



2026 Transparency Report

Deloitte AB

Date published 30 September 2026

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Deloitte AB leadership message

This report sets out the practices and processes that are currently employed by Deloitte AB, in accordance with the requirements of the European Union's Regulation 537/2014 on specific requirements regarding statutory audit of public interest entities. It relates to the fiscal year 1 June 2025 to 31 May 2026.

Conclusion on the effectiveness of the system of quality management

Deloitte AB is responsible for designing, implementing, and operating a system of quality management (SQM) for audits or reviews of financial statements, or other assurance or related services engagements performed by the firm that provides the firm with reasonable assurance that the objectives of the SQM are being achieved.

Deloitte AB concluded that the SQM provides the firm with reasonable assurance that the objectives of SQM are being achieved as of 31 May 2026.

Reasonable assurance is obtained when the system of quality management reduces to an acceptably low level the risk that the objectives of the SQM are not achieved. Reasonable assurance is not an absolute level of assurance, because there are inherent limitations of a system of quality management.

Approved by the Board on 30 September 2026



Didrik Roos
Chief Executive Officer
Deloitte AB



Didrik Roos

Deloitte network

Deloitte Sweden: legal structure and ownership

Deloitte AB operates as a Swedish limited liability company, with registered office at SE-113 79 Stockholm and registration number 556271-5309. Deloitte AB is a registered audit firm and is authorized to serve as an auditor for clients in Sweden.

Deloitte AB is a wholly owned subsidiary of Deloitte Sweden Holding AB, a Swedish limited liability company registered under number 559512-6490. Deloitte Sweden Holding AB is owned by 107 auditors and specialists at Deloitte AB.

Until 31 May 2026, Deloitte AB was a Swedish affiliate of Deloitte NSE LLP, a limited liability partnership incorporated in England, which was then member firm of the Deloitte network. All shares in Deloitte Sweden Holding AB previously owned by Deloitte NSE LLP, England, and Deloitte NSE No2 Company Limited by Guarantee, Ireland, were redeemed on 29 May 2026, following which Deloitte AB ceased to be affiliated with Deloitte NSE LLP.

Deloitte EMEA: regional structure from 1 June 2026

On 1 June 2026, a new Deloitte Europe, Middle East and Africa member firm of Deloitte Touche Tohmatsu Limited was established (“Deloitte EMEA”), bringing together the 16 participating firms of Deloitte North and South Europe (NSE), Deloitte Central Europe (DCE) and Deloitte Spain. Deloitte EMEA brings together 132,000 professionals, led by approximately 6,000 partners, operating in more than 80 countries. Deloitte EMEA is intended to strengthen cross-border collaboration at greater pace and scale, support strategic alignment and enable regional investment in areas including innovation, technology platforms and talent development.

From 1 June 2026, each participating firm became a shareholder in Deloitte EMEA BV, a Belgian private limited company with representation on the EMEA Board. Deloitte AB participates in the Deloitte EMEA governance structure through the Danish public limited liability company Deloitte Nordic A/S, the participating firm representing Deloitte firms in the Nordic countries. Deloitte Nordic A/S is the shareholder in Deloitte EMEA BV. Deloitte Nordic A/S does not provide professional services to clients. Deloitte AB continues to operate as a separate local legal entity with its own board and executive leadership.

Deloitte AB is referred to throughout this report as “Deloitte Sweden”.

Network description

The Deloitte network

The Deloitte network (also known as the Deloitte organization) includes a globally connected network of DTTL member firms and their respective related entities operating in more than 150 countries and territories around the world. These separate and independent member firms operate under a common brand.

Deloitte Touche Tohmatsu Limited (DTTL or Deloitte Global)

Deloitte Touche Tohmatsu Limited is a private company limited by guarantee incorporated in England and Wales. DTTL serves a coordinating role for its member firms and their respective related entities and establishes policies and protocols with the objective of promoting a consistently high level of quality, professional conduct, and service across the Deloitte network. DTTL does not provide services to clients and does not direct, manage, or control any member firm or any of their respective related entities.

“Deloitte” is the brand under which over 470,000 dedicated professionals and practitioners in independent member firms (or their respective related entities) throughout the world collaborate to provide leading professional services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our people deliver measurable and lasting results that help reinforce public trust in capital markets and enable clients to transform and thrive. These member firms are members of DTTL. DTTL, these member firms and each of their respective related entities form the Deloitte organization. Each DTTL member firm and/or its related entities provides services in particular geographic areas and is subject to the laws and professional regulations of the country or countries in which it operates. Each DTTL member firm is structured in accordance with national laws, regulations, customary practice, and other factors, and may secure the provision of professional services in its respective territories through related entities. Not every DTTL member firm or its related entities provides all services, and certain services may not be available to attest clients under the rules and regulations of public accounting. DTTL, and each DTTL member firm and each of its related entities, are legally separate and independent, cannot obligate or bind any other, and are liable only for their own acts and omissions, and not those of any other. The Deloitte organization is a global network of

independent firms and not a partnership or a single firm. DTLT does not provide services for clients.

