

KOMMUNINVEST I SVERIGE AB

Equality and diversity policy

excerpt from HR Policy G6P



Adopted by the Board of Directors	Document manager	Document owner	Information classification
25 April 2024	HR manager	Board of Directors	Public
External rules			
The Work Environment Act (1977:1160) The Discrimination Act (2008:567) FFFS 2014:1 (Internal governance and control), FFFS 2011:1 (Remuneration), EBA/GL/2021/04 (Remuneration) EBA/GL/2021/06 (Guidelines on the assessment of the suitability of members of the management body and key function holders)			
Earlier versions			
6 December 2023; Work environment, equality, and diversity policy, Remuneration policy, Talent management policy			
Background, etc.			
<p>Kommuninvest i Sverige AB (hereinafter the “Company”) shall have good governance and internal control. The Board of Directors is responsible for ensuring that the Company complies with the laws and applicable national and European regulations which govern the Company’s operations. The Company’s governance documents consist of documents adopted by the Board of Directors, the CEO, or the respective managers. The Board adopts policies and certain Board of Director’s instructions. If necessary, these governance documents can be broken down into instructions, which are confirmed by the CEO. Thereafter, the instructions can be broken down into more detailed descriptions, which are confirmed by the respective managers. The Board of Directors shall adopt policies annually and ensure that they are complied with and regularly assessed in the operations. The Board is ultimately responsible for ensuring that the Company has appropriate and efficient operations and a well-developed system for risk management and regulatory compliance.</p> <p>This policy covers the Company’s Board of Directors, management, all employees, consultants, cooperating partners, agents, and service providers involved in the Company’s operations. The policy is applicable to all parts of the operations and also includes outsourced operations and areas.</p> <p>The CEO is responsible for implementing and monitoring compliance with this policy and reporting on this to the Board of Directors. It is also the responsibility of the CEO to assess and update the content of this policy annually or when necessary, and to present it to the Board of Directors with any proposals for amendments.</p>			

1 Equality and diversity

The Company should be an inclusive and equal-opportunity workplace that takes advantage of the diversity and differences in its employees.

The Company shall actively conduct equality and diversity management, which means that:

- all employees shall be treated equally regardless of gender, gender identity or expression, age, ethnicity, religion or other beliefs, disability, or sexual orientation;
- gender balance shall be sought after for all positions in the Company;
- the recruitment process, salary setting, employment conditions, and career opportunities are equal and non-discriminatory;
- professional development and training are to be offered on equal terms; and
- diversity in the composition of the workforce shall be strived after based on established competence requirements.

1.1 Competence, suitability, and diversity of directors and CEO

When appointing directors, the applicable regulations and guidelines require that a broad set of characteristics and skills be considered in assessing the suitability of the person. Circumstances that promote diversity shall also be taken into consideration.

Through the employee representatives on the Board of Directors, employees bring a perspective and good knowledge of the Company's operations.

Rules regarding working on the competence, suitability, and diversity of the Board of Directors are set out in the Board of Director's instructions.

Rules regarding working on the competence and suitability of the CEO are set out in the Board of Director's instructions.

1.2 Competence, suitability, and diversity of senior management

In this context, senior management is referred to as member of the executive management other than the CEO and those responsible for the control functions. Other persons can also be included if they are considered having significant influence over the organization's orientation.¹

When appointing senior management, the applicable regulations and guidelines require that a broad set of characteristics and skills be considered in assessing the suitability of the person. Circumstances that promote diversity in the Company shall also be taken into consideration. Under the current regulatory framework, the suitability must be reassessed in certain cases. The assessment of the suitability of senior management should also be carried out in the context of a general evaluation of governance of the Company.

The purpose of assessing the suitability of senior managers is to ensure that they are always of sufficiently good repute, honesty and integrity, and possess sufficient knowledge, skills, and experience for their positions. HR is responsible for providing

¹ EBA GL 2021/06

detailed guidelines on how to evaluate the suitability of senior management in the Company.