative changes in surplus liquidity normally are managed with the help of ongoing maturities. Avanza is also a monetary counterparty to the Riksbank and all bonds can be pledged to the Riksbank. Consequently, the risk of having to sell bond holdings in advance at a lower market value is limited, reducing the risk of negative price movements due to changes in credit spreads or interest rates. If Avanza still has to sell bonds in advance, the effect on earnings is limited. The fair value of the bonds was SEK 4 million lower than the accrued acquisition cost as of 31 December 2024. Of the liquid assets of just over SEK 12.2 billion at the end of the year, SEK 30 million was pledged as collateral, mainly with Swedish credit institutions and the stock exchange.



## Capital planning

Avanza has a strong capital position with good margins to the regulatory requirements as well as low risk in the balance sheet. The dividend policy stipulates a dividend of 70 per cent of profit for the year. Considering Avanza's strong capitalisation, with a likely increase in deposits on Avanza's balance sheet when external savings accounts are no longer offered, the Board of Directors proposes a dividend of SEK 11.75 per share (11.50), corresponding to a dividend ratio of 82 per cent (91) of the profit for 2024. As of 31 December, Avanza's leverage ratio for the consolidated situation was 5.0 per cent. With the current leverage ratio, deposits can increase by SEK 34 billion without risking to fall short of the requirement including guidance of 3.5 per cent. See also Note 33 Own funds and capital requirements.

## The Parent Company

Avanza Bank Holding AB (publ) is the parent company of the Avanza Group. The Parent Company does not report any revenues. Operating profit for 2024 was SEK -45 million (-41). The parent company's shareholders' equity as of 31 December 2024 amounted to SEK 2,683 billion (2,642) and liquid assets amounted to SEK 6 million (6). Anticipated dividends from subsidiaries of SEK 1,850 million (1,813) were recognised.

The dividend for 2023 of SEK 1,808 million (1,175) was paid to shareholders in April 2024 following a resolution by the Annual General Meeting in April.

## Sustainability reporting

Avanza has chosen to prepare a Sustainability report separately from the Administration report and largely from the formal financial statements in accordance with the Annual Reports Act, chap. 6, section 11. The sustainability report covers Avanza and its subsidiaries, with descriptions of Avanza's work with environmental, social and governance-related matters, including human rights and anti-corruption. The report and its scope is outlined on page 133. The report has been prepared in accordance with the GRI Standards 2021: Core option. It has been reviewed by the auditors' who have submitted a separate statement.

See pages 46–48 for Avanzas' report in accordance with Article 8, Taxonomy regulation (EU) 2020/852. Avanza will report in accordance with the CSRD starting in 2025.

More information about Avanza's sustainability work is provided on pages 28–45 and 131–134. Avanza's sustainability policy is published on [avanza.se/ir](https://www.avanza.se/ir).

## Employees

In 2024, the Avanza Group had, on average, a total of 674 employees (654) of whom 38 per cent (38) were women. The average age was 38 years (37). The Parent Company had, on average, 5 employees (6) during the year. All employees have individual targets, based on Avanza's overall targets, which are followed up through regular development discussions. One of Avanza's long-term goals is engaged employees, measured by an international measure of employee loyalty called the employer Net Promoter Score (eNPS). The score for 2024 was 59 (58), which shows continued strong ambassadorship. Additional information about Avanza's employees is provided on pages 33–37 and in Note 8 Employees and personnel costs.

## Significant risks and uncertainty factors

Avanza has a conservative approach to risk. Financial risks, such as credit risks, market risks and liquidity risks, are limited. Avanza's operations are largely digital with high demands placed on stability and availability. Protecting our information assets is critical to maintain the trust of customers. Avanza strives to minimise operational risks by creating the most efficient and automated processes possible.

The Board of Directors evaluates and formulates the risk appetite, which determines the risk exposure that the Board is willing to accept in order to reach the Group's strategic and financial targets. Changes to the risk appetite and limits take into account the outcomes of the company's stress tests. Avanza's debt consists almost exclusively of customer deposits.

Avanza does not engage, and has not previously engaged, in proprietary trading in securities.

Avanza's lending and investment of surplus liquidity expose the business to credit risk. All margin lending is secured against listed securities. Avanza has offered mortgage loans since the end of 2013. The offering is targeted at Avanza's high-net-worth customers within Private Banking with at least SEK 3 million in total savings with Avanza and with loan-to-value ratio of not more than 50 per cent when the loan is granted. Settlement risk and counterparty risk that arise as a result of customers' security trading are limited. Avanza is primarily exposed to a small market risk in the form of credit spread risk, where increased credit spreads have a negative impact on the market value of interest-bearing securities, and interest rate risk in the banking book because the interest rate duration of assets and liabilities do not fully coincide. See Note 31 for more detailed information.

Historically, the Swedish financial market has performed strongly. At the same time, market turbulence and rising interest rates in recent years have negatively impacted risk tolerance and, as a result, stock market activity and investments. Recent market conditions have underscored the importance of multiple revenue streams. An increased risk appetite in 2024 positively affected commission income and trading-related income, while falling market interest rates began to put pressure on net interest income. Historically, falling market interest rates have led to increased risk tolerance and trading activity, offsetting lower interest income. Net fund commissions have grown in recent years as a proportion of total income despite a shift in the mix of fund savings and a higher higher proportion of index funds with lower income margins.

When the investment savings account (ISK) was launched in 2012, the law limited the interest rate on deposits to the standard rate of capital income, i.e. the government borrowing rate on 30 November of the previous year, which was to prevent any arbitrage opportunities from arising. This means that interest exceeding the standard rate of capital income had to be reported as income from capital and thereby faced double taxation. In 2016, the standard rate of capital income was changed to the government borrowing rate plus one percentage point. However, when this was implemented, legislators neglected to make a corresponding change to how high an interest rate can be paid before double taxation is incurred. As worded, the law no longer aligned with the original purpose. Like the legislators, Avanza overlooked the fact that the interest rule had not been changed at the same time as the tax, which means that Avanza has offered too high of an interest rate on ISK. In the second quarter of 2024 Avanza submitted supplementary data to the Swedish Tax Agency for customers who at some point during 2018–2023 had unutilised credit in their ISK. Avanza has reimbursed those customers who have reached out and been able to verify that the Swedish Tax Agency has charged them additional tax. During 2024 customer compensations of SEK 28.5 million were paid out. Any further claims are expected to be small.

In January 2024, a draft law to protect against overindebtedness was presented, which would phase out the interest deduction on unsecured consumer loans. The proposal also covered margin lending. After receiving criticism on the proposal, including from Avanza through Finance Sweden and the Swedish Securities Markets Association, revisions were made, allowing for the possibility to continue to deduct interest on loans collateralised by securities. Unfortunately, the law has been written in such a way that the deduction is only applicable in the case of direct ownership, which means that it does not apply to endowment insurance. Avanza continues

to lobby for an adjustment of the law to also apply to endowment insurance by submitting a formal request to the Swedish Ministry of Finance. Decreased interest deductions on margin lending on endowment insurance affects demand and could also affect the growth in volume of margin lending for Avanza.

In May 2023, the EU Commission proposed a ban on commissions on all investment services without advice, the Retail Investment Strategy (RIS). The EU's institutions are currently negotiating the proposal, but the Council and European Parliament's proposal leading up to the negotiations did not contain the same restriction. This suggests that there will not be a general ban on commissions at the EU level. In Sweden, however, the Swedish FSA has long sought national rules on commissions, and there is likely to be a study of their feasibility regardless of what the EU eventually decides. If a commission ban were introduced, it would primarily affect Avanza's external fund business and Avanza Markets. In that case, Avanza has various alternatives to adapt its business model.

In 2024, The EU introduced a ban on sale of order flows. Avanza does not engage in sale of order flows and is therefore unaffected by this ban.

Risks are measured, controlled and, where necessary, acted upon, in order to protect the company's capital and reputation. The manner in which Avanza identifies, follows up and manages these risks has a bearing on the soundness of the business and on Avanza's long-term profitability. Additional information about the Group's risk exposure and risk management is provided on pages 26–27, 62, and in Note 34 Financial risks.

### Remuneration guidelines for senior management

The Annual General Meeting of Avanza Bank Holding AB (publ) resolved on 11 April 2024 to establish the following guidelines for determining salaries and other remuneration paid to the CEO and other members of the company's management (Group Management) until further notice. The guidelines also include any remuneration to Board members other than Director's fees.

### The guidelines' promotion of the company's business strategy, long-term interests and sustainability

Avanza's business model is built on strong growth through satisfied customers, in combination with a scalable business model and the market's lowest costs to savings capital ratio. This creates long-term growth in operating income, facilitates further development and builds shareholder value. The strategy is to create cheaper, better and simpler offerings. Through continuous innovation, and with a focus on doing what's best for the customer, better savings opportunities are created, trust is built and growth is created. Sus-

tainability work has always been an important part of Avanza and is essential in order to maintain low risks, stay competitive and attract new customers and talented employees. The sustainability strategy is integrated in the overarching strategy, is based on international frameworks and guidelines, and is focused on three main areas: Sustainable investments, Educate & Challenge, and Sustainable organisation. The aim is to create the best tool for customers to successfully manage their finances. Further information on the company's business strategy is provided on page 14.

Successful implementation of Avanza's business strategy and the safeguarding of its long-term interests, including its sustainability, require Avanza to be able to recruit and retain qualified employees. In order to do this, the company needs to be able to offer market-based remuneration. These guidelines allow senior executives to be offered such remuneration.

Avanza has long-term incentive programmes based on warrants. They were resolved by the Annual General Meeting and therefore are not subject to these guidelines.

For more information about these programmes, including the criteria on which the outcome depends, please see [avanza.se/ir](https://www.avanza.se/ir).

### Forms of remuneration

Remuneration must be market-based and may consist of a fixed cash salary, pension benefits and other benefits. In addition, the Annual General Meeting may, and regardless of these guidelines, decide on, for example, shares and share price related remuneration or incentive programmes based on warrants.

For the CEO, pension benefits as well as health insurance must be determined based on a premium. Pension premiums for premium based pension shall amount to a maximum of 35 per cent of the fixed cash salary. For other senior executives, pension benefits, including health insurance, must be determined based on a premium. Pension premiums for premium based pension shall amount to a maximum of 30 per cent of the fixed cash salary.

Other benefits may, among other things, include life insurance and health insurance. Premiums and other costs in connection with such benefits may amount to a maximum of 5 per cent of the fixed cash salary.

### Termination of employment

Upon termination of employment, the notice period may not exceed 12 months. In the event of termination of the CEO by the company, fixed cash salary during the notice period and severance pay may together not exceed an amount corresponding to the fixed cash salary of 2 years for the CEO. In the event of termination of other senior executives by the company, fixed cash salary during the notice

period and severance pay may together not exceed an amount corresponding to the fixed cash salary of 1 year for such senior executive. In the event of termination by the CEO or by other senior executives, the period of notice may not exceed 6 months, without the right to severance pay.

### Salary and terms of employment for employees

In the processing of the Board's proposal of these compensation guidelines, salaries and terms of employment for Avanza's employees have been taken into account. This has been done by using the information on employees' total remuneration, components of the remuneration and rates of increase over time as part of the Remuneration Committee's and the Board's underlying documentation to evaluate the reasonableness of the guidelines and the limitations that follow from them.

### Board fees

Under certain circumstances, Avanza's Board members elected by the Annual General Meeting may be compensated for services rendered in their area of expertise (including directorships in other Group companies) which fall outside their board work for Avanza Bank Holding. Such commitments will be subject to applicable internal rules and with due regard to potential conflicts of interest. Market-rate compensation is paid for these services. Information on any compensation for such services is included in the annual report and the remuneration report.

### The decision-making process to establish, review and implement the guidelines

The Board has established a Remuneration committee. The committee's tasks include preparing the Board's decision on proposals for guidelines for remuneration to senior executives. The Board shall draw up proposals for new guidelines at least every four years and submit the proposal to be resolved at the Annual General Meeting. The guidelines shall apply until new guidelines have been adopted by the Annual General Meeting. The Remuneration committee shall also follow and evaluate the application of guidelines for remuneration to senior executives as well as current remuneration structures and remuneration levels in the company. The members of the Remuneration committee are independent in relation to Avanza and its management. In the Board's processing of and decisions on remuneration related matters, the CEO or other members of the executive management are not present, insofar as they are affected by the issues. In the latest review of the guidelines, clarifications have been added for any remuneration to Board members other than Director's fees.

### Deviations from the guidelines

The Board may decide to temporarily deviate from the guidelines in whole or in part, if in an individual case there are special reasons for it and a deviation is necessary to satisfy Avanza's long-term interests, including its sustainability, or to ensure Avanza's financial viability. As stated above, it is part of the Remuneration committee's tasks to prepare the Board's decision on remuneration issues, which includes decisions on deviations from the guidelines.

### The Board of Directors and Group Management

The Annual General Meeting on 11 April 2024 resolved that the Board of Directors shall comprise nine members without deputies.

The Annual General Meeting in 2024 re-elected all previously elected members, except for Catharina Eklöf, Hans Toll and Sofia Sundström, who declined re-election. John Hedberg was elected as Deputy Chairman of the Board, a role that is new for this year. Julia Haglind and Lisa Åberg was elected as new board members. In accordance with the Articles of Association, the Board shall consist of not less than five and not more than ten members. Avanza's Board of Directors consisted in 2024 of nine members elected by the Annual General Meeting with no deputies, who are elected until the next Annual General Meeting.

On 25 March, Gustaf Unger took over as CEO succeeding Gunnar Olsson, who had served as Acting CEO since November 2023. In September, Gunnar Olsson, COO, announced his intention to resign, and left Group Management. However, he remained Deputy CEO until 31 December 2024.

CIO Peter Almqvist left Avanza in March after 13 years. In March, Anders Karlsson stepped down as Chief Product & Technology Officer (CPTO) and a member of Group Management after a mutual agreement was reached between Anders and Avanza due to differing views on leadership. On 19 August, Fredrik Broman took over as CTO. When he began, an organisational change was made to create streamlined technology and product organisations. Fredrik is responsible for IT and engineering. Olov Eriksson joined Avanza on 10 February 2025 as Chief Product Officer.

In May, Karin Åge took over as the new Chief Human Resource Officer, succeeding Camilla Hedenfelt, who held the position since 2019.

In July, Erik Gjötterberg took over as Chief Business Development Officer, a new role in Group Management.

Avanza's Group Management currently consists of nine members, of which five are women.

More information about Avanza's Board of Directors and Group management can be found in the corporate governance report on pages 65–77.

Capital surplus financial conglomerate, SEK m <sup>1)</sup>	31-12-2024	31-12-2023
<b>Own funds per sector</b>		
Own funds for regulated units in the insurance sector <sup>2)</sup>	4,430	3,532
Own funds for regulated units within the banking and investment services sector	3,508	3,138
<b>Total own funds after dividends</b>	<b>7,938</b>	<b>6,670</b>
<b>Total own funds before dividends</b>	<b>9,786</b>	<b>8,478</b>
<b>Capital requirement per sector</b>		
Capital requirement for regulated units in the insurance sector <sup>3)</sup>	2,913	2,213
Capital requirement for regulated units within the banking and investment services sector	2,724	2,345
<b>Total capital requirement</b>	<b>5,637</b>	<b>4,557</b>
Deduction for non-distributable solvency capital <sup>2)</sup>	-633	-532
<b>Capital surplus after dividends</b>	<b>1,669</b>	<b>1,580</b>
<b>Capital surplus before dividends</b>	<b>3,517</b>	<b>3,388</b>
Capital surplus per share after dividend per share, SEK	10.62	10.05
Capital surplus per share before dividend per share, SEK	22.37	21.55

<sup>1)</sup> Capital surplus for the financial conglomerate. See also Note 33 Own funds and capital requirements.

<sup>2)</sup> Non-distributable solvency capital (future profits) = solvency capital – solvency capital requirement.

<sup>3)</sup> Avanza Pension's solvency capital requirement and own funds are calculated using the Solvency 2 directive's standard model. The standard model requires assumptions that are determined partly by the authorities and partly by Avanza Pension's Board of Directors.

Capital surplus leverage ratio, consolidated situation, SEK m	31-12-2024	31-12-2023
Leverage ratio total exposure measure	78,358	71,011
Tier 1 capital after dividends	3,941	3,574
Leverage ratio after dividends, %	5.0	5.0
Leverage ratio incl. Pillar 2-guidance <sup>1)</sup> , %	3.5	3.5
<b>Capital surplus after dividends and leverage ratio requirements incl. Pillar 2 guidance</b>	<b>1,199</b>	<b>1,089</b>
<b>Capital surplus risk-based, consolidated situation, SEK m</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Total own funds	3,941	3,574
Minimum own funds requirement (Pillar 1)	1,368	1,156
Combined buffer requirement	770	650
Additional own funds requirement (Pillar 2) <sup>1)</sup>	977	825
Pillar 2 guidance	-	-
Total risk-based capital requirement (desired level of own funds)	3,114	2,631
<b>Capital surplus after risk-based capital requirement</b>	<b>827</b>	<b>943</b>

<sup>1)</sup> The additional own fund requirement are equivalent to the Swedish FSA's decided Pillar 2 requirements.



### **The Avanza share**

The Avanza share is listed on Nasdaq Stockholm Large Cap, included in the Financial Services sector under the ticker symbol AZA.

At year-end 2024 there were a total of 157,236,949 shares in Avanza. There is only one class of shares, each share entitles to one vote and there are no limitations as to the number of votes a shareholder may exercise at an Annual General Meeting. There is no rule in Avanza's Articles of Association limiting the right to disposal of shares.

Avanza had two owners who each directly or indirectly represented at least one tenth of the voting rights for all shares as of 31 December 2024: Sven Hagströmer including family and companies representing 10.2 per cent and Creades AB representing 10.1 per cent.

Three outstanding warrant programmes comprise a total of 3,151,346 transferred warrants. The remainder has been cancelled. If all transferred warrants were exercised, it would result in a dilution of 2.0 per cent.

For further information on the Avanza share, see pages 24–25 and 65 and in Note 28 Equity.

### **Repurchase of the company's own shares**

The Annual General Meeting in 2024 resolved to authorize the Board of Directors to implement the acquisition of own shares, up to a maximum of 10 per cent of the shares in Avanza Bank Holding AB (publ). The authorisation is valid until the following Annual General Meeting. No shares were repurchased in 2024 and the company holds no repurchased shares as of 31 December 2024.

### **Provisions of the Articles of Association**

The Board of Directors shall comprise no less than five and no more than ten members and is elected at the Annual General Meeting.

The Articles of Association have no provisions on their amendment. Instead, the Articles of Association are amended through resolution at the Annual General Meeting according to section 3:4 of the Swedish Companies Act. The Articles of Association were last amended at the Annual General Meeting on 31 March 2022.

### **Significant events after the end of the reporting period**

There have been no significant events after the end of the period.

### **Proposed allocation of profits**

The Board of Directors of Avanza Bank Holding AB (publ) propose that the Annual General Meeting on 24 April 2025 resolve that the accumulated profit, including net profit for the year, share premium reserve and fair value reserve of SEK 2,683,098,879, in accordance with the established balance sheet, be allocated in such a way that a dividend of SEK 11.75 per share is distributed to the shareholders and the remainder is carried forward. This corresponds to a dividend of SEK 1,848 million (1,808) and a payout ratio of 82 per cent (91). To be compared with Avanza's dividend policy, where the goal is to distribute 70 per cent of profit for the year to the shareholders, taking into account the riskbased capital requirement as well as the leverage ratio requirement, including Pillar 2 guidance and the internal buffer requirement. For the Board of Directors' statement on the proposed allocation of profits, see Note 38 Proposed allocation of profits.

# Consolidated income statement

SEK m	Note	2024	2023
Commission income	3, 4	2,704	2,176
Commission expenses	4	-396	-311
Interest income calculated using the effective interest method	5	2,748	2,537
Other interest income	5	10	3
Interest expenses	5, 10	-1,178	-966
Net result of financial transactions	6	4	-1
Other operating income		7	0
<b>Total operating income</b>		<b>3,900</b>	<b>3,437</b>
General administrative expenses	7-9	-1,117	-1,007
Depreciation and amortisation	10, 22-23	-92	-88
Other operating expenses	11	-70	-53
<b>Total operating expenses before credit losses</b>		<b>-1,280</b>	<b>-1,148</b>
<b>Operating profit before credit losses</b>		<b>2,620</b>	<b>2,289</b>
Credit losses, net	12	0	3
<b>Operating profit</b>		<b>2,621</b>	<b>2,292</b>
<b>Profit before tax</b>		<b>2,621</b>	<b>2,292</b>
Tax on profit for the year	14	-367	-310
<b>Profit for the year</b>		<b>2,254</b>	<b>1,982</b>
Earnings per share before dilution, SEK		14.33	12.64
Earnings per share after dilution, SEK		14.32	12.64

# Consolidated statement of comprehensive income

SEK m	Note	2024	2023
<b>Profit for the year</b>		<b>2,254</b>	<b>1,982</b>
<b>Items that will be reversed to the income statement</b>			
Changes in value of financial instruments recognised at fair value via other comprehensive income	6	42	58
Tax on changes in value of financial instruments recognised at fair value via other comprehensive income		-9	-12
<b>Items that will not be reclassified to the income statement</b>			
Changes in value of shares and participations	20	-8	-99
Tax on changes in value and of shares and participations		-	-
<b>Total other comprehensive income after tax</b>		<b>25</b>	<b>-53</b>
<b>Total comprehensive income after tax<sup>1)</sup></b>		<b>2,279</b>	<b>1,929</b>

<sup>1)</sup> The total comprehensive income accrues to the Parent Company's shareholders.

# Consolidated balance sheet

SEK m	Note	31-12-2024	31-12-2023
<b>Assets</b>	30–32		
Cash and balances with central banks		8,194	8,630
Treasury bills eligible for refinancing	17	1,899	4,698
Loans to credit institutions	16	4,007	2,599
Loans to the public	18	23,924	19,583
Bonds	19	35,192	31,195
Shares and participations	20	146	154
Assets in insurance operations	21	266,491	213,713
Intangible fixed assets	22	66	87
Right-of-use assets	10	290	96
Tangible fixed assets	23	70	58
Other assets	14, 24	2,299	774
Prepaid expenses and accrued income	25	1,036	866
<b>Total assets</b>		<b>343,614</b>	<b>282,453</b>
<b>Liabilities and shareholders' equity</b>			
<b>Liabilities</b>	30–32		
Deposits from the public	16	66,862	61,728
Liabilities in insurance operations	21	266,493	213,715
Lease liabilities	10	281	92
Other liabilities	14, 26	3,470	922
Accrued expenses and deferred income	27	188	164
<b>Total liabilities</b>		<b>337,295</b>	<b>276,621</b>
<b>Shareholders' equity</b>	28		
Share capital		79	79
Other capital contributed		712	701
Fair value reserve		37	12
Retained earnings		5,492	5,041
<b>Total shareholders' equity</b>		<b>6,320</b>	<b>5,832</b>
<b>Total liabilities and shareholders' equity</b>		<b>343,614</b>	<b>282,453</b>

# Changes in the Group's shareholders' equity

SEK m	Share capital	Other capital contributed	Fair value reserve	Retained earnings	Total
<b>Shareholders' equity, 31-12-2022</b>	<b>78</b>	<b>579</b>	<b>65</b>	<b>4,229</b>	<b>4,951</b>
Profit for the year	–	–	–	1,982	1,982
Other comprehensive income	–	–	–53	–	–53
Total comprehensive income	–	–	–53	1,982	1,929
<i>Transactions with owners</i>					
Dividend paid	–	–	–	–1,175	–1,175
Exercise of share warrants	0	114	–	–	115
Warrants issue	–	8	–	4	13
<b>Shareholders' equity, 31-12-2023</b>	<b>79</b>	<b>701</b>	<b>12</b>	<b>5,041</b>	<b>5,832</b>
Profit for the year	–	–	–	2,254	2,254
Other comprehensive income	–	–	25	–	25
Total comprehensive income	–	–	25	2,254	2,279
<i>Transactions with owners</i>					
Dividend paid	–	–	–	–1,808	–1,808
Exercise of share warrants	–	10	–	6	16
<b>Shareholders' equity, 31-12-2024</b>	<b>79</b>	<b>712</b>	<b>37</b>	<b>5,492</b>	<b>6,320</b>

# Consolidated cash flow statement

SEK m	Note	2024	2023
<b>Operating activities</b>			
Profit before tax		2,621	2,292
whereof interest payments received		2,758	2,540
whereof interest expenses paid		-1,178	-966
<i>Adjustment for items not included in cash flow</i>			
Depreciations	10, 22–23	92	88
Interest expenses on lease liabilities	10	2	2
Early termination of lease agreements		-7	-
Realised gains/losses		0	0
Income tax paid		1,380	-137
<b>Total</b>		<b>4,088</b>	<b>2,245</b>
<b>Changes in operating activities' assets and liabilities</b>			
Increase (-)/decrease (+) in loans to credit institutions	32	-11	6
Increase (-)/decrease (+) in loans to the public		-4,341	-323
Increase (-)/decrease (+) in shares and participations <sup>1)</sup>		0	0
Increase (-)/decrease (+) in other assets		-1,761	-434
Increase (+)/decrease (-) in deposits from the public		5,134	7,420
Increase (+)/decrease (-) in other liabilities		885	-270
<b>Cash flow from operating activities' assets and liabilities</b>		<b>-95</b>	<b>6,398</b>
<b>Cash flow from operating activities</b>		<b>3,993</b>	<b>8,644</b>
<b>Investment activities</b>			
Acquisition and disposals of treasury bills eligible for refinancing		2,799	-3,897
Acquisition and disposals of intangible fixed assets	22	-	-
Acquisition and disposals of tangible fixed assets	23	-42	-24
Acquisition of shares and participations		-	-15
Acquisition and disposals of bonds <sup>1)</sup>		-3,954	652
<b>Cash flow from investment activities</b>		<b>-1 197</b>	<b>-3,284</b>

Continued in the right column

Continuation from the left column

SEK m	Note	2024	2023
<b>Financing activities</b>			
Amortisation lease liabilities		-43	-43
Cash dividend		-1,808	-1,175
Exercise of share warrants		-	115
Warrants issue		16	13
<b>Cash flow from financing activities</b>		<b>-1,835</b>	<b>-1,091</b>
<b>Cash flow for the year</b>		<b>961</b>	<b>4,269</b>
Liquid assets at beginning of year		11,211	6,942
Liquid assets at end of year		12,172	11,211
<b>Change</b>		<b>961</b>	<b>4,269</b>
<b>Composition of liquid assets, SEK m</b>			
		<b>31-12-2024</b>	<b>31-12-2023</b>
Cash and balances with central banks		8,194	8,630
Loans to credit institutions		4,007	2,599
Pledged assets		-30	-19
<b>Total</b>		<b>12,172</b>	<b>11,211</b>

<sup>1)</sup> An adjustment of SEK 99 million has been made in the comparative figures for 2023 between the lines Increase (-)/decrease (+) in shares and participations and Acquisition and disposals of bonds due to a classification error.

