

Swedfund

Swedfund International AB – Code of Conduct

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This Code of Conduct (the “Code”) describes the core values that we stand for in Swedfund and outlines the corporate conduct that can be expected from Swedfund, its employees, long-term consultants/contractors¹ and, as applicable, its board members. The Code shall be used to guide our behaviour as a business partner, an employer or employee and as a member of society.

Swedfund’s mission

Swedfund’s mission is to fight poverty by sustainable investments that create decent jobs and inclusive growth in emerging markets and thereby contributing to the implementation of the Paris Agreement and Agenda 2030.

The Paris Agreement and Agenda 2030 constitute a transformative plan of action. Combined with the United Nations Guiding Principles on Business and Human Rights, this global agenda aims to eliminate poverty, reduce inequalities and protect our planet.

Swedfund’s role as a Development Finance Institution is focused on development of the private sector in countries eligible for official development assistance. Swedfund’s business model is based on three equally important pillars: Impact on Society, Sustainability and Financial Viability. We measure our performance against each pillar and believe that this structured approach increases our leverage when it comes to advancing Agenda 2030.

Regulatory framework

The Swedish state owns all shares in Swedfund. The main principles and regulations governing Swedfund’s operations are the *Owner’s Instructions*, the *Swedish State’s ownership policy and guidelines for state owned*

¹ This Code of Conduct is only applicable to long-term consultants/contractors provided that such long-term consultant/contractor is expressly bound to follow this Code of Conduct in a direct agreement between Swedfund and such consultant/contractor governing the relationship between Swedfund and the relevant consultant/contractor (as applicable), which extends for at least nine (9) consecutive months.

enterprises, the Swedish Companies Act (Sw. *Aktiebolagslag (2005:551)*) as well as the *Swedish Corporate Governance Code*.

Swedfund has committed to several international standards, principles for responsible investment and sustainable business practices. These standards and commitments have been integrated into our business model and investment process. A complete list of our external commitments and central policies is included in our Ethical Compass.²

Swedfund's corporate values

Good and well-established corporate values build a good corporate conduct. A code of conduct rests on the corporate values that applies to the organisation. Swedfund's core values are expressed in three keywords which applies to all work conducted by Swedfund's employees.

- The first keyword is 'Integrity' meaning that our *mindset* is to dare to be true to our mission, hold ourselves to high standards and hold ourselves accountable. We will, in our *behaviour*, take ownership, dare to speak up and take a stand, and do the right thing – even when it's hard.
- The second keyword is 'Inclusion' meaning that our *mindset* is to embrace diversity, grow through collaborations and keep an open mind. We will, in our *behaviour*, challenge ourselves and others to be inclusive, work in a collaborative and respectful way (internally and with partners) and encourage different opinions.
- The third keyword is 'Dedication' meaning that our *mindset* is that we are dedicated to our mission, continuously aspire to improve and are committed to delivering results. We shall, in our *behaviour*, do what we say we will do, take responsibility for our mission and work towards ambitious and measurable results.

Swedfund's business conduct

Swedfund is a reliable, long-term business partner that conducts its business in a professional manner. Environmental as well as social responsibility and sound corporate governance constitutes central parts in our daily work and we have developed a set of policies that guide our conduct and the conduct we expect from our portfolio companies.

Integrity

Swedfund expects all employees to commit to the following general principles of integrity in all aspects of their work:

² <https://www.swedfund.se/api/download?fileUrl=/media/g1rj0bsv/swedfund-ethical-compass-2023.pdf>

- i) always comply with applicable laws and company policies and never help an investee company or colleague to break the law;
- ii) refrain from doing business with persons, companies or institutions if such business is related to activities that are prohibited or can be considered unethical; and
- iii) report (suspicion of) fraud or other objectionable practices immediately through Swedfund's reporting channels as described below.

Confidentiality and protection of personal data

Swedfund's employees shall at all times treat all information about trade secrets, their ongoing projects and all other information of confidential nature which the employee receives during their employment with Swedfund as strictly confidential, unless such information has been made public by Swedfund. Such confidentiality undertaking is evident from each employee's employment contract and shall survive the termination of the employment.

Further, all Swedfund employees are required to treat personal data in accordance with applicable data protection legislation. Internal policies on handling of such personal data is available for employees.

Conflicts of interest, private trading and independence

At Swedfund, employees do not mix private interests with the company's business. Swedfund employees may not participate in projects where there is a conflict of interest. Swedfund's employees shall not invest in or trade with any of Swedfund's portfolio companies without the prior consent from their immediate superior. Employees may not engage in side-line occupations which can risk the employee's integrity and loyalty towards Swedfund or impact its performance of their employment with Swedfund, without the prior consent of the employee's immediate superior. In the event of a potential conflict of interest, each employee shall report such matter in accordance with internal guidelines.

Swedfund does not support political parties, organizations or its representatives.

Bribery and other types of corruption

Bribes and other types of corruption, concealed commission, facilitation payments or other similar benefits are not permitted. We do not receive nor give unwarranted benefits in the form of gifts, travels, representation or services. Moderation applies to all types of representation, both our own and when we are being invited. All Swedfund's employees shall treat gifts, rewards and other benefits in accordance with internal guidelines.

Our employees and board members have a responsibility to report suspected acts of corruption in our internal information and reporting channels, to the chairman of Swedfund's board or in Swedfund's whistleblowing service.

Swedfund's working environment

The working climate in Swedfund shall be characterized by openness, transparency and mutual respect. All employees shall act consistently with the policies regarding the working environment developed by Swedfund as well as Swedfund's core values as described above.

Discrimination, equality and diversity

All forms of discrimination are prohibited. Swedfund employees show their colleagues respect and treat them in the same manner as they themselves want to be treated. Any forms of bullying or harassments between colleagues are unacceptable. In the event that an employee either experiences or witnesses any form of discrimination or degrading treatment, such incidents shall be reported in accordance with internal guidelines.

Swedfund works actively in maintaining a diverse workforce which shall be taken into consideration in all recruitment processes.

Swedfund's communication

Swedfund's employees help to form the image of the company through their conduct and the facts they convey to the public, both in private and at work. Swedfund's information and communication is based on credibility, openness, respect and an active dialogue with co-workers and other stakeholders. Swedfund shall, by making information about our business available to the public, contribute to increasing transparency in development cooperation work.

Application and compliance with the Code

All employees receive the Code in connection with taking employment at Swedfund. Swedfund expects all employees to be fully familiar with the provisions of the Code and to act consistently with the Code. Training sessions are held on a regular basis.

Any violations of the Code shall be reported to the immediate superior, the chief legal counsel, the CEO or through other available reporting channels as described below. Disciplinary measures will be taken against those employees who violate the Code.

Any suspicions on serious breaches of this Code and any other serious irregularities can also be reported in Swedfund's whistleblowing service. The whistleblowing service is available through Swedfund's website.

Individuals and communities that are subject to risks or impacts from Swedfund's operations will also be able to lodge a grievance in Swedfund's Grievance Mechanism). More information on how to lodge a grievance and on

Swedfund's procedures is available on Swedfund's website. If an employee is unsure of how to apply the Code in any given situation, such employee shall consult their immediate superior, the chief legal counsel or the CEO. All employees shall use their best efforts to apply the Code on the basis of common sense, their own insights and estimation of the situation when any given situation has not been foreseen.

The management team of Swedfund is responsible for reviewing the Code on an annual basis.

This Code of Conduct has been approved by the board of directors in Swedfund International AB on 8 December 2023.