Deloitte Sweden: governance leadership in action
Deloitte Sweden is a company providing services to clients.

The partner meeting of Deloitte Sweden is according to agreement the supreme governing body whereas the shareholders’ meeting is the supreme governing body according to the Swedish Companies Act.

Partner meetings are held annually and whenever necessary.

The Board of Directors and the Chief Executive Officer for Deloitte Sweden are elected for a period of up to four years.

The Board of Directors work to ensure that all embracing principles are fulfilled and handles for a limited liability company customary governance issues. The Board of Directors shall hold ten meetings per year and whenever necessary. The Board of Directors are also members of Partnership Council overseeing and handling partner matters.

The Board of Directors (which also constitutes the Partnership Council) consisted as of 31 May 2026 of the following members:

Deloitte Sweden – Board of Directors
Therese Kjellberg, Partner and Chairperson
Fredrik Jonsson, Partner
Anders Rinzén, Partner
Anna Sabelström Holmberg, Partner
Kathinka Skoe, Partner

The Board of Directors (which also constitutes the Partnership Council) consisted as of 3rd July 2026 of the following members:

Deloitte Sweden – Board of Directors
Fredrik Jonsson, Partner and Chairperson
Therese Kjellberg, Partner
Anna Sabelström Holmberg, Partner
Andreas Marcetic, Partner
Ester Sundström, Partner

Jonas Ståhlberg, Partner
Richard Peters, Partner

The Executive Team provides operational leadership and has authority and accountability for strategy execution and management of Deloitte Sweden’s operations. The Executive Team shall hold ten meetings per year and whenever necessary. The Executive Team consisted as of 31 May 2026 of the following executives:

Deloitte Sweden – Executive Team
Chief Executive Officer, Didrik Roos
Country Managing Partner, Erik Olin
Chief Operating Officer, Zlatko Mehinagic
Head of Audit & Assurance, Anneli Pihl
Head of Tax & Legal, Frida Haglund
Head of Strategy, Risk & Transactions Advisory, Marcus Ekehov
Head of Technology & Transformation, Morten Nielsen
Brand Impact and Growth leader, Ajla Talovic
Risk and Reputation Leader, Jeanette Roosberg
People & Purpose Partner, Elvira Allvin

Anneli Pihl, Audit & Assurance Business Leader, is appointed by the Chief Executive Officer of Deloitte Sweden. Anneli Pihl and the Audit & Assurance leadership develop and implement the strategy for the Audit & Assurance practice, including related policies and procedures. In all of their activities, Deloitte Sweden Audit & Assurance leaders are responsible for the overarching objective of audit quality, including compliance with applicable professional standards and regulatory requirements. Deloitte Sweden’s strategy is developed in alignment with the overall strategic direction established for the Deloitte network.

Deloitte Sweden Audit & Assurance leaders participate in Deloitte network groups that set and monitor quality standards, and from which a number of audit quality initiatives emanate.

System of quality management (SQM)

Deloitte's priority focus on quality

Deloitte's commitment to quality is central to everything we do. We consistently deliver on this commitment by instilling a culture of quality, integrity, and excellence across the network, establishing business and financial priorities, and developing effective processes, tools, and technologies applied in the execution of engagements. Deloitte's brand is defined by the high-quality audit and assurance services delivered and by the unwavering commitment to continuous improvement of our systems of quality management. Keeping pace with emerging economic, business, and regulatory conditions, as well as technological advances, is critical to the continual enhancement of Deloitte's role in protecting the public interest and supporting the effective functioning of the corporate reporting ecosystem.

System of quality management

ISQM 1 introduces a risk-based approach to the SQM that requires firms to respond to quality objectives and risks to our ability to execute high-quality audits in the following areas:

- the firm's risk assessment process;
- governance and leadership;
- relevant ethical requirements;
- acceptance and continuance of client relationships and specific engagements;
- engagement performance;
- resources;
- information and communication; and
- the monitoring and remediation process.

The effective implementation of ISQM 1 has been and remains a key element of Deloitte's global audit and assurance quality strategy.

As part of the implementation of ISQM 1, quality objectives, quality risks and responses were formalized and brought together in a globally consistent technology platform to facilitate the design and maintenance of the system, as well as the operation through tri-annual self-assessments by business process owners and reporting capabilities to support the required annual evaluation.

Deloitte Sweden continues to work with leaders across the firm, as well as the broader network, to further enhance our proactive approach to managing the quality of engagements performed identifying and addressing risks to quality and driving continued advancements in quality management processes serves us well into the future as the environment within which we operate continues to evolve and become increasingly complex.