See Note 2 Accounting principles for the basis for preparing cash flow statement.

# Parent Company income statement

SEK m	Note	2024	2023
<b>Operating expenses</b>			
Administration expenses	8–9	–35	–31
Other operating expenses		–10	–10
<b>Operating profit/loss</b>		<b>–45</b>	<b>–41</b>
<b>Profit/loss from financial investments</b>			
Profit/loss from participations in Group companies	13	1,850	1,813
Interest income and similar items		4	2
Interest expenses and similar items		0	–1
<b>Profit/loss before appropriations and tax</b>		<b>1,809</b>	<b>1,774</b>
<b>Appropriations</b>			
Group contribution received		78	62
Group contribution paid		–28	–13
<b>Profit/loss before tax</b>		<b>1,859</b>	<b>1,823</b>
Tax on profit for the period	14	–2	–2
<b>Profit/loss for the period</b>		<b>1,857</b>	<b>1,820</b>

# Parent Company statement of comprehensive income

SEK m	Note	2024	2023
<b>Profit/loss for the period</b>		<b>1,857</b>	<b>1,820</b>
<i>Items that will not be reversed to the income statement</i>			
Changes in value of shares and participations	20	–8	–99
Tax on changes in value and of shares and participations		–	–
<b>Total other comprehensive income after tax</b>		<b>–8</b>	<b>–99</b>
<b>Total comprehensive income after tax</b>		<b>1,849</b>	<b>1,721</b>

# Parent Company balance sheet

SEK m	Note	31-12-2024	31-12-2023
<b>ASSETS</b>			
<b>Fixed assets</b>			
<i>Financial fixed assets</i>			
Shares and participations in Group companies	29	456	444
Shares and participations in other companies		130	138
<b>Total fixed assets</b>		<b>586</b>	<b>582</b>
<b>Current assets</b>			
<i>Current receivables</i>			
Receivables from Group companies		2,095	2,053
Current tax receivable		6	5
Other receivables		9	5
Prepaid expenses and accrued income		3	3
<b>Total current receivables</b>		<b>2,113</b>	<b>2,066</b>
Cash and bank balances		6	6
<b>Total current assets</b>		<b>2,119</b>	<b>2,072</b>
<b>Total assets</b>		<b>2,705</b>	<b>2,653</b>
<b>Shareholders' equity and liabilities</b>			
<b>Shareholders' equity</b>			
<i>Restricted shareholders' equity</i>			
Share capital		79	79
<i>Unrestricted shareholders' equity</i>			
Share premium reserve		660	660
Fair value reserve		37	45
Retained earnings		51	39
Net profit for the year		1,857	1,820
<b>Total shareholders' equity</b>		<b>2,683</b>	<b>2,642</b>
<b>Current liabilities</b>			
Accounts payable		0	1
Liabilities to Group companies		11	0
Tax liability		–	–
Other liabilities		1	1
Accrued expenses and deferred income		10	10
<b>Total current liabilities</b>		<b>22</b>	<b>11</b>
<b>Total shareholders' equity and liabilities</b>		<b>2,705</b>	<b>2,653</b>

# Changes in the Parent Company's shareholders' equity

SEK m	Share capital	Share premium reserve	Fair value reserve	Retained earnings	Total
<b>Shareholders' equity, 31-12-2022</b>					
Net profit for the year	–	–	–	1,820	1,820
Other comprehensive income for the year	–	–	–99	–	–99
Total comprehensive income for the year	–	–	–99	1,820	1,721
<i>Transactions with owners</i>					
Dividend paid	–	–	–	–1,175	–1,175
Exercise of share warrants	0	114	–	–	115
<b>Shareholders' equity, 31-12-2023</b>	<b>79</b>	<b>660</b>	<b>45</b>	<b>1,859</b>	<b>2,642</b>
Net profit for the year	–	–	–	1,857	1,857
Other comprehensive income for the year	–	–	–8	–	–8
Total comprehensive income for the year	–	–	–8	1,857	1,849
<i>Transactions with owners</i>					
Dividend paid	–	–	–	–1,808	–1,808
<b>Shareholders' equity, 31-12-2024</b>	<b>79</b>	<b>660</b>	<b>37</b>	<b>1,908</b>	<b>2,683</b>

# Parent Company cash flow statement

SEK m	2024	2023
<b>Operating activities</b>		
Profit before tax	1,859	1,823
whereof interest payments received	4	2
whereof interest expenses paid	0	0
<i>Adjustment for items not included in cash flow</i>		
Anticipated dividend	-1,850	-1,813
Income tax paid	-4	-18
<b>Total</b>	<b>5</b>	<b>-9</b>
<b>Changes in operating activities' assets and liabilities</b>		
Increase (-) / decrease (+) in other assets	1,805	1,084
Increase (+) / decrease (-) in other liabilities	11	4
<b>Cash flow from operating activities' assets and liabilities</b>	<b>1,815</b>	<b>1,087</b>
<b>Cash flow from operating activities</b>	<b>1,820</b>	<b>1,079</b>
<b>Investment activities</b>		
Acquisition of shares and participations	-	-
<b>Cash flow from investment activities</b>	<b>-</b>	<b>-</b>
<b>Financing activities</b>		
Cash dividend	-1,808	-1,175
Exercise of share warrants	-	115
Shareholder contribution paid	-12	-18
<b>Cash flow from financing activities</b>	<b>-1,820</b>	<b>-1,078</b>
<b>Cash flow for the year</b>	<b>0</b>	<b>1</b>
Liquid assets at beginning of year	6	6
Liquid assets at end of year	6	6
<b>Change</b>	<b>0</b>	<b>1</b>

# Notes

## Note 1 Corporate information

The Parent Company, Avanza Bank Holding AB (publ), Corporate Identity Number 556274-8458, is a Swedish registered limited company whose registered office is in Stockholm. The Parent Company's share is listed on Nasdaq Stockholm Large Cap. The address of the head office is Regeringsgatan 103, Box 1399, SE-111 93 Stockholm, Sweden.

The consolidated accounts for 1 January 2024 – 31 December 2024 comprise the Parent Company and its subsidiaries, referred to collectively as "the Group". The Group offers a wide selection of savings products, a strong pension offering and mortgages in Sweden. The Group's operations are described in more detail in the Administration report. The consolidated accounts and the Annual report for Avanza Bank Holding AB (publ) for the 2024 financial year were approved on 20 February 2025 by the Board of Directors and the CEO. The consolidated accounts and the Annual report are adopted by the Annual General Meeting on 24 April 2025.

## Note 2 Accounting principles

### (a) Compliance with standards and legislative requirements

The consolidated financial statements are prepared in accordance with the IFRS Accounting standards (IFRS) and IFRIC Interpretations adopted by the EU. The complementary rules in the Annual Accounts Act for Credit Institutions and Securities Companies (1995:1559) and the regulations and general guidelines of the Swedish Financial Supervisory Authority (FFFS 2008:25) regarding Annual Reports in Credit Institutions and Securities Companies are applied as well. The consolidated financial statements also apply recommendation RFR 1 Supplementary accounting rules for groups and statements from the Swedish Sustainability and Financial Reporting Board.

The Parent Company applies the same accounting principles as the Group other than in the cases specified below under section (t). The Parent Company's accounting principles.

### (b) Preconditions with regard to the preparation of financial reports of the Parent Company and Group

The Parent Company's functional currency is Swedish kronor, which also constitutes the reporting currency for both the Parent Company and the Group. All amounts, unless otherwise indicated, are rounded to the nearest million. Financial assets and liabilities are reported at amortised cost, except for certain financial assets and liabilities that are valued at fair value via income statement or via other comprehensive income, see Note 31 Financial instruments.

Certain parts of the Annual report have also been prepared according to the European Single Electronic Format (ESEF). The financial statements included in ESEF for 2024 are the consolidated income statement, balance sheet, cash flow statement, changes in the Group's shareholders' equity and the following notes.

The accounting principles have been applied consistently to all periods presented in the Group's financial statements, unless otherwise indicated below.

### (c) New IFRS and interpretations

Only those IFRS and interpretations that are currently considered relevant to Avanza's consolidated financial statements are reported below.

#### *New IFRS and interpretations introduced in 2024*

No new or amended IFRS, IFRIC interpretations or changes as a result of IASB's annual improvement project, which entered into force on 1 January 2024, are assessed to have had a significant impact on the Group.

#### *IFRS and interpretations applicable in 2025 or after*

The new standards, amendments to standards and statements of interpretation entering into force in the financial year 2025 or later have not been applied prematurely in the preparation of the financial statements. Only the changes that could impact the Group in the future are described below.

#### *IFRS 18 Presentation and Disclosure in Financial Statements*

This is the new standard for presentation and disclosure in financial statements, which replaces IAS 1, with a focus on updates to the income statement. The most important terms introduced in IFRS 18 refer to:

- the structure of the income statement with required subtotals;
- requirement to determine the most useful structured summary to present expenses in the income statement;
- required disclosures in a single note in the financial statements for certain performance measures that are reported outside an entity's financial statements (i.e. management-defined performance measures); and
- enhanced principles for aggregation and disaggregation that apply to the financial statements and notes in general.

The standard is applicable for financial years beginning on 1 January 2027 or later. Premature application is permitted. The EU has not yet adopted the standard. The Group has not yet evaluated the impacts of IFRS 18.

### (d) Segment reporting

Avanza's internal monitoring is conducted on the basis of the result for the Group as a whole and expenditure per cost unit. This business is connected with the customers' accounts and Avanza is guided by total customer volume rather than financial information for different product categories. The operating profit is only followed up at a group level. Avanza as a whole, therefore, constitutes a total segment in accordance with the criteria in IFRS 8 Operating Segments.

### (e) Classification

Fixed assets comprise, in every significant respect, amounts that are expected to be recovered more than twelve months after the closing day. Current assets comprise, in every significant respect, amounts that are expected to be recovered or paid within twelve months of the closing day. Long-term liabilities comprise, in every significant respect, amounts that the Group and the Parent Company at the end of the reporting date have an unconditional right to defer settlement for at least twelve months after the end of the reporting date. If there is no right, or if the liability is held for trading or is expected to be settled within the normal course of business within twelve months, the principal amount is recognised as a current liability.

### (f) Consolidation principles

Subsidiaries are all companies over which the Group has a controlling interest. The Group controls a company when it is exposed, or has rights, to variable returns from its involvement with the company and has the ability to affect those returns through its power over the company. Subsidiaries are included in the consolidated accounts from the date on which the controlling influence is transferred to the Group. They are excluded from the consolidated accounts from the date on which the controlling influence ends.

In accordance with IFRS 3 Business Combinations, the acquisition method has been used for the accounting of the group's business combinations.



Note 2, cont.

### **Restrictions on the transfer of funds to the Parent Company**

The subsidiaries Avanza Bank AB (publ), Försäkringsaktiebolaget Avanza Pension and Avanza Fonder AB are, in accordance with external regulations and legislative requirements, obliged to maintain a certain amount of shareholders' equity in each legal entity, which means that restrictions exist on the transfer of funds to the Parent Company, Avanza Bank Holding AB (publ).

### **Transactions eliminated on consolidation**

Intra-group receivables, liabilities and transactions, including income or expenses and unrealised gains or losses arising from intra-group transactions, are eliminated in their entirety. The accounting principles for subsidiaries have been amended as appropriate in order to guarantee the consistent application of the Group's principles.

### **(g) Foreign currencies**

Transactions in foreign currencies are converted to Swedish kronor at the exchange rate applicable on the transaction date, in accordance with IAS 21 Effects of Changes in Foreign Exchange Rates. Monetary assets and liabilities in foreign currencies are converted to Swedish kronor at the closing day exchange rate. Exchange rate differences arising in conjunction with the conversions are recognised in the income statement.

### **(h) Income**

#### **Net commission income**

Commission income primarily comprises brokerage, fund commissions, currency-related income and other commissions and is, according to IFRS 15, recognised as revenue when the customer obtains control over the sold goods or services and has the potential to use or obtain benefit from the goods or services. A customer is a party that enters into a contract with Avanza to obtain services that are the result of Avanza's ordinary activities. Brokerage is recognised as income on the transaction date. Fund commissions are received from external fund managers and essentially comprise compensation based on fund volume, which are recognised on a monthly basis. Currency-related income refer to currency exchanges related to customers' securities and fund trades listed in other currency than Swedish kronor. Other commissions mainly refer to compensation for brokering securities in conjunction with corporate actions, the sale of structured products and compensation for distribution. Other commissions are recognised upon completion of transactions. This also applies to investment contracts within the insurance operations.

Commission expenses mainly consist of transaction costs directly related to brokerage income and payment commissions.

#### **Net interest income**

Income from financial instruments is reported in accordance with IFRS 9. Interest income related to assets measured at amortised cost and fair value via other comprehensive income is recognised as interest income in the income statement according to the effective interest method, while other interest income is recognised in other interest income. Interest income from lending to credit institutions and lending to the public is recognised as income as it is earned, which implies that interest income is allocated to the period to which it refers in accordance with the effective interest method. Bonds generate net interest income in periods with positive rates as an effect of the sum of amortisation of premiums and the coupon rate, where the coupon rate exceeds the interest expense for amortisation of premiums.

Interest expenses primarily refer to deposits from the public, but also lease liabilities, as well as fees for the deposit guarantee fee and the resolution fee which are recognised expensed as incurred, meaning that interest expenses are allocated to the period to which they refer. Interest expenses regarding lending to credit institutions refer to interest fees for periods with negative interest, which are recognised according to the same principle.

#### **Net result of financial transactions**

Income from financial instruments is reported in accordance with IFRS 9. Profit/loss from financial transactions comprises realised and unrealised profit/loss from the sales and holdings of securities, participations and currencies. For bonds, only realised gains or losses are reported within the net result of financial transactions, while unrealised gains or losses are reported as other comprehensive income. Profit/loss on assets and liabilities in the insurance operations is also reported here.

#### **(i) Financial instruments**

Financial instruments are defined in accordance with IAS 32 Financial Instruments: Classification as agreements that give rise to a financial asset in a company and a financial liability or equity instrument in another company.

As a rule, financial assets and liabilities are recognised gross in the balance sheet. A financial asset and a financial liability are set off and reported with a net amount in the balance sheet only when there is a legal right to set off the amounts and there is an intention to settle the items with a net amount or to simultaneously realise the asset and settle the liability. Securities trading receivables and

securities trading liabilities are offset in the balance sheet, this is because they are settled by payment for delivery in a clearing business.

According to the classification and measurement requirements in IFRS 9, financial assets and liabilities are classified as and measured at fair value via income statement, amortised cost or fair value via other comprehensive income. The classification is determined by a business model assessment for different groups of instruments and in a so-called SPPI test (Solely Payment of Principal and Interest), which determines whether the asset's cash flow consists solely of repayments of principal and interest. The SPPI test must be passed in order for financial instruments to be classified at amortised cost or at fair value via other comprehensive income. If the SPPI test is not passed, the financial instrument is classified at fair value via income statement.

#### **Financial assets at fair value via income statement**

Equity instruments and derivatives measured at fair value via income statement mainly consist of shares and participations, as well as interest-bearing securities held as part of the insurance operations. Interest-bearing securities held as part of the insurance operations are assets used as liability coverage for the Group's investment contracts in the insurance operations. All contracts within the Avanza Group have conditional dividends in which the policyholder bears the risk of changes in value and these contracts are consequently defined as investment contracts and recognised in accordance with IFRS 9, see also section (n) Insurance operations.

Instruments are measured at fair value less transaction costs. The policyholders are authorised to manage the assets themselves, while at the same time being responsible for all risks related to changes in value as a consequence of this management, which is why insurance-related assets and debts (conditional dividends) are of equal size at all times. There is also a minor item for outstanding claims included among insurance-related liabilities (guaranteed return), due to which total insurance-related liabilities slightly exceed insurance-related assets. The policyholders carries risk of change in value of the assets in the insurance operations corresponding to the part of liabilities in the insurance operations which regards conditional dividends, the net effect of change in value is therefore zero. Change in the remaining insurance debt, which relates to outstanding claims, is guaranteed by the insurance company.

#### **Financial assets at amortised cost**

This category includes a portfolio of treasury bills eligible for refinancing (as of 31 December 2023), covered bonds and, to a lesser

*Note 2, cont.*

extent, government, municipal and county bonds that are held as an element in the management of the Group's surplus liquidity. This category also includes balances at central banks, lending to credit institutions, lending to the public, securities trading receivables, tax receivables, accounts receivable and the part of the insurance assets that pertains to cash. The business model consists of generating value by obtaining contractual payments. The terms of the instruments mean cash flows passing the SPPI test.

Lending to the public and accounts receivable are measured at amortised cost less confirmed credit losses and expected credit losses. Avanza has neither corporate financing nor consumer loans, which are normally associated with banking operations. Concerning lending to the public, account credits have collateral in the form of securities or cash, while mortgages have collateral in the form of real estate.

**Financial assets at fair value via other comprehensive income**

Assets measured at fair value via other comprehensive income are initially recognised in the balance sheet at fair value with addition to acquisition value costs. Following first reporting, instruments in this category are measured at fair value via other comprehensive income. Unrealised changes in fair value are recognised in other comprehensive income and accumulated in the fair value reserve in shareholder's equity. In connection with a sale, a reclassification is made from the fair value reserve through other comprehensive income to profit or loss, where the realised result is recognised on the line for net result of financial transactions in the income statement.

Financial instruments in this category consists of a portfolio of treasury bills eligible for refinancing (as of 31 December 2024) and covered bonds, to a lesser extent, securities issued by the Swedish government, municipalities and county councils which are held as a part of administration of the Group's excess liquidity. The business model consists of both generating value by obtaining contractual payments and through certain sales of the financial assets. The terms of the instruments mean cash flows passing the SPPI test. This category also reports the parts of shares and participations that are not held for trading, identified to the category fair value via other comprehensive income at the first reporting date.

**Financial liabilities at fair value via income statement**

In this category liabilities in the insurance operations are reported, see section (n) Insurance operations, excluding provisions for outstanding claims, since corresponding assets are measured at fair value via income statement. All agreements with Avanza have conditional dividends in which the policyholder bears the risk of

changes in value, with which the commitment is reported as a liability in the balance sheet. The size of the debt is directly proportional to the value of the securities, as well as deposits and withdrawals.

The liabilities have initially been identified as financial liabilities at fair value via income statement less transaction costs. The valuation is based on the fair value of the underlying assets.

**Financial liabilities at amortised cost**

Financial liabilities in this category mainly refer to deposits from the public, securities trading liabilities, tax liabilities, accounts payable and other liabilities.

**Loss reserves**

All assets measured at amortised cost and fair value via other comprehensive income are subject to a calculation of expected credit loss reserves. Avanza divides the assets into three categories depending on the degree of credit impairment in accordance with IFRS 9. Category 1 comprises assets where there has not been a significant increase in the credit risk, category 2 comprises assets where there has been a significant increase in the credit risk, and category 3 comprises defaulted assets. Significant assets in category 3 are evaluated in greater detail on an individual basis, while a collective assessment is made for insignificant assets. Linked to this are forward-looking scenarios where macro factors are taken into account in the categorisation, see under the section Macro analysis. Avanza's definition of default is an exposure that wound up in category 3.

**Loss reserves within lending to the public**

Margin lending and mortgage lending are classified in categories 1–3 according to the above-mentioned changes in credit deterioration.

- Category 1: Margin lending where the borrowers abide by the current credit and account terms with fewer deviations than specified in category 2. Mortgages where the borrowers have made their interest payments during the latest rolling 12-month period with fewer deviations than specified in category 2.
- Category 2: Margin lending and mortgage lending with a significant increase in the risk of default are moved from category 1 to category 2 when the following conditions are met: Margin lending where the borrowers are overleveraged, but where the value of the collateral (which reflects repayment capacity) exceeds the active liability for more than 10 days or loans that have been categorised in category 3 in the last 90 days. Mortgages where the borrowers during the latest 12-month period

have had at least one violation of interest payment deadlines lasting longer than 30 days. A return to category 1 requires: Margin lending – the customer is no longer in violation for more than 10 days and in the latest 90 days has not been categorised in category 3. Additionally, the market value of the financial securities pledged as collateral (which reflects repayment capacity) for the active liability exceeds the active liability. Mortgages – where the customer during the latest rolling 12-month period has remained current on their interest payments without being in violation for more than 30 days.

- Category 3: Margin lending and mortgages with a significant increase in credit risk compared to category 2 are moved to category 3 when the following conditions are met: Margin lending where the borrowers are overleveraged at the same time that the value of the collateral (which reflects repayment capacity) is less than the active liability or a violation of the credit and account terms has continued for longer than 90 days. Mortgages where the borrowers during the latest 3-month period have had a violation of interest payment deadlines lasting 90 days or more. A return to category 2 requires: Margin lending – the market value of the financial securities pledged as collateral (which reflects repayment capacity) for the active liability is no longer less than the active liability and the customer is no longer in violation of the credit and account terms for more than 90 days. Mortgages – the customer is not returned until they have not been in violation for 90 days or more during the latest rolling 3-month period. Returns are initially always to category 2, never directly to category 1, which applies to both products.

The provisions will be calculated as exposure at default times the probability of default times the loss given default. In category 1, the provisions correspond to the part of the entire term's expected credit losses that is attributable to an event of loss in the coming 12 months. In categories 2 and 3, the provisions correspond to lifetime expected credit losses.

If the expected loss is considered definitive, it is recognised as a confirmed credit loss and the value of the lending and the associated provisions for credit losses are derecognised from the balance sheet. The principle for derecognition from the balance sheet is bankruptcy, completed debt restructuring or mortality.

**Loss reserves within the liquidity portfolio**

Avanza's portfolios of bonds, which are recognised at fair value via other comprehensive income or at amortised cost, are considered to be of the highest possible credit quality with low credit risk. The portfolios mainly consists of covered bonds and municipal bonds.

*Note 2, cont.*

All bonds are market listed. The bonds are placed in category 1 and Avanza currently does not allocate any provisions to the reserve for expected credit losses for bonds. This assessment is based on the fact that the portfolios as a whole have high ratings and meet the criteria for exemption of holdings with low credit risk, according to IFRS 9. This exemption allows no loss reserve to be recognised when the financial instrument is considered to be at low risk of default and the issuer is able to fulfil its payment obligations. The need for a loss reserve is assessed on a regular basis and may change if the portfolios' structure changes or if market conditions change significantly. Avanza continuously monitors the credit quality of issuers and market conditions to ensure that this assessment remains current and accurate.

**Macro analysis**

The macroeconomic scenario work is based on three scenarios (a baseline scenario, a positive scenario and a negative scenario) to determine any impact on probability of default (PD), loss given default (LGD) and exposure at default (EAD). The weights for these scenarios are 70 per cent for the baseline scenario, 15 per cent for the positive scenario, and 15 per cent for the negative scenario.

The IFRS 9 model also uses forward-looking macroeconomic factors that are revised over time and a reasonability and sensitivity assessment of their impact on expected credit losses (ECL). The macro variables that affect the ECL calculation for margin lending are probability of a significant drop in stock prices, probability of a significant price drop in individual securities and unemployment. The macro variables that affect the ECL calculation for mortgages are the policy rate, unemployment and the house price index.

