



Movestic Communication on Progress contains

- Movesetic Global Compact Letter of commitment 2018
- Sustainability Report, part of the annual financial report
- UNPRI Public Transparency Report Movestic Livförsäkring AB 2017
- Movestic Policy

Stockholm 23rd March 2018

Movestic hereby confirms our continued support regarding Global compact.

Sustainability, for Movestic, is about taking responsibility for our actions and decisions in different perspectives, and in all parts of our operation. This can include anything from finding more efficient and sustainable ways of working, to carbon offsetting and making other sustainable choices in our daily work.

In our position we have a unique opportunity as well as responsibility to influence and encourage our business partners regarding sustainability. A close relationship with external fund companies investing significant amounts in various securities makes our dialog crucial and an inexhaustible source of progress within the sustainability sector.

With regards to our customers and partners we try to inform, engage and educate to gradually shift the demand towards sustainable savings products.

The development and positive overall results of our sustainability engagement have been encouraging. Direct effects, commitments and positive responses in external assessments have been some of our milestones. We will continue this path the coming years.



Linnéa Ecorcheville

CEO

Movestic Livförsäkring AB

A sustainable Movestic for a sustainable society



To work actively and consciously with sustainability is central to Movestic and reflected within a number of areas – from those that are very close to our core business, with focus on our staff, customers and partners, to a broader sustainability perspective, where we try to take responsibility and influence the world around us.

STAFF IN FOCUS

We live in a changing world, where we continuously have to adapt to new regulatory requirements, and increasing demands from the market and our customers. To make the most of any opportunities and overcome any challenges, we place high demands on our staff members. At the same time Movestic is doing its utmost to ensure that our employees are happy, develop and feel well. For this reason, Movestic has put in place an occupational health policy, aimed at preventing and monitoring work-related health issues. Movestic wants to improve the balance between work and personal time, and works actively to improve the health and well-being of our employees.

All new employees at Movestic complete a tailor-made induction program, as well as the internal training courses in Movestic Academy, with the aim that everyone – irrespective of job title – will obtain a good insight into the Company's vision, services, and values.

Movestic has a positive attitude to internal mobility and regularly promotes existing employees to new positions. All managers complete a training program, which includes individual coaching and leadership courses.

We carry out an annual employee survey, the results of which are actively utilised at both company and department level, and lead to

concrete action plans aimed at improving both our company culture and working practices.


SUSTAINABILITY IN THE WORLD AROUND US

Corporate responsibility is a cornerstone in both our operation and our values. By helping our customers to build up a good pension and feel protected, we generate values that are of benefit to society as a whole. With our savings and insurance solutions, we help our customers to make wise choices for an active life. This is what we are passionate about in our everyday operation – but we are also aware that we must take responsibility from a broader perspective.

Movestic's aim is to reduce its environmental impact, not least by encouraging employees to act in an environmentally responsible manner. All staff members must take an active part in our environmental efforts, for example by suggesting improvements or reporting breaches of the Company's environmental policies. All purchase decisions and supplier selections include relevant environmental requirements, and we strive to reduce our consumption of energy and consumables, as well as the amount of waste we produce. We do this by, as far as possible, using electronic means of communication, avoiding paper mailings, and minimising the use of consumables. Equipment that is no longer in use is sent for resale or recycling. Whenever possible we replace business travel with telephone or video conferences; where this is not possible, we try to choose modes of transportation with a low environmental impact.

THE SAME FOR ALL

An equal society is a good society. With this as our starting point, we provide a system which counteracts the gender differences when

A black and white photograph featuring two women. The woman on the left is in the foreground, looking slightly off-camera with a gentle smile. She has dark, shoulder-length hair. The woman on the right is partially visible in the background, also smiling. The lighting is soft, creating a warm and intimate atmosphere.

»By helping our customers to build up a good pension and feel protected, we generate values that are of benefit to society as a whole.«

it comes to pensions. Movestic has highlighted the issue of equal pensions for several years, and continued to do so in 2017, by pointing out the factors that lead to women's pensions being on average 30 per cent lower than men's. Within our own industry, we run the business network MOVE – a forum where female insurance brokers can exchange experiences and build contact networks, which aims to help increase the proportion of female brokers.

Our employees have different backgrounds and experiences, something that improves Movestic's ability to meet the challenges and opportunities of tomorrow. One way to ensure diversity is the Company's policy on equal rights and zero tolerance of harassment and discrimination because of gender, ethnic origin, religion or sexual orientation. No reports of such incidents were received in 2017.

