

# Board policy on ethical issues

## Background

AMF's approach to ethical matters is based on the requirement for high occupational pension standards as set out in Chapter 4, Section 4 of the Swedish Occupational Pension Companies Act (2019:742) and the general guidelines issued by the Swedish Financial Supervisory Authority (FFFS 1998:22) regarding the handling of ethical issues by supervised institutions. The rules in this section complement those requirements and are based on the Code against Corruption in Business and the recommendations issued by Insurance Sweden.

## Purpose and objectives

This section sets out the rules governing the handling of ethical matters at AMF. These rules apply to all of AMF's operations and to everyone representing AMF.

AMF's values are centered on acting in the best interest of customers, being a responsible societal actor and a good employer. The purpose of these rules is to clarify the importance of ethical conduct and how it relates to AMF's values. AMF's values and these rules shall guide AMF's approach in relationships with customers, suppliers, partners, portfolio companies and authorities.

The objective is to ensure that AMF maintains high standards in business ethics, always prioritizes customer interests and contributes to preserving AMF's good reputation.

## Approach and fundamental ethical rules of conduct

AMF employees shall perform their duties with sound judgment and consideration for customers, owners and colleagues. Employees shall observe a duty of loyalty toward customers equivalent to that of the board, meaning personal interests must never take precedence over those of AMF's customers or AMF's legitimate interests.

AMF shall conduct its operations honestly, professionally and transparently, act with due skill, care and promptness, avoid conflicts of interest and ensure fair treatment of customers if conflicts arise. In customer interactions, AMF shall act honestly and provide accurate and factual information. Employees shall possess a level of competence appropriate to customer needs and circumstances.

AMF shall observe good business practice and expects the same from its business and cooperation partners. AMF shall operate with high business ethics and with care for society, people and the environment.

AMF shall work to prevent all forms of corruption within its operations and in relation to portfolio companies. AMF shall follow the Code against Corruption in Business.

AMF shall act cautiously in dealing with external parties to avoid compromising loyalty to customers.

AMF shall maintain an internal control system capable of preventing and detecting corruption and shall have procedures for managing potential conflicts between employees' private interests



and customer interests. If there is suspicion of a breach of these principles, AMF shall act promptly.

In situations where it is unclear what is considered to be an ethical conduct ethical conduct is unclear or an employee feels uncertain about their actions or decision-making, they shall seek guidance, primarily from their immediate manager. For questions regarding interpretation or application of these rules, the employee shall consult their manager, the CEO, or a person appointed by the CEO.

Employees who receive information or perceive that someone is acting unethically in relation to laws, regulations, industry ethical standards, or these rules shall consult their manager, the CEO, or the CEO's appointee. If consultation with the manager or CEO is inappropriate, the employee shall consult the compliance function. Whistleblowing is also an option.

### **Confidentiality**

AMF shall maintain confidentiality regarding customers' personal information, business dealings, or strategies, except where disclosure is required by law. Specific confidentiality rules apply to beneficiary designations and genetic information under Chapter 4, Sections 8 and 14–16 of the Occupational Pension Companies Act. AMF shall also follow prevailing practices regarding confidentiality.

AMF shall ensure confidentiality in agreements with contractors (legal entities).

### **Market abuse and personal trading**

Employees and contractors shall not be suspected of using knowledge of financial markets that they acquire through their work for improper gain. As part of AMF's approach to market abuse regulation and ethical conduct, employees and contractors shall comply with both legal requirements and AMF's internal rules regarding personal trading in financial instruments.

### **Responsibility and sustainability**

AMF shall follow international principles for sustainable business, including the UN Global Compact principles on human rights, labour, environment and anti-corruption, the OECD Guidelines for Multinational Enterprises and the UN Principles for Responsible Investment.

Sustainability shall be considered when selecting business partners and making investment decisions. AMF's sustainability work shall be preventive and focused on continuous improvement.

### **Conflicts of interest**

AMF shall take all reasonable measures to prevent customer interests from being adversely affected by conflicts of interest. AMF shall always take into consideration that it operates in accordance with mutual principles.

### **Business travel**

Business travel shall be weighed against its business value, cost and environmental impact. The CEO is responsible for ensuring AMF has a travel policy.

### **Physical and information security**

All AMF employees share responsibility for the security of information management, including IT systems and verbal or written communication. Employees may not use AMF's technology in

illegal, inappropriate, offensive, or harmful ways, including the collection, storage, or distribution of information.

Employees also share responsibility for physical security. The aim is to minimize risks and prevent accidents and injuries. The CEO is responsible for ensuring AMF has internal instructions on both information and physical security.

### **Representation**

Representation shall be exercised with judgment and moderation. AMF shall be cautious with frequent representation directed at the same individual or group. The CEO is responsible for ensuring AMF has internal instructions on representation.

### **Gifts, rewards and other benefits**

These rules outline the basic principles employees must follow and how to handle questionable situations. They are based on the Code against Corruption in Business. The CEO is responsible for ensuring AMF has internal instructions on handling gifts, rewards and other benefits.

#### **General principles**

To prevent and address corruption, criminal provisions on bribery are found in Chapter 10 of the Swedish Penal Code (1962:700). AMF shall maintain a restrictive stance on gifts, rewards and benefits to avoid reputational risk. No one representing AMF may give or receive a benefit that could influence the recipient's behavior.

AMF shall identify, analyze and report risks of bribery as part of its operational risk management.

#### **Bribery**

Employees may not accept, promise, or request improper benefits to influence decisions or actions in business relations, public authority functions, or public procurement. Special caution is required when the recipient has duties involving public authority or procurement. It is prohibited for an employee to offer benefits to public sector employees or their relatives.

#### **Corruption**

AMF shall work to prevent all forms of corruption. It is especially important to assess the integrity of suppliers and partners operating in high-risk sectors. AMF shall focus its review on their anti-corruption policies and any history of involvement in corruption.

### **Secondary occupations**

Secondary occupations may create conflicts of interest for AMF employees or board members. AMF shall identify, manage and monitor such activities.

### **Equal treatment**

AMF shall promote diversity, inclusion and a gender-equal work environment and counteract discrimination and abusive conduct. The CEO is responsible for ensuring AMF has an equal treatment policy.

### **Documentation**

Proper documentation benefits both AMF and its customers by clarifying past actions. AMF shall document significant or principled actions, as well as agreements and commitments, in writing.



### **Marketing**

AMF's marketing shall comply with laws and accepted practices regarding good marketing conduct.

### **Whistleblowing**

AMF shall maintain a whistleblower system allowing current and former employees, consultants, job applicants, interns and suppliers to report misconduct anonymously.

### **Follow-up, control and reporting**

The CEO is responsible for ensuring operations comply with established ethical principles and for AMF having a supplier code of conduct based on this policy. The CEO shall decide on ethical matters of principle or importance.

The board shall monitor compliance with internal rules on ethical matters and ensure updates are made as needed.

The CEO shall provide the board with annual and ad hoc reports assessing AMF's compliance with ethical rules and regularly inform the board of key ethical issues.

The CEO is also responsible for ensuring that AMF employees are continuously informed and trained on ethical rules and principles. Such training shall be ongoing.