**(j) Intangible fixed assets**

Intangible assets are recognised in accordance with IAS 38 Intangible Assets as assets in the balance sheet if it is probable that future financial benefits will accrue to the company and the acquisition value of the asset can be calculated in a reliable way.

An intangible asset is initially measured at acquisition value when recognised in the balance sheet. After first reporting, an intangible asset is recognised in the balance sheet at acquisition value, following deduction of any accumulated amortisation and accumulated write-downs. The accounting principles for amortisation are shown under (k) Depreciation and amortisation. The accounting principles for write-downs are shown under (l) Write-downs.

**Capitalised development expenditure**

Capitalised development expenditure comprises externally purchased services and capitalised personnel costs. Capitalised

expenditure relates to the implementation of a backoffice system and the development of a trading system and other applications, which will generate long-term economic advantages for the Group through either increased income or cost savings.

Costs to configure and adapt SaaS services are expensed as they arise or accrued over the system's contract term. Development costs are otherwise expensed when they arise.

**(k) Depreciation and amortisation**

The estimate useful lives are:

● computers and other technical installations	3 or 5 years
● equipment	5 years
● patents and trademarks	5 years
● development expenditure	5 years
● development expenditure trading system	10 years
● customer relations	5 years
● right-of-use assets	1–4 years

**(l) Write-downs**

The carrying amounts for the Group's assets not classified as financial instruments are tested each closing day to determine whether there is any indication of a write-down requirement. If any such indication exists, the asset's recoverable amount is calculated. A write-down is reported when the carrying amount of an asset exceeds the recoverable amount. A write-down is charged to the income statement. The recoverable amount of goodwill and other intangible assets with indeterminable useful lives, and intangible assets not yet ready for use, is calculated annually.

**(m) Leasing**

For Avanza as a lessee, IFRS 16 Leases is applied according to which material leases with a term exceeding 12 months are recognised as assets and liabilities in the balance sheet represented by the right to use the leased asset and the obligation to pay future leasing charges. Depreciation of the lease asset and interest expenses attributable to the lease liability are recognised in the income statement. The leases in question comprise premises.

**(n) Insurance operations****Insurance contracts and investment contracts**

IFRS distinguishes between insurance contracts, which are recognised according to IFRS 17, and investment contracts, which are recognised according to IFRS 9. Insurance contracts are contracts

where significant insurance risk is transferred from the policyholder to the issuer. Investment contracts are financial instruments which are not defined as insurance contracts, since they do not transfer a significant insurance risk to the issuer. All contracts in Avanza's insurance operations are classified as investment contracts and are recognised according to IFRS 9, see also section (i) Financial instruments. Risk insurance such as premium waiver, life, health, disability, child and health-care insurance is offered in partnership with Euro Accident.

Avanza's policies consist of unit-linked insurance or traditional insurance. For unit-linked policies, the value of the insurance is entirely dependent on the investments that the policyholder makes. It is the policyholders themselves who bear the investment risk for the investments. In traditional insurance, the value of the insurance consists in its entirety of conditional dividends, which means that policy does not have a guaranteed insured amount. It is the policyholders who bear the investment risk for the investments. The occupational pension and private pension insurance products will, upon pay-out, be converted to unit linked insurance. The endowment pension, can, upon pay-out, be converted to unit-linked insurance. If the policy remains as traditional insurance, a fixed annual amount of 1 per cent of the insurance value will be calculated on the first pay-out date in the first five years and will be paid out over five years. The payment amount is guaranteed in the first five years.

**Prepaid acquisition cost insurance operations**

Avanza does not capitalise acquisition costs and thus has no prepaid acquisition costs, also known as Deferred Acquisition Costs (DAC), in the balance sheet. Acquisition costs are recognised as they arise.

**Assets in insurance operations**

Assets in the insurance operations consist of policyholders' investments in securities in endowment insurance, endowment pensions, private pension insurance and occupational pensions. It is the policyholders who bear the investment risk, with the exception of any guaranteed amount in paying traditional insurance. Assets in the insurance operations, excluding cash, are measured at fair value via income statement. Amounts received from and paid to the holders are recognised in the balance sheet as deposits or withdrawals.

**Technical provisions**

The technical provisions are divided into the life insurance provision, unit-linked insurance commitments, provisions for outstanding claims and conditional dividends.

*Note 2, cont.*

The life insurance provision is comprised of the capital value of the future insurance compensation guaranteed to policyholders. The provision is calculated individually by policy and refers to the guaranteed entitlements to be paid out in five years.

Unit-linked insurance commitments are calculated individually by policy. The provision corresponds to the total market value of the holding in the policyholders' custodial accounts.

The provision for outstanding claims refers to claims for incidents that have occurred but have not been reported. The provision is calculated collectively for the insured portfolio and is a specific percentage of the gross risk premium income for the claim year.

Conditional dividends are calculated individually by policy. It corresponds to the total market value of the holding in the policyholder's custodial account less any provision for guaranteed entitlements.

**Commitments for investment contracts**

All contracts with Avanza have conditional dividends where the policyholder bears the risk for changes in value, whereby they are classified as investment contracts and the commitment is recognised as a liability. The size of the liability is directly related to the change in value of the underlying securities as well as deposits and withdrawals. The liability is mainly recognised as liabilities measured at fair value via income statement. Changes in the value of assets in the insurance operations and the corresponding change in the commitment for investment contracts are offset in the income statement. The substance of the transaction is that the changes in value belong in their entirety to the policyholders. Netting makes it easier for policyholders and other stakeholders to understand the transactions and assess the company's results and future cash flows.

The liability related to the reserve for outstanding claims is calculated on an actuarial basis and recognised as a liability to policyholders.

**Commitments for insurance contracts**

No contracts are classified as insurance contracts, since there are no significant insurance risks within the insurance operations. Risk insurance such as premium waiver, life, health, disability, child and health-care insurance is offered in partnership with Euro Accident (issuer), which means that Avanza is not exposed to any insurance risk related to these products.

**(o) Dividend paid**

Dividends are recognised as liabilities once the Annual General Meeting has approved the Board's dividend proposal.

**(p) Employee benefits**

Pension costs refer to occupational pension premiums and special employer's contribution. Occupational pensions are obtained through defined contribution pension plans equivalent to the ITP 1 plan. Payment obligations for defined contribution plans are expensed in the income statement as they arise. In contrast to defined benefit pensions, where the employee is guaranteed a specific predetermined pension, the value of the pension for the employee depends on the premiums that have been paid in and the returns that the investments have generated.

**(q) Taxes**

Income taxes are recognised in accordance with IAS 12 Income Taxes. For detailed information on recognition of current and deferred tax, see IAS 12.

Försäkringsaktiebolaget Avanza Pension also pays a yield tax based on an approximation of the return on assets managed on behalf of policyholders. Fees for the yield tax is deducted from policyholders' assets.

**(r) Pledged assets and contingent liabilities**

Pledged assets can consist both of pledged assets for own liabilities as well as provisions and pledged assets for items other than liabilities reported in the balance sheet. Pledged assets refer to collateral held by Swedish credit institutions, clearing institutions and the Riksbank.

Avanza's commitments relate to granted but not disbursed mortgage loans.

**(s) Cash flow statement**

The cash flow statements for the Group and the Parent Company are prepared according to IAS 7 Statement of Cash Flows using the indirect method and show the payments received and made by the operating activities, investment activities and financing activities during the financial year.

**Liquid assets**

Liquid assets mainly comprise balances held with banks and equivalent institutions that can be reinvested with one day's or a maximum of one month's notice. Balances held with banks and equivalent institutions relating to assets pledged as collateral are excluded from liquid assets.

**(t) The Parent Company's accounting principles**

The Parent Company has prepared its Annual report in accordance with the provisions of the Swedish Annual Accounts Act

(1995:1554) and RFR 2 Accounting for legal entities of the Swedish Financial Reporting Board. Under RFR 2 the Parent Company, in its annual accounts for the legal entity, shall apply all IFRS accounting standards and IFRIC interpretations, as far as possible, within the framework of the Swedish Annual Accounts Act and with regard to the connection between accounting and taxation. The differences between the accounting principles of the Group and the Parent Company are shown below.

The accounting principles for the Parent Company described below have been applied consistently to all periods presented in the Parent Company's financial reports.

**Shares and participations in Group companies**

Participations in Group companies are recognised by the Parent Company in accordance with the acquisition value method of accounting.

**Group contributions**

Group contributions are recognised as appropriations, regardless of whether the Group contribution is paid or received.

**Anticipated dividend**

Anticipated dividends from subsidiaries are booked as financial income in the Parent Company already during the vesting year in connection with the annual accounts. The subsidiaries do not book the dividend until the following year in conjunction with the Annual General Meeting deciding on the allocation of profits.

**(u) Notes that have no direct reference to income statements or balance sheets**

Note 1	Corporate information
Note 2	Accounting principles
Note 33	Own funds and capital requirements
Note 34	Financial risks
Note 35	Related parties
Note 36	Important estimates and assessments
Note 37	Events after the closing day
Note 38	Proposed allocation of profits

**Note 3 Revenue from contracts with customers**

SEK m – The Group	2024	2023
Trading in commission-generating securities	1,492	1,125
Fund savings	800	639
Corporate services	15	16
Other commission income	398	395
<b>Total</b>	<b>2,704</b>	<b>2,176</b>
<i>Timing of revenue recognition</i>		
Service or goods transferred to customer at a specific point in time	2,704	2,176
Service or goods transferred to customer over time	–	–
<b>Total</b>	<b>2,704</b>	<b>2,176</b>

Avanza’s customers mainly consist of individual investors in Sweden, professional traders and corporate customers and partners in third-party relationships. Revenue from contracts with customers mainly comes from securities trading and includes net currency-related income of SEK 454 million (SEK 288m) in the lines Trading in commission-generating securities and Fund savings.

No assessments are needed that would materially affect the size or timing of the above-mentioned revenue. Nor has Avanza incurred any expenditures to secure or fulfil the contracts with customers.

No single external customer generates more than 10 per cent of the Group’s revenue. Avanza offers a diversified portfolio of savings and loans in strongly competitive markets. As a result, the Group’s dependence on individual customers is limited. The largest single customer generated brokerage income of SEK 3.3 million (SEK 2.3m) and interest income of SEK 6.1 million (SEK 4.0m) in 2024. The largest customer in the corporate services category generated revenue of SEK 3.2 million (SEK 10.9m). Regarding trading in external funds, Avanza receives commission from partners and does not charge any fees to the customer. Avanza received revenue of SEK 94.5 million (SEK 57.2m) in 2024 from the fund company that provided the largest single provision.

All operations are conducted in Sweden and both income from external customers and fixed assets are attributable to Sweden.

**Note 4 Net commission income**

SEK m – The Group	2024	2023
Brokerage, gross	1,066	862
Fund commissions	771	615
Currency-related income	454	288
Other commissions <sup>1)</sup>	413	412
<b>Commission income</b>	<b>2,704</b>	<b>2,176</b>
Transaction costs <sup>2)</sup>	–155	–138
Payment services commissions	–117	–94
Other commission expenses <sup>3)</sup>	–124	–80
<b>Commission expenses</b>	<b>–396</b>	<b>–311</b>
<b>Net commission income</b>	<b>2,309</b>	<b>1,864</b>

<sup>1)</sup> Includes mainly income from Avanza Markets, but also income from Corporate Finance, stock lending, compensation for distribution and advertising sales, subscriptions and customer’s add-on services.

<sup>2)</sup> Costs directly related to brokerage income.

<sup>3)</sup> Includes application costs for mortgages, SEO costs, costs for trading systems, customer compensations, refund of fund commissions and various other smaller costs.

**Note 5 Net interest income**

SEK m – The Group	2024	2023
<b>Interest income</b>		
<i>Interest income using the effective interest method</i>		
Interest income from loans to credit institutions	398	389
Interest income from loans to the public <sup>1)</sup>	966	986
Interest income from interest-bearing securities	1,385	1,162
<b>Total interest income using the effective interest method</b>	<b>2,748</b>	<b>2,537</b>
<i>Other interest income</i>		
Other interest income	10	3
<b>Total other interest income</b>	<b>10</b>	<b>3</b>
<b>Total interest income</b>	<b>2,758</b>	<b>2,540</b>
<b>Interest expenses</b>		
Interest expenses for loans to credit institutions	0	0
Interest expenses for deposits from the public <sup>1)</sup>	–1,124	–922
Interest expenses for lease liabilities	–2	–2
Other interest expenses	–52	–42
<b>Total interest expenses</b>	<b>–1,178</b>	<b>–966</b>
<b>Net interest income</b>	<b>1,580</b>	<b>1,574</b>

<sup>1)</sup> Includes interest income related to customers’ credit accounts of SEK 48 million (SEK 185m), which are matched by an equal interest expense.

The average lending rate to account customers amounted to 4.2 per cent (4.1) during the year. The average deposit rate from accounts with surplus liquidity amounted to 1.6 per cent (1.2) during the year.

Part of loans to the public is continuously covered throughout the year in full by pledged liquid assets on endowment insurance. This part of lending does not affect net interest income, as the deposit rate is the same as the lending rate.

## Note 6 Net result of financial transactions

SEK m – The Group	2024	2023
Realised profit/loss regarding shares, etc	1	-1
Exchange rate fluctuation	3	0
Change in value of insurance operations assets	36,109	20,779
Change in value of insurance operations liabilities	-36,109	-20,779
<b>Total</b>	<b>4</b>	<b>-1</b>
<b>Net profit/net loss per valuation category</b>		
Financial assets valued at fair value via income statement	36,110	20,777
Financial liabilities valued at fair value via income statement	-36,109	-20,779
Financial liabilities valued at amortised cost	3	0
Financial assets valued at fair value via other comprehensive income	34	-41
<b>Total</b>	<b>38</b>	<b>-42</b>

## Note 7 General administration expenses

SEK m – The Group	2024	2023
Personnel costs	-788	-704
Consultancy services purchased	-94	-82
Market information costs	-80	-79
Other general administration expenses	-156	-143
<b>Total</b>	<b>-1,117</b>	<b>-1,007</b>

## Note 8 Employees and personnel costs

SEK m – The Group	2024	2023
Salaries and other remuneration	-511	-467
Pension costs	-89	-64
Social insurance charges	-160	-145
Other personnel costs	-28	-28
<b>Total personnel costs</b>	<b>-788</b>	<b>-704</b>

Note 8, cont.

The Group has no employees outside Sweden. At the end of the year there was a total of 679 Group employees (661). Normal employment terms comprise salary and benefits.

Occupational pensions, through defined contribution pension plans are obtained for all employees over 25 years. Pension costs refer to occupational pension premiums and special employer's contribution.

### Salaries, other remuneration and social insurance charges

SEK m	2024		2023	
	Salaries and other remuneration	Social insurance charges (of which pension costs)	Salaries and other remuneration	Social insurance charges (of which pension costs)
The Group	511	249	467	209
		(89)		(64)
of which the Board of Directors and senior executives	34	20	33	19
		(9)		(8)
Parent Company	23	9	20	8
		(6)		(4)
of which the Board and CEO	10	5	9	5
		(2)		(2)

Average no. employees	2024		2023	
	No. employees	Of whom, men	No. employees	Of whom, men
Parent Company	6	3	6	2
Subsidiaries	668	414	648	406
<b>Total</b>	<b>674</b>	<b>417</b>	<b>654</b>	<b>408</b>

2024 SEK thousand – The Group	Basic salary/ Directors' fees	Variable remuneration	Pension cost	Total
Chairman of the Board	575	-	-	575
Members of the Board	4,877	-	-	4,877
CEO	9,360	-	3,298	12,657
Deputy CEO	2,690	-	780	3,470
Other senior executives	16,631	-	5,146	21,777
<b>Total</b>	<b>34,132</b>	<b>-</b>	<b>9,223</b>	<b>43,355</b>

2023 SEK thousand – The Group	Basic salary/ Directors' fees	Variable remuneration	Pension cost	Total
Chairman of the Board	540	-	-	540
Members of the Board	4,850	-	-	4,850
CEO	8,857	-	3,462	12,318
Deputy CEO	2,755	-	710	3,465
Other senior executives	16,478	-	4,162	20,640
<b>Total</b>	<b>33,479</b>	<b>-</b>	<b>8,334</b>	<b>41,813</b>

Note 8, cont.

SEK thousand – Parent Company	2024		2023	
Board members	Directors' fees	Other remuneration	Directors' fees	Other remuneration
Sven Hagströmer	575	–	540	–
Magnus Dybeck	466	–	446	–
Catharina Eklöf	135	–	537	–
Jonas Hagströmer	580	–	516	–
John Hedberg	457	–	333	–
Linda Hellström	553	–	490	–
Johan Roos	908	–	846	–
Sofia Sundström	138	–	532	–
Hans Toll	167	–	660	–
Leemon Wu	607	–	490	–
Julia Haglind	483	–	–	–
Lisa Åberg	386	–	–	–
<b>Total</b>	<b>5,452</b>	<b>–</b>	<b>5,390</b>	<b>–</b>

The Board of Avanza Bank Holding AB (publ) has 9 members (10), 5 of whom are men (6). Fees have been paid to the Chairman of the Board and Board Members in accordance with the resolutions of the 2024 Annual General Meeting. The Chairman of the Board has not received any remuneration in addition to Director's fees.

#### Information regarding senior executives

The term, senior executive, refers to the CEO and 8 other persons (8) at the end of the year who hold senior positions. Together, they make up the Group Management. There were 9 senior executives (9) in the Group during the year, 4 of whom were men (4).

#### Remuneration to senior executives during the financial year

Remuneration to the CEO and other senior executives has, in accordance with Avanza's guidelines, comprised a base salary. No variable remuneration has been paid during the current or previous year to the CEO or other senior executives. There is thus no cost-bearing movable compensation related to the year, nor is there any previously deferred variable remuneration that has not fallen due for payment. The remuneration to the CEO for the financial year 2024 has been prepared by the boards Remuneration Committee and decided by the Board of Directors.

Other senior executives refer to eight individuals who comprised the Group Management during the year together with the CEO. For more information on Group Management's composition at the end of the financial year, see pages 75–76. The CEO has a 6-month period of notice if he terminates his employment contract himself, and a severance pay corresponding to 6 monthly salaries if the contract is terminated by the company. The period of notice for other senior executives if they themselves terminate their contracts of employment is 6 months. There are no severance pay agreements for other senior executives. The retirement age for the CEO and other senior executives is 65. Avanza has no pension commitments for senior executives.

Members of the Group Management have during the year acquired warrants, on market terms in accordance with the warrant programme approved by the the Annual General Meeting on 11 April 2024. The total remuneration paid to members of the Group Management should be on market terms.

Details of the company's remuneration policy are provided on the corporate web investors.avanza.se/en.

#### Financial instruments, warrants

Subsidiary programme 2022-2025	Warrants			Market value		
	SEK thousand	Number	Value <sup>1)</sup>	Acquisition	Benefit	31-12-2024
CEO	–	–	–	–	–	–
Other senior executives	55,140	536	536	536	–	3,583
<b>Total</b>	<b>55,140</b>	<b>536</b>	<b>536</b>	<b>536</b>	<b>–</b>	<b>3,583</b>

Subsidiary programme 2023-2026	Warrants			Market value		
	SEK thousand	Number	Value <sup>1)</sup>	Acquisition	Benefit	31-12-2024
CEO	–	–	–	–	–	–
Other senior executives	36,209	499	499	499	–	1,352
<b>Total</b>	<b>36,209</b>	<b>499</b>	<b>499</b>	<b>499</b>	<b>–</b>	<b>1,352</b>

Subsidiary programme 2024-2027	Warrants			Market value		
	SEK thousand	Number	Value <sup>1)</sup>	Acquisition	Benefit	31-12-2024
CEO	127,307	2,000	2,000	2,000	–	3,255
Other senior executives	44,095	693	693	693	–	1,127
<b>Total</b>	<b>171,402</b>	<b>2,693</b>	<b>2,693</b>	<b>2,693</b>	<b>–</b>	<b>4,382</b>

<sup>1)</sup> Market value on acquisition date.

Subsidiary programmes were acquired at market price in August 2022, August 2023 and May 2024. The market value has been calculated in accordance with the Black & Scholes valuation model. See Note 28 Equity for terms and exercise prices.

## Note 9 Auditors' fees and reimbursement of expenses

SEK thousand – The Group	2024	2023
<b>KPMG</b>		
Audit engagements	-4,177	-3,465
Audit business over and above audit engagements	-190	-622
Tax consultancy	-	-247
Other services	-107	-
<b>Total</b>	<b>-4,475</b>	<b>-4,333</b>
<b>SEK thousand – Parent Company</b>	<b>2024</b>	<b>2023</b>
<b>KPMG</b>		
Audit engagements	-760	-774
Audit business over and above audit engagements	-	-24
Tax consultancy	-	-
Other services	-107	-
<b>Total</b>	<b>-868</b>	<b>-798</b>

The audit engagement refers to the auditing of the Annual report, Consolidated Financial Statement, bookkeeping, and the administration by the Board of Directors and the CEO, as well as other duties incumbent upon the auditors of the group and the parent company. The audit engagement also includes provision of advice or other assistance arising from observations in conjunction with such audits or the performance of related duties.

Auditing activities beyond the audit engagement include reviewing interim reports and services provided in conjunction with certifications and opinions. Tax consultancy refers to taxation issues and Other services mainly comprise advice on accounting issue and regulatory reviews.

## Note 10 Leasing agreements

**The Group**

The Group's leased assets classified as right-of-use assets refer to premises. Leases do not contain any limitations other than the security in the leased assets.

The existing lease agreement for premises has been extended and renegotiated during 2024, which is reflected in the right-of-use assets and lease liabilities as of December 31 2024. Excluding this, no other right-of-use assets were added and no reassessments of lease terms or changes in interest rate levels were made in 2024. Indexation of leases related to leased premises is taken into account in right-of-use assets and lease liabilities as of 31 December 2024.

### Right-of-use-assets

SEK m – The Group	31-12-2024	31-12-2023
Right-of-use assets at the beginning of the year	96	87
Change of lease contract	236	50
Year's depreciation	-42	-41
<b>Right of use assets at the end of the year</b>	<b>290</b>	<b>96</b>

### Lease liabilities

SEK m – The Group	31-12-2024	31-12-2023
Current liabilities	0	0
Long-term liabilities	281	92
<b>Total</b>	<b>281</b>	<b>92</b>

For an analysis of the remaining term of the lease liabilities, see Note 34 Financial risks, section Liquidity risk.

### Amounts in the income statement in accordance with IFRS 16

SEK m – The Group	2024	2023
Depreciation of right-of-use-assets	-42	-41
Interest expenses on lease liabilities	-2	-2
<b>Total</b>	<b>-44</b>	<b>-43</b>

### Amounts in the income statement in accordance with IFRS 16

SEK m – The Group	2024	2023
Expenses for short-term lease agreements	-1	-1
Expenses related to low-value lease agreements (excluding short-term leases)	0	0
Cash flow related to lease agreements	-45	-42

## Note 11 Other operating expenses

SEK m – The Group	2024	2023
Marketing costs	-30	-28
Other operating expenses	-40	-24
<b>Total</b>	<b>-70</b>	<b>-53</b>

## Note 12 Credit losses, net

SEK m – The Group	2024	2023
Year's confirmed credit losses	-	0
Year's change in expected credit losses	0	3
<b>Total</b>	<b>0</b>	<b>3</b>

For more information on Avanza's management of credit losses, see Note 2 Accounting principles section (i) Financial instruments; Loss reserves, Note 18 Loans to the public and Note 34 Financial risks.

## Note 13 Profit/loss on Group participations

SEK m – Parent Company	2024	2023
Dividend received from Group companies	-	-
Anticipated dividend received from Group companies	1,850	1,813
<b>Total</b>	<b>1,850</b>	<b>1,813</b>



**Note 14 Tax on profit/loss for the year**

SEK m	The Group		Parent Company	
	2024	2023	2024	2023
<i>Current tax expense (-)/ tax income (+)</i>				
Tax expense (-)/tax income (+) for the period	-367	-310	-2	-2
<b>Total current tax</b>	<b>-367</b>	<b>-310</b>	<b>-2</b>	<b>-2</b>
<i>Deferred tax expense (-)/ tax income (+)</i>				
Deferred tax in respect of temporary differences	0	0	-	-
<b>Total deferred tax</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>-</b>
<b>Total reported tax expense</b>	<b>-367</b>	<b>-310</b>	<b>-2</b>	<b>-2</b>
<i>Reconciliation of effective tax</i>				
Profit/loss before tax	2,621	2,292	1,859	1,823
Tax at current rate of taxation	20.6%	20.6%	20.6%	20.6%
Non-deductible costs	0.2%	0.2%	0.0%	0.0%
Non-taxable income	-0.1%	0.0%	-20.5%	-20.5%
Other tax base in insurance operations	-6.9%	-7.2%	-	-
Other	0.1%	0.0%	-	-
<b>Effective tax</b>	<b>14.0%</b>	<b>13.5%</b>	<b>0.1%</b>	<b>0.1%</b>

**Deferred tax in temporary differences**

SEK m – The Group	31-12-2024	31-12-2023
Deferred tax receivable	1	1
Deferred tax liability	-	-
<b>Net</b>	<b>1</b>	<b>1</b>

The temporary differences attributable to tax on profit/loss for the year refer to depreciation of leasehold improvements, which are depreciated for accounting purposes over 5 years and for tax purposes over 20 years. There are no loss carry forwards in the Group.