Consistent with Deloitte's culture of continuous improvement and innovation, Deloitte Sweden's efforts relating to ISQM 1 and our SQM provide us the opportunity to continually challenge ourselves examining those areas where we can further enhance and transform our SQM. Quality is always front and center, and robust quality monitoring processes play an integral role in our ability to continually improve.

ISQM 1 requires an annual evaluation of the SQM. Deloitte Sweden performed its annual evaluation of its SQM as of 31 May 2026.

Deloitte Sweden is preparing for the upcoming Public Company Accounting Oversight Board's standard on a Firm's System of Quality Control (QC 1000) and believes this continues to strengthen the firm's SQM.

Conclusion on the effectiveness of the SQM

Deloitte Sweden is responsible for designing, implementing, and operating a SQM for audits or reviews of financial statements, or other assurance or related services engagements performed by the firm, that provides the firm with reasonable assurance that the objectives of the SQM are being achieved. The objectives are:

- the firm and its personnel fulfill their responsibilities in accordance with professional standards and applicable legal and regulatory requirements, and conduct engagements in accordance with such standards and requirements; and
- engagement reports issued by the firm or engagement partners are appropriate in the circumstances.

Deloitte Sweden conducted its evaluation in accordance with the ISQM 1.

Deloitte Sweden concluded that the SQM provides the firm with reasonable assurance that objectives of the SQM are being achieved as of 31 May 2026.

Reasonable assurance is obtained when the SQM reduces to an acceptably low level the risk that the objectives of the SQM are not achieved. Reasonable assurance is not an absolute level of assurance, because there are inherent limitations of a system of quality management.

Independence, objectivity, and professional skepticism

The execution of high-quality audit and assurance engagements requires independence, objectivity, and professional skepticism. This means a continuous and tangible focus on Deloitte's critical role in serving the public interest, including creating a culture of quality where doing the right thing is of paramount importance. Deloitte consistently reinforces the important role of auditors as independent evaluators who must maintain a mindset of professional skepticism throughout the conduct of our work. This approach is reflected in Deloitte policies, methods, procedures, and learning, and is reinforced through quality management and accountability measures.

Audit & Assurance approach

Deloitte's approach to performing a high-quality engagement involves the use of audit and standards-based assurance methodologies, common across the Deloitte network, supplemented by tools for use by our practitioners to plan, perform, supervise, review, document, conclude, and communicate the results of each engagement. Deloitte's approach is underpinned by professional standards, as well as the requirements of applicable laws and regulations.

Deloitte's audit methodology is risk-based, focusing on the financial statement account balances, disclosures, and underlying assertions that have a reasonable possibility of being materially misstated. Our methodologies are also dynamic – it evolves continuously to keep pace with the changing demands of investors, companies, and other stakeholders. It recognizes that advances in the availability and management of large data sets, in statistical science as well as Generative AI (GenAI) are relevant to continuing to enhance the quality of Deloitte engagements.

Resources to support Deloitte practitioners in the execution of high-quality engagements

The resources applied by Deloitte practitioners in the performance of their work include the proprietary tools, guidance, materials, and practice aids used in conducting engagements, which are available to all our practitioners in

the Research Portal, an extensive online library, and in our audit execution platforms (such as Deloitte Omnia). These resources drive greater standardization and consistency across Deloitte firms. Deloitte regularly issues guidance to our practitioners and communicates developments that should be factored into audit risk assessments and responses in order to maintain and drive quality execution.

Consultation

Quality and risk management considerations are integral to Deloitte's audit and assurance business and to the performance of engagements. That is why Deloitte views consultation as an essential, collaborative process – one that involves robust challenge and helps determine the most appropriate answers to complex questions. Deloitte has identified circumstances where consultation outside of the engagement team is required in order to demonstrate an appropriate level of professional judgment and the exercise of professional skepticism. Deloitte consultation policies require that conclusions are documented, understood, and implemented. Foundational to the effectiveness of the consultation process is Deloitte's investment in consultation resources who have the appropriate skills and expertise. In addition to formal consultations, whenever engagement partners and teams need additional information or perspectives, they are encouraged to seek assistance from the Audit & Assurance Quality & Risk, or others in the organization with specialized knowledge.

External and internal quality monitoring

Monitoring of quality

A continued focus on quality is of paramount importance to the Deloitte brand. It is critical that a Deloitte engagement is consistently executed and of high-quality, wherever in the world it is performed.

The objective of monitoring and remediation processes are to provide relevant, reliable, and timely information about the design, implementation, and operation of the SQM to leadership in order to enable appropriate and timely actions to be taken to respond to identified deficiencies. This includes the identification of deficiencies and good practices in the SQM and the assessment of the effectiveness of remedial actions in driving improvements in audit quality.



