

KOMMUNINVEST I SVERIGE AB

Code of Conduct

C1P



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External regulations			
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Former versions			
23 October, 2023; 24 May 2022			
Background			
<p>Kommuninvest i Sverige AB (the Company) acts to implement good governance and internal control. The Board of Directors is responsible for managing the Company's compliance with laws as well as national and European regulations that govern the operations of the Company, where applicable. The governing documents of the Company consist of documents established by the Board, President and CEO or respective functional manager. Policies and some Instructions for the Board are established by the Board. These governing documents can be derived into Instructions established by the President and CEO, as needed. Even more detailed Instructions can be derived from these, to be established by the respective functional manager. The Board shall establish the Policies on an annual basis and manage their compliance with and evaluation by the operations. The Board is ultimately responsible for the Company running an appropriate and effective business as well as a well-developed system for risk management and compliance.</p> <p>This Policy includes the Company's Board, management, all employees, consultants, cooperating partners, agents and assignees that are affected by the operations of the Company. The Policy is applicable to all parts of the operations and also includes activities and areas that have been outsourced to another party.</p> <p>The President and CEO is responsible to implement and monitor compliance with this Policy. It is imposed on the President and CEO to assess and update the contents of this Policy annually or as needed and present it to the Board, including any revisional changes.</p>			

1 Introduction

This Code of Conduct has been established by the Board of Directors for Kommuninvest i Sverige AB (Kommuninvest / the Company).

Kommuninvest is a values-driven organization, and the Code of Conduct describes our responsibility as an employer and the responsibility of the employee, based on the ownership directive for the Company.

All employees have a responsibility and an obligation to comply with the Code of Conduct, current laws, regulations, and other policies and instructions which govern the business.

1.1 Our mission

Kommuninvest has an important role as a socially beneficial credit provider and the Company shall operate for the business idea and vision to be realized.

The company shall consider economic, social, and environmental sustainability throughout our operations, both in terms of direct and indirect impact. This includes considering the Sustainable Development Goals (Agenda 2030) and to offer services and products that meet members' and customers' needs in this regard.

1.2 Our business idea

Kommuninvest's operating concept assumes that society and financial market actors perceives the Company as a stable, efficient, and knowledgeable actor, whose role as a socially beneficial credit market company provides the municipal sector in Sweden with the most cost-efficient loan financing. The basis of the Company's work to create trust in the business is a risk culture based on core municipal values, regulatory compliance and good internal governance and control.

1.3 Our vision

Kommuninvest shall be the world's leading organization for municipal financial management. We finance the development and investments of the Swedish local and regional sector for a sound and sustainable society.

The vision indicates a direction rather than a final destination. What is the best thing to do today, is neither what was best to do yesterday nor tomorrow. Our constant pursuit of the greatest possible benefit for customers and members creates continuous improvement work.

2 Our core values

Kommuninvest shall be characterized by a professional and respectful treatment of members, customers, investors,

counterparties, and employees.

Our core values are based on three keywords: completeness, simplicity and value creation that inspire and guide us in working methods, processes and business plans and in our approach.

3 What can employees expect from us?

Current and future employees can expect us to offer a safe, inclusive, and developing work environment with the tools and the skills required to be able to fulfill their duties. We have market-based working conditions that mean good opportunities for development, learning and balance in life. Our approach to holistic sustainability permeates the employee experience.

3.1 Terms and conditions of employment

We must have good and clearly defined working conditions, role descriptions and work processes which contribute to goal achievement, job satisfaction and commitment. We regularly follow up on goals and conditions for the individual employee work performance.

Our salaries are market-based but not market-leading. They are individual and reflects performance, competence, and responsibility. We comply with applicable collective agreements, laws and regulations governing terms of employment and everything related thereto.

3.2 Work environment

We have zero tolerance towards all forms of discrimination, harassment, sexual harassment, and abusive discrimination. We work proactively and systematically to investigate, risk assess, remediate, control and prevent both the physical, digital, and social and organizational work environment. We analyze risk indicators within the personnel area continuously during the year and work actively with preventative measures to avoid unhealth and work environmental problems.

The annual employee survey aims to capture what can be improved in the business. Relevant key figures are followed up annually in the personnel and health accounts, which also results in an action plan for the upcoming year's efforts in the work environment area. We work for a good, safe, and developing work environment where every employee can take personal responsibility for health and the working environment.

