

KOMMUNINVEST I SVERIGE AB

Sustainability

Policy

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Sustainability Policy

1 Introduction

In this policy, the Company's Board of Directors has established internal rules for the Company's sustainability work. Responsible action is a fundamental prerequisite for long-term value creation and to enable Kommuninvest i Sverige AB (the "Company") to live up to Kommuninvest's vision.

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

The cornerstones of Kommuninvest's culture are relationships with the members of Kommuninvest Cooperative Society (the "Society"), the Company's customers and other stakeholders, low risk-taking, and cost consciousness. This creates a basis for operating the Company's business in a responsible and sustainable manner.

1.1 External regulations

The Annual Reports Act contains requirements regarding reporting on sustainability.

1.2 Purpose

The purpose of this policy is to establish the focus of the Company's sustainability work.

Ethical conduct and responsibility for economically, environmentally, and socially sustainable long-term development are fundamental for maintaining confidence in this task. Moreover, the Company must endeavour to maintain a dynamic dialogue and communication with stakeholders in respect of the work.

1.3 Definitions

Sustainable development Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.

The term is included in Sweden's Constitution (Instrument of Government, Chapter 1, § 2).

2 Governance and scope

This policy covers all activities of the Company and applies to customers, investors, financial cooperation partners, and other suppliers. The policy is revised on an annual basis or as necessary, and is supplemented by policy documents regarding, among other things, diversity and gender equality, conflicts of interest, money laundering, and terrorist financing. The CEO is responsible, as necessary, for formulating guidelines regarding areas and industries, as well as to provide for the existence of relevant organisation, delegation, and instruction so that this policy can be applied in practice.

3 Focus

The Company shall take both the direct and indirect impact of economic, social, and environmental sustainability into account throughout its business. This will make it possible for new opportunities to be identified, to motivate employees, and to maintain confidence in the Company at the same time as risks and costs are reduced. This means that the Company must conduct a financially sound and sustainable business, and must not participate in human rights violations, employee rights violations, or negative environmental impact, nor accept corruption.

The Company's success is contingent upon the confidence of members of the Society, customers, counterparties, investors, employees, and public agencies. Ethical and moral action is thus important. This is evident from the Company's Code of Conduct, which has been adopted by the Company's Board of Directors and is updated as necessary. The Code of Conduct describes the responsibility incumbent upon the Company as a business and an employer, as well as the responsibility incumbent on the Company's employees.

It is natural for the Company, of its own volition, to assume responsibility for how its operations affect society from an economic, environmental, and social perspective. This also means that in its business, the Company must look for ways that it can provide support for sustainable development work which is conducted by members of the Society. The Company must endeavour to offer services and products which meet its customers' needs in this respect. For example, the Company may offer products and services which render its customers' efforts visible and contribute to the development of such work.

3.1 Financial responsibility

The Company and its employees must comply with the laws, provisions, and regulations which apply to the business and must always act in an ethically appropriate way, with transparency, integrity, and honesty.

The Company has a zero-tolerance policy towards all types of corruption. No employee may give or receive benefits which may be regarded as inappropriate and thus criminal.

The Company's employees must avoid all existing or conceivable situations which may lead to conflicts of interest.

3.1.1 Taxes

The Company's conduct in respect of tax issues must be responsible, correct, and transparent. The Company must not participate in transactions or provide products which can be questioned in light of applicable tax legislation. In the event of doubt, the Company must refrain from participating. Sound ethics must always be taken into consideration.

3.2 Social responsibility

Respect for human rights is a basic prerequisite for long-term value creation in the Company. The Company must avoid causing or contributing to a negative impact on human rights in its own activities and rectify such impact if it occurs. The Company must work to prevent discrimination, must promote diversity and gender equality, and must safeguard good working conditions. It must be possible for employees to combine their working lives and private lives.

Kommuninvest must be knowledgeable about, and monitor, compliance with applicable labour market laws and agreements, in particular antidiscrimination legislation, environmental legislation, legislation for public companies, and legislation which affects business relationships.

No form of discrimination is tolerated within the Company. The fundamental vision which permeates the Company's Code of Conduct must also permeate the Company's relationship to people in its group of stakeholders.

3.2.1 Local cooperation

Through local cooperation with parties which have an articulated community involvement and values which match those of Kommuninvest, the Company can convey its community responsibility on the local level. The goal of local cooperation is to strengthen the Company's possibilities for recruitment, make the Company's presence in the local community visible, and strengthen the Company's employer brand.

3.3 Environmental responsibility

Kommuninvest's view is that an integrated environmental vision is a fundamental condition for long-term value creation. Structured environmental activities are thus a natural part of the business, where the Company takes responsibility for contributing to long-term sustainable development and seeks to minimise its environmental impact. By continually developing its environmental activities and taking social and technological developments into consideration, the Company must actively work to minimise its direct environmental impact. By taking environmental issues into consideration in

lending, borrowing, and investment activities, the Company can also manage its indirect environmental impact.

4 Organisation and responsibility

The Head of Sustainability is responsible for managing, developing, and following up on the Company's sustainability work, in close cooperation with Company management and division heads.

Reporting shall be submitted to the Head of Business Activities/Deputy CEO.

5 Follow-up and reporting

The Company must measure, report, and follow up on the sustainability work in accordance with national legislation. Reporting must be submitted annually in the Company's annual accounts and prepared in accordance with the requirements for sustainability reporting contained in the Annual Reports Act. This includes a requirement that the Company follow up on and measure its environment impact.