SQM monitoring

SQM monitoring is an integral part of Deloitte Sweden's monitoring activities and considers relevant requirements in ISQM 1, as well as evaluating the design, implementation and operating effectiveness of responses that address the quality risks that have been identified for the firm.

Key components of SQM monitoring include:

- Risk-based approach to selecting business processes, quality risks and responses to monitor.
- Mandatory moderation panel to drive consistency in evaluating findings and deficiencies.
- Identifying appropriate resources from within Deloitte Sweden as well as from other Deloitte geographies or Deloitte Global with the right experience.

identified, whether through internal or external monitoring activities, actions are taken to identify gaps and develop appropriate remediation activities. Remediation is imperative to drive continuous improvement in quality and avoid future similar findings. An audit quality plan is prepared by Deloitte Sweden and provides for effective implementation and monitoring of key audit quality priorities.

 Inspections of completed engagements

Key components of inspections of completed engagements include:

- Risk-based engagement selection and consideration of all major industries served by Deloitte Sweden while considering all signing partners or partner equivalents on a cyclical basis.
- Mandatory moderation panel to drive consistency in findings and engagement ratings.
- Identifying appropriate resources from within Deloitte Sweden as well as from other Deloitte geographies or Deloitte Global with the right experience and industry knowledge.

 External inspections

In addition to Deloitte Sweden’s own monitoring of quality, we are subject to external monitoring by the Swedish Inspectorate of Auditors (Revisorsinspektionen) and Public Company Accounting Oversight Board (PCAOB).

Internal monitoring	External monitoring
Date of inspection report: 14 July 2026, period covered: 1 June 2025 to 31 May 2026	The Swedish Inspectorate of Auditors (Revisorsinspektionen) issued its latest inspection report on 7 February 2025 covering 2024 and engagements with fiscal years ended in 2023. PCAOB issued its latest inspection report on 24 July 2025 covering 2024 and engagements with fiscal years ended in 2023.

 Root cause analysis and remediation

Continuous improvement is essential to Deloitte’s culture of quality and excellence. Understanding why engagement level findings and SQM deficiencies occur is critical to being able to design effective remedial actions. When engagement level findings or SQM deficiencies are

Learning and development initiatives

At the core, Deloitte has a single, global mandatory audit technical learning curriculum, tailored for learners by level, using a dynamic blend of live instructor-led, digital on-demand courses, and on-the-job activities.

All client service practitioners are required to follow the firm's learning requirements for their roles and complete sufficient continuing professional education (CPE) each year to ensure both compliance with regulatory standards and Deloitte internal policies. This is achieved through structured, formal learning programs, such as internal or external courses, seminars, or e-learning, and all of these programs cover the full range of the Global Talent Standards (e.g., leadership & professional competencies, function-specific technical competencies, and competencies in areas of specialization).

All client service practitioners have clearly defined role expectations and global Talent Standards which outline the capabilities that are required of practitioners at each level.

Deloitte has made substantial investments in talent and learning strategies and transformed the technical curriculum to build the refreshed skillsets and proficiency required by level.

Aligned to Deloitte A&A's efforts to deliver a more skills-focused career experience, Deloitte prioritizes providing modernized learning experiences that are skills-based, tailored, and relevant for practitioners and professionals in their specific roles.

Deloitte has also established specific learning offerings for specialists working on engagements to support their knowledge and understanding. In addition, client service practitioners working on Assurance engagements are provided with a range of learning offerings responsive to emerging business needs.

The objective of the Deloitte Sweden professional development program is to help partners and practitioners maintain and enhance their professional competence and

ensure consistency of execution. To supplement on-the-job development, Deloitte Sweden provides formal continuing professional development programs in relevant subject areas consistent with the Deloitte Global Audit & Assurance Curriculum.

Deloitte University

Deloitte actively cultivates the collective knowledge and skills of Deloitte people globally through continued investment in Deloitte Universities (DU), the cornerstone of our organization's commitment to leadership development and technical training for Deloitte people around the world. These are state-of-the-art learning and development centers focused on Deloitte culture and founded in the principles of connectedness and leadership in a highly inclusive learning environment¹. Since opening the Westlake, Texas location in 2011, we've launched additional facilities in Beijing, Paris, Hyderabad, Mexico City, Paris, Singapore, and Toronto. Being together for "moments that matter" is critical as we develop the next generation of leaders, as well as create—and strengthen—the connections that are so important to succeed in a global organization serving multinational clients.

Strengthening A&A quality through AI-enabled innovation

Deloitte Audit & Assurance (A&A) is advancing with purpose as we execute our digital transformation strategy. In a landscape defined by rapid technological development, the focus remains on delivering high-quality engagements while adapting how A&A work is performed. Responsible innovation is fundamental to this approach. We seek to capture technological opportunities while maintaining the centrality of professional judgment, integrity, and trust.

