

Deviation from Swedish Code of Corporate Governance

In some cases Swedfund has chosen to deviate from the Code in accordance with the Code's rules concerning "observe or explain". The main reason for deviating is Swedfund's ownership situation whereby Swedfund is wholly-owned by the Swedish state and thus not a listed company with broad ownership

* Deviation from Swedish Code of Corporate Governance: In 2015 Swedfund deviated from the Code in the following areas:

- (i) Nomination committee. Swedfund has no such committee due to its ownership structure. The nomination process for Board members, selection of chairman for the AGM and the appointment of auditors is performed in accordance with the principles stated in the Swedish state's ownership policy;
- (ii) The Board's independence to the owners. Swedfund does not report, in accordance with the Swedish state's ownership policy, whether Board members are independent of the owners;
- (iii) Audit and remuneration committees. Swedfund does not have either an audit or a remuneration committee.

These assignments are instead performed by the Board.