



Code of Conduct for Employees

Länsförsäkringar AB

lansforsakringar.se

Länsförsäkringar 

Message from the CEO

In order for us to maintain the high level of confidence that Länsförsäkringar enjoy, we must act professionally and sustainably in our professional roles, towards each other as employees and in our contact with external stakeholders, such as the 23 regional insurance companies, customers, suppliers, partners, interest groups, supervisory authorities and the media.

LFAB is owned by and works on behalf of the 23 mutual regional insurance companies that are owned by their customers. This places particular requirements on our actions and is a responsibility that entails many obligations in relation to our owners and customers.

Our common platform called The Foundation consists of Our history, Our vision, Our mission and Our values and together with this *Code of Conduct*, it is the starting point for our approach and the corporate culture that we are proud of together. You as an employee or board member are expected to share our values and follow the *Code of Conduct* and be responsible for ensuring that it is complied with. Our e-training in the *Code of Conduct*, which is part of the so-called Länskompassen, is mandatory for all employees to complete annually.

Our *Code of Conduct* can never fully regulate how every situation in the workplace can be managed.

Always use your common sense and let the questions below provide you guidance.

- What does the law say about my actions?
- Is it ethically correct?
- Can I justify my actions?
- How are our customers affected by my actions?
- Could my actions affect Länsförsäkringar's reputation?

Sometimes there can be difficult trade-offs and situations and if you are uncertain, you should seek guidance with your boss, colleagues or other relevant function.

Fredrik Bergström, President and CEO of Länsförsäkringar AB



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About the Code of Conduct

Our vision “Together we create security and opportunities” and our values; trust, commitment, openness and professionalism are the basis of our corporate culture.

Everyone within the LFAB Group must act in a manner that earns the long-term trust and respect of our owners, employees, customers, government authorities, partners and other stakeholders in society.

The Code of Conduct provides guidance and is to be used as a tool in our day-to-day work that describes expected standards of conduct and behaviour. The Code also provides our external environment an understanding of the LFAB Group’s work on ethical, social and environmental issues.

The Code of Conduct is based on the UN Global Compact’s principles on responsible business in the areas of human rights, work conditions, the environment and business ethics. We also have a *Code of Conduct for suppliers*, which is also based on the UN Global Compact’s principles. We expect our suppliers, and their subcontractors, to comply with the principles described in this code of conduct or to have equivalent standards that are complied with in their own operations.

The Code of Conduct is an overall governance document and refers in some cases to other governance documents where more detailed information is available.

The regulations decided by Insurance Sweden, the Swedish Bankers’ Association, the Swedish Securities Dealers Association and the Swedish Investment Fund Association are recommendations that are to be adhered to wherever applicable to our operations and we decided to follow them.

Scope

The Code of Conduct applies to Board members and employees of the LFAB Group (including Agria’s international branches and subsidiaries), regardless of form of employment. Accordingly, the Code also applies to personnel who are also employed at the regional insurance companies as well as contracted employees, such as consultants. The Code of Conduct is actively applied at all levels within the Group.

The code of conduct is available in Swedish and English both on our internal website Länet and on our external website.

The relationship to the LFAB Group and colleagues

We seek to offer a welcoming and inclusive workplace where everyone has the same rights and opportunities.

The importance of an inclusive culture is critical for benefiting from diversity and welcoming different perspectives and approaches. Our workplace must be characterised by respect, integrity and tolerance so that everyone feels included and be given opportunities to develop our skills based on the needs of our professional role.

Working on diversity is a matter of business value. It helps strengthen competitiveness and increases profitability. We believe that different perspectives are a success factor for learning and innovation that brings new customers from new markets. Diversity initiatives also play an important role in being an attractive and responsible employer and broadening the recruitment pool.

Zero tolerance of discrimination

Länsförsäkringar AB's diversity agenda reflects the law prohibiting discrimination and everything that makes people different and unique. We do not accept any form of discrimination on the basis of the seven grounds of discrimination prohibited by law; gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation, or age. We also have a zero tolerance policy of victimisation, harassment and sexual harassment. You have an individual responsibility to actively take a stand against all forms of discrimination. Our *Equality and diversity plan* describes the issues in more detail.

Work environment and health

We want to offer the best possible work environment for our employees. With a good work environment, we want to create conditions for all of us to perform, contribute with high commitment, feel proud and maintain a good health. We work to ensure that everyone experiences clarity in responsibilities and expectations, has a balance between requirements and resources, has a reasonable workload and feels job satisfaction. To promote a good work environment and prevent the risk health problems, we work actively with health in the workplace. As an employer, we also respect your rights to organize freely and join a trade union and collective agreement. LFAB's Group-wide *Personnel Policy* regulates our working conditions and our responsibility as an employer, as well as how we regularly examine, risk assess, takes measures and follow up the work environment in a systematic manner.