A key recent development is the introduction of an embedded network of intelligent agents within Deloitte Omnia, Deloitte's global cloud-based platform. The agents operate outside clients' system environments. This advancement supports teams with enhanced, context-aware insights, and real-time workflow assistance. These

¹ Please refer to Deloitte.com for more information about [Deloitte Universities](#)

capabilities enable our people to analyze information, identify potential risk factors, support compliance and regulatory assessments, and reinforce the consistency and quality of procedures. Throughout, the principle of “human in the loop” remains paramount.

These capabilities are designed to augment, not replace, professional judgment: A&A professionals and practitioners remain responsible for challenging and validating the outputs of technology, ensuring that technology serves as an enabler of quality rather than a replacement for critical thinking or professional skepticism.

These enhancements are complemented with practical and ethical guidance, drawing on recognized frameworks such as Trustworthy AI™. Our people have access to regular and targeted learning, including the Deloitte AI Academy™, that addresses both the value and limitations of AI-enabled technologies. This learning reinforces the importance of human oversight, and alongside updated practice aids and guidance from subject matter specialists, supports teams in navigating new challenges and adapting to evolving stakeholder requirements.

Deloitte A&A’s training and talent model is designed to equip teams not only to use technology, but also to apply professional skepticism, challenge estimates, assess disclosures, understand automated assurance workflows, and investigate exceptions or anomalies identified through digital capabilities. The Deloitte Global A&A talent framework and delivery models have also been revised, so that teams are equipped to operate confidently in a digital environment—balancing human oversight with the power of artificial intelligence.

Security, integrity, and client data

Deloitte recognizes that the security and confidentiality of client data are fundamental to maintaining stakeholder trust and delivering credible engagement outcomes. As processes increasingly rely on cloud-based platforms and digital solutions, we continue to make investments to protect data safety and privacy. Deloitte A&A applies a security-by-design approach across the technology lifecycle, including upfront risk and data assessments, secure engineering standards, controlled testing and release processes, and ongoing monitoring and remediation in production. These controls are designed to support the confidentiality and security of client data throughout the A&A technology lifecycle.

We adhere to applicable regulatory requirements and industry standards concerning data handling, encryption, and access management. Secure data flows minimize risk of error or unauthorized access. Real-time oversight within

Omnia enables early identification and resolution of anomalies, supporting prompt responses to potential risks.

Direction, supervision, and review (DSR) principles are embedded within both our technology and methodologies, extending not only to AI-enabled solutions but to many facets of digital engagement execution. Updated practice aids and practitioner guidance reinforce this focus on DSR across engagements.

Deloitte A&A’s approach to technology usage is built on responsible stewardship of information. Through secure platforms, robust processes, and ongoing professional vigilance we continue to uphold the integrity expected by the public, regulators, and capital markets.

Remuneration

Execution of high-quality is expected from all practitioners and is embedded across the Deloitte network. This is recognized through reward and recognition programs and is built into performance standards at every level, against which practitioners' overall evaluations are measured.

In accordance with global policies, Deloitte Sweden's partners are evaluated on a yearly basis, and depending on the outcome of the evaluation, the remuneration of partners may increase or decrease. Specifically, A&A partner evaluations take into account the following factors:

- regulatory reviews and inspection results on the partner's engagements
- practice review results in respect to the engagement partner's engagements
- participation by the partner in applicable learning programs
- contribution to quality in the member firm, for example:
 - performing engagement quality control reviews
 - facilitating learning events
 - participation in quality improvement initiatives
 - participation in the practice review program.

A&A partners are not evaluated on or earn or receive compensation, bonuses or other direct financial incentives for selling products or services, other than audit, review or assurance-related services, to any client where they participate in the audit engagement or any assurance engagement.

Attraction and retention

The current environment for talent is extremely competitive, and attraction and retention of our people is a strategic priority for Deloitte. We are focused on transforming the Audit & Assurance talent experience, including reimagining the ways of working to improve retention and further advance our inclusive culture and the well-being of all Deloitte people. We are continuously looking at opportunities to collectively enhance the talent experience. This focus on our people and retention of top talent underpins Deloitte's ability to deliver high-quality.

Deloitte continues to receive recognition and awards across the globe for its commitment to delivering an unrivalled talent experience for its [people Awards and recognition | Deloitte Global](#).

Audit & Assurance Leadership appointments

Critical Audit & Assurance leadership roles are clearly defined. A role profile and key performance indicator framework provide a basis for consistent leadership appointments and evaluations across the Deloitte Audit & Assurance network, enabling alignment of member firm and Deloitte Global Audit & Assurance strategic objectives. Deloitte maintains globally consistent standards for member firm Audit & Assurance leaders, including Audit & Assurance Business Leaders, Audit & Assurance Quality Leaders, and Audit & Assurance Risk Leaders through clearly defined roles, responsibilities, and expected success outcomes. These inform objective setting and evaluation processes and reinforce Deloitte's culture of quality and excellence. Robust monitoring of succession planning helps ensure Deloitte is developing and appointing the appropriate individuals with the capabilities to achieve these consistent standards.