OUR BUSINESS MODEL

Movestic offers a comprehensive range of savings and insurance products. Within the saving and pension segment, we provide unit-linked products, with focus on occupational pension plans. Within the risk segment, we offer life, accident and health insurance. Movestic's insurance products are mainly distributed by insurance brokers. Further information on our business model is available under the headline 'This is Movestic' on page 5.

SUSTAINABILITY RISKS

Movestic operates in an industry based on confidence, where security and value-generation for its customers, both today and in the future, are vitally important. Everything we do in our business operation has an effect on the trust of our customers and partners, which is why we continuously work to ensure that our actions are in line with both relevant regulations and the interests of our customers.

When it comes to sustainability, personnel and social conditions are areas that should be subject to special focus, as their intrinsic risks could potentially have a negative impact on both Movestic and our customers. We work continuously to ensure that both our personnel policies and social conditions are sustainable, and supported by clear policies and guidelines.

There is a risk that Movestic, despite a high awareness of environmental matters, is unable to live up to the customers' expectations for responsibility and environmentally friendly products. This

risk still exists, despite Movestic's high ambitions when it comes to sustainability matters.

One vitally important risk segment is compliance and corruption. For this reason, Movestic works continuously to ensure that all legal requirements are complied with, and to prevent all forms of corruption.

A significant sustainability risk in our operation relates to the way in which we process the personal data of our customers. Safe and correct processing of personal data is critical to our ability to maintain a good reputation and the trust of our customers.

SUSTAINABLE INVESTMENTS

We believe that people who save in funds will generally gain long-term benefits as a result of our greater focus on various aspects of sustainability, such as the environment, human rights, and good business ethics. This is why sustainability efforts are an important part of the work of our investment department. They get involved with different activities related to sustainability; in particular through ongoing reviews of the fund companies included in Movestic's fund offering. The long-term aim is to ensure that any fund company we work with also carries out its investment activities in a responsible manner.



Examples of areas where Movestic try to influence the fund companies:

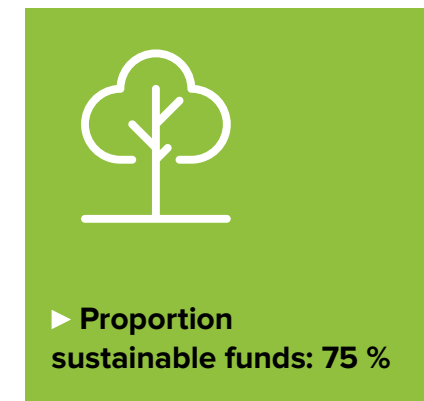
The fund companies should:

- ▶ Ensure that their board of directors, management team, and the company as a whole are characterised by diversity
- ▶ Be active at AGMs and vote for their ownership
- ▶ Hold a proactive sustainability dialogue with the companies in which their funds invest
- ▶ Follow basic international norms, such as signing the UNPRI, the UN's Principles for Responsible Investments
- ▶ Design any incentive programs to reward long-term thinking

In addition to this, Movestic also carries out its own reviews of the fund holdings, aided by the independent external consultancy firm ISS/Ethix. Assessments are carried out twice a year, based on widely recognised sustainability criteria. Funds that do not meet our requirements are excluded for sustainability reasons. In 2017 one fund was removed due to a lack of focus on sustainability, and four other funds with a clear focus on sustainability were brought in. Our aim is that at least 75 per cent of Movestic's regular fund offering should be sustainable.

In the spring, we published a Sustainability Summary, intended as a guide for customers wishing to invest sustainably. The guide includes Movestic's sustainability ratings, to make it easier for our customers to make environmentally conscious selections from our range of funds. We have also started publishing information about ongoing activities related to the sustainability efforts performed by our investment department on movestic.se. In 2017, Movestic had its first assessment by UNPRI, the UN Initiative for responsible investments. Movestic received a rating above, or on par with, the median rating for its peer group in all areas.