**Note 15 Earnings per share**

The Group	2024	2023
Earnings per share before dilution, SEK	14.33	12.64
Earnings per share after dilution, SEK	14.32	12.64
Profit for the year after tax attributable to the Parent Company's shareholders, SEK m	2,254	1,982
Average no. shares before dilution	157,236,949	156,753,717
Average no. shares after dilution	157,386,210	156,837,612
Outstanding no. shares before dilution	157,236,949	157,236,949
Outstanding no. shares after dilution	157,565,027	157,362,705
No. shares on full dilution	160,388,295	160,836,949

Avanza has three outstanding incentive programmes that originally comprised warrants entitling subscription of 3,900,000 shares. However, non-transferred warrants have been cancelled. A total of 3,151,346 warrants have been transferred to employees, corresponding to a dilution effect of 2.0 per cent if the programmes are exercised.

Each of the three programmes runs for three years: 2022–2025 with a subscription price of 209.03 per share, 2023–2026 with a subscription price of SEK 258.95 per share, and 2024–2027 with a subscription price of SEK 282.12 per share. The market price, as of 31 December 2024 was SEK 272.90. For more information, see Note 28 Equity.

**Note 16 Client funds**

**The Group**  
Client fund receivables, attributable to banking business, amounted as of 31 December 2024 to SEK – million (SEK 716m), which are reported net against client fund payables of SEK – million (SEK 716m). During the first quarter 2024, Avanza changed the terms for deposits on IPS accounts (Individual Pension Savings), resulting in those deposits no longer being classified as client funds. The reason for the change was that the old conditions for IPS accounts were not aligned with industry standards.

**Note 17 Treasury bills eligible for refinancing**

SEK m – The Group	31-12-2024	31-12-2023
Eligible government securities	1,899	4,698
Other eligible securities	-	-
<b>Total</b>	<b>1,899</b>	<b>4,698</b>

**Note 18 Loans to the public**

SEK m – The Group	31-12-2024	31-12-2023
Margin lending	10,654	8,096
Mortgage lending	13,270	11,486
of which with collateral secured by houses	9,181	7,967
of which with collateral secured by tenant-owned apartments	4,088	3,519
<b>Total</b>	<b>23,924</b>	<b>19,583</b>

Loans to the public is secured through securities and real estate. Avanza does not offer any consumer credits. SEK 14,919 million (SEK 12,809m) in mortgage lending was granted as of 31-12-2024, of which SEK 1,647 million (SEK 1,319m) was commitment for granted, undisbursed mortgage loans. Avanza has a low risk appetite within lending, where credit losses and the number of modified loans are basically zero.

Throughout the year, lending fully covered by pledged liquid assets in endowment insurance and investment savings accounts is reported. This lending and deposits are excluded from the balance sheet as of 31 December and have not affected the net interest income, as the interest rate on lending and deposits is the same.

Loans to the public are recognised after deduction of confirmed and expected credit losses. As of 31 December 2024, provisions for expected credit losses amounted to SEK 5 million (SEK 6m), or only 0.02 per cent (0.03) of lending. The change in the accumulated provision for expected credit losses impacted profit for the year by SEK 0 million. Expected credit losses are calculated according to methodology in IFRS 9. See also Note 34 Financial Risks section Expected credit losses and IFRS 9 and Note 2 Accounting Principles section (i) Financial Instruments section Loss reserves within loans to the public.

**Provision for expected credit losses**

SEK m – The Group	31-12-2024	31-12-2023
Reserv at the beginning of the year	-6	-9
Provision for expected losses	0	3
<b>Provision at the end of the year</b>	<b>-5</b>	<b>-6</b>
Provision ratio at the end of the year	0.02%	0.03%

Note 18, cont.

31-12-2024		
SEK m – The Group	Lending <sup>1)</sup>	Reserve
<b>Mortgages</b>		
Category 1	12,682	-1
Category 2	576	-1
Category 3	14	0
<b>Total</b>	<b>13,272</b>	<b>-3</b>
Provision ratio		0.02%
<b>Margin lending</b>		
Category 1	10,655	-2
Category 2	0	0
Category 3	2	-1
<b>Total</b>	<b>10,657</b>	<b>-3</b>
Provision ratio		0.02%

<sup>1)</sup> Amortised cost less provision for expected credit losses.

31-12-2023		
SEK m – The Group	Lending <sup>1)</sup>	Reserve
<b>Mortgages</b>		
Category 1	10,873	-2
Category 2	606	-2
Category 3	11	0
<b>Total</b>	<b>11,490</b>	<b>-4</b>
Provision ratio		0.03%
<b>Margin lending</b>		
Category 1	8,096	-1
Category 2	0	0
Category 3	2	-1
<b>Total</b>	<b>8,099</b>	<b>-2</b>
Provision ratio		0.03%

<sup>1)</sup> Amortised cost less provision for expected credit losses.

## Note 19 Bonds

SEK m – The Group	31-12-2024	31-12-2023
Issued by public authorities	4,129	3,028
Issued by other borrowers	31,063	28,168
<b>Total</b>	<b>35,192</b>	<b>31,195</b>
<b>SEK m – The Group</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Bonds, quoted	35,192	31,195
Bonds, unquoted	-	-
<b>Total</b>	<b>35,192</b>	<b>31,195</b>

As of 31 December 2024, 74.0 per cent (75.0) of the total nominal value was measured at amortised cost and 26.0 per cent (25.0) at fair value through other comprehensive income.

As of 31 December 2024, SEK 3,266 million (SEK 2,765m) in bonds was pledged as collateral. All bonds can be pledged to the Riksbank and are OTC traded, where indicative prices are published on Bloomberg. All holdings of covered bonds issued by Swedish banks have the highest bond rating with Standard & Poor's (AAA) or Moody's (AAA). Avanza does not allocate any provisions for expected credit losses, since the portfolio qualifies for the exemption for low credit risk holdings in accordance with IFRS 9. See also Note 2 Accounting principles section (i) Financial instruments, section Loss reserves within the liquidity portfolio.

## Note 20 Shares and participations

SEK m – The Group	31-12-2024	31-12-2023
Shares and participations, quoted	0	1
Shares and participations, unquoted	146	153
<b>Total</b>	<b>146</b>	<b>154</b>

Unquoted holdings mainly refer to Stabelo Group AB and Stock Republic AB.

## Note 21 Assets and liabilities in insurance operations

SEK m – The Group	31-12-2024	31-12-2023
<i>Financial assets in insurance operations</i>		
Shares and participations	250,967	199,046
Interest-bearing securities	5,768	4,145
Liquid assets	9,755	10,523
<b>Total</b>	<b>266,491</b>	<b>213,713</b>
<i>Financial liabilities in insurance operations</i>		
Life insurance provisions	142	105
Provision for outstanding claims	3	2
Unit-linked insurance commitments	3,548	2,664
Conditional dividends	262,801	210,943
<b>Total</b>	<b>266,493</b>	<b>213,715</b>

All assets in insurance operations refer to assets for which the policyholders carry direct investment risk. Corresponding liabilities in insurance operations refer to conditional dividends for which the policyholders bear the direct risk. This means that the policyholders receive yields but also cover the risk entailed by the insurance operations assets and liabilities.

The Group has no entitlement to the cash flow attributable to invested funds. Both assets and liabilities (conditional dividends) are valued at fair value via the Income Statement. The net effect on profit/loss from acquired securities, unrealised value changes, realised value change, received interest and dividends, as well as paid premiums and changes in the value of the liability, is net zero.

**Note 22 Intangible fixed assets**

SEK m – The Group	31-12-2024	31-12-2023
<b>Goodwill</b>		
<i>Acquisition values</i>		
At the beginning of year	26	26
<b>At the end of year</b>	<b>26</b>	<b>26</b>
<i>Write-downs</i>		
At the beginning of year	-3	-3
<b>At the end of the year</b>	<b>-3</b>	<b>-3</b>
<b>Carrying amount at the end of the year</b>	<b>23</b>	<b>23</b>
<b>Other intangible assets</b>		
<i>Acquisition values</i>		
At the beginning of year	153	165
Year's investments	-	-
Year's disposals	-	-12
<b>At the end of the year</b>	<b>153</b>	<b>153</b>
<i>Depreciation</i>		
At the beginning of the year	-89	-80
Year's depreciation	-21	-21
Year's disposals	0	12
<b>At the end of the year</b>	<b>-109</b>	<b>-89</b>
<b>Carrying amount at the end of the year</b>	<b>43</b>	<b>64</b>
<b>Total intangible fixed assets</b>	<b>66</b>	<b>87</b>

Goodwill in the Group amounts to SEK 23 million and derives from acquisitions in 2001 of parts of the operations that are now conducted within the Group. No write-down requirement has been identified in the annual impairment testing. The profit for the banking operations exceeds the goodwill value on an annual basis.

Other intangible assets consist of software licenses and customer relationships, which are fully amortised, capitalised development of SEK 72 million for a new trading system, which was accrued in 2014–2018, as well as expenses related to a new back-office system of SEK 64 million, accrued during 2020–2022. Amortisation of the trading system began at the end of 2017 and the amortisation period is 10 years. Amortisation of expenses related to the back-office system began in 2022 and the amortisation period is 5 years.

**Note 23 Tangible fixed assets**

SEK m – The Group	31-12-2024	31-12-2023
<i>Acquisition value</i>		
At the beginning of the year	168	212
Year's investments	42	24
Year's disposals	-	-69
<b>At the end of the year</b>	<b>210</b>	<b>168</b>
<i>Write-downs</i>		
At the beginning of the year	-110	-152
Year's depreciation	-29	-27
Year's disposals	-	69
<b>At the end of the year</b>	<b>-139</b>	<b>-110</b>
<b>Carrying amount at the end of the year</b>	<b>70</b>	<b>58</b>

**Note 24 Other assets**

SEK m – The Group	31-12-2024	31-12-2023
Securities trading receivables	393	379
Current tax assets	46	105
Deferred tax assets	1	9
Other	1,859	282
<b>Total</b>	<b>2,299</b>	<b>774</b>

**31-12-2024**

SEK m – The Group	Gross amount	Amount set off	Net amount
Securities trading receivables	4,157	-3,763	393
Securities trading liabilities	4,811	-3,763	1,047

**31-12-2023**

SEK m – The Group	Gross amount	Amount set off	Net amount
Securities trading receivables	3,130	-2,751	379
Securities trading liabilities	2,952	-2,751	201

**Note 25 Prepaid expenses and accrued income**

SEK m – The Group	31-12-2024	31-12-2023
Prepaid expenses	106	117
Accrued income	930	749
<b>Total</b>	<b>1,036</b>	<b>866</b>

**Note 26 Other liabilities**

SEK m – The Group	31-12-2024	31-12-2023
Tax deduction	8	6
Securities trading liabilities	1,047	201
Accounts payable	24	35
Current tax liabilities	2,275	586
Other	117	94
<b>Total</b>	<b>3,470</b>	<b>922</b>

Securities trading liabilities amounts to gross SEK 4,811 million (SEK 2,952m) see note 24 Other assets.

**Note 27 Accrued expenses and deferred income**

SEK m – The Group	31-12-2024	31-12-2023
Personnel-related liabilities	91	93
Other	98	70
<b>Total</b>	<b>188</b>	<b>164</b>

## Note 28 Equity

As of 31 December 2024, the registered share capital comprised 157,236,949 ordinary shares (157,236,949) with a quotient value of SEK 0.50 per share (SEK 0.50). Each share entitles the holder to one vote at the Annual General Meeting and entitles the holder to the dividend resolved at the meeting. In 2024, Avanza neither acquire nor held any of its own shares as of 31 December 2024.

When new shares are issued due to the exercise of warrants, the share capital increases proportionate by the quotient value of each newly issued share. Funds exceeding the quotient value, and proceeds received in connection with issuance of warrants, are classified in the Group as Other capital contributed.

The fair value reserve includes accumulated unrealised value change for the part of the bond portfolio recognised at fair value via other comprehensive income, as well as the parent company's accumulated revaluation of its shareholding in Stabelo Group AB. Retained earnings include accumulated profits in the Parent Company and its subsidiaries, including profit for the year.

### Incentive programmes

In order to create a personal ownership commitment and motivate employees to take interest in the business, Avanza offers permanent employees participation in incentive programs.

Avanza has three outstanding incentive programmes that originally comprised warrants entitling subscription of 3,900,000 shares. However, non-transferred warrants have been cancelled. A total of 3,151,346 warrants have been transferred to employees, corresponding to a dilution effect of 2.0 per cent if the programmes are exercised. The programmes runs from August 2022 to November 2027 and outstanding warrants entitle holders to subscribe for new shares as outlined in the terms in following table. There is a risk for employees to lose invested capital if the company and the share do not perform sufficiently well.

Programme	No. of shares	Exercise price per share, SEK	Exercise periods
2022–2025	1,200,000	209.03	28 August 2025 30 October 2025 27 November 2025
2023–2026	923,912	258.95	27 August 2026 29 October 2026 26 November 2026
2024–2027	1,027,434	282.12	Period 1: Two weeks between 22 April–31 May 2027 Period 2: Two weeks between 18 October–30 November 2027

The previous warrant programme 2021–2024, with exercise period in August, October, and November and exercise price of SEK 380.47 per share, expired without value and no new shares were subscribed or issued.

The warrants are issued on market terms and the valuation is performed by an independent agency. The Black & Scholes model is used to determine the value. For the complete warrant terms, see [avanza.se/ir](http://avanza.se/ir).

Parent Company	No. outstanding shares
<b>31-12-2023</b>	<b>157,236,949</b>
Warrants issue due to exercise of share warrants	–
<b>31-12-2024</b>	<b>157,236,949</b>

## Note 29 Shares and participations in Group companies

SEK m – Parent Company	31-12-2024	31-12-2023
<i>Acquisition value</i>		
At the beginning of the year	451	432
Shareholder contribution paid (Avanza Fonder AB)	12	3
Shareholder contribution paid (Placera Media AB)	–	15
<b>At the end of the year</b>	<b>463</b>	<b>451</b>
<i>Accumulated write-downs</i>		
At the beginning of the year	–7	–7
<b>At the end of the year</b>	<b>–7</b>	<b>–7</b>
<b>Carrying amount at the end of the year</b>	<b>456</b>	<b>444</b>

31-12-2024 Subsidiary <sup>1)</sup>	Corporate ID no	Registered office	No. shares	% of shares	Book value, SEK m
Avanza Bank AB (publ) <sup>2)</sup>	556573-5668	Stockholm	550,000	100	366
Avanza Fonder AB	556664-3531	Stockholm	31,000	100	36
Försäkringsaktiebolaget Avanza Pension	516401-6775	Stockholm	350,000	100	39
Placera Media Stockholm AB	556642-9592	Stockholm	1,000	100	15
Avanza Förvaltning AB	556840-0286	Stockholm	50,000	100	0
<b>Total</b>					<b>456</b>

<sup>1)</sup> Unquoted securities.

<sup>2)</sup> Holdings in credit institutions.

## Note 30 Terms for assets and liabilities

### Remaining term (undiscounted cash flows)

31-12-2024 SEK m – The Group	Upon request	<3 months	3–12 months	1–5 years	>5 years	Perpetual	Total
<b>Assets</b>							
Cash and balances with central banks	8,194	–	–	–	–	–	8,194
Treasury bills eligible for refinancing	–	1,900	–	–	–	–	1,900
Loans to credit institutions	4,007	–	–	–	–	–	4,007
Loans to the public	–	10,657	–	–	14,919	–	25,576
Bonds	–	1,100	5,128	28,767	–	–	34,995
Shares and participations	–	–	–	–	–	146	146
Assets in insurance operations <sup>1)</sup>	–	9,024	32,266	99,554	125,647	–	266,491
Intangible assets	–	–	–	–	–	66	66
Right-of-use assets	–	–	–	–	–	290	290
Tangible fixed assets	–	–	–	–	–	70	70
Other assets	–	2,299	–	–	–	–	2,299
Prepaid expenses and accrued income	–	1,036	–	–	–	–	1,036
<b>Total assets</b>	<b>12,201</b>	<b>26,016</b>	<b>37,394</b>	<b>128,321</b>	<b>140,566</b>	<b>572</b>	<b>345,070</b>
<b>Liabilities</b>							
Deposits from the public	66,862	–	–	–	–	–	66,862
Liabilities in insurance operations <sup>1)2)</sup>	–	9,024	32,266	99,554	125,647	3	266,493
Lease liabilities	–	–	–	–	281	–	281
Other liabilities	–	3,470	–	–	–	–	3,470
Accrued expenses and deferred income	–	188	–	–	–	–	188
<b>Total liabilities</b>	<b>66,862</b>	<b>12,682</b>	<b>32,266</b>	<b>99,554</b>	<b>125,928</b>	<b>3</b>	<b>337,294</b>

<sup>1)</sup> Based on the expected development of each insurance contract, taking into account contractual options such as relocation, repurchase, and choice of payout time and age for the first payout.

<sup>2)</sup> See also the section on Liquidity risks in Note 34 Financial risks.

### Remaining term (undiscounted cash flows)

31-12-2023 SEK m – The Group	Upon request	<3 months	3–12 months	1–5 years	>5 years	Perpetual	Total
<b>Assets</b>							
Cash and balances with central banks	8,630	–	–	–	–	–	8,630
Treasury bills eligible for refinancing	–	4,700	–	–	–	–	4,700
Loans to credit institutions	2,599	–	–	–	–	–	2,599
Loans to the public	–	8,099	–	–	11,490	–	19,589
Bonds	–	800	4,660	25,431	–	–	30,891
Shares and participations	–	–	–	–	–	154	154
Assets in insurance operations <sup>1)</sup>	–	7,465	26,125	82,022	98,101	–	213,713
Intangible assets	–	–	–	–	–	87	87
Right-of-use assets	–	–	–	–	–	96	96
Tangible fixed assets	–	–	–	–	–	58	58
Other assets	–	774	–	–	–	–	774
Prepaid expenses and accrued income	–	866	–	–	–	–	866
<b>Total assets</b>	<b>11,229</b>	<b>22,702</b>	<b>30,785</b>	<b>107,453</b>	<b>109,590</b>	<b>395</b>	<b>282,157</b>
<b>Liabilities</b>							
Deposits from the public	61,728	–	–	–	–	–	61,728
Liabilities in insurance operations <sup>1)2)</sup>	–	7,465	26,125	82,022	98,101	2	213,715
Lease liabilities	–	–	–	92	–	–	92
Other liabilities	–	922	–	–	–	–	922
Accrued expenses and deferred income	–	164	–	–	–	–	164
<b>Total liabilities</b>	<b>61,728</b>	<b>8,551</b>	<b>26,125</b>	<b>82,114</b>	<b>98,101</b>	<b>2</b>	<b>276,621</b>

<sup>1)</sup> Based on the expected development of each insurance contract, taking into account contractual options such as relocation, repurchase, and choice of payout time and age for the first payout.

<sup>2)</sup> See also the section on Liquidity risks in Note 34 Financial risks.

## Note 31 Financial instruments

### Classification of financial information

31-12-2024 SEK m – The Group	Fair value via Income Statement	Amortised cost	Fair value via Other compre- hensive income	Non financial instruments	Total
<b>Assets</b>					
Cash and balances with central banks	–	8,194	–	–	8,194
Treasury bills eligible for refinancing	–	–	1,899	–	1,899
Loans to credit institutions	–	4,007	–	–	4,007
Loans to the public	–	23,924	–	–	23,924
Bonds and other interest-bearing securities	–	26,393 <sup>1)</sup>	8,799	–	35,192
Shares and participations	1	15	130	–	146
Assets in insurance operations	256,735	9,755	–	–	266,491
Intangible assets	–	–	–	66	66
Right-of-use assets	–	–	–	290	290
Tangible fixed assets	–	–	–	70	70
Other assets	–	2,299	–	0	2,299
Prepaid expenses and accrued income	–	930	–	106	1,036
<b>Total assets</b>	<b>256,736</b>	<b>75,517</b>	<b>10,829</b>	<b>532</b>	<b>343,614</b>
<b>Liabilities</b>					
Deposits from the public	–	66,862	–	–	66,862
Liabilities in insurance operations	266,491	–	–	3	266,493
Lease liabilities	–	–	–	281	281
Other liabilities	–	1,188	–	2,282	3,470
Accrued expenses and deferred income	–	93	–	95	188
<b>Total liabilities</b>	<b>266,491</b>	<b>68,143</b>	<b>–</b>	<b>2,661</b>	<b>337,295</b>

<sup>1)</sup> The fair value amounts to SEK 26,389 million.

### Financial instruments valued at fair value in balance sheet

31-12-2024 SEK m – The Group	Level 1	Level 2	Level 3	Total
<b>Assets</b>				
Shares	132,542	0	130	132,672
Fund units	118,426	0	–	118,426
Bonds and other interest-bearing securities	10,756	0	–	10,756
Other securities	5,702	9	–	5,711
<b>Total assets</b>	<b>267,426</b>	<b>9</b>	<b>130</b>	<b>267,565</b>
<b>Liabilities</b>				
Liabilities in insurance operations (investment contracts)	–	266,491	–	266,491
<b>Total liabilities</b>	<b>–</b>	<b>266,491</b>	<b>–</b>	<b>266,491</b>
<b>SEK m – The Group</b>				<b>Level 3</b>
<b>31-12-2023</b>				<b>138</b>
Change in value				–8
Reclassification				–
Sale				–
<b>31-12-2024</b>				<b>130</b>

### Financial instruments valued at amortised cost in balance sheet where fair value is given for information purposes

31-12-2024 SEK m – The Group	Carrying amount	Level 1	Level 2	Level 3	Total
<b>Assets</b>					
Cash and balances with central banks	8,194	8,194	–	–	8,194
Loans to credit institutions	4,007	–	4,007	–	4,007
Loans to the public	23,924	–	23,924	–	23,924
Bonds	26,393	26,389	–	–	26,389
Assets in insurance operations	9,755	–	9,755	–	9,755
Other assets	2,299	2,299	–	–	2,299
Prepaid expenses and accrued income	930	930	–	–	930
<b>Total assets</b>	<b>75,502</b>	<b>37,812</b>	<b>37,686</b>	<b>–</b>	<b>75,498</b>
<b>Liabilities</b>					
Deposits from the public	66,862	–	66,862	–	66,862
Other liabilities	1,188	1,188	–	–	1,188
Accrued expenses and deferred income	93	93	–	–	93
<b>Total liabilities</b>	<b>68,143</b>	<b>1,281</b>	<b>66,862</b>	<b>–</b>	<b>68,143</b>

Note 31, cont.

**Classification of financial information**

31-12-2023 SEK m – The Group	Fair value via Income Statement	Amortised cost	Fair value via Other compre- hensive income	Non financial instruments	Total
<b>Assets</b>					
Cash and balances with central banks	–	8,630	–	–	8,630
Treasury bills eligible for refinancing	–	4,698	–	–	4,698
Loans to credit institutions	–	2,599	–	–	2,599
Loans to the public	–	19,583	–	–	19,583
Bonds and other interest-bearing securities	–	23,391	7,805	–	31,195
Shares and participations	1	15	138	–	154
Assets in insurance operations	203,190	10,523	–	–	213,713
Intangible assets	–	–	–	87	87
Right-of-use assets	–	–	–	96	96
Tangible fixed assets	–	–	–	58	58
Other assets	–	774	–	0	774
Prepaid expenses and accrued income	–	749	–	117	866
<b>Total assets</b>	<b>203,191</b>	<b>70,962</b>	<b>7,943</b>	<b>357</b>	<b>282,453</b>
<b>Liabilities</b>					
Deposits from the public	–	61,728	–	–	61,728
Liabilities in insurance operations	213,713	–	–	2	213,715
Lease liabilities	–	–	–	92	92
Other liabilities	–	330	–	592	922
Accrued expenses and deferred income	–	79	–	85	164
<b>Total liabilities</b>	<b>213,713</b>	<b>62,137</b>	<b>–</b>	<b>772</b>	<b>276,621</b>

**Financial instruments valued at fair value in balance sheet**

31-12-2023 SEK m – The Group	Level 1	Level 2	Level 3	Total
<b>Assets</b>				
Shares	111,637	–	138	111,775
Fund units	87,409	–	–	87,409
Bonds and other interest-bearing securities	9,847	10	–	9,857
Other securities	2,089	3	–	2,093
<b>Total assets</b>	<b>210,983</b>	<b>13</b>	<b>138</b>	<b>211,134</b>
<b>Liabilities</b>				
Liabilities in insurance operations (investment contracts)	–	213,713	–	213,713
<b>Total liabilities</b>	<b>–</b>	<b>213,713</b>	<b>–</b>	<b>213,713</b>
<b>SEK m – The Group</b>				<b>Level 3</b>
<b>31-12-2022</b>				<b>237</b>
Change in value				–99
Reclassification				–
Sale				–
<b>31-12-2023</b>				<b>138</b>

**Financial instruments valued at amortised cost in balance sheet where fair value is given for information purposes**

31-12-2023 SEK m – The Group	Carrying amount	Level 1	Level 2	Level 3	Total
<b>Assets</b>					
Cash and balances with central banks	8,630	8,630	–	–	8,630
Treasury bills eligible for refinancing	4,698	4,698	–	–	4,698
Loans to credit institutions	2,599	–	2,599	–	2,599
Loans to the public	19,583	–	19,583	–	19,583
Bonds	23,391	23,349	–	–	23,349
Assets in insurance operations	10,523	–	10,523	–	10,523
Other assets	774	774	–	–	774
Prepaid expenses and accrued income	749	749	–	–	749
<b>Total assets</b>	<b>70,947</b>	<b>38,202</b>	<b>32,704</b>	<b>–</b>	<b>70,906</b>
<b>Liabilities</b>					
Deposits from the public	61,728	–	61,728	–	61,728
Other liabilities	330	330	–	–	330
Accrued expenses and deferred income	79	79	–	–	79
<b>Total liabilities</b>	<b>62,137</b>	<b>409</b>	<b>61,728</b>	<b>–</b>	<b>62,137</b>



Not 31, cont.