Independence

Deloitte Sweden Independence

Deloitte Sweden has designed and implemented and operates a system of quality management (“SQM”) for the relevant independence requirements as it relates to audit or reviews of financial statements, and other assurance or related services engagements (“Independence SQM”). The Independence SQM comprises responses (policies and procedures) that address independence quality risks to the achievement of the independence objectives. The responses are based on expectations set out in Deloitte Global Independence policies, and are supplemented, as appropriate, to reflect additional national or regional requirements that may be more restrictive than Deloitte Global policies. Deloitte Sweden leadership reinforces the importance of compliance with independence and related quality management standards, thereby setting the appropriate tone at the top and instilling its importance into the professional values and culture of Deloitte Sweden. Strategies and procedures to communicate the importance of independence to partners, other practitioners, and support staff have been adopted, emphasizing each individual’s responsibility to understand and meet the independence requirements. The Independence Leader is responsible for overseeing independence matters within Deloitte Sweden, including the design, implementation and operation of the Independence SQM.

The firm’s Independence SQM comprises responses to the following key independence areas:

- client, engagement, and business relationships, including use of the independence business process tools: the Deloitte Entity Search and Compliance (DESC) system and the Service Request Monitoring (SRM) application
- firm and personal financial relationships, including the use of the Global Independence Monitoring System (GIMS)
- employment and other relationships
- independence confirmations
- independence consultations
- independence-related policies and communications
- independence learning
- breaches of independence requirements
- disciplinary measures for failures to adhere to applicable independence requirements.

The firm’s Independence SQM also includes detective monitoring responses over some of the key independence areas to ensure independence compliance.

All responses (including the detective monitoring responses) in the Independence SQM are tri-annually self-assessed and subject to SQM monitoring for design, implementation and operating effectiveness on a risk-based approach.



DESC

Deloitte Entity Search and Compliance

Global, searchable database containing specific entity information relevant in determining personal and professional independence restrictions



SRM

Service Request Monitoring

Application integrated with DESC that provides a standard business process workflow for submitting and reviewing preapproval requests to provide services to and enter into business relationships with clients



GIMS

Global Independence Monitoring System

Application that contains financial relationship data with relevant independence compliance indicators

Long association requirements of audit partners and practitioners

Deloitte Sweden complies with the key audit partner rotation requirements of the code of the International Ethics Standards Board for Accountants (IESBA), Regulation (EU) 537/2014 of the European Parliament and of the Council of 16 April 2014, and generally accepted auditing standards in Sweden, as well as standards issued by the U.S. Securities and Exchange Commission (SEC), where required.

We employ processes to track key audit partner rotation that enable effective monitoring of compliance with requirements.

We have also implemented a process for gradual rotation mechanism and decision making that involves consultation with, and approvals by, our Risk Management and Independence as needed.

Ethics

All Deloitte people are expected to act with integrity in accordance with high ethical standards as described in the Deloitte [Global Principles of Business Conduct](#) (“Global Code”). The Global Code is embedded into each member firm’s Code of Conduct and defines the commitments that all Deloitte people make regarding ethical standards, as well as explaining each individual’s responsibilities to their clients, colleagues, and society.

In addition to the Global Code, other foundational elements of Deloitte’s ethics program include global policies, a program of training and communications, and established reporting channels supported by defined incident management protocols. For continuous improvement, regular program assessments and reviews are conducted, and feedback is collected from Deloitte people through an annual ethics survey.

Ethics at Deloitte is led by the Deloitte Global Chief Ethics Officer at the global level, and by member firm Ethics at Deloitte is led by the Deloitte Global Chief Ethics Officer at the global level. Locally in Sweden, Ethics is lead by an Ethics Partner and an Ethics Officer, both experienced and with direct access to the member firm’s CEO and governing body. Deloitte Global and member firm ethics leaders work together to continually monitor risk and to reinforce compliance with the Global Code.

Deloitte Sweden maintains policies and procedures that build on global policies and are designed to provide reasonable assurance that its people comply with relevant ethical requirements.

The ethical requirements for audit and related assurance services provided by Deloitte Sweden are in accordance with FAR’s (the professional institute for the accountancy

profession in Sweden) Ethics Standards. Deloitte Sweden also complies with Deloitte Global policies and procedures, which align with the requirements and guidance set out in the international Code of Ethics for Professional Accountants issued by the International Ethics Standards Board for Accountants, a standard-setting body of the International Federation of Accountants (IFAC). When the national professional requirements are more restrictive than the Deloitte Global policies and procedures, Deloitte Sweden follows the applicable national requirements.

