

KOMMUNINVEST I SVERIGE AB

**Anti-Money Laundering  
and Terrorist Financing Policy  
C.09.00.00**



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Specially appointed  
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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.

### **1.1 External regulations**

This policy is governed by the Act (2017:630) on measures against money laundering and financing of terrorism together with the Financial Supervisory Authority's regulations on measures against money laundering and financing of terrorism (FFFS 2017:11) also called the money laundering regulations (see also FFFS 2019:28 regarding changes in FFFS 2017:11).

### **1.2 Purpose**

The purpose of this policy is to ensure that the Company has an organization, methods and procedures to prevent money laundering and terrorist financing.

### **1.3 Definitions**

#### **1.3.1 Money laundering**

Process that makes money or property derived from crime or criminal activity to appear to be legitimately acquired. The purpose of money laundering is to conceal where the money comes from. For example, transactions take place that convert money from drug trafficking to ostensibly legal income.

#### **1.3.2 Financing of terrorism**

Financing of terrorism means that someone supports terrorism financially. In addition to making direct contributions to terrorism it can also mean that someone collects, provides or receives money and assets to finance terrorism.

## **2 General risk assessment**

The company shall document a general risk assessment. The general risk assessment shall be based on a vulnerability analysis of how the Company's products and services could be used for money laundering and terrorist financing. The document shall be adopted by the Company's Board as an appendix to this policy. The general risk assessment shall be evaluated and updated at least annually.

## **3 Specially appointed executive**

The Company shall appoint a specially appointed executive to monitor the Company's work regarding anti-money laundering and financing of terrorism.

### **3.1 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.

### **3.2 Monitoring**

The specially appointed executive must control and follow up the Company's measures related to anti-money laundering and terrorist financing. The work must be reported to the President and CEO at least annually. Incidents affecting these regulations must be reported to the President and CEO as soon as they are known.

## **4 Appointed officer for controlling and reporting obligations and the independent audit function**

The Company shall 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 shall provide support and advice to managers and employees in their efforts to comply with these rules, including to 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.

## **5 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.

## **6 Organisation and responsibility**

The President and CEO shall 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.

## **7 Monitoring and reporting**

The President and CEO is responsible for the policy being followed up and evaluated at least once a year.

The role as specially appointed executive is responsible for annual reporting to the Financial Supervisory Authority and reporting to the President and CEO according to section 3.2.

Reporting from the central functional manager takes place in connection with the interim and full-year reports from the function for regulatory compliance. Deviation reporting takes place on an ongoing basis.