### Fair value

For financial instruments recognised at accrued acquisition cost, incurring variable interest, or with short maturities, the carrying amount and fair value are equal in most cases. For fair value of loans to the public with financial instruments or housing as collateral, fair value may deviate from book value if there are long-term, fixed-rate loans, which is not the case with Avanza.

### Hierarchy for fair value via income statement

Financial assets measured at fair value via income statement are classified through the use of a hierarchy for fair value that reflects the significance of the input data used in the valuations. The hierarchy contains the following three levels:

- Level 1 – Quoted prices (unadjusted) on active markets for identical assets or liabilities. Fair value is determined by using the official bid rate on the closing date. The majority of equities and funds pertaining to the insurance operations as well as bonds and other interest-bearing securities in Avanza's liquidity portfolio are included in this category. Pension and insurance customers (assets in the insurance operations) are, in principle, only permitted to hold securities traded on a regulated market or a multilateral trading facility (MTF), investment funds or securities on unlisted securities markets managed electronically by Avanza.
- Level 2 – The fair value of securities without an active market is determined, initially, by obtaining pricing information from operators who quote daily prices, mainly the asset values quoted by the fund companies, where the issuer values every individual security, and secondarily, by assessing the most recently completed market transaction between two mutually independent parties. Bonds that are less liquid can be found at this level and are measured on the yield curve for interest rates. Liabilities in the insurance operations are included in this category as the value of the entire balance sheet item is indirectly related to the value of the assets in the insurance operations.
- Level 3 – Input data from the asset or liability in question that is not based on observable market data (non-observable input data). This category's stockholdings refer to an unlisted ownership in Stabelo Group AB. When there is a lack of active market, the choice of valuation model in level 3 is governed by what is deemed appropriate for the individual instrument.

In these cases, assumptions that cannot be directly derived from a market can be applied. These assumptions are then based on experience and knowledge of valuation in financial markets. In cases where it is considered necessary, relevant adjustments are made to reflect fair value, in order to accurately reflect the parameters that exist in the financial instruments and that should be reflected in its valuation.

The level of the hierarchy for fair value to which a financial instrument is classified is determined on the basis of the lowest level of input data of significance to the valuation at fair value in its entirety. During the year, no transfers between the levels have taken place.

### Note 32 Pledged assets and contingent liabilities

SEK m – The Group	31-12-2024	31-12-2023
<b>Pledged assets</b>		
<i>Pledges and comparable collateral for own liabilities and for provisions for recognised contingent liabilities</i>	None	None
<i>Assets registered on behalf of policyholders</i>	266,491	213,713
<i>Other pledged collateral and comparable collateral</i>		
Liquid assets and interest-bearing securities	3,295	2,783
of which with the Riksbank	1,517	1,524
of which with credit institutions	1,324	810
of which with clearing institutions	455	449
<b>Contingent liabilities</b>		
<i>Contingent obligations</i>		
Guarantees	20	20
<i>Commitments</i>		
Other contingent liabilities	1,647	1,319

### Pledged assets

Avanza had no pledged assets for own liabilities as of 31 December 2024.

In the insurance business, registered assets are pledged as collateral to cover technical provisions where preferential rights for policyholders apply in the event of insolvency.

Other pledged assets and comparable collateral are divided between liquid assets, SEK 30 million (SEK 19m), and interest-bearing securities, SEK 3,266 million (SEK 2,765m). If Avanza fails to meet its obligations or abide by its commitments in its capacity as a borrower, counterparties are entitled to claim the collateral according to collateral agreements. The assets remain on the balance sheet since the value change risk for these securities remain with Avanza. The collateral primarily refers to pledged assets with the Riksbank for settlement of Avanza's deposits and withdrawals via data clearing, with Swedish banks to cover the requirement for CCP terminated transactions (EMCF), with Swedish banks that offer Avanza's customers stock lending (GMSLA), and with Nasdaq Stockholm to cover the stock exchange's security requirements for customers' derivative positions. For customers' stock loans and derivative positions, Avanza in turn places the collateral requirement directly on the customer.

### Contingent liabilities

As a guarantee for the fulfillment of obligations and commitments incumbent upon Avanza Bank AB (publ) under the lease agreement for office premises, the Parent Company has provided a surety bond to the landlord.

Other contingent liabilities refer to obligations for granted but undisbursed mortgage loans. There are no commitments for unused margin loans that entail risk taking since the unused portion of the margin loans is revocable.

SEK m – Parent Company	31-12-2024	31-12-2023
Pledged assets	None	None
Contingent liabilities	20	20

### Note 33 Own funds and capital requirements

#### Information on capital adequacy regarding the conglomerate, the consolidated situation and Avanza Bank AB (publ)

Information in this note is provided in accordance with Regulation (EU) No 575/2013 (CRR) of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms (CRR, Capital Requirements Regulation) as well as amending regulations, the Swedish FSA regulations and general guidelines (FFFS 2008:25) regarding annual reports in credit institutions and securities companies, regulations on prudential requirements and capital buffers (FFFS 2014:12) and the regulation (FFFS 2010:7) on managing liquidity risks for credit institutions and securities companies. The information relates to both the risk-based capital requirement, the leverage ratio requirement and liquidity. Other mandatory information is provided in Avanza's "Pillar 3 Report on capital adequacy and risk management 2024", which is available on Avanza's website [avanza.se/en/ir/reports](http://avanza.se/en/ir/reports).

#### The conglomerate's own funds and capital requirements

The financial conglomerate is comprised of Avanza Bank Holding AB (publ) and all its subsidiary companies.

The conglomerate's own funds shall cover the prescribed minimum capital requirements as regulated in CRR and the solvency requirements regulated in the Swedish Insurance Business Act (2010:2043). The regulations help boost the Group's resilience to unforeseen financial losses and thereby protect customers. The Special Supervision of Financial Conglomerates Act (2006:531) and the regulations and general guidelines of the Swedish FSA (FFFS 2011:26) concerning special supervision of financial conglomerates apply when determining the statutory capital requirement of the financial conglomerate. The financial conglomerate's own funds and capital requirement have been calculated using the consolidation method (fully consolidated). The conglomerate's own funds comply with financial conglomerate's capital requirements. At present, there are no material obstacles to a rapid transfer of funds from own funds or repayment of liabilities between the Parent Company and its subsidiaries.

The conglomerate's largest sector is in the insurance sector. Avanza Pension's solvency capital requirement and own funds are calculated using the Solvency 2 directive's standard model. The standard model requires assumptions that are determined partly by the authorities and partly by Avanza Pension's Board of Directors. Solvency capital included as a separate item in own

funds largely consists of share capital, retained profit and revaluations of technical provisions. The capital requirement for the insurance sector refers to the estimated Solvency Capital Requirement, mainly based on the policyholders' assets. The bank's capital requirement is calculated according to CRR's standardised approaches, while the fund company uses the Investment Fund Act (2004:46) and the Act on Alternative Investment Fund Managers (2013:561) as a basis for the calculation.

Financial conglomerate SEK m	31-12-2024	31-12-2023
<b>Own funds per sector</b>		
Own funds for regulated units in the insurance sector	4,430	3,532
Own funds for regulated units within the banking and investment services sector	3,508	3,138
<b>Total own funds</b>	<b>7,938</b>	<b>6,670</b>
<b>Capital requirement per sector</b>		
Capital requirement for regulated units in the insurance sector	2,913	2,213
Capital requirement for regulated units within the banking and investment services sector	2,724	2,345
<b>Total capital requirement</b>	<b>5,637</b>	<b>4,557</b>
<b>Capital surplus</b>	<b>2,302</b>	<b>2,113</b>
<b>Own funds/Capital requirement</b>	<b>1.41</b>	<b>1.46</b>

#### Own funds and capital requirements for the consolidated situation and Avanza Bank AB (publ)

The consolidated situation is comprised of Avanza Bank Holding AB (publ) and the subsidiary companies Avanza Bank AB (publ) and Avanza Fonder AB. The difference between the financial conglomerate and the consolidated situation is that the insurance business is also consolidated in the financial conglomerate. For supervisory purposes Avanza Bank Holding AB (publ) and its consolidated situation do not constitute a large or small and non-complex institution according to the Capital Requirements Regulation.

The following applies to determine the statutory capital requirements for the consolidated situation and the institution Avanza Bank: CRR, the Credit Institutions and Securities Companies (Special Supervision) Act (2014:968), the Capital Buffers Act (2014:966), and the regulations and general advice of the Swedish FSA on prudential requirements and capital buffers (FFFS 2014:12).

These rules seek to ensure that companies manage their risks and protect customers' deposits. Own funds shall cover the minimum capital requirement (capital requirements for credit risk, market risk, settlement risk, credit valuation adjustment risk and operational risk), buffer requirements (capital conservation buffer and countercyclical buffer), additional own funds requirement in Pillar 2 and Pillar 2 guidance. The Swedish FSA completed a review and evaluation (SREP) of Avanza in 2023. In conjunction, the Swedish FSA decided on a risk-based Pillar 2 requirement of total 5.71 per cent for the consolidated situation distributed between credit related concentration risk (0.9 per cent) and interest rate risk in the banking book (4.81 per cent). Three quarters of the capital requirement shall be covered by Tier 1 capital, of which at least three quarters must be Common Equity Tier 1 capital. Furthermore, the Swedish FSA has informed Avanza regarding the Pillar 2 guidance concerning leverage ratio, 0.5 per cent on group level, beyond the minimum requirement for the leverage ratio of 3.0 per cent. The guidance must be covered by CET1 capital. The next SREP from the Swedish FSA is expected to be conducted in 2025, which may lead to changes in the specific capital base requirement in Pillar 2 and Pillar 2 guidance.

Common Equity Tier 1 (CET1) capital consists of shareholders' equity less items that may not be included in own funds such as unverified profits, foreseeable dividends and charges, additional value adjustments, intangible assets, and significant holdings in the financial sector. Profits are included if external auditors have audited the results and approval has been received from the Swedish FSA. Deductions for foreseeable charges and any dividends are made according to Commission Delegated Regulation (EU) 241/2014. Additional value adjustments are calculated according to Commission Delegated Regulation (EU) 2016/101 and relate to prudent measurement of financial instruments at fair value. Intangible assets largely consist of goodwill and IT development. Deductions for significant holdings in the financial sector relate to the subsidiary Försäkringsaktiebolaget Avanza Pension.

Avanza calculates capital requirements according to the supervisory regulation's standardised approaches. Avanza's capital requirement derive essentially from credit risk and operational risk. In the category of credit risk, it is mainly Avanza's mortgage lending and the portfolio of covered bonds that require capital.

Capital adequacy analyses for the consolidated situation and Avanza Bank AB (publ) can be found on the following pages. The total capital ratio for the consolidated situation was 23.0 per cent as of 31 December 2024 and 24.2 per cent for Avanza Bank, which compares to a total risk-based capital requirement of 18.2 per

Not 33, cont.

cent for the consolidated situation and 18.7 per cent for Avanza Bank. The leverage ratio was 5.0 per cent for the consolidated situation and 4.5 per cent for Avanza Bank as of 31 December 2024, which compares to the leverage ratio requirement of 3 per cent and the Pillar-2 guidance for the consolidated situation of 0.5 per cent. Capital ratios and leverage ratios have historically always been above the regulatory requirements.

At present, there are no current or foreseen material practical or legal impediment to the prompt transfer of own funds or repayment of liabilities between the Parent Company and its subsidiaries.

### Upcoming regulatory changes

On 19 June 2024, the changes in the CRR and Directive 2013/36/EU for the implementation of parts of Basel in EU were published in the Official Journal of the EU. The areas that impact Avanza's capital requirements primarily concern the standardised approach for credit risk related to mortgages and the standardised approach for operational risk; other changes have less impact. To ensure that Avanza meets the risk-based own funds and leverage ratio requirements, the company follows both externally and internally set buffer requirements. Avanza expects no significant impact on own funds or the application of large exposures due to the changes in the Capital Requirements Regulation. Avanza is well-capitalised to meet the upcoming requirements that come into effect on 1 January 2025, with transition rules until 1 January 2030. In addition to changes in the Capital Requirements Regulation, regulatory changes in international accounting standards are not expected to have an impact on the consolidated situation's own funds, capital requirements or large exposures.

### Internal capital adequacy assessment process (ICAAP)

According to article 73 of the EU's capital adequacy directive 2013/36/EU and FFFS 2014:12, chap. 10, companies must describe in a separate document their assessment of the total capital need. This document is called the company's internal capital adequacy assessment (ICAAP). The ICAAP is conducted annually, and in the document the company makes an internal assessment of the capital requirement for each type of risk. The internal capital requirement is compared to the company's regulatory capital requirement. The purpose of the ICAAP is for companies to make an independent analysis of their capital needs, not mechanically use prescribed practices.

In conjunction with the annual ICAAP, a detailed stress test is performed of Avanza's exposures to evaluate all risks and ensure that Avanza's business model is sustainable. A capital requirement is estimated for each risk, which is then compared to the prescribed minimum requirement and buffer requirement. Included in the forward-looking analysis are several highly stressed scenarios, as well as the effect on own funds, to ensure that Avanza does not subject depositors' funds to risk.

The result of the ICAAP is approved by Avanza's Board of Directors and submitted to the Swedish FSA upon request. The ICAAP is used as the basis for decisions regarding the capital structure, e.g. in conjunction with decisions to exercise the authorisation granted by the Annual General Meeting to repurchase the company's own shares and decisions on dividend payments.

Work is currently underway to prepare an ICAAP as of 31 December 2024, which is expected to be completed by the end of the first quarter 2025. Avanza's latest completed ICAAP was prepared as of 31 December 2023. An assessment was made at the time that the total capital requirement to cover unexpected losses including an internal capital planning buffer amounted to SEK 936 million for the consolidated situation and SEK 898 million for Avanza Bank. At the same time, the total capital requirement for the consolidated situation was SEK 2,623 million and for Avanza Bank SEK 2,314 million, while Avanza's actual own funds amounted to SEK 3,574 million and SEK 3,114 million, respectively. The ICAAP stated that Avanza was sufficiently capitalised and did not subject depositors' funds to risk.

Consolidated situation	31-12-2024	31-12-2023
<b>Own funds, SEK m</b>		
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>		
Shareholders' equity according to the balance sheet	5,868	5,482
Forseeable dividend	-1,848	-1,808
<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>4,020</b>	<b>3,674</b>
Additional value adjustments	-13	-13
Intangible assets (net of related tax liability)	-66	-87
Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions)	-	-
<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>-79</b>	<b>-99</b>
<b>Common Equity Tier 1 (CET1) capital</b>	<b>3,941</b>	<b>3,574</b>
Additional Tier 1 (AT1) capital	-	-
<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>3,941</b>	<b>3,574</b>
<b>Tier 2 (T2) capital: instruments and provisions</b>		
Capital instruments and the related share premium accounts	-	-
<b>Tier 2 (T2) capital</b>	<b>-</b>	<b>-</b>
<b>Total capital (TC = T1 + T2)</b>	<b>3,941</b>	<b>3,574</b>

Not 33, cont.

Consolidated situation Risk exposure amount, SEK m	31-12-2024		31-12-2023	
<b>Risk exposure amount</b>				
Credit risk according to the standardised approach	11,247		9,570	
of which exposures to institutions	789		499	
of which exposures to corporates	28		39	
of which retail exposures	213		237	
of which exposures secured by mortgages on immovable property	4,685		4,036	
of which exposures in default	22		17	
of which exposures to covered bonds	3,119		2,813	
of which exposures to equity	459		479	
of which exposures to other items	1,932		1,450	
Counterparty credit risk	2		1	
Market risk (position risk)	2		1	
Settlement risk	34		0	
Credit valuation adjustment risk according to the standardised method	–		–	
Operational risk according to the standardised approach	5,819		4,877	
<b>Total risk exposure amount</b>	<b>17,103</b>		<b>14,450</b>	
<b>Capital requirement</b>				
Credit risk according to the standardised approach	900	5.3%	766	5.3%
of which exposures to institutions	63	0.4%	40	0.3%
of which exposures to corporates	2	0.0%	3	0.0%
of which retail exposures	17	0.1%	19	0.1%
of which exposures secured by mortgages on immovable property	375	2.2%	323	2.2%
of which exposures in default	2	0.0%	1	0.0%
of which exposures to covered bonds	249	1.5%	225	1.6%
of which exposures to equity	37	0.2%	38	0.3%
of which exposures to other items	155	0.9%	116	0.8%
Counterparty credit risk	0	0.0%	0	0.0%
Market risk (position risk)	0	0.0%	0	0.0%
Settlement risk	3	0.0%	0	0.0%
Credit valuation adjustment risk according to the standardised method	–	–	–	–
Operational risk according to the standardised approach	465	2.7%	390	2.7%
<b>Capital requirement</b>	<b>1,368</b>	<b>8.0%</b>	<b>1,156</b>	<b>8.0%</b>

Continued in the right column

Continuation from the left column

Consolidated situation Risk exposure amount, SEK m	31-12-2024		31-12-2023	
Total own funds	3,941	23.0%	3,574	24.7%
Minimum own funds requirement (Pillar 1)	1,368	8.0%	1,156	8.0%
Combined buffer requirement	770	4.5%	650	4.5%
Additional own funds requirement (Pillar 2) <sup>1)</sup>	977	5.7%	825	5.7%
Pillar 2 guidance	–	–	–	–
<b>Total risk-based capital requirement (desired level of own funds)</b>	<b>3,114</b>	<b>18.2%</b>	<b>2,631</b>	<b>18.2%</b>
Capital surplus after risk-based capital requirement	827	4.8%	943	6.5%
<b>Leverage ratio</b>				
Leverage ratio total exposure measure	78,358		71,011	
Leverage ratio, %	5.0%		5.0%	
Tier 1 capital	3,941	5.0%	3,574	5.0%
Minimum own funds requirement (Pillar 1)	2,351	3.0%	2,130	3.0%
Additional own funds requirement (Pillar 2)	–	–	–	–
Leverage ratio guidance	392	0.5%	355	0.5%
<b>Total leverage ratio requirement (desired level of own funds)</b>	<b>2,743</b>	<b>3.5%</b>	<b>2,485</b>	<b>3.5%</b>
Capital surplus after leverage ratio requirement	1,199	1.5%	1,089	1.5%

<sup>1)</sup> The additional own fund requirement are equivalent to the Swedish FSA's estimated Pillar 2 requirements.

Note 33, cont.

Consolidated situation Key metrics, SEK m	31-12-2024	30-09-2024	30-06-2024	31-03-2024	31-12-2023
<b>Available own funds (amounts)</b>					
1 Common Equity Tier 1 (CET1) capital	3,941	3,622	3,615	3,594	3,574
2 Tier 1 capital	3,941	3,622	3,615	3,594	3,574
3 Total capital	3,941	3,622	3,615	3,594	3,574
Risk-weighted exposure amounts					
4 Total risk-weighted exposure amount	17,103	14,646	14,199	14,793	14,450
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>					
5 Common Equity Tier 1 ratio (%)	23.0%	24.7%	25.5%	24.3%	24.7%
6 Tier 1 ratio (%)	23.0%	24.7%	25.5%	24.3%	24.7%
7 Total capital ratio (%)	23.0%	24.7%	25.5%	24.3%	24.7%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a Additional own funds requirements to address risks other than the risk of excessive leverage (%)	5.7%	5.7%	5.7%	5.7%	5.7%
EU 7b of which: to be made up of CET1 capital (percentage points)	3.2%	3.2%	3.2%	3.2%	3.2%
EU 7c of which: to be made up of Tier 1 capital (percentage points)	4.3%	4.3%	4.3%	4.3%	4.3%
EU 7d Total SREP own funds requirements (%)	13.7%	13.7%	13.7%	13.7%	13.7%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>					
8 Capital conservation buffer (%)	2.5%	2.5%	2.5%	2.5%	2.5%
EU 8a Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.0%	0.0%	0.0%	0.0%	0.0%
9 Institution specific countercyclical capital buffer (%)	2.0%	2.0%	2.0%	2.0%	2.0%
EU 9a Systemic risk buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
10 Global Systemically Important Institution buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 10a Other Systemically Important Institution buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
11 Combined buffer requirement (%)	4.5%	4.5%	4.5%	4.5%	4.5%

Continued in the right column

Continuation from the left column

Consolidated situation Key metrics, SEK m	31-12-2024	30-09-2024	30-06-2024	31-03-2024	31-12-2023
EU 11a Overall capital requirements (%)	18.2%	18.2%	18.2%	18.2%	18.2%
12 CET1 available after meeting the total SREP own funds requirements (%)	9.3%	11.0%	11.8%	10.6%	11.0%
<b>Leverage ratio</b>					
13 Leverage ratio total exposure measure	78,358	75,962	69,913	71,659	71,011
14 Leverage ratio (%)	5.0%	4.8%	5.0%	5.0%	5.0%
<b>Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)</b>					
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14b of which: to be made up of CET1 capital (percentage points)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14c Total SREP leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>					
EU 14d Leverage ratio buffer requirement (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14e Overall leverage ratio requirement (%)	3.0%	3.0%	3.0%	3.0%	3.0%
<b>Liquidity Coverage Ratio</b>					
15 Total high-quality liquid assets (HQLA) (Weighted value – average)	27,391	26,718	26,522	25,633	22,390
EU 16a Cash outflows – Total weighted value	7,204	7,041	6,899	6,784	6,591
EU 16b Cash inflows – Total weighted value	3,957	3,658	3,431	3,148	2,893
16 Total net cash outflows (adjusted value)	3,247	3,383	3,469	3,636	3,699
17 Liquidity coverage ratio (%)	856%	802%	778%	710%	606%
<b>Net Stable Funding Ratio</b>					
18 Total available stable funding	63,787	62,205	58,271	58,277	58,699
19 Total required stable funding	32,202	29,923	29,602	29,696	29,341
20 NSFR ratio (%)	198%	208%	197%	196%	200%

Not 33, cont.