Deloitte Sweden reinforces its commitment to ethics and integrity through communication tools, learning programs, compliance processes, and measurement systems for all people. Learning includes targeted content for onboarding, manager and senior manager promotion, partner admission, independent contractors, and refresher programs at least every two years. Recent global training topics have included a focus on ethical handling of client confidential information, being an active bystander, ethical learning, and appropriate use of Generative AI, and courses have included a confirmation that professionals are aware that answers should not be shared with others and doing so would constitute a violation of the Global Code. In addition, Deloitte Sweden conducts ethics reviews of senior leaders and requires all partners, other practitioners, and support staff to confirm annually that they have read and comprehended the member firm’s Code of Conduct and understand that it is their responsibility to comply with it.

Appendices

Appendix A | EU EEA audit firms

Disclosure in accordance with Article 13.2 (b)(ii)-(iv) of the EU Audit Regulation

EU/EEA member state (Article 13.2 (b)(iii) EU Audit Regulation: the countries in which each audit firm that is a member of the network is qualified as a statutory auditor or has its registered office, central administration, or principal place of business)

Name of audit firms carrying out statutory audits in each member state (Article 13.2 (b)(ii) EU Audit Regulation: the name of each audit firm that is a member of the network)

EU/EEA member state	Name of audit firms carrying out statutory audits in each member state
Austria	Deloitte Audit Wirtschaftsprüfungs GmbH
	Deloitte Niederösterreich Wirtschaftsprüfungs GmbH
	Deloitte Oberösterreich Wirtschaftsprüfungs GmbH
	Deloitte Salzburg Wirtschaftsprüfungs GmbH
	Deloitte Tirol Wirtschaftsprüfungs GmbH
	Deloitte Wirtschaftsprüfung Steuerberatung DWS1 Steiermark GmbH
Belgium	Deloitte Bedrijfsrevisoren/Réviseurs d'Entreprises BV/SRL
Bulgaria	Deloitte Audit OOD
Croatia	Deloitte d.o.o. za usluge revizije
Cyprus	Deloitte Limited
Czech Republic	Deloitte Audit s.r.o.
	Deloitte Assurance s.r.o.
Denmark	Deloitte Statsautoriseret Revisionspartnerselskab
Finland	Deloitte Oy
France	Deloitte & Associés
	Deloitte Audit Holding
	BEAS
	Constantin Associés
	Pierre-Henri Scacchi et Associés
	Revi Conseil
Germany	Deloitte GmbH Wirtschaftsprüfungsgesellschaft
	Deutsche Baurevision GmbH Wirtschaftsprüfungsgesellschaft
	SüdTreu Süddeutsche Treuhand GmbH Wirtschaftsprüfungsgesellschaft
Greece	Deloitte Certified Public Accountants S.A.
Hungary	Deloitte Könyvvizsgáló és Tanácsadó Kft.
Iceland	Deloitte ehf.
Ireland	Deloitte Ireland LLP
Italy	Deloitte & Touche S.p.A.
Latvia	Deloitte Audits Latvia SIA

EU/EEA member state	Name of audit firms carrying out statutory audits in each member state
Liechtenstein	Deloitte (Liechtenstein) AG
Lithuania	UAB Deloitte Lietuva
Luxembourg	Deloitte Audit
Malta	Deloitte Audit Limited
Netherlands	Deloitte Accountants B.V.
Norway	Deloitte AS
Poland	Deloitte Audyt spółka z ograniczoną odpowiedzialnością spółka komandytowa
	Deloitte Audyt spółka z ograniczoną odpowiedzialnością
	Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością spółka komandytowa
	Deloitte Assurance Polska spółka z ograniczoną odpowiedzialnością
Portugal	Deloitte & Associados, SROC S.A.
Romania	Deloitte Audit SRL
Slovakia	Deloitte Audit s.r.o.
Slovenia	Deloitte Revizija d.o.o.
Spain	Deloitte Auditores, S.L.
Sweden	Deloitte AB

Disclosure in accordance with Article 13.2 (b)(iv) of the EU Audit Regulation

The total turnover achieved by the audit firms that are members of the network, resulting from the statutory audit of annual and consolidated financial statements: €2.4 billion²

² Amount represents an estimate determined based upon best efforts to collect this data. Certain Deloitte audit firms registered to perform statutory audits in respective member states provide statutory audit services as well as other audit, assurance, and non-audit services. While Deloitte endeavored to collect specific statutory audit turnover for each EU/EEA Deloitte audit firm, in certain cases turnover from other services has been included. The turnover amounts included herein are as of 31 May 2026, except for a limited number of instances where a Deloitte audit firm has different financial year-end or has not finalized its reporting for such period. In these cases, turnover amounts are for the relevant financial year or preceding financial year. Where currency other than the Euro is used in the member state, the amount in Euros was translated using an average exchange rate in effect for the period 1 June 2025 to 31 May 2026.