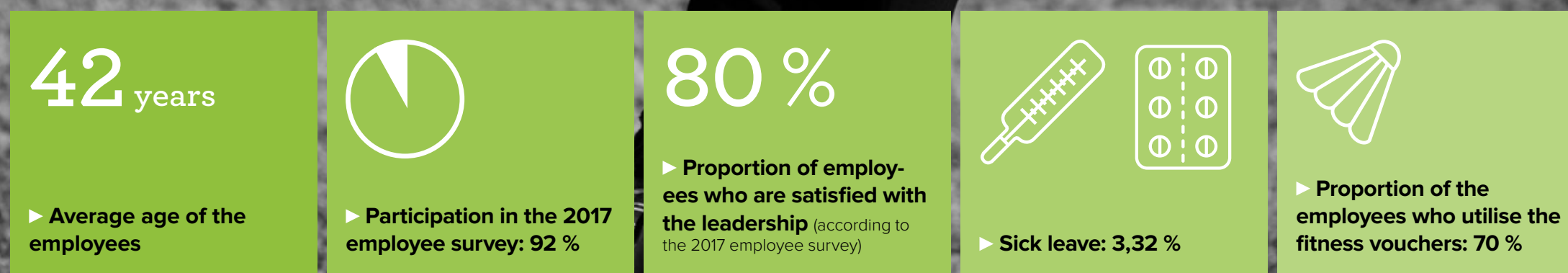
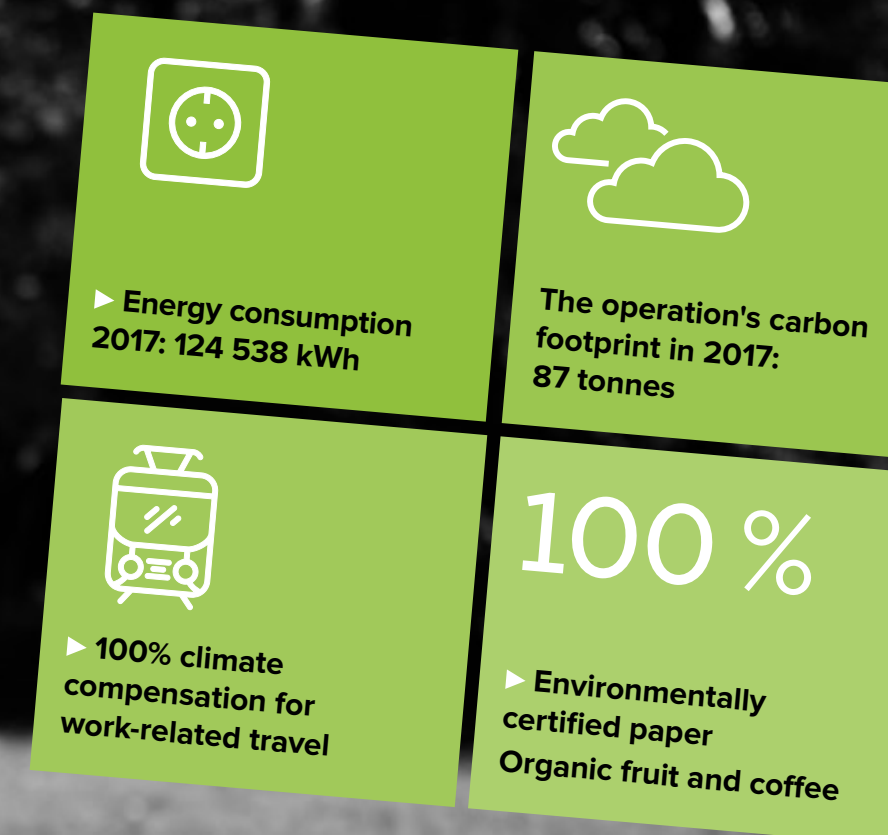
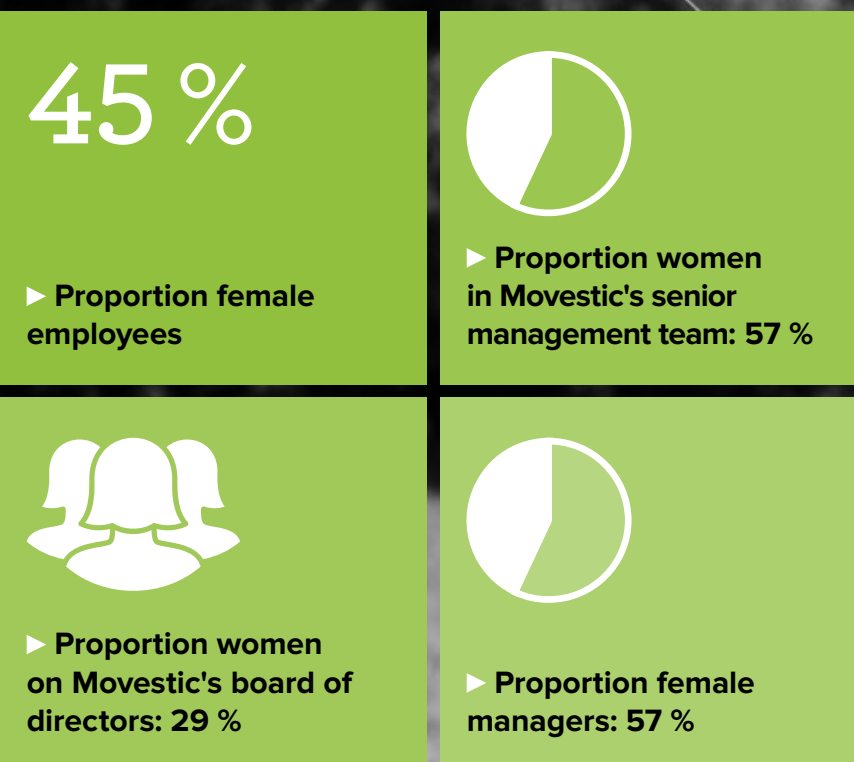
As a result of the sustainability work carried out by Movestic's investment department, we were awarded the highest rating by Söderberg & Partners. We were one of four providers of unit-linked products, out of a total of 14 assessed, to receive this rating.