Education and skills

Employees' skills development must take place in accordance with our overall goals and the business's needs, both short and long term. By working systematically with skills development, we want to increase competitiveness and manage the ever-changing conditions in our business environment and utilize the full potential of all employees. Our work with continuous learning and skills development is crucial for us to be able to achieve our goals. LFAB's group-wide *Personnel Policy* addresses the issues in more detail.

Sustainability and environment

Sustainability is integral to all of our operations. By integrating sustainability into our operations, we can reduce our risks, increase customer value and at the same time contribute to a positive development of society and business value.

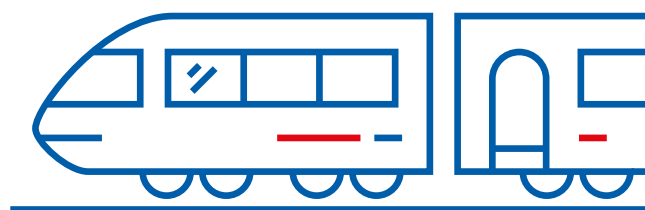
Our sustainability efforts are divided into three main areas: responsible offering, responsible business conduct and long-term environmental and social responsibility.

Our sustainability activities are to contribute to selected UN Sustainable Development Goals (SDGs) and/or our climate-smart vision. Customer offerings will be adapted to the climate-smart vision and we must work to reduce the environmental impact of the operations. Reduced carbon emissions, resource management as well as recycling and reuse are key words. All employees are expected to actively contribute to reduce the environmental impact of the operations.

LFAB's group-wide *Sustainability Policy* addresses the issues in more detail.

Traveling and transportations

We have guidelines for business travel. Digital meetings are to be used in the first instance, and rail rather than air travel when pos-



sible. The issues are addressed in more detail in LFAB's group-wide Sustainability Policy and on Länet.

Procurement of products and external services

Products and services are to be procured on the basis of commercial principles. A supplier or partner is to be chosen after analysing the market price, sustainability and expected quality level. Fundamental requirements regarding human rights, labour conditions, environment and ethics must be met.

LFAB's group-wide *Purchasing and procurement policy* and the *Code of Conduct for Suppliers* addresses the issues in more detail.

Business Ethics

Regulatory compliance and business ethics are of great importance for our daily tasks. We constantly make considerations in our day to day work with the aim of acting on the basis of applicable laws, rules and internal governance documents which are described below:

Whistle-blowing

If you suspect any improprieties regarding laws, rules and internal requirements you should contact your immediate manager in the first instance, or your manager's superior. If the circumstances of the situation dictate that it is more appropriate to contact someone outside your own group or department, you can instead report to LFAB's Compliance function. Reporting takes place according to the applicable procedure on Länet.

Reporting any suspicions is voluntary and you always have the right to remain anonymous. The LFAB Group also protects individuals who are the subject of a report from negative consequences if an investigation yields no evidence to support taking measures against them. Measures against someone who is the subject of a report are taken in a manner that protects the individual in question from any consequences that are not intended with the measures.

Conflicts of interest

In any given situation, for example, when making a business decision or when providing advisory services to customers, the interests of the customer and the company are always put first. No customer is to be disadvantaged in favour of another. We identify and manage conflicts of interest to ensure that any personal or professional circumstances affecting the interests of the company or the customer are avoided.

Employees are to report situations that may involve a conflict of interest, on their own initiative, to their immediate manager, process lead or project manager or client.

Some conflicts of interest are to be avoided entirely, for example, making decisions in a disqualification situation. Conflicts of interest that cannot be avoided are to be managed through measures such as stakeholder consent, specific limitations, documentation protections, follow up, training, openness and transparency.

LFAB's group-wide *Guidelines on identifying and managing conflicts of interest* addresses the issues in more detail.

Secondary employment

As an employee you can take on secondary employment (extra work or assignment) as long as it does not have a negative effect on your employment or can be perceived as competing with the LFAB Group's operations. If you are uncertain about the definition of secondary employment, you can always speak to your immediate manager or contact the Compliance function for advice.

The issues are addressed in more detail in LFAB's Group-wide *Guidelines on identifying and managing conflicts of interest* and on Länet. All secondary employments must be approved by your immediate manager and be reported in the HR-system.