Appendix B | Financial information

Disclosure in accordance with Article 13.2 (k)(i)-(iv) of the EU Audit Regulation

The breakdown of the Deloitte Sweden’s FY25/26 turnover:

Turnover	SEK (millions) ³
Statutory audit (PIEs or PIE subsidiaries)	744
Statutory audit (non-PIEs or non-PIE subsidiaries)	462
Non-audit services (audited PIEs or PIE subsidiaries)	91
Non-audit services (audited non-PIEs or non-PIE subsidiaries)	78
Non-audit services (other entities)	2,797
Total revenue for FY25/26	4,173

³ Amounts represent an estimate determined based upon best efforts to collect this data. Deloitte Sweden provides statutory audit services as well as other audit, assurance, and non-audit services. While Deloitte Sweden endeavored to collect specific statutory audit turnover for each engagement, in certain cases turnover from other services has been included and vice versa.

Appendix C | Public interest entities

Disclosure in accordance with Article 13.2 (f) of the EU Audit Regulation

Public Interest Entities Audited for Statutory Purposes by Deloitte AB in the Financial Year 2025/2026:

Public interest entities that have issued transferable securities on a regulated market		
AB Sveriges Säkerställda Obligationer (publ)	Fasadgruppen Group AB	PostNord AB
Addtech AB	H & M Hennes & Mauritz AB	RaySearch Laboratories AB (publ)
AFRY AB	HAKI Safety AB	Sinch AB (publ)
Aktiebolaget Industrivärden	I.A.R. Systems Group AB	Sivers Semiconductors AB
Aktiebolaget SKF	If Skadeförsäkring Holding AB (publ)	SkiStar AB
Aktiebolaget Volvo	Infant Bacterial Therapeutics AB (publ)	Svedbergs i Dalstorp AB
Arla Plast AB	Intrum AB	Svensk Fastighetsfinansiering AB (publ)
Atrium Ljungberg	Investor AB	Synsam AB (publ)
Axfood AB	Kährs BondCo AB	Telefonaktiebolaget L M Ericsson
Bactiguard Holding AB	Lagercrantz Group AB	Verve Group SE
Beijer Ref AB (publ)	Legres AB (publ)	Vitec Software Group
Bergman & Beving Aktiebolag	Lindab International AB	VitroLife AB
Bico Group AB	Loomis AB	Volvo Car AB
BioGaia AB	Keo Capital AB	Volvo Treasury Aktiebolag
Boozt AB	Midsona AB	
Castellum AB	Netel Holding AB (publ)	
Clas Ohlson AB	New Wave Group AB	
Diös Fastigheter AB	Nordnet AB	
Electrolux Professional AB	NOVOTEK Aktiebolag	
engcon AB	Open Infra US Assets AB (publ)	
EQL Pharma AB	PION Group AB	
Banks, Insurance companies, etc under the supervision of FI, Sweden´s financial supervisory authority		
ABG Sundahl Collier AB	Länsförsäkringar Bank Aktiebolag	SBAB Bank AB (publ)
Avida Finans AB	Länsförsäkringar Finans AB	Sparbanken i Karlshamn
ACCEPT FÖRSÄKRINGSAB (PUBL)	Länsförsäkringar Fondliv Försäkrings AB	Sparbanken Lidköping AB (publ)
Axfood Försäkrings AB	Länsförsäkringar Grupplivs-försäkringsaktiebolag	Sparbanken Sjuhärad AB
Dalarnas Försäkringsbolag	Länsförsäkringar Göteborg och Bohuslän	Sparbanken Skåne AB (publ)
Danske Hypotek AB	Länsförsäkringar Hypotek AB (publ)	SPK Pension Tjänstepensionsförening
Försäkringsaktiebolaget Agria	Länsförsäkringar Kalmar	Svenska Handelsbanken AB

Banks, Insurance companies, etc under the supervision of FI, Sweden 's financial supervisory authority

Försäkringsbranschens Pensionskassa, Förs.Fören	Länsförsäkringar Liv Försäkrings AB	Söderberg & Partners Wealth Management AB
Gar-bo Försäkring AB	LÄNSFÖRSÄKRINGAR SKÅNE - ÖMSESIDIGT	Volvo Group Insurance Försäkringsaktiebolag
Hennes Insurance Försäkringsbolag	NOBA Bank Group AB (publ)	Återförsäkringsab SKF
IF Livförsäkring AB	Nordnet Bank AB	
If Skadeförsäkring AB	Nordnet Pensionsförsäkring AB	
Länsförsäkringar AB (publ)	Pp Pension Tjänstepensionsförening	



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