Avanza Bank AB Own funds, SEK m	31-12-2024	31-12-2023
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>		
Shareholders' equity according to the balance sheet	4,573	4,274
Interim result net after deductions for foreseeable costs and dividends that have been verified by persons with an independent position	-1,045	-1,084
<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>3,528</b>	<b>3,191</b>
Additional value adjustments	-13	-13
Intangible assets (net of related tax liability)	-44	-64
Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions)	-	-
<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>-56</b>	<b>-77</b>
<b>Common Equity Tier 1 (CET1) capital</b>	<b>3,472</b>	<b>3,114</b>
Additional Tier 1 (AT1) capital	-	-
Tier 1 capital (T1 = CET1 + AT1)	3,472	3,114
<b>Tier 2 (T2) capital: instruments and provisions</b>		
Capital instruments and the related share premium accounts	-	-
<b>Tier 2 (T2) capital</b>	<b>-</b>	<b>-</b>
<b>Total capital (TC = T1 + T2)</b>	<b>3,472</b>	<b>3,114</b>
<b>Avanza Bank AB</b>		
<b>Risk exposure amount, SEK m</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
<b>Risk exposure amount</b>		
Credit risk according to the standardised approach	9,642	8,223
of which exposures to institutions	785	495
of which exposures to corporates	28	39
of which retail exposures	213	237
of which exposures secured by mortgages on immovable property	4,685	4,036
of which exposures in default	22	17
of which exposures to covered bonds	3,119	2,813
of which exposures to equity	-	-
of which exposures to other items	789	595
Counterparty credit risk	2	1
Market risk (position risk)	2	1
Settlement risk	34	0
Credit valuation adjustment risk according to the standardised method	-	-
Operational risk according to the standardised approach	4,650	4,133
<b>Total risk exposure amount</b>	<b>14,329</b>	<b>12,369</b>

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Continuation from the left column

Avanza Bank AB	31-12-2024		31-12-2023	
Risk exposure amount, SEK m				
<b>Capital requirement</b>				
Credit risk according to the standardised approach	771	5.4%	659	5.3%
of which exposures to institutions	63	0.4%	40	0.3%
of which exposures to corporates	2	0.0%	3	0.0%
of which retail exposures	17	0.1%	19	0.2%
of which exposures secured by mortgages on immovable property	375	2.6%	323	2.6%
of which exposures in default	2	0.0%	1	0.0%
of which exposures to covered bonds	249	1.7%	225	1.8%
of which exposures to equity	-	0.0%	-	-
of which exposures to other items	63	0.4%	48	0.4%
Counterparty credit risk	0	0.0%	0	0.0%
Market risk (position risk)	0	0.0%	0	0.0%
Settlement risk	3	0.0%	0	0.0%
Credit valuation adjustment risk according to the standardised method	-	-	-	-
Operational risk according to the standardised approach	372	2.6%	331	2.7%
<b>Capital requirement</b>	<b>1,146</b>	<b>8.0%</b>	<b>989</b>	<b>8.0%</b>
Total own funds	3,472	24.2%	3,114	25.2%
Minimum own funds requirement (Pillar 1)	1,146	8.0%	989	8.0%
Combined buffer requirement	645	4.5%	557	4.5%
Additional own funds requirement (Pillar 2) <sup>1)</sup>	889	6.2%	767	6.2%
Pillar 2 guidance	-	-	-	-
<b>Total risk-based capital requirement (desired level of own funds)</b>	<b>2,680</b>	<b>18.7%</b>	<b>2,314</b>	<b>18.7%</b>
Capital surplus after risk-based capital requirement	791	5.5%	800	6.5%
<b>Leverage ratio</b>				
Leverage ratio total exposure measure	77,000		69,937	
Leverage ratio, %	4.5%		4.5%	
Tier 1 capital	3,472	4.5%	3,114	4.5%
Minimum own funds requirement (Pillar 1)	2,310	3.0%	2,098	3.0%
Additional own funds requirement (Pillar 2)	-	-	-	-
Leverage ratio guidance	-	-	-	-
<b>Total leverage ratio requirement (desired level of own funds)</b>	<b>2,310</b>	<b>3.0%</b>	<b>2,098</b>	<b>3.0%</b>
Capital surplus after leverage ratio requirement	1,162	1.5%	1,016	1.5%

<sup>1)</sup> The additional own fund requirement are equivalent to the Swedish FSA's estimated Pillar 2 requirements.

Note 33, cont.

Avanza Bank AB Key metrics, SEK m	31-12-2024	30-09-2024	30-06-2024	31-03-2024	31-12-2023
<b>Available own funds (amounts)</b>					
1 Common Equity Tier 1 (CET1) capital	3,472	3,170	3,154	3,133	3,114
2 Tier 1 capital	3,472	3,170	3,154	3,133	3,114
3 Total capital	3,472	3,170	3,154	3,133	3,114
<b>Risk-weighted exposure amounts</b>					
4 Total risk-weighted exposure amount	14,329	13,338	12,867	12,718	12,369
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>					
5 Common Equity Tier 1 ratio (%)	24.2%	23.8%	24.5%	24.6%	25.2%
6 Tier 1 ratio (%)	24.2%	23.8%	24.5%	24.6%	25.2%
7 Total capital ratio (%)	24.2%	23.8%	24.5%	24.6%	25.2%
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>					
EU 7a Additional own funds requirements to address risks other than the risk of excessive leverage (%)	6.2%	6.2%	6.2%	6.2%	6.2%
EU 7b of which: to be made up of CET1 capital (percentage points)	3.5%	3.5%	3.5%	3.5%	3.5%
EU 7c of which: to be made up of Tier 1 capital (percentage points)	4.7%	4.7%	4.7%	4.7%	4.7%
EU 7d Total SREP own funds requirements (%)	14.2%	14.2%	14.2%	14.2%	14.2%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>					
8 Capital conservation buffer (%)	2.5%	2.5%	2.5%	2.5%	2.5%
EU 8a Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.0%	0.0%	0.0%	0.0%	0.0%
9 Institution specific countercyclical capital buffer (%)	2.0%	2.0%	2.0%	2.0%	2.0%
EU 9a Systemic risk buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
10 Global Systemically Important Institution buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 10a Other Systemically Important Institution buffer (%)	0.0%	0.0%	0.0%	0.0%	0.0%
11 Combined buffer requirement (%)	4.5%	4.5%	4.5%	4.5%	4.5%
EU 11a Overall capital requirements (%)	18.7%	18.7%	18.7%	18.7%	18.7%

Continued in the right column

Continuation from the left column

Avanza Bank AB Key metrics, SEK m	31-12-2024	30-09-2024	30-06-2024	31-03-2024	31-12-2023
12 CET1 available after meeting the total SREP own funds requirements (%)	10.0%	9.6%	10.3%	10.4%	11.0%
<b>Leverage ratio</b>					
13 Leverage ratio total exposure measure	77,000	75,624	69,578	70,584	69,937
14 Leverage ratio (%)	4.5%	4.2%	4.5%	4.4%	4.5%
<b>Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)</b>					
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14b of which: to be made up of CET1 capital (percentage points)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14c Total SREP leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>					
EU 14d Leverage ratio buffer requirement (%)	0.0%	0.0%	0.0%	0.0%	0.0%
EU 14e Overall leverage ratio requirement (%)	3.0%	3.0%	3.0%	3.0%	3.0%
<b>Liquidity Coverage Ratio</b>					
15 Total high-quality liquid assets (HQLA) (Weighted value – average)	27,391	26,718	26,522	25,633	22,390
EU 16a Cash outflows – Total weighted value	7,144	6,981	6,839	6,724	6,546
EU 16b Cash inflows – Total weighted value	3,950	3,651	3,424	3,141	2,883
16 Total net cash outflows (adjusted value)	3,195	3,330	3,415	3,583	3,663
17 Liquidity coverage ratio (%)	865%	812%	788%	720%	608%
<b>Net Stable Funding Ratio</b>					
18 Total available stable funding	63,317	61,752	57,811	57,816	58,239
19 Total required stable funding	30,837	29,589	29,264	28,616	28,258
20 NSFR ratio (%)	205%	209%	198%	202%	206%

Not 33, cont.

### Additional information on liquidity

Pursuant to FFFS 2010:7, Avanza reports its liquidity risk positions for the consolidated situation.

Liquidity risk is the risk that Avanza cannot meet its payment obligations at maturity without the cost of obtaining means of payment rising significantly. Avanza's payment obligations mainly come from the deposits that Avanza Bank's customers do not place in various financial instruments or products. When this occurs, deposits arise that Avanza manages.

To manage the liquidity, Avanza's Board of Directors has established internal rules on selecting and approving counterparties as well as investment alternatives and maturities. The distribution of responsibilities and reporting have also mainly been predetermined.

The liquidity reserve is financed by deposits from the public and on equity. Avanza's liquidity is invested in covered bonds, Riksbank certificates and interest-bearing securities issued by the Swedish government or Swedish municipalities. A smaller percentage is invested in systematically important Nordic banks and the Riksbank. Avanza Bank AB is a member of the Swedish Riksbank.

Avanza does not engage in proprietary trading in securities and intends to hold all interest-bearing financial instruments to maturity, but with the option to sell financial assets at fair value through other comprehensive income. The overarching concern in liquidity management is that Avanza's customers can get their deposits back at any time. As a result, deposits are distributed across various counterparties, instruments and maturities, so that the portfolio matures consistently over time. Avanza's payment obligations are in SEK and surplus liquidity is therefore invested in SEK. Avanza does not take currency risk.

<b>Consolidated situation</b>		
<b>Liquidity reserve, SEK m</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Liquid assets	10,832	10,484
Covered bonds and securities issued by governments and municipalities	33,823	33,094
<b>Total liquid assets</b>	<b>44,656</b>	<b>43,579</b>

<b>Consolidated situation</b>		
<b>Sources of funding, SEK m</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Deposits from the public	66,862	61,728
Lease liability	281	92
Other liabilities	2,863	1,562
Accrued expenses and deferred income	166	146
Shareholders' equity	5,868	5,482
<b>Total liabilities and shareholders' equity</b>	<b>76,040</b>	<b>69,011</b>

<b>Avanza Bank AB</b>		
<b>Liquidity reserve, SEK m</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Liquid assets	10,832	10,484
Covered bonds and securities issued by governments and municipalities	33,823	33,094
<b>Total liquid assets</b>	<b>44,656</b>	<b>43,579</b>

<b>Avanza Bank AB</b>		
<b>Sources of funding, SEK m</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Deposits from the public	66,862	61,728
Lease liability	–	–
Other liabilities	3,077	1,779
Accrued expenses and deferred income	147	133
Shareholders' equity	4,573	4,274
<b>Total liabilities and shareholders' equity</b>	<b>74,659</b>	<b>67,914</b>



## Note 34 Financial risks

### The Group's exposure to financial risks

Avanza is mainly exposed to credit risks and operational risks, but also has some exposure to market risks, liquidity risks and life insurance risks. Avanza's exposure to sustainability risks is very limited and is described in more detail in the section on Sustainability Risks and within the framework of Avanza's TCFD reporting.

Risks and risk management are also described on pages 26–27, 70–71, and in the Corporate governance report on page 62.

### Credit risks

Avanza's lending on the balance sheet and management of surplus liquidity expose the business to credit risk, i.e. the risk that borrowers will not fulfil their financial commitments to Avanza and that pledged securities will not cover the claim. Avanza also faces a counterparty risk, which arises as a result of customers' security trading and its settlement procedure. The counterparty risk is considered low, since the majority of all settlements take place on a central marketplace or with counterparties with a high credit rating. No significant concentrations of risks arise with any individual financial security, counterparty, sector or region. The limited concentration risk that does exist is with credit institutions, interest-bearing investments and the Riksbank related to surplus liquidity management. See also the section Liquidity management.

### Lending

Avanza's lending is in the form of margin lending and mortgages. The majority of all exposures are to customers residing in Sweden. Loans are only made to Swedish citizens domiciled outside the Nordic countries in exceptional circumstances. Avanza does not offer consumer loans. On the closing day, loans to the public amounted to SEK 23,924 million (SEK 19,583m). Average lending in 2024 was SEK 21,753 million (SEK 19,421m). Lending to the public is recognised after deducting expected credit losses in accordance with IFRS 9.

### Expected credit losses and IFRS 9

Avanza has a low risk appetite in its lending and limits the securities that may be mortgaged in various ways. The majority of the collateral consists of highly liquid, listed shares and Avanza has no any concentration of pledged securities. Mortgage lending is limited to Private Banking customers and employees of Avanza, which, coupled with the requirement that Avanza be the only mortgagee of the property, creates a low risk profile. Restrictive lending and proactive credit risk management explain why Avanza has not had any confirmed credit losses tied to events after 2011.

The low credit risk mentioned above is reflected in the small expected credit losses (ECL) which as of 31 December 2024 amounted to SEK 5 million (SEK 6m). Avanza has developed a model for expected credit losses calculated according to the methodology in IFRS 9. The model is continuously reviewed and the parameters in the model were last updated in the fourth quarter of 2024. In addition to the IFRS 9 categorisation of credit customers, Avanza regularly reviews credit customers with elevated risk and deals with distressed credit customers and defaulted loans.

The IFRS 9 model is adapted to the loan products that are offered: margin lending and mortgages. The valuation of expected credit losses within Avanza's IFRS 9 model is essentially based on the same product-specific characteristics and risks that are monitored within credit risk management otherwise. Within margin lending, it is mainly the borrower's loan-to-value ratio as well as the quality and diversification of the collateral that determine the risk in the lending. These parameters also serve as the basis of the credit loss calculations. Within mortgages, it is mainly the borrower's loan-to-value ratio and ability to repay which impact the risk in the lending, which is why they also serve as the basis of the credit loss calculations.

The assets are divided into three categories depending on the degree of credit impairment according to IFRS 9. A significant increase in credit risk occurs when a mortgage interest payment is delinquent by longer than 30 calendar days or there is a breach of terms (margin lending) for longer than 10 calendar days. Forward-looking scenarios are linked to this, where macroeconomic factors are considered in the classification into different categories. The following table shows how expected credit losses changed during the year. See also Note 2 Accounting principles (i) Financial instruments, section Loss Reserves and Note 18 Loans to the public for more information on IFRS 9.

#### Expected credit losses, SEK thousands

	31-12-2024	31-12-2023	Change, %
<b>Mortgage lending</b>			
Category 1	-1,413	-1,768	-20
Category 2	-1,253	-1,707	-27
Category 3	-148	-31	374
<b>Total</b>	<b>-2,813</b>	<b>-3,506</b>	<b>-20</b>
<b>Margin lending</b>			
Category 1	-1,531	-1,384	11
Category 2	-2	-1	166
Category 3	-1,064	-974	9
<b>Total</b>	<b>-2,596</b>	<b>-2,360</b>	<b>10</b>
<b>Total ECL</b>	<b>-5,409</b>	<b>-5,865</b>	<b>-8</b>

Avanza's macro scenario work is based on three different scenarios to assess any impact on probability of default (PD), loss given default (LGD) and exposure at default (EAD); a base scenario, a negative scenario and a positive scenario. The weights of these scenarios are divided with 70 per cent for the baseline scenario, 15 per cent for the positive scenario and 15 per cent for the negative scenario.

The forward-looking macroeconomic factors are revised continuously. A reasonability and sensitivity assessment of their impact on ECL is performed. The macro variables that impact the ECL calculation for margin lending are the probability of a significant drop in stock prices (systemic risk) as well as of a significant price drop in individual securities (unsystemic risk) and unemployment. The macro variables that impact the ECL calculation for mortgage lending are the policy rate, unemployment and house price index.

### Significant drop in stock prices

The model tests how mortgage lending is impacted by a broad-based decline in stock prices. The risk in the product consists to a large extent of a substantial, broad price drop, where a well-diversified portfolio with low concentration risk does not help for the most part. The exposures and loan to value ratios of individual customers are pivotal therefore to how well the portfolio handles the stress test.

### Significant price drop in individual securities

The second dimension that can impact the risk in margin lending is the unsystematic risk, which is affected on the concentration of collateral in the customer portfolios. If a customer's entire collateral for the loan consists of a single security, the risk is higher than if the customer has diversified exposures. The portfolios are therefore stress tested based on concentration risks as well, where declines of 100 per cent in individual collateral are simulated.

### Unemployment

Unemployment can also impact the margin lending risk, since Avanza's ability to collect on receivables is dependent on customers' repayment capacity, based on income and external assets. Unemployment is stressed with various outcomes from a forward-looking perspective. Unemployment presumably also can impact mortgage customers to some extent, even though they generally have a good financial position and the risk in the portfolio is low. The mortgage portfolio's resilience with respect to unemployment is therefore considered very good, even though there is a theoretical pain threshold when a problem with interest

Note 34, cont.

payments arises, because of which forward-looking unemployment is used as a stress test for mortgages as well.

#### Policy rate

The risk in the mortgage portfolio is also stressed with a higher policy rate, which directly impacts mortgage borrowers' interest costs. During credit assessments, the mortgage borrowers' repayment ability is stress tested with an interest rate currently at 8 per cent, to ensure that borrowers can manage to pay for the loans even if interest rates significantly rise. Avanza's IFRS 9 model assumes that the risk within the mortgage portfolio increases with a higher policy rate.

#### House price index

House prices have a direct impact on the risk in the mortgage portfolio. Avanza uses forward-looking expected house price projections from other institutes as a basis for stress tests of the collateral.

#### Margin lending

All margin lending is secured against listed securities. As of year end, margin lending after deducting expected credit losses totalled SEK 10,654 million (SEK 8,096m). The market value of pledged securities was SEK 82,782 million (SEK 64,143m). The financial effects of securities held are calculated on a customer by customer basis, meaning that any surplus value in a security for one customer cannot be offset against that of another customer. The majority of the securities are Swedish listed equities with good liquidity that are measured at the fair value on the particular market. An assessment is made of the appropriate loan to value ratio based on liquidity, volatility and underlying exposures. For stocks, companies' market values and other company-specific aspects such as business sector and profitability are considered as well. The average loan-to-value ratio for margin lending was 26 per cent (26) at year end. All margin lending is subject to a month's notice and can be served notice to terminate, should exposure need to be rapidly reduced.

The repayment capacity of all borrowers is evaluated and a credit limit is assigned. In the lending process, a joint limit is set for all borrowers belonging to the same sphere. The spread in Avanza's lending is good. There is no significant concentration of pledged securities within margin lending. As of 31 December 2024, 83 margin loans (106) exceeded SEK 10 million. The combined total of these loans was SEK 2,132 million (SEK 2,070m) and the highest individual exposure was SEK 156 million (SEK 112m).

Lending is monitored daily, and credit risks are primarily measured by following systematic risks (risks that arise even when the portfolio is diversified) and unsystematic risks (concentration risks that arise when the collateral for the loans is not diversified). This is done by continuously stress testing the margin lending portfolios in several dimensions and then limiting and following up on the outcomes.

With excess leverage, that is to say where debt is covered by pledged securities but the loan exceeds the value of the security or the limit, the customer is contacted. The customer can rectify the excess leverage by depositing money or securities in the account or alternatively by settling securities. If no action is taken, Avanza has the right to sell enough of the securities pledged as collateral as required to rectify the excess leverage.

In the event of volatile markets or other extreme events, excess leverage is actioned through the sale of securities more urgently to counteract credit losses. As of 31 December 2024, excess leverage amounted to SEK 3,6 million (SEK 2.7m) or 0.03 per cent (0.03) of margin lending. Average excess leverage during the year amounted to SEK 4.0 million (SEK 4.0m) or 0.04 per cent (0.05) of margin lending.

For margin loans, loss reserves are calculated by classifying the loans within categories 1–3 according to Note 2 Accounting principles, section (i) Financial Instruments, section Loss reserves. On the closing day, the reserve for expected credit losses on margin lending in accordance with IFRS 9 amounted to SEK 3 million (SEK 2m). Avanza had confirmed credit losses on margin lending of SEK – million (SEK 0m) during the year. As of 31 December 2024, there were no past due loans that had not been written down where collateral had not been utilised and seized collateral that had not been sold. Exchange rate gains/losses or other revaluations do not arise. See also Note 12 Credit losses, net and Note 18 Loans to the public.

If a customer has signed a standardised option and derivative agreement and has an approved margin loan with Avanza, they have the opportunity to trade in standardised equity / index derivatives. Derivative positions do not automatically mean that the customer uses any credit, but depending on the customer's exposure, a credit utilisation may be relevant in the redemption procedure. To take into account the customer's exposure, a collateral requirement is calculated that limits the derivative customer's available funds. At the end of the year, the number of accounts with derivative positions amounted to 641 (693) and the collateral requirement for them amounted to SEK 511 million (SEK 443m).

#### Pledged financial assets for margin lending

31-12-2024	Market value, SEK m	Credit exposure, SEK m	Share of balanced exposure, %
Shares	66,442	8,593	81
Funds	14,513	1,835	17
ETFs	1,745	195	2
Other <sup>1)</sup>	81	31	0
<b>Total</b>	<b>82,782</b>	<b>10,654</b>	<b>100</b>

<sup>1)</sup> Market value excluding the value of currency positions.

#### Currency for pledged financial assets for margin lending

31-12-2024	Market value, SEK m	Credit exposure, SEK m	Share of balanced exposure, %
SEK	66,430	8,425	79
USD	10,557	1,437	13
EUR	2,529	349	3
NOK	1,222	189	2
DKK	1,288	171	2
Other	755	83	1
<b>Total</b>	<b>82,782</b>	<b>10,654</b>	<b>100</b>

#### Largest concentration for pledged securities

31-12-2024	Share of exposure, %
Investor B	4
Volvo B	3
Evolution	3
Swedbank A	2
Avanza Global	2
<b>Total</b>	<b>15</b>

#### Mortgage lending

The mortgage offering on the balance sheet is targeted at high-net-worth clients with at least SEK 3 million in savings capital with Avanza, the so-called Private Banking segment. The loan-to-value ratio must not exceed 50 per cent when the loan is granted. The low loan-to-value ratio ensures adequate collateral even in the event of a sharp drop in housing prices. Employees of Avanza can also take part in the offer, and the loan-to-value ratio may not exceed 85 per cent when the loan is granted. The concentration risk is low, as mortgages normally do not exceed SEK 10 million. Avanza does not offer loan commitments. As of December 31 2024, lending after deductions for expected credit losses amounted to SEK 13,270 million (11,486).

Note 34, cont.

Avanza had confirmed credit losses during the year on mortgage lending of SEK – million (SEK –m). Provisions for expected credit losses on the mortgage amounted to SEK 3 million (SEK 4m). All mortgages are secured with pledges on houses and tenant-owned apartments in Sweden. Pledged properties are reassessed at least once a year through a statistical evaluation from external parties. The last reassessment occurred in the fourth quarter of 2024. The average loan to value ratio was 39 per cent (40) at the end of the year. Avanza is required to act as the only pledgee for the security. Normal credit assessment is performed, including a left-to-live-on calculation to ensure that the borrower can manage an unfavourable macroeconomic scenario with higher mortgage rates, which are currently estimated at a level of 8 per cent in the calculation. Conditional amortisation is usually introduced if the borrower's loan-to-value ratio exceeds 75 per cent. Regulatory requirements regarding amortisation are applied as well.

For external mortgages offered through financial partners, Avanza is not exposed to any credit risk.

#### Pledged assets for mortgage lending

31-12-2024	Credit limit, SEK m	Lending, SEK m	Loan to value ratio (credit limit), %	Loan to value ratio (lending), %
Houses	9,865	9,181	40	39
Tenant-owned apartments	4,401	4,088	41	40
<b>Total</b>	<b>14,266</b>	<b>13,270</b>	<b>40</b>	<b>39</b>

#### Geographical distribution of mortgages

Region	Share of exposure, %
Stockholm	70
Göteborg	10
Malmö	6
Other	13
<b>Total</b>	<b>100</b>

#### Liquidity management

Treasury is responsible for Avanza's liquidity management, which comprises investments to comply with applicable regulations as well as measuring and reporting relevant risk and return measures and the portfolio's composition.

Surplus liquidity arises when deposits significantly exceed lending to the public. The surplus liquidity is mainly invested in

covered bonds, Riksbank certificates and as deposits with the Riksbank and systemically important Nordic banks, plus to a lesser extent in interest-bearing securities issued by the Swedish government, municipalities and county councils (including Kommuninvest). The surplus liquidity amounted to SEK 49,292 million (SEK 47,123m) at the end of the year. Investable liquidity, excluding pledged collateral, amounted to SEK 45,997 million (SEK 44,340m) at the end of the year.

Holdings of interest-bearing securities including pledged assets at the closing day amounted to SEK 37,091 million (SEK 35,894m). Of these, securities issued by Swedish municipalities and county councils (including Kommuninvest) amounted to SEK 4,129 million (SEK 3,223m) and those issued by the Riksbank amounted to SEK 1,899 million (SEK 4,698m). Other liquidity at systematically important Nordic credit institutions and the Riksbank amounted to SEK 12,201 million (SEK 11,229m) at the end of the year.

Avanza has a diversified portfolio of interest-bearing securities with limited concentration risk vis-a-vis individual issuers. Liquidity is invested in accordance with the company's internal regulations, which regulate eligible interest-bearing securities issuers, and set a maximum average interest duration of three months. Consequently, the risk of having to sell bond holdings prematurely at a changed market value is limited, reducing the risk of realising negative price movements due to revised credit spreads or interest rates. All bonds are pledgeable with the Riksbank.

There is also a regulation that safeguards the quality of counterparties and pledged securities. All covered bonds are listed and have the highest bond rating with Standard & Poor's (AAA) or Moody's (AAA). For interest-bearing securities issued by the Swedish government, municipalities and regions (including Kommuninvest), ratings vary between AAA and AA.

Avanza currently does not allocate any provisions to the reserve for expected credit losses for interest-bearing securities as the portfolio as a whole has a high rating and is assessed according to the exception for holdings with low credit risk as per IFRS 9. Assessment of the need to report a loan loss reserve is carried out regularly and may be adjusted if the structure of the portfolio changes.

#### Counterparty risk within security trading on customers' behalf

Avanza has a limited exposure to counterparty risk within securities trading. Avanza is a member of the Stockholm, Copenhagen and Helsinki stock exchanges. The counterparty risks primarily arise as a consequence of transaction volumes in these markets. Avanza only trades on customers' behalf in standardised deriv-

atives, settled over Nasdaq. There are no significant OTC dealings. The risks are limited by Avanza's use of recognised clearing houses, e.g. Euroclear and Nasdaq in Sweden, to settle executed transactions.

The counterparty risk that arises in connection with margin lending, which Avanza Pension offers is managed by having the counterparty pledge collateral. Avanza Pension will only accept collateral in the form of government bonds issued by pre-approved countries. Pledged collateral shall amount to 105 per cent of the market value of loaned shares.