Own or related party's cases and information in the system

As an employee, you must distinguish between your professional role within Länsförsäkringar, and the role of customer in Länsförsä-

säkringar. This means that you are not permitted to handle or view information or cases concerning you or related parties in Länsförsäkringar's IT systems due to the conflict of interest that may arise. This applies to all types of cases, such as banking, claims adjustment, health declarations and general customer information.

Improper benefits

Our business model imposes rigorous demands on ethical and responsible conduct in all its transactions. Offering and accepting improper benefits both affect society's trust in the LFAB Group as well as in the financial market. The LFAB Group has a high ethical standard concerning improper benefits. These issues are further addressed in LFAB's Group-wide *Policy on Improper Benefits*.

It can sometimes be hard to know where the line is for what is permitted when it comes to gifts and other benefits. The *Policy on Improper Benefits* contains information concerning several benefits that are always considered improper, while others are assessed on a case by case basis. You can always ask your manager or HR for advice.

Economic and financial crime

Our operations are at risk of being subject to economic and financial crime. We are all responsible for preventing, discovering and reducing financial crime such as fraud, tax fraud and bribery.

Systematic work is conducted to reduce the risk of the LFAB Group being used for or associated with money laundering and terror financing. Employees who deal with bank and life-assurance customers must always be well informed about their customers. Suspicious transactions must be immediately reported to the Financial Intelligence Unit (FIPO) of the police. LFAB's group-wide *Policy on Measures Against Money Laundering and Terrorist Financing* addresses the issues in more detail.



Competition rules

The LFAB Group and its employees may not act in a manner that violates competition legislation by, for example, limiting the competitiveness of other players, coordinating pricing or entering into exclusivity contracts that are too far-reaching. Our information management is regulated in more detail in LFAB's Group-wide *Security Guidelines*.

Management of tax issues

The LFAB Group's approach and actions regarding tax issues must be characterised by compliance, responsibility and transparency. The LFAB Group must strive, based on the aim of legislation, to comply with applicable laws and regulations in the countries in which it operates. The companies within the LFAB Group must pay the correct taxes at the correct time and submit the correct tax reporting.

Terms and conditions and information to customers

We always simplify information in our terms and conditions and advice so that it is as clear, relevant and comprehensive as possible for customers. Information is to be readily available in all meetings and we are to respond to customers quickly in all meetings and channels.

Advisory services to customers

You must always ensure that our customers understand the products that they are buying and the risk associated with these products. Employees who provide advice to customers and everyone who contributes to the development of products, services and support systems for customer processes share a responsibility for ensuring that our actions in relation to the customer comply with laws and other regulations. It is also important that all advisory services are based on the requirements of the customer. As part of the LFAB Group, we are obligated to attend to customer needs.

Equal treatment and action in customers' interest

You seek to understand customer wishes and act consistently by showing respect and understanding. In our contact with customers, you always gain an understanding of the customer's situation so that you can provide advice and decide on the product or service that best suits the customer. Customer interests are always put first. All customers are to be treated in the same way in all contact with us.

Handling customer complaints

Complaints are to be handled promptly and received in a positive manner. You must clearly demonstrate that you are receptive to and value criticism. Complaints from customers provide valuable information that could form the basis of improvement efforts.

Detailed information can be found, if applicable, in each companies' guidelines for handling customer complaints.

Media

Contact with the media is always handled via LFAB's communications department, which is responsible for ensuring that the correct person speaks on behalf of the company. By being professional and active in our media relations, we can help convey a correct and objective view of our operations, and help strengthen confidence in the Group. LFAB's group-wide *Communication Policy* addresses the issues in more detail.

Social media

The line between private and professional can be blurred in social media. As an employee, you are responsible in your private lives for not using social media in a way that could be perceived as though you are acting as a spokesperson for LFAB or a subsidiary. Everyone in the LFAB Group need to take a professional responsibility since your views may impact the Länsförsäkringar brand.

It is important to take our values and Code of Conduct into consideration when you use social media. You must always respect copyright laws and other legislation regarding images and other materials, and you are always personally responsible for what you publish or upload as a private individual.

Employees' private transactions in financial Instruments

Employees' and related parties' own securities transactions are regulated by law and supplemented with self-regulation from the Swedish Securities Market Association in "Rules concerning transactions with financial instruments for own account by employees, contractors and related parties"¹ and in the Swedish Investment Fund Association's "Guidelines on employees' and contractors' personal transactions with financial instruments"².

