

TRANSLATION

To the Board of Directors of Swedbank

The Swedish Shareholders' Association (reg. number 857202-1593), hereby requests, in its capacity as shareholder in Swedbank, that the extraordinary general meeting, which will be summoned shortly, shall consider the question regarding appointment of a special examiner in accordance with chapter 10 paragraph 21 in the Swedish company's act.

The theme for the assignment of the special examiner is proposed to be:

- to investigate if, and in that case in what way and to what extent, Swedbank has been involved in money laundering in its Baltic operations from 2007 and onwards,
- to investigate whether the Bank's control functions as regards money laundering in its Baltic operations from 2007 and onwards have been sufficient and adhered to applicable laws and regulations,
- to investigate what measures that have been taken pursuant to the potential recognized/verified insufficiencies in relation thereto and how this has effected the company's processes related to the discovery of money laundering and financing of terrorism,
- to investigate if information that Swedbank in 2018 still had customers with connections to the Magnitskij affair is correct, and if it is correct, what measures the bank has taken since then in relation to such customers,
- to investigate if the management has misled the market in relation to its measures to prevent money laundering in its Baltic operations from 2007 and onwards. With regard to, inter alia, the content of the internal report from September 2018 and the comments provided at that time by Swedbank's management in relation thereto,
- to investigate whether Swedbank has provided correct information to Swedish and foreign authorities in relation to the items above and any closely associated matters,
- to examine internal and external investigations, as well as other relevant material in relation to the items above, and
- to assess whether it, on the basis of the results of the examination of the items above, can be presumed that any employee or former employee in the Swedbank Group or member of the Board of Directors of Swedbank has acted in such a way that liability for damages has arisen in relation to the Company or its shareholders.

Stockholm 13 Maj, 2019

Joacim Olsson, CEO