#### Liquidity management

31-12-2024	Book value, SEK m	Share, %
Cash and balances with central banks	8,194	17
Loans to credit institutions, including pledged assets	4,007	8
Interest-bearing securities, including pledged assets <sup>1)</sup>	37,091	75
of which Swedish government, municipalities and county councils (including the Riksbank)	6,028	16
of which covered bonds	31,063	84
<b>Total</b>	<b>49,292</b>	<b>100</b>

<sup>1)</sup> Average duration of bond holdings is 0.15.

#### Operational risks

Operational risk is defined as the risk of loss as a result of inappropriate or failing processes or routines, human error, faulty systems or external events. The definition of operational risk includes information, communication and security (ICT) risks, legal risk and compliance risk, and can impact the company's assets (financial impact), reputation, availability, and/or result in sanctions (regulatory impact).

Operational risks arise in all businesses. It is neither possible nor cost effective to try to eliminate all operational risks. Avanza strives to minimise operational risks by creating the most efficient and automated processes possible, which also contributes to cost effectiveness. Avanza does not have any consumer credits, payment accounts or debit cards, and does not participate in payment transactions, which reduces threats and the risk of fraud. The work involved in managing operational risks is structured and follows methods and guidelines for identifying and managing risks. Ultimate responsibility for Avanza's operational risks rests with the Board of Directors, while the CEO is responsible for day-to-day administration. Since each unit manager has operational

Note 34, cont.

responsibility commensurate with their managerial responsibility, responsibility for the risks has essentially been delegated to unit managers, and consequently to operations. This approach enables adequate management of risks considered to be serious within the established limit structure. Avanza works towards preventative operational risk management.

Risks are measured according to a model for probability and consequence. The consequences are assessed in four areas: financial impact, reputational impact, availability impact and regulatory impact. Within operational risk, qualitative and quantitative measures are both grounds for the Board's determination of the risk appetite. In addition, the CEO sets tolerance limits.

Business impact analyses are undertaken on Avanza's critical processes. By establishing tolerable disruption times in these activities, the requirements in terms of resources such as infrastructure, systems, employees and premises are clarified.

Avanza's employees regularly receive training in risk management, security, internal control and governance in order to raise understanding of and competence in these fields. All employees whose work duties require so are licensed according to the Swed-Sec AB's requirements.

Incident reporting in the operations sharpens the focus on the prevailing situation and the actual outcome of the risks to which Avanza is exposed. Incidents are measured, analysed and reported to those responsible for managing the risks in order to facilitate improvements but also to inform the valuation of risks in the operations.

Changes in the operations follow an approval process whereby the relevant considerations are given the appropriate significance. Commercial, technical, legal, regulatory related, risk and security considerations are made before any decision is taken as to implementation.

IT risks and information security, i.e. processes and procedures to ensure the availability, accuracy and confidentiality of information, is of major significance for Avanza. Information is one of Avanza's most important assets, and digitisation is increasing the amount of information at the same time that managing the information is becoming increasingly complex. Information security and cyber security are to a large extent a management and board issue. To ensure an effective and structured way that it has the right protection for its information and can adapt the protection to future needs, Avanza uses an information security management system.

### Market risks

Market risk is the risk of a decrease in Avanza's result, shareholders' equity or value of assets due to changes in risk factors in the financial market. Market risk includes stock price risk, interest rate risk and currency risk.

### Stock price risk

Stock price risk is the risk that the market value of a share will fluctuate. Avanza does not conduct proprietary trading and only trades on behalf of customers. The stock price risk Avanza is exposed to arises as a consequence of faulty trades.

### Interest rate risk

Interest rate risk can arise through an imbalance in the terms of Avanza's assets and liabilities as changes in interest rates can affect market values. Management of Avanza's surplus liquidity entails market risk in held interest-bearing securities with fixed and floating rate notes (FRN) through changes in credit spreads and interest rates. Avanza allocates capital under Pillar 2, taking into account interest rate risk and credit spread risk; see Note 33 Own funds and capital requirements.

Changes in interest rates can also affect net interest income. All else being equal, without taking into consideration changes in customer behaviour, the competitive landscape or the bond portfolio's interest rate duration, a 1 percentage point decrease or increase in the policy rate would affect full-year net interest income by between SEK -360 million and SEK 730 million, based on volumes and rates by the end of the year. The calculation only highlights the sensitivity of net interest income. On the upside, Avanza has absorbed the entire increase without sharing it with customers, which would be unlikely, and on the downside, it has lowered interest rates on both deposits and loans. A sensitivity analysis of the balance sheet is conducted at the end of each quarter in connection with an interest rate report to the Swedish FSA. Avanza allocates capital under Pillar 2 for interest rate risk in the banking book (IRRBB), see Note 33 Own funds and capital requirements.

Avanza has no fixed interest agreements with customers. Avanza lends at a variable interest rate and adjusts in normal market conditions in the event of policy rate changes by the Riksbank. Lending is financed only by deposits.

Avanza's surplus deposits are invested in accordance with the internal risk appetite and limit framework. To effectively manage the liquidity, the Board has established an interest rate risk appe-

tite. The investment of the bank's surplus liquidity is normally made for a maximum average fixed interest rate duration of 0.25 years, i.e. three months. Furthermore, the interest rate risk, based on average fixed interest rate duration and measured as a parallel displacement of 0.5 percentage units of the interest curve, may not exceed 3 per cent of Avanza's own funds. Investible liquidity excluding pledged assets amounted to SEK 45,997 million (SEK 44,340m) at year end. Interest sensitivity in the portfolio is measured and reported internally on a weekly basis. Interest rate risk is limited as Avanza intends, and normally has the capacity, to hold all reported bondholdings to maturity. The risk of having to sell bondholdings in advance at a modified market value is limited. This reduces the risk that negative price movements, due to changes in credit spreads or interest rates, will lead to realised losses.

Avanza's holding of interest-bearing securities is reflected in two portfolios where one is valued at amortised cost and the other at market value. Normally, approximately 75 per cent of the holdings are allocated to the first portfolio and the remaining approximately 25 per cent to the second. The distribution can fluctuate over time. The results for each portfolio are booked with straight-line accruals in Avanza's income statement. Any change in market value in the portfolio measured at market value affects Avanza's own funds via other comprehensive income. In a 1 percentage point interest rate stress, the market value is affected by approximately SEK 54 million.

Of all the bonds, about 98 per cent have variable coupons (FRN - Floating Rate Notes) with quarterly interest revaluations, and about 2 per cent are fixed-interest bonds with individual maturities of less than one year. The average interest term on fixed rate bonds is approximately less than one year.

### Currency rate risk

Avanza has very limited foreign currency exposure. Avanza does not conduct any proprietary currency trading and trades only to facilitate customers' securities trading. Assets and liabilities in the balance sheet are measured primarily in SEK. Customers may hold foreign currency in their account and to settle transactions in a foreign currency. Such currency balances are matched in full by the equivalent balance in Avanza's bank accounts. Avanza Pension is exposed to currency risk through the advance payments of foreign withholding tax made to customers when the corresponding receivable has not been received from the respective country at the time of payment. There is no significant currency exposure off the balance sheet.

Note 34, cont.

#### Valuation of assets and liabilities in foreign currency

SEK m – The Group	31-12-2024
<b>Assets</b>	
Loans to credit institutions	584
Loans to the public	53
Other assets	1,116
<b>Total assets</b>	<b>1,753</b>
<b>Liabilities</b>	
Deposits from the public	352
Other liabilities	1,337
<b>Total liabilities</b>	<b>1 689</b>

31-12-2024 SEK m – The Group	Assets	Liabilities	Net exposure	Currency rate risk <sup>1)</sup>
USD	917	866	51.3	5.1
EUR	304	303	0.1	0.0
NOK	80	79	1.6	0.2
DKK	403	403	0.0	0.0
Other	49	38	10.4	1.0
<b>Total</b>	<b>1,753</b>	<b>1,689</b>	<b>63.4</b>	<b>6.3</b>

<sup>1)</sup> Calculated as an adverse exchange rate movement of 10 per cent in each respective currency.

#### Liquidity risks

Liquidity risk refers to the risk that payment obligations cannot be fulfilled due to a lack of liquid funds or that they can only be fulfilled by borrowing at significantly higher costs than normal or by disposing of assets at a significantly lower price than market value. Treasury bears operational responsibility for managing Avanza's liquidity risk and reports to the CFO.

Avanza is financed via shareholders' equity and customer deposits. Avanza's operations are conducted without the need for market funding. Deposits from the public are considered one of the most secure sources of financing. The liquidity risk is reduced because the financing being spread across a very large number of households and small corporate customers. Historically, deposits from the public have exhibited little movement, a relatively high degree of so-called stickiness. Avanza's current financing structure exceeds liquidity requirements many times over, giving Avanza substantial surplus liquidity. Overall, the conclusion is that the exposure to liquidity risks is limited.

Payment readiness requires that the asset side of the balance sheet is liquid. To have sufficient funds at all times to meet its payments and ensure customer withdrawals, Avanza makes continuous forecasts and performs stress tests to assess its need for

means of payment. The stress tests build on historical data and are based on a number of scenarios specific to Avanza. Liquidity risks are estimated and monitored with the help of various risk measures according to Avanza's risk appetite and limit frameworks. The risk appetite for liquidity risk is conservative, which is ensured by adding an extra liquidity buffer to the regulatory requirement in effect at any given time. Treasury regularly calculates the liquidity coverage ratio (LCR) and a stable funding ratio (NSFR) and reports the results to the Board of Directors and management.

Forecasts are performed daily to manage short-term liquidity risks. A special contingency funding plan is established to be prepared to manage serious disruptions to the liquidity situation. The purpose of contingency plans is to be able to effectively and efficiently take measures to restore the liquidity situation. In order to cope with short-term fluctuations in deposits and lending from/to the general public, a significant part of the assets is held in on-demand accounts. Furthermore, Avanza is a monetary counterparty to the Riksbank and can thus use the Riksbank's standing credit facility in the event of a short-term liquidity requirement.

SEK 30 million (SEK 19m) of lending to credit institutions has been pledged as security. Lending to credit institutions, excluding pledged securities, of SEK 3,978 million (SEK 2,580m) and balances at the Riksbank of SEK 8,194 million (SEK 8,630m) are available by the next banking day at the latest. Besides from mortgage lending with a usual term of 30 years, Avanza's other larger balance sheet items have a short term. For margin lending, the term is indefinite, but the notice period is one month. Covered mortgage bonds and interest-bearing securities issued by the Swedish government, municipa-

lities and county councils are managed daily and can normally be converted to cash within a few days. Avanza's bond portfolio has an even maturity structure annually, quarterly and to a certain extent monthly, meaning that large negative changes in surplus liquidity normally are managed with the help of ongoing maturities. Avanza has no individual large deposit customers of significance for liquidity. Instead, deposits are spread among many customers and payment readiness is considered very good. See also Note 30 Terms for assets and liabilities.

Liabilities in the insurance business do not affect the liquidity risk. The reason for this is that there are equivalent assets and that it is policyholders' own funds, and thus the customers themselves, that are responsible for the risk. Nor are there any contractual due dates.

#### Life insurance risks

The life insurance risks in the insurance business operations are small. Mortalities, survivors' pensions, waivers of premium and sickness insurance are relayed by an external party and the risks are not borne by Avanza. Avanza Pension is exposed to mortality risk linked to endowment insurance contracts, where payment to the insured's survivor amounts to 101 per cent of the sum assured upon death. The risk premium so far has more than covered the risk cost associated with mortalities arising from the endowment insurance policies.

The insurance risk is managed by basing risk premiums on statistical assumptions and through monitoring according to actuarial guidelines. To avoid large fluctuations in earnings, Avanza reinsures risk costs in excess of SEK 250 thousand.

#### Remaining term (undiscounted cash flows)

SEK m 31-12-2024	Upon request	<3 months	3–12 months	1–5 years	>5 years	Perpetual	Total
Deposits from the public	66,862	–	–	–	–	–	<b>66,862</b>
Lease liabilities	–	–	–	–	281	–	<b>281</b>
Other liabilities	–	3,470	–	–	–	–	<b>3,470</b>
Accrued expenses and deferred income	–	188	–	–	–	–	<b>188</b>
<b>Total liabilities<sup>1)</sup></b>	<b>66,862</b>	<b>3,658</b>	<b>–</b>	<b>–</b>	<b>281</b>	<b>–</b>	<b>70,801</b>

<sup>1)</sup> Total liabilities excluding liabilities in insurance operations for which policyholders are exposed to the risk of changes in value. These liabilities do not affect the liquidity risk.

Liquidity and financing, SEK m	31-12-2024	Term
Cash and balances with central banks	8,194	1 day
Loans to credit institutions	4,007	1 day
Loans to the public – margin lending	10,654	1 month
Loans to the public – mortgage lending	13,270	At least 30 years
Interest-bearing securities	37,091	30 months
Deposits from the public	66,862	On spot basis

### Note 35 Related parties

Transactions and lending to related parties are part of Avanza's normal business operations. All terms are set on market conditions. During the financial year, no activity has taken place beyond normal account management with senior management, the Board of Directors, their close family members, or companies under their controlling influence. Furthermore, no provisions or costs for bad debts associated with related parties been reported during the financial year. All lending is secured by collateral in securities or real estate; see Note 18 Lending to the Public for full terms and conditions.

Senior executives participate in the Group's warrant programme on market terms, see Note 8 Employees and personnel costs.

<b>The Group</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Lending, SEK m	18	22
Deposits, SEK m	1,092	456
	<b>2024</b>	<b>2023</b>
Brokerage, SEK thousand	802	799
Interest income, SEK thousand	440	949
Interest expenses, SEK thousand	21,696	13,504
Invoicing from related parties' limited companies, SEK m	4	4
	<b>2024</b>	<b>2023</b>
<b>The Parent Company</b>	<b>31-12-2024</b>	<b>31-12-2023</b>
Parent Company receivables from Group companies, SEK m	2,095	2,053
Parent Company liabilities to Group companies, SEK m	109	0
	<b>2024</b>	<b>2023</b>
Parent Company interest income from Group companies, SEK m	4	2
Parent Company interest expenses to Group companies, SEK m	–	–

### Note 36 Important estimates and assessments

The estimations and assessments are reviewed regularly. Changes in assessments are reported in the period in which the change is made if such change has had an effect only during that period, or in the period in which the change is made and also in future periods if the change affects both the period in question and future periods. According to management, critical assessments regarding the accounting principles applied and the source of uncertainty in estimations primarily refer to credit assessments.

#### Credit assessment

Loss reserves are calculated using a model where credits are divided into three categories based on assessments of when material increases in credit risk will arise. Additional assessments factor macroeconomic scenarios into the calculation of the impairment need. See Note 2 Accounting principles, section (i) Financial instruments and Note 34 Financial risks.

### Note 37 Events after the closing day

There have been no significant events after the end of the period.

### Note 38 Proposed allocation of profits

The Board of Directors of Avanza Bank Holding AB (publ) proposes that the Annual General Meeting on 24 April 2025 agree to a dividend of SEK 11.75 per share for 2024 and that the remaining amount is carried forward. Monday, 28 April 2025 is proposed as the record day for the dividend. If the Annual General Meeting agrees to the proposal, the dividend is expected to be paid by Euroclear Sweden AB on Friday, 2 May 2025. The proposal corresponds to a total dividend of 1,848 SEK million, representing 82 per cent of profit for 2024, compared to Avanza's dividend policy, which is to pay a dividend of 70 per cent of profit for the year, taking into account the leverage ratio requirement, including Pillar 2 guidance, and the internal buffer requirement. Dividends will only be paid to an extent that is defensible given the requirements that the nature, scope and risk of the activities place on the size of equity and the company's consolidation requirement, liquidity and position in general. The dividend may be combined with other measures, such as redemption or repurchase of own shares.

The Board of Directors' assessment is that The Parent Company's and Group's profit and position are good, which is evident from the most recent profit and loss statement and balance sheet. It is the opinion of the Board of Directors that the proposed dividend is covered by equity, and is within the remit of the company's dividend policy. The capital ratio and liquidity, following the proposed dividend, will be satisfactory in relation to the Group's activities.

The Board of Directors has especially considered the uncertain macroeconomic situation. The assessment is that Avanza's financial position is not jeopardised by the proposed dividend. Avanza has not seen a deteriorated payment capacity among customers, has not incurred any credit losses during the year, and also does not anticipate that the macroeconomic situation will result in a significant increase in credit losses that would have a materially negative impact on shareholders' equity. Both capital adequacy and the liquidity situation are still considered satisfactory after the proposed dividend.

Overall, the Board of Directors thereby considers that the proposed dividend is justified with regards to the requirements, that the nature, scope and risks of the activities (the company's and the Group's respectively), place on the amount of equity, and the company's and the Group's consolidation requirements, liquidity and position in general.

<b>SEK – The Parent Company</b>	<b>31-12-2024</b>
The following profits are at the disposal of the Annual General Meeting:	
Share premium reserve	659,706,195
Fair value reserve	37,088,303
Retained profit	58,497,147
Net profit for the year	1,849,188,360
<b>Total</b>	<b>2,604,480,005</b>
The Board of Directors propose that the profits be disposed as follows:	
Dividend to shareholders, SEK 11.75 per share	1,847,534,151
To be carried forward	756,945,854
<b>Total</b>	<b>2,604,480,005</b>

The undersigned hereby attest that the consolidated and annual accounts have been prepared in accordance with IFRS international accounting standards, as adopted by the EU, and with generally accepted accounting principles, and that they provide a fair presentation of the Group's and the company's position

and results, and that the consolidated Administration report constitutes a fair review of the performance of the Group's and the company's operations, position and results, and describe significant risks and uncertainty factors faced by the companies that make up the Group.

**Stockholm, 20 February 2025**

**Sven Hagströmer**  
Chairman of the Board

**Magnus Dybeck**  
Board member

**Julia Haglind**  
Board member

**Jonas Hagströmer**  
Board member

**John Hedberg**  
Board member

**Linda Hellström**  
Board member

**Johan Roos**  
Board member

**Lisa Åberg**  
Board member

**Leemon Wu**  
Board member

**Gustaf Unger**  
CEO

Our Audit Report was submitted on 20 February 2025

**KPMG AB**

**Dan Beitner**  
Authorised Public Accountant

# Auditor's report

*Translation from the Swedish original*

To the general meeting of the shareholders of Avanza Bank Holding AB, corp. id 556274-8458

## **Report on the annual accounts and consolidated accounts**

### **Opinions**

We have audited the annual accounts and consolidated accounts of Avanza Bank Holding AB (publ) for the year 2024. The annual accounts and consolidated accounts of the company are included on pages 78-125 in this document.

In our opinion, the annual accounts have been prepared in accordance with the Annual Accounts Act, and present fairly, in all material respects, the financial position of the parent company as of 31 December 2024 and its financial performance and cash flow for the year then ended in accordance with the Annual Accounts Act. The consolidated accounts have been prepared in accordance with the Annual Accounts Act for Credit Institutions and Securities Companies and present fairly, in all material respects, the financial position of the group as of 31 December 2024 and their financial performance and cash flow for the year then ended in accordance with IFRS Accounting Standards, as adopted by the EU, and the Annual Accounts Act for Credit Institutions and Securities Companies. The statutory administration report is consistent with the other parts of the annual accounts and consolidated accounts.

We therefore recommend that the general meeting of shareholders adopts the income statement and balance sheet for the parent company and the group.

Our opinions in this report on the the annual accounts and consolidated accounts are consistent with the content of the additional report that has been submitted to the parent company's audit committee in accordance with the Audit Regulation (537/2014) Article 11.

### **Basis for Opinions**

We conducted our audit in accordance with International Standards on Auditing (ISA) and generally accepted auditing standards in Sweden. Our responsibilities under those standards are further described in the Auditor's Responsibilities section. We are independent of the parent company and the group in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements. This includes that, based on the best of our knowledge and belief, no prohibited services referred to in the Audit Regulation (537/2014) Article 5.1 have been provided to the audited company or, where applicable, its parent company or its controlled companies within the EU.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinions.

### **Key Audit Matters**

Key audit matters of the audit are those matters that, in our professional judgment, were of most significance in our audit of the annual accounts and consolidated accounts of the current period. These matters were addressed in the context of our audit of, and in forming our opinion thereon, the annual accounts and consolidated accounts as a whole, but we do not provide a separate opinion on these matters.



### **Valuation of financial investment assets and technical insurance provisions**

See the income statement, balance sheet, and accounting principles, as well as note 21 in the annual report for detailed information and description of the area.

#### *Description of key audit matter*

Assets in the insurance business amount to SEK 266,491 million (213,713) and the liabilities in the insurance business amount to SEK 266,493 million (213,715), which corresponds to 77.6 per cent (75.7) of the group's total assets and 79.0 per cent (77.3) of the group's total liabilities, respectively. Thus, this area constitutes a significant part of the group balance sheet in Avanza, which has led us to consider this area as a particularly significant area.

The assets in the insurance business mainly consist of financial instruments for which there is an active market with quoted prices. Only to a lesser extent are there holdings where valuation is based on market data other than quoted prices for the same instruments.

The valuation of liabilities in the insurance business is essentially based on the fair value of the underlying assets.

#### *Response in the audit*

We have evaluated Avanza's process and controls regarding pricing and securities reconciliation.

We have reviewed the valuation of the assets in the insurance business by comparing Avanza's valuation with the control valuation of our own valuation specialists against independent external sources.

For the liabilities in the insurance business, we have reviewed reconciliations against assets and actuarial data sources. With the help of our internal actuaries, we have independently calculated the life insurance provision based on the technical calculation data.

### **Commission income**

See note 4 and accounting principles on page 95 in the annual report and consolidated financial statements for detailed information and description of the area.

#### *Description of key audit matter*

Commission income constitutes a significant part of Avanza's revenue. This primarily consists of brokerage fees received in connection with customers' buying and selling of securities, as well as commissions from fund activities.

The group reports net revenue related to commission income of SEK 2,704 million (2,176) for the year 2024. Thus, this item is significant from a financial reporting perspective.

Revenue recognition involves risks primarily related to completeness, accuracy, and valuation due to the large number of transactions. IT systems and applications are used for billing of revenues, and a large amount of data is generated in these systems and applications when customers use Avanza's services.

Revenue recognition is considered a particularly significant area because the large transaction volume makes completeness and accuracy critical to prevent a material error in financial reporting.

#### *Response in the audit*

Our audit included testing and evaluating the design and effectiveness of controls for the accounting of commission income. This includes, among other things, the evaluation of key procedures and controls for revenue recognition, including relevant IT systems and applications used for accounting and monitoring.

We performed data analyses in combination with analytical review of commission income, where transactions were compared with agreed brokerage levels in relation to completed transactions. We also assessed the timing of revenue recognition to ensure it pertains to the relevant accounting periods.

Additionally, we conducted calculations to verify the amount of fund distribution income through analytical and detailed review.

### **Lending and Provisioning for Credit Losses**

See note 18 and accounting principles on page 96 in the annual report and consolidated financial statements for detailed information and description of the area.

#### *Description of key audit matter*

Lending at Avanza Bank consists of loans secured by securities and real estate. The lending is conducted in Sweden through its own channels. As of December 31, 2024, the group's lending to the public amounts to SEK 23,924 million (19,583), which corresponds to 7.0 per cent (6.9) of the group's total assets. The company's provisions for credit losses in the loan portfolio amount to SEK 5 million (6).

The provisions for credit losses in the company's loan portfolio represent the company's best estimate of potential losses incurred in the loan portfolio as of the balance sheet date. Provisions require the company to make assessments and assumptions regarding credit risks and calculations for expected credit losses. The complexity of these calculations, as well as the assessments and assumptions made, leads us to consider this a particularly significant area.

#### *Response in the audit*

We have tested the company's key controls in the lending process, including credit decisions, credit review, rating classification, and provisioning. We have also tested general IT controls, including access management for relevant systems.

We have reviewed the company's principles based on IFRS 9 to assess whether the company's interpretation of these is reasonable. Furthermore, we have tested the company's key controls regarding the provisioning process. We have also spot-checked the input data in the models and the accuracy of the calculations, as well as evaluated management's assessments. In our audit, we used our internal model specialists to assist us in the audit procedures we performed.

We have assessed the circumstances presented in the disclosures in the annual report and whether the information is sufficiently comprehensive as a description of the company's assessments.

### Other Information than the annual accounts and consolidated accounts

This document also contains other information than the annual accounts and consolidated accounts and is found on pages 1-64, 131-133 and 135-140. The other information comprises also of the remuneration report which we obtained prior to the date of this auditor's report. The Board of Directors and the Managing Director are responsible for this other information.

Our opinion on the annual accounts and consolidated accounts does not cover this other information and we do not express any form of assurance conclusion regarding this other information.

In connection with our audit of the annual accounts and consolidated accounts, our responsibility is to read the information identified above and consider whether the information is materially inconsistent with the annual accounts and consolidated accounts. In this procedure we also take into account our knowledge otherwise obtained in the audit and assess whether the information otherwise appears to be materially misstated.

If we, based on the work performed concerning this information, conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

### Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director are responsible for the preparation of the annual accounts and consolidated accounts and that they give a fair presentation in accordance with the Annual Accounts Act and the Annual Accounts Act for Credit Institutions and Securities Companies and, concerning the consolidated accounts, in accordance with IFRS as adopted by the EU. The Board of Directors and the Managing Director are also responsible for such internal control as they determine is necessary to enable the preparation of annual accounts and consolidated accounts that are free from material misstatement, whether due to fraud or error.

