

KOMMUNINVEST I SVERIGE AB

**Anti-Money Laundering
and Terrorist Financing Policy**

C.09.00.00



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ANTI-MONEY LAUNDERING AND TERRORIST FINANCING POLICY

1 Introduction

In this policy, the Company's Board of Directors has established overall rules for handling questions regarding anti-money laundering and terrorist financing measures.

The Company's business is such that the regulatory framework governing anti-money laundering and terrorist financing measures is applicable to the Company. The Swedish Financial Supervisory Authority's regulations provide that any such company must adopt internal rules, known as instructions, in order to prevent money laundering and terrorist financing. These overall rules have been drafted in light of the Company's business and customer structure.

The Company must take all reasonable and legally required measures to prevent the business being used for money laundering.

2 Specially appointed executive

Due to the size and nature of the Company's business, the Company must appoint a specially appointed executive for money laundering questions. The executive must be a member of the management committee or the CEO.

The specially appointed executive is responsible for the following items, which are specified by the CEO in the operational instruction.

2.1 General risk assessment

A general risk assessment must be evaluated regularly, however at least once annually, and updated as necessary. The risk assessment must be produced by the executive specially appointed for money laundering questions and confirmed by the CEO.

2.2 Internal guidelines

The specially appointed executive is responsible for ensuring that the Company has established rules and routines for anti-money laundering and terrorist financing measures, and must update these as necessary, however at least once annually.

The internal rules must specifically state rules for customer due diligence, which must be based on the general risk assessment of the Company's customers.

2.3 Monitoring

The specially appointed executive must verify and monitor that the measures decided on by the Company are implemented in its activities.

3 Appointed officer for controlling and reporting obligations and the independent audit function

The size and nature of the Company's business are such that the Company must appoint an officer for controlling and reporting obligations who monitors and verifies the Company's compliance with its obligations under the anti-money laundering rules. The appointed officer for controlling and reporting obligations must be in place in the Company and independent of the functions which they monitor and verify.

The appointed officer for controlling and reporting obligations must give support and advice to managers and employees in their efforts to comply with these rules, and must inform and train affected personnel.

The internal audit function is the independent audit function which, in its audit of how the Company complies with the internal monitoring, must take into consideration the application of the anti-money laundering regulations.

4 Training and 'fit and proper' assessments

The Company must have an on-going training programme that addresses anti-money laundering and terrorism measures. All employees who administer matters or have customer contacts in which the provisions of the Anti-Money Laundering Act may become applicable must be provided with training in this area.

There must also be a routine for conducting 'fit and proper' assessments of those persons those persons who administer matters or have customer contacts in which the provisions of the Anti-Money Laundering Act may become applicable.

5 Organisation and responsibility

The CEO must adopt an operational instruction regarding anti-money laundering and terrorist financing measures, as well as appoint a specially appointed executive and an appointed officer for controlling and reporting obligations for the area. The CEO is entitled to allow these individuals to delegate authority to one or more persons for support.

6 Reporting

Reporting Policy A.04.00.00 states which type of reporting must take place on the basis of this instruction.