3.3 Learning culture

We shall be a sustainable organization that through systematic skills supply ensures that the right skills are in the right place at the right

time. Competence supply consists to a certain extent of recruitment and to a large extent of skill enhancement of existing employees. Competence development takes place continuously and in line with the competence needs the company has going forward, where employees have good opportunities for development and to create new abilities.

Kommuninvest strives to be a learning organization. The company stands for structures and processes of knowledge acquisition. Together with the immediate manager, the employee has himself a great responsibility for his own development and learning.

3.4 Security

We put safety first. That implies all forms of security, for example personal security, perimeter protection, IT- and cybersecurity and education. We have a crisis group that work actively with prevention and practice crisis and continuity management.

3.5 Employeeeship

Every employee receives education through the company-wide leadership and employee program to create structures, incentives, and tools to encourage good communication, high ability for self-leadership, knowledge of group development and effective meetings and a culture of learning and feedback. Each employee has a responsibility to build the Company's culture as described in the code of conduct and highlight misconduct if necessary. Employees and managers are jointly responsible for cooperating with each other and creating an inclusive work environment and workplace where everyone have equal value.

3.6 Working methods

We strive to have process oriented working methods, with constant improvements and always with the customer's / member's best interests in focus and where creating value and efficiency constantly develops us. With employment comes a responsibility to contribute to development, improvement, and change. We expect every employee to comply existing routines and processes or contribute to the improvement of them.

3.7 Sustainable organization

Having a sustainable organization is crucial for long-term value creation. It includes both work environment, organization, and employees. We work actively with leadership and employeeeship. Our aim is for every employee to be able to have a good balance between work, leisure, and parenting for a sustainable everyday life. Both employers and employees have a responsibility to create space for flexibility and the opportunity for recovery in everyday life. We have big possibilities for flexible working methods. We work actively to through good internal communication be as transparent as possible,

clarify assignments and goals in the aim to minimize social organizational stress. Systems and structures in the Company create opportunities for dialogue, participation, and influence.

3.8 Diversity and equality

We treat each other with respect, understanding and dignity and treat each other as we ourselves want to be treated. All employees must be given the opportunity to express their opinions where differences and the building climate create a prerequisite for wise decisions. We encourage diversity as it enriches both the culture and competence in the Company and contributes to the pursuit of a good and sustainable society.

We strive to have an equal workplace in all respects. We strive for equal gender distribution among employees, managers and in executive management. We encourage and facilitate all employees to be able to take parental leave. The annual salary survey aims to create the conditions for an equal salary policy as well as to detect any unreasonable pay differences between men and women. We have a non-discriminatory recruitment process and the objectives of the recruitment process are set from an equality perspective.

3.9 Travelling and representation

All representation is characterized by moderation and normal hospitality.

So called loyalty programs featured at hotel chains and airlines generating free hotel stays or discounted travels may never be utilized for personal use, but shall always be used in conjunction with, for example, booking a new work-related travel. The choice of transportation shall be made from safety, environmental and cost aspects.

3.10 Alcohol and drugs

Kommuninvest is a drug- and alcohol-free workplace, which is stated in the Society's Policy for representation. The main rule is that gatherings are alcohol-free, and the Company is not offering spirits. Exceptions can be made for special events or company entertainment, but with moderation, outside of office hours and without affecting one's ability to work.

3.11 Disqualification, conflicts of interest and side activities

An employee cannot handle work matters where there is risk for a conflict of interest or suspicion of being biased.

Matters of disqualification and other conflicts of interests are

regulated in a specific policy.

3.12 Employee's personal business and economy

An important factor for maintaining the trust in the Company and its business and in the financial markets, is that neither the Company or its employees may be suspected of undue gain, for example personal gain, of the knowledge of customers or the financial markets etc., that they can receive in their operation. Employees must avoid businesses or other commitments that can jeopardize their personal economy.

3.13 Gifts and benefits

We are restrictive with gifts and events and take special care to comply the specific requirements for contact with public law entities.

We have routines in place for employees and assignees to disclose benefits that are in danger of deviating from external and internal regulations for gifts and benefits.

3.14 Confidential information and privacy issues

The information and knowledge we possess in the Company is a valuable asset that we must protect by understanding and following applicable internal and external rules. Employees must get clear information about how information should be classified and kept in a diary.