In preparing the annual accounts and consolidated accounts The Board of Directors and the Managing Director are responsible for the assessment of the company's and the group's ability to continue as a going concern. They disclose, as applicable, matters related to going concern and using the going concern basis of accounting. The going concern basis of accounting is however not applied if the Board of Directors and the Managing Director intend to liquidate the company, to cease operations, or has no realistic alternative but to do so. The Audit Committee shall, without prejudice to the Board of Director's responsibilities and tasks in general, among other things oversee the company's financial reporting process.

The Audit Committee shall, without prejudice to the Board of Director's responsibilities and tasks in general, among other things oversee the company's financial reporting process.

### Auditor's responsibility

Our objectives are to obtain reasonable assurance about whether the annual accounts and consolidated accounts as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinions. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs and generally accepted auditing standards in Sweden will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these annual accounts and consolidated accounts.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the annual accounts and consolidated accounts, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinions. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of the company's internal control relevant to our audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the company's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors and the Managing Director.
- Conclude on the appropriateness of the Board of Directors' and the Managing Director's, use of the going concern basis of accounting in preparing the annual accounts and consolidated accounts. We also draw a conclusion, based on the audit evidence obtained, as to whether any material uncertainty exists related to events or conditions that may cast significant doubt

on the company's and the group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the annual accounts and consolidated accounts or, if such disclosures are inadequate, to modify our opinion about the annual accounts and consolidated accounts. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause a company and a group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the annual accounts and consolidated accounts, including the disclosures, and whether the annual accounts and consolidated accounts represent the underlying transactions and events in a manner that achieves fair presentation.
- Plan and perform the group audit to obtain sufficient and appropriate audit evidence regarding the financial information of the entities or business units within the group as a basis for forming an opinion on the consolidated accounts. We are responsible for the direction, supervision and review of the audit work performed for purposes of the group audit. We remain solely responsible for our opinions.

We must inform the Board of Directors of, among other matters, the planned scope and timing of the audit. We must also inform of significant audit findings during our audit, including any significant deficiencies in internal control that we identified.

We must also provide the Board of Directors with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, measures that have been taken to eliminate the threats or related safeguards.

From the matters communicated with the Board of Directors, we determine those matters that were of most significance in the audit of the annual accounts and consolidated accounts, including the most important assessed risks for material misstatement, and are therefore the key audit matters. We describe these matters in the auditor's report unless law or regulation precludes disclosure about the matter.

## Report on other legal and regulatory requirements

### Auditor's audit of the administration and the proposed appropriations of profit or loss

#### Opinions

In addition to our audit of the annual accounts and consolidated accounts, we have also audited the administration of the Board of Directors and the Managing Director of Avanza Bank Holding AB (publ) for the year 2024 and the proposed appropriations of the company's profit or loss.

We recommend to the general meeting of shareholders that the profit be appropriated in accordance with the proposal in the statutory administration report and that the members of the Board of Directors and the Managing Director be discharged from liability for the financial year.

#### Basis for Opinions

We conducted the audit in accordance with generally accepted auditing standards in Sweden. Our responsibilities under those standards are further described in the Auditor's Responsibilities section. We are independent of the parent company and the group in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinions.

#### Responsibilities of the Board of Directors and the Managing Director

The Board of Directors is responsible for the proposal for appropriations of the company's profit or loss. At the proposal of a dividend, this includes an assessment of whether the dividend is justifiable considering the requirements which the company's and the group's type of operations, size and risks place on the size of the parent company's and the group's equity, consolidation requirements, liquidity and position in general.

The Board of Directors is responsible for the company's organization and the administration of the company's affairs. This includes among other things continuous assessment of the company's and the group's financial situation and ensuring that the company's organization is designed so that the accounting, management of assets and the company's financial affairs otherwise are controlled in a reassuring manner.

The Managing Director shall manage the ongoing administration according to the Board of Directors' guidelines and instructions and among other matters take measures that are necessary to fulfill

the company's accounting in accordance with law and handle the management of assets in a reassuring manner.

#### Auditor's responsibility

Our objective concerning the audit of the administration, and thereby our opinion about discharge from liability, is to obtain audit evidence to assess with a reasonable degree of assurance whether any member of the Board of Directors or the Managing Director in any material respect:

- has undertaken any action or been guilty of any omission which can give rise to liability to the company, or
- in any other way has acted in contravention of the Companies Act, the Annual Accounts Act, the Annual Accounts Act for Credit Institutions and Securities Companies or the Articles of Association.

Our objective concerning the audit of the proposed appropriations of the company's profit or loss, and thereby our opinion about this, is to assess with reasonable degree of assurance whether the proposal is in accordance with the Companies Act.

Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with generally accepted auditing standards in Sweden will always detect actions or omissions that can give rise to liability to the company, or that the proposed appropriations of the company's profit or loss are not in accordance with the Companies Act.

As part of an audit in accordance with generally accepted auditing standards in Sweden, we exercise professional judgment and maintain professional scepticism throughout the audit. The examination of the administration and the proposed appropriations of the company's profit or loss is based primarily on the audit of the accounts. Additional audit procedures performed are based on our professional judgment with starting point in risk and materiality. This means that we focus the examination on such actions, areas and relationships that are material for the operations and where deviations and violations would have particular importance for the company's situation. We examine and test decisions undertaken, support for decisions, actions taken and other circumstances that are relevant to our opinion concerning discharge from liability. As a basis for our opinion on the Board of Directors' proposed appropriations of the company's profit or loss we examined the Board of Directors' reasoned statement and a selection of supporting evidence in order to be able to assess whether the proposal is in accordance with the Companies Act.

## The auditor's examination of the Esef report

#### Opinion

In addition to our audit of the annual accounts and consolidated accounts, we have also examined that the Board of Directors and the Managing Director have prepared the annual accounts and consolidated accounts in a format that enables uniform electronic reporting (the Esef report) pursuant to Chapter 16, Section 4(a) of the Swedish Securities Market Act (2007:528) for Avanza Bank Holding AB (publ) for year 2024.

Our examination and our opinion relate only to the statutory requirements.

In our opinion, the Esef report has been prepared in a format that, in all material respects, enables uniform electronic reporting.

#### Basis for opinion

We have performed the examination in accordance with FAR's recommendation RevR 18 Examination of the Esef report. Our responsibility under this recommendation is described in more detail in the Auditors' responsibility section. We are independent of Avanza Bank Holding AB (publ) in accordance with professional ethics for accountants in Sweden and have otherwise fulfilled our ethical responsibilities in accordance with these requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

#### Responsibilities of the Board of Directors and the Managing Director

The Board of Directors and the Managing Director are responsible for the preparation of the Esef report in accordance with the Chapter 16, Section 4(a) of the Swedish Securities Market Act (2007:528), and for such internal control that the Board of Directors and the Managing Director determine is necessary to prepare the Esef report without material misstatements, whether due to fraud or error.

#### Auditor's responsibility

Our responsibility is to obtain reasonable assurance whether the Esef report is in all material respects prepared in a format that meets the requirements of Chapter 16, Section 4(a) of the Swedish Securities Market Act (2007:528), based on the procedures performed.

RevR 18 requires us to plan and execute procedures to achieve reasonable assurance that the Esef report is prepared in a format that meets these requirements.

Reasonable assurance is a high level of assurance, but it is not a guarantee that an engagement carried out according to RevR 18

and generally accepted auditing standards in Sweden will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of the Esef report.

The audit firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The examination involves obtaining evidence, through various procedures, that the Esef report has been prepared in a format that enables uniform electronic reporting of the annual accounts

and consolidated accounts. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement in the report, whether due to fraud or error. In carrying out this risk assessment, and in order to design procedures that are appropriate in the circumstances, the auditor considers those elements of internal control that are relevant to the preparation of the Esef report by the Board of Directors and the Managing Director, but not for the purpose of expressing an opinion on the effectiveness of those internal controls. The examination also includes an evaluation of the appropriateness and reasonableness of the assumptions made by the Board of Directors and the Managing Director.

The procedures mainly include a validation that the Esef report has been prepared in a valid XHTML format and a reconciliation of the Esef report with the audited annual accounts and consolidated accounts.

Furthermore, the procedures also include an assessment of whether the consolidated statement of financial performance, financial position, changes in equity, cash flow and disclosures in the Esef report have been marked with iXBRL in accordance with what follows from the Esef regulation.

KPMG AB, Box 382, 101 27, Stockholm, was appointed auditor of Avanza Bank Holding AB (publ) by the general meeting of the shareholders on April 11, 2024. KPMG AB or auditors operating at KPMG AB have been the company's auditor since 2019.

Stockholm, 20 February 2025  
KPMG AB

Dan Beitner  
Authorised Public Accountant

# Sustainability reporting

Avanza's sustainability reporting is an important part of an open and balanced presentation of Avanza's position, activities and achievements in key areas.

In accordance with the Annual Accounts Act, chap. 6, section 11, Avanza has chosen to prepare a Sustainability report separately from the Administration report and largely from the formal financial statements. The Sustainability Report refers to the calendar year 2024 and covers Avanza Bank Holding (publ) and its subsidiaries. It outlines Avanza's work on environmental, social, and governance-related matters, including human rights and anti-corruption. The statutory sustainability report and its scope are presented on page 133. The report has been prepared

based on the GRI Standards 2021, Core option. For reporting according to EU's Taxonomy Regulation 2020/852, article 8, see pages 46–58.

A separate statement on the Sustainability report has been prepared by an external party.

Previous Sustainability report concerned the calendar year 2023 and was published on 23 February 2024.

Avanza's policies are published on [avanza.se/ir](http://avanza.se/ir).

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## Other sustainability disclosures

### Memberships

To share knowledge, meet for discussion with others in the industry and together influence the industry's development, Avanza and its companies are members of, and participate actively in, trade associations such as the Swedish Bankers' Association, the Swedish Securities Markets Association and the Swedish Investment Fund Association. Avanza Fonder is a member of Principles of Responsible Investments (PRI).

### Climate

An analysis is conducted annually to monitor our impact on climate change. The total energy consumption in 2024 amounted to 863 MWh (1,001), of which 310 MWh (323) related to internal consumption. The total GHG emissions amounted to 397 tonnes CO<sub>2</sub>e (494).

The climate reports are published on [avanza.se/ir](https://www.avanza.se/ir).

### Contact

Malin Löfvenberg, CSR Manager  
E-mail: [malin.lofvenberg@avanza.se](mailto:malin.lofvenberg@avanza.se)  
Phone: + 46 (0)8 409-420 18

# Auditor's opinion on the statutory sustainability report

To the general meeting of the shareholders in Avanza Bank Holding AB (publ), corporate identity number 556274-8458

## Engagement and responsibility

The Board of Directors is responsible for the sustainability report on pages 131–134, and that it is prepared in accordance with the Annual Accounts Act in accordance with the older wording that applied before 1 July 2024.

## The scope of the the examination

Our examination has been conducted in accordance with FAR:s auditing standard RevR 12 The auditor's opinion regarding the statutory sustainability report. This means that our examination of the statutory sustainability report is different and substantially less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinion.

## Opinion

A statutory sustainability report has been prepared.

Stockholm, 20 February 2025

KPMG AB

Dan Beitner  
Authorised Public Accountant



# Our customers

Our offering is mainly targeted at private investors, but we also offer services for professional investors and corporate customers, including self-employed firms, asset managers, and businesses subscribing for occupational pension plans.

## Standard offer

Most of our customers are included in our standard offer. All customers have full access to Avanza's platform. However, certain instruments require specific suitability tests before trading. Being a customer at Avanza is free, and you only pay brokerage or currency exchange fees for trading with equities, mutual fund fees, or interest for loans.

## Private Banking

Private Banking serves our high-net-worth customers with savings of at least SEK 3 million. We offer digital and personal service with a wide range of securities, low brokerage fees, and very attractive interest rates on margin loans and mortgages. In addition, our Private Banking customers have access to services such as tax advice and legal aid, as well as market updates and investment advice from Placera, Avanza's independent editorial media unit. Private Banking customers also receive prompt and personal service from our specialised brokers and account managers. More over, Private Banking Customers have access to VIP-tickets, pre-showings and exclusive events via the digital entertainment service KEY.

## Pro

Our Pro offering is designed for more active customers and professional day traders. As a Pro customer, you make at least two trades a day at the minimum brokerage fee or trade at least SEK 280,000 daily. Pro customers receive favourable terms, low brokerage fees and access to trading tools. Our Pro customers also have access to prompt, personal service from our specialised brokers and account managers. Pro customers also have access to the services available for Private Banking customers, as long as they qualify for the capital requirements.

## Corporate customers

Corporate customers have the same access to our services as private customers and can qualify for our Standard offer or Private Banking.

We also have an occupational pension offering for companies, free from unnecessary insurance fees, which can give each employee up to SEK 1 million more in retirement savings. The majority of corporate customers with occupational pensions are small and medium-sized companies with less than 100 employees. Firms can in a few simple steps digitally apply for an occupational pension plan.

For institutional investors we offer a highly competitive alternative distinguished by high quality, premium service, and fast and secure order processing by phone, online or the trading app. Asset managers have access to our broad range of investment options. We have around 50 institutional trading customers, mainly Swedish asset managers, who trade for their funds or other management vehicles through Avanza. This is in addition to around 15 collaborations with managers who use Avanza's platform to manage their clients' wealth.

In Corporate Finance, we mainly target small and medium-sized companies as an advisor in connection with IPOs and funding, and as a partner to medium-sized and large companies.



# Brokerage fee classes

We offer various brokerage fee classes to fit each customer's trading activity. We have something for everyone, from the smallest trader to those who make large trades and want to pay a flat fee. Customers choose a brokerage fee class and can switch classes whenever they like, but at the earliest one day after the last change. Fund trades are commission free.

## Start

Variable  
brokerage fee

0 %

Lowest  
brokerage fee

SEK 0

Selectable if you have  
less than  
SEK 50,000\*

## Mini

Variable  
brokerage fee

0.25 %

Lowest  
brokerage fee

SEK 1

Suitable for trades  
below  
SEK 15,600

## Small

Variable  
brokerage fee

0.15 %

Lowest  
brokerage fee

SEK 39

Suitable for trades  
between  
SEK 15,600 –  
46,000

## Medium

Variable  
brokerage fee

0.069 %

Lowest  
brokerage fee

SEK 69

Suitable for trades  
between  
SEK 46,000 –  
143,500

## Fast Pris

Variable  
brokerage fee

0 %

Lowest  
brokerage fee

SEK 99

Suitable for trades  
over  
SEK 143,500

## PB Mini

Variable  
brokerage fee

0.15 %

Lowest brokerage fee

SEK 1

## PB

Variable  
brokerage fee

0.055 %

Lowest brokerage fee

SEK 59

## PB Fast Pris

Variable  
brokerage fee

0 %

Lowest brokerage fee

SEK 99

## Pro

Variable  
brokerage fee

0.034 % and below

Lowest brokerage fee

SEK 49 and below

*The prices in our brokerage fee classes apply to equity trading on the Stockholm Stock Exchange including First North, with the exception of Start, which applies only to equity trading on the Stockholm Stock Exchange. For more information on our prices, please visit our website, [avanza.se](https://www.avanza.se) (in Swedish only).*

\* Brokerage fee class Start can be chosen if you have never had SEK 50,000 or more in total savings capital with us. If you reach SEK 50,000 or make more than 500 brokerage-free trades during a 12-month period, you are automatically placed in brokerage fee class Mini and can not choose Start again.

# Definitions and key ratios

Key ratios and concepts that appear in the Annual Report are defined below. Avanza uses alternative performance measures when it is relevant to describe Avanza's operations and financial position. Alternative performance measures are financial metrics that are not defined in accounting regulations or in the EU's capital requirements regulation.

## Alternative performance measures<sup>1)</sup>

### Costs to savings capital ratio

Operating expenses in relation to average savings capital (calculated on the opening and closing balance per quarter during the period). The key ratio shows the impact of scalability and cost efficiency. A low ratio indicates higher competitiveness and is necessary to deliver strong margins regardless of interest rate levels.

### Credit loss level

Net credit losses in relation to the opening balance for loans to credit institutions and loans to the public. The key ratio is used to show the proportion of lending that has been identified as a credit loss, providing insight into the business's risk management.

### Currency-related income, net

Foreign exchange income generated from customers' trading in foreign securities, after deducting the repayment of foreign exchange expenses to customers in benefit level Start for funds. The measure shows the net earnings from customers' trading in securities in currencies other than SEK.

### Deposits

Cash held in customers' accounts, including external deposits, less the portion that is fully covered by cash pledged on endowment insurance and ISK. This measure shows customers' liquidity.

### Deposits/Savings capital

Deposits in relation to the savings capital at the end of the period. The key ratio shows customers' liquidity share and indirectly how much is invested in securities.

### Equity per share

Shareholders' equity in relation to the number of outstanding shares before dilution at the end of the year. The key ratio shows how shareholders' equity is allocated per share.

### External deposits

The value of deposits in savings accounts provided by external banks and credit market companies, managed via Avanza's platform. The measure is used to distinguish deposits that are outside of Avanza's balance sheet. Earnings from external deposits are included in Other commission income.

### External lending

The value of mortgages issued by external financial institutions, managed via Avanza's platform. The measure is used to distinguish lending that is outside of Avanza's balance sheet. Earnings from external lending are included in Other commission income.

### Fund commissions, net

Distribution compensation from fund management companies (consisting of commission based on fund volume) and management fees from Avanza's own funds, after deducting fund commissions to customers in benefit level Start. This measure shows net earnings from fund distribution.

### Gross brokerage income/Turnover in brokerage-generating securities

Gross brokerage income in relation to turnover, excluding fund trading and brokerage-free turnover within Avanza Markets. This ratio reflects the effect of trading across different brokerage fee classes.

### Income to savings capital ratio

Operating income in relation to average savings capital (calculated on the opening and closing balance per quarter during the period). The key ratio shows the mix effects in savings capital, the impact of interest rate changes, price reductions, and customer activity.

### Internally financed lending

Lending volume excluding external mortgages, less the portion that is fully covered by cash pledged on endowment insurance and ISK, including provisions for bad debt. The measure shows customers' lending financed by Avanza.

### Net brokerage income

Gross brokerage income less direct costs. The measure shows net earnings from trading in brokerage-generating securities.

### Net inflow

Deposits, less withdrawals, of liquid assets and securities. The measure indicates how much new capital has been added to Avanza's platform during the period.

### Provision ratio

The provision for expected credit losses in relation to loans to the public according to the balance sheet at the end of the period. The key ratio indicates the proportion of lending expected to result in credit losses and provides an overview of the business's risk management.

### Return on assets

Profit/loss after tax in relation to average total assets (calculated on the opening and closing balance per quarter during the period). The key ratio indicates how efficiently the business uses its assets to generate profit.

**Return on equity**

Profit/loss after tax in relation to the average shareholders' equity (calculated on the opening and closing balance per quarter during the period). The key ratio shows how efficiently the shareholders' equity is used to generate profit.

**Savings capital**

The combined market value of customers' assets in accounts held with Avanza. The savings capital is affected by inflows, outflows, and changes in value.

**Savings capital per customer**

Savings capital in relation to the number of customers at the end of the year. This ratio shows the average savings capital per customer and how the customer base's capital develops over time.

**Surplus liquidity**

Surplus liquidity consists of cash and balances with central banks, eligible government securities, loans to credit institutions, bonds, and other interest-bearing securities. This measure is used to assess the liquidity situation and demonstrate returns linked to the net interest income.

**Other key ratios<sup>2)</sup>****Earnings per share**

Profit/loss after tax in relation to the weighted average number of shares calculated on a daily basis during the year before and after dilution.

**Leverage ratio**

Leverage ratio is a non-risk weighted measure showing Tier 1 capital and the total exposure amount according to Article 429 of the CRR.

**Liquidity Coverage Ratio (LCR)**

LCR shows the ratio between liquid assets and the 30-day net cash outflows in a stressed scenario, according to the European Commission's Delegated Regulation 2015/61 on liquidity coverage requirements.

**Net stable funding ratio (NSFR)**

NSFR calculates the stability of the Group's funding in relation to its assets according to Regulation (EU) 2019/876 on NSFR.

**Operating margin**

Operating profit/loss in relation to operating income.

**Own funds**

Equity adjusted for deductions in accordance with the provisions governing credit institutions, fund management companies and insurance companies regarding the determination of own funds and capital requirements.

**Profit margin**

Profit/loss after tax in relation to operating income.

**Solvency capital**

Estimated future present value of the insurance company Avanza Pension's profits generated from policyholders' capital.

**Solvency capital requirement**

Estimated capital requirement under the Solvency 2 rules.

**Definitions and concepts****Customer**

Individual or company with at least one account with cash, holdings, or an external mortgage.

**Note**

A customer's buying and selling assignments involving a specific security. A note may comprise one or more transactions.

**The Swedish savings market**

Total capital in the Swedish savings market per quarter according to Statistics Sweden's Savings Barometer, less Avanza's non-addressable assets, except for collectively agreed occupational pensions where statistics are published annually by Insurance Sweden. The statistics are published with a quarterly lag.

**The Swedish life insurance market**

Total capital in the occupational pension market according to Statistics Sweden's Savings Barometer and premium inflows according to statistics from Insurance Sweden. The statistics are published with a quarterly lag. Total capital for non-collectively agreed occupational pensions within unit-linked insurance is published annually by Insurance Sweden.

<sup>1)</sup> Alternative Performance Measures (APM) according to ESMA's guidelines. The calculation of alternative performance measures may vary, which is why they are not directly comparable to other companies. Historical data and calculations can be found at [avanza.se/keydata](https://www.avanza.se/keydata).

<sup>2)</sup> Key ratios as defined in the applicable accounting frameworks (IFRS and the Annual Accounts Act) or in the EU Capital Requirements Directive (CRD IV) / Capital Requirements Regulation (CRR), as well as in Directive 2009/138/EC (Solvency II).

# Annual General Meeting

The Avanza Bank Holding AB (publ) (“Avanza”) Annual General Meeting will be held on Thursday, 24 April 2025.

## Right to participate in the Annual General Meeting

Shareholders who wish to participate in Avanza’s Annual General Meeting must:

- be listed in the shareholder register maintained by Euroclear Sweden AB no later than 14 April 2025,
- notify Avanza of their intention to attend the Annual General Meeting or cast their postal vote in the manner indicated in the notice of the meeting.

## Registration

Avanza’s share register is maintained by Euroclear Sweden AB. Only owner-registered holdings are listed in the shareholder’s own name in the register. Shareholders with nominee-registered shares shall be entitled to participate in the Annual General Meeting provided that the nominee-registered shares are re-registered in their own name. Re-registration must be completed by 16 April 2025. The institution responsible for administration of the shares must be instructed well in advance to assist the shareholder with this.

## Notification

Information on how to notify Avanza will be provided in the notice of the Annual General Meeting. The notice will be published in a press release and in the Official Swedish Gazette (Post- and Inrikes Tidningar), and will be available on the company’s website, [avanza.se/ir](http://avanza.se/ir), not later than four weeks prior to the meeting.

If a shareholder wishes to attend by proxy, they are asked to submit a proxy form and other documentation when registering for the meeting. The proxy form will also be available on the company’s website, [avanza.se/ir](http://avanza.se/ir), and sent to shareholders upon request when they provide their mailing or email address.

## Right to submit matters for consideration

Shareholders are entitled to submit matters for consideration by Avanza’s Annual General Meeting provided that a written request is received by the Board in sufficient time for the matter to be included in the Notice.

The shareholder’s written request should be submitted no later than 6 March 2025 and be sent to [arsstamma@avanza.se](mailto:arsstamma@avanza.se), or by post to:

Avanza Bank Holding AB  
Att: Bolagsjuridik  
Box 1399  
SE-111 93 Stockholm

# Financial calendar

**15** April  
2025

Interim report January–March

**24** April  
2025

Annual General Meeting

**11** July  
2025

Interim report January–June

**17** October  
2025

Interim report January–September

# Published

**21** February  
2025

Annual and Sustainability report  
2024

**23** February  
2024

Annual and Sustainability report  
2023

Our financial reports are digitally distributed via the corporate website.

## Contacts

Sofia Svavar, Head of Communication & Investor Relations  
Telephone: +46 (0)8 409 420 17

Karolina Johansson, IR Manager  
Telefon: +46 (0)8 409 422 08

Email: [ir@avanza.se](mailto:ir@avanza.se)

Anna Casselblad, CFO  
Telephone: +46 (0)8 409 420 11  
E-mail: [anna.casselblad@avanza.se](mailto:anna.casselblad@avanza.se)

## Head office

Visiting address: Regeringsgatan 103, Stockholm  
Postal address: Box 1399, SE-111 93 Stockholm  
Telephone: +46 (0)8 562 250 00  
Website: [avanza.se](http://avanza.se)  
Corporate web: [avanza.se/ir](http://avanza.se/ir)

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*This Annual report is published in Swedish and English.  
In the event of any differences between the English version and  
the Swedish original, the Swedish version shall prevail.*