* According to Söderberg & Partners' report, Sustainable Unit-Linked Policies (Hållbara fondförsäkringar), Jan. 2018



Sustainability report



Auditor's report on the statutory sustainability report

**To the general meeting of the shareholders
in Movestic Livförsäkring AB, corporate identity
number 516401-6718**

ENGAGEMENT AND RESPONSIBILITY

It is the board of directors who is responsible for the statutory sustainability report for the year 2017 on pages 12-16 and that it has been prepared in accordance with the Annual Accounts Act for Insurance Companies.

THE SCOPE OF THE AUDIT

Our examination has been conducted in accordance with FAR's auditing standard RevR 12 The auditor's opinion regarding the statutory sustainability report. This means that our examination of the statutory sustainability report is substantially different and less in scope than an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that the examination has provided us with sufficient basis for our opinion.

OPINION

A statutory sustainability report has been prepared.

Stockholm 22 March 2018
Deloitte AB
[Signature on the Swedish original]

Henrik Nilsson
Authorized public accountant



RI TRANSPARENCY REPORT

2017

Movestic Livförsäkring AB

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the 2016 reporting cycle. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information. As a result, the reports can be extensive. However, to help easily locate information, there is a **Principles index** which highlights where the information can be found and summarises the indicators that signatories complete and disclose.

Understanding the Principles Index

The Principles Index summarises the response status for the individual indicators and modules and shows how these relate to the six [Principles for Responsible Investment](#). It can be used by stakeholders as an 'at-a-glance' summary of reported information and to identify particular themes or areas of interest.

Indicators can refer to one or more Principles. Some indicators are not specific to any Principle. These are highlighted in the 'General' column. When multiple Principles are covered across numerous indicators, in order to avoid repetition, only the main Principle covered is highlighted.

All indicators within a module are presented below. The status of indicators is shown with the following symbols:

| Symbol | Status |
|--------|---|
| ✓ | The signatory has completed all mandatory parts of this indicator |
| ☑ | The signatory has completed some parts of this indicator |
| 🔒 | This indicator was not relevant for this signatory |
| - | The signatory did not complete any part of this indicator |
| 🔍 | The signatory has flagged this indicator for internal review |

Within the table, indicators marked in blue are mandatory to complete. Indicators marked in grey are voluntary to complete.

Principles Index

| Organisational Overview | | | | Principle | | | | | | General |
|-------------------------|---|--------|------------------------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| OO 01 | Signatory category and services | ✓ | Public | | | | | | | ✓ |
| OO 02 | Headquarters and operational countries | ✓ | Public | | | | | | | ✓ |
| OO 03 | Subsidiaries that are separate PRI signatories | ✓ | Public | | | | | | | ✓ |
| OO 04 | Reporting year and AUM | ✓ | Public | | | | | | | ✓ |
| OO 05 | Breakdown of AUM by asset class | ✓ | Asset mix disclosed in OO 06 | | | | | | | ✓ |
| OO 06 | How would you like to disclose your asset class mix | ✓ | Public | | | | | | | ✓ |
| OO 07 | Fixed income AUM breakdown | ✓ | Private | | | | | | | ✓ |
| OO 08 | Segregated mandates or pooled funds | ✓ | Private | | | | | | | ✓ |
| OO 09 | Breakdown of AUM by market | ✓ | Private | | | | | | | ✓ |
| OO 10 | RI activities for listed equities | ✓ | Public | | | | | | | ✓ |
| OO 11 | RI activities in other asset classes | ✓ | Public | | | | | | | ✓ |
| OO 12 | Modules and sections required to complete | ✓ | Public | | | | | | | ✓ |
| OO End | Module confirmation page | ✓ | - | | | | | | | |