The rules stipulate that you may not conduct personal security transactions in such a way or to such an extent that confidence in the securities market or Länsförsäkringar risks being compromised:

The rules also include, for example, that certain identified persons have an obligation to report their security transactions and those of related parties, and may not realise profit within 30 days (the one-month rule). For these persons, the governance documents of each company contain requirements for the personal security transactions of employees.

Market abuse

Market abuse regulations in criminal law apply to everyone (inside trading, market manipulation and unlawful disclosure of inside information). In general, this means that a person who has inside information is prohibited from benefiting from it for their own or someone else's account, directly or indirectly, though purchasing or selling the financial instruments to which the information pertains.

This also means that disclosing inside information to persons who are not in need of this information to carry out their work is also prohibited. The regulations also prohibit market manipulation.

The aim of the regulations is to uphold high confidence in the financial markets. The regulator's aim is that all trade in the markets takes place on the same conditions in so far as that all potential investors gain access to the same information on which to base their business decisions at the same time.

¹ www.svanskvardepappersmarknad.se/en/

² www.fondbolagen.se/en/

Security

The LFAB Group actively works with the Group's security. The term "security" refers to the result of the measures the Group takes to protect the Group's assets with protection value from damage, misuse or loss. The Company's assets with protection value are divided into operations, personnel, information, IT systems, equipment and premises. The overall objective of our security activities is to protect the Group's assets with protection value from the threats (internal or external, intentional or unintentional) to which the Group is exposed. These security activities are also to create security for our employees and our customers, and prepare the Group for managing incidents. LFAB's group-wide *Security Policy* and *Security guidelines* addresses the issues in more detail.

Information security and confidentiality

Information is an asset in need of protection for the LFAB Group and can be covered by confidentiality. Depending on the nature of the information, it is protected by different regulations as well as



the General Data Protection Regulation, the Act on the Protection of Trade Secrets (1990:409) and bank confidentiality regulated by banking and financing laws.

Confidentiality means that if you have access to sensitive information, regardless of form of employment, you may not pass on this information to persons outside the Group, or to other employees within the same company or to other companies within the Group unless required for work purposes and the information is not subject to bank confidentiality or if the transfer of information is limited by another regulation. Note that other information can also be sensitive and therefore not distributed to unauthorised individuals. The classification of the information specifies how the information should and may be handled. Professional secrecy applies even after a working or contractual relationship has ended as long as the information is customer or competition sensitive or otherwise confidential. The LFAB Group has *Security Guidelines* that further address these issues.

IT system, equipment and premises

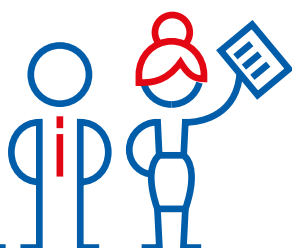
The LFAB Group's system, equipment and premises must be managed in accordance with the *Security Guidelines*. When replaced or returned, the LFAB Group's equipment is to be disposed of according to the *Security Guidelines*.

Security incidents

Everyone has a responsibility to report security incidents so that they can be managed and even prevented. Acute and/or serious security incidents must be reported immediately to your immediate manager and/or the Security Manager. For other incidents, reports are to be made according to current procedures.

Internal regulations that you are expected to be familiar with

The following is a summary of areas that are regulated in internal governance documents, which also comprise the basis of the *Code of Conduct*. Several relevant internal rules may also apply to your specific unit or functions. These internal regulations can be found on *Länet* and in our document system *Länsman*. The internal regulations are continuously updated. In order to be compliant with this *Code of Conduct*, you are expected to be aware of, take part of and act in accordance with the governance documents that are relevant to your professional role.



- Group instructions
- Contract instructions
- Communication policy
- Personnel policy
- Security policy
- Tax policy
- Sustainability policy
- Company-specific guidelines on handling financial information and insider information
- Policy on employees' private transactions in financial instruments (only applicable to the LF Bank Group)
- Policy on improper benefits
- Guidelines on identifying and managing conflicts of interest

Compliance

Managers in the organisation ensure compliance with the policy and that team/unit/department has knowledge of its contents. The Head of Strategy and Change Management is responsible for monitoring compliance with the Code of Conduct and ensuring that self-assessments and procedures are in place in the operations that ensure a compliance review.

All employees have a responsibility to be aware of and follow the *Code of Conduct*. Violation of the *Code of Conduct* can lead to labour law measures.

Amendments

The Code of Conduct is to be processed and adopted by the Board of Directors even if no revisions are proposed. The Head of Strategy and Change Management is responsible for the policy and for it to be revised if necessary.



Code of Conduct for Employees was adopted by the Board of Directors of Länsförsäkringar AB December 13th 2021.