All documents stored at Kommuninvest and received or drawn up at Kommuninvest must be considered public documents that can be requested by third parties party. Information covered by confidentiality needs to be kept in a diary.

3.15 Insider information

Information acquired in the role of employee at Kommuninvest may only be used in the role. We do not use inside information in private investments or give the information to others who may benefit from it. We as employees have an obligation towards the employer to notify when we gain access to insider information.

3.16 Suspected criminal activity

Employees who suspect that fraud or other suspected crime is taking place must report it immediately to the immediate supervisor, the compliance manager, HR manager or local Union. A notification can also be made through the whistle-blowing function on the intranet. (See section 5 below.)

4 What can others expect from Kommuninvest?

We rely on the confidence of those around us in order to conduct

our business.

4.1 Customers and members

Our customers and members can expect competitive products and services, with high quality delivery and a limited impact on the environment and surrounding world. To build good relationships and to be a good business partner, we conduct an on-going dialogue with customers and owners. We communicate openly and proactively.

4.2 Public authorities

Public authorities can expect us to act in accordance with laws, regulations, and principles, and for us to be transparent, provide a secure supply, and take responsibility. We are a company that lives up to the requirements and expectations imposed on us.

4.3 The capital market

The capital market can expect a stable and secure counterpart with a relevant range of products. We are active on both the Swedish and international capital markets and act consistently, with risk consciousness and a long-term perspective, and in accordance with established rules.

4.4 The media and external reporting

Media outlets can expect us to be transparent, objective, available, and prompt. Our ambition is to be as transparent as possible in accordance with the principle of public access to official records. The Company comply with external reporting and accounting requirements. We have designated spokespersons for contacts with media and they are responsible for representing Kommuninvest and communicating our message.

4.5 Confidence

Any possible gains that can be made against a third party can not be utilized by employees at Kommuninvest. Within employment we do not accept offers of discounts, services or gifts from a supplier that directs itself to us as a private individual. By this we aim to create trust in Kommuninvest and good relationships with customers, members and other stakeholders.

4.6 Suppliers

We abide the Public Procurement Act when appointing suppliers. For dealings that are not covered by the Act we observe strict business sense and gather, when appropriate and possible, offers from more than one supplier. Suppliers can expect that our aim is to build long-term business relations that are based on confidence and mutual value creating.

4.7 Sustainability ambition

According to our vision we strive to contribute to a good and sustainable society and are actively working to integrate

sustainability in all our affairs, from an ESG-perspective.

We seek to lessen direct and indirect impact on the environment and our surroundings, partly through adoption of the climate plan. We encourage fair trade and other social and environmental initiatives by choosing those alternative when possible. Ethical, environmental and other corresponding demands shall be stated in the quotation request in procurements. We contribute with structures to facilitate social sustainability.

5. Whistleblowing

Violations of the Code of Conduct shall be reported, and unethical conduct is unacceptable. It is crucial to Kommuninvest that Company management learn of any violations or unethical conduct. A person perceiving/experiencing unethical conduct should first report it to their immediate supervisor. They can also report to the head of HR, the local trade Union, or the head of regulatory compliance.

The whistleblowing procedure provides a separate, and by request anonymous, reporting possibility to be used in the event of suspected regulatory violations. The reporting person shall rest safe in the knowledge that the report will not lead to any reprisals but will be received and handled appropriately. This procedure aims to enhance the possibility of discovering and amending suspected irregularities in an early stage, and by this lessen negative impact and contribute to maintain confidence in the business.

The Company has appointed an external supplier for the receiving and handling of whistleblowing reports. The external supplier has committed to comply all external and internal regulations regarding whistleblowing. Information on how to make a report are provided on our internal website.

We will not discriminate a reporting person for filing a report of violations of regulations that are applicable to our business or participates in some thereto related investigation. We make sure that the regulations for handling of personal data are met during the handling of the reports.

A reporting person that abides the established procedure for whistleblowing is guaranteed anonymity throughout the entire process if the person wishes to. Regardless of the person chooses to be anonymous or not, the report will be treated confidentially. The head of Legal and Procurement has the internal responsibility for the procedure of whistleblowing.

6 Follow-up

Follow-up of compliance with the guidelines for ethical matters takes place through the Board's instructions and in the annual personnel and health accounts. All fundamental or other important ethical matters concerning the business and the acting by the employees shall be reported to the Board.