| Strategy and Governance | | | | Principle | | | | | | General |
|-------------------------|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| SG 01 | RI policy and coverage | ✓ | Public | | | | | | | ✓ |
| SG 02 | Publicly available RI policy or guidance documents | ✓ | Public | | | | | | ✓ | |
| SG 03 | Conflicts of interest | ✓ | Public | | | | | | | ✓ |
| SG 04 | | ✓ | Private | | | | | | | ✓ |
| SG 05 | RI goals and objectives | ✓ | Public | | | | | | | ✓ |
| SG 06 | Main goals/objectives this year | ✓ | Private | | | | | | | ✓ |
| SG 07 | RI roles and responsibilities | ✓ | Public | | | | | | | ✓ |
| SG 08 | RI in performance management, reward and/or personal development | ✓ | Private | | | | | | | ✓ |
| SG 09 | Collaborative organisations / initiatives | ✓ | Public | | | | ✓ | ✓ | | |
| SG 10 | Promoting RI independently | ✓ | Public | | | | ✓ | | | |
| SG 11 | Dialogue with public policy makers or standard setters | ✓ | Private | | | | ✓ | ✓ | ✓ | |
| SG 12 | ESG issues in strategic asset allocation | ✓ | Public | ✓ | | | | | | |
| SG 13 | Long term investment risks and opportunity | ✓ | Private | ✓ | | | | | | |
| SG 14 | Allocation of assets to environmental and social themed areas | ✓ | Private | ✓ | | | | | | |
| SG 15 | ESG issues for internally managed assets not reported in framework | ⚡ | n/a | | | | | | | ✓ |
| SG 16 | ESG issues for externally managed assets not reported in framework | ✓ | Public | | | | | | | ✓ |
| SG 17 | Innovative features of approach to RI | ✓ | Private | | | | | | | ✓ |
| SG End | Module confirmation page | ✓ | - | | | | | | | |

| Indirect – Manager Selection, Appointment and Monitoring | | | | Principle | | | | | | General |
|--|--|--------|------------|-----------|---|---|---|---|---|---------|
| Indicator | Short description | Status | Disclosure | 1 | 2 | 3 | 4 | 5 | 6 | |
| SAM 01 | Role of investment consultants/fiduciary managers | ✓ | Public | | | | ✓ | | | |
| SAM 02 | RI factors in selection, appointment and monitoring across asset classes | ✓ | Public | ✓ | | | | | | |
| SAM 03 | Breakdown by passive, quantitative, fundamental and other active strategies | ✓ | Private | | | | | | | ✓ |
| SAM 04 | ESG incorporation strategies | ✓ | Public | ✓ | ✓ | | | | | |
| SAM 05 | Selection processes (LE and FI) | ✓ | Public | ✓ | | | | | | |
| SAM 06 | Evaluating engagement and voting practices in manager selection (listed equity/fixed income) | ✓ | Public | | ✓ | | | | | |
| SAM 07.1 | Appointment processes (listed equity/fixed income) | ⚡ | n/a | ✓ | | | | | | |
| SAM 07.2-5 | Appointment processes (listed equity/fixed income) | ⚡ | n/a | ✓ | | | | | | |
| SAM 08 | Monitoring processes (listed equity/fixed income) | ✓ | Public | ✓ | | | | | | |
| SAM 09 | Monitoring on active ownership (listed equity/fixed income) | ✓ | Public | ✓ | | | | | | |
| SAM 10 | Percentage of (proxy) votes | ⚡ | n/a | | ✓ | | | | | |
| SAM 11 | Percentage of externally managed assets managed by PRI signatories | ✓ | Private | ✓ | | | | | | |
| SAM 12 | Examples of ESG issues in selection, appointment and monitoring processes | ✓ | Public | ✓ | | | | | ✓ | |
| SAM 13 | Disclosure of RI considerations | ✓ | Public | | | | | | ✓ | |
| SAM End | Module confirmation page | ✓ | - | | | | | | | |

Movestic Livförsäkring AB

Reported Information

Public version

Organisational Overview

PRI disclaimer

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| Basic Information | | | | |
|-------------------|--|--|--|--|
|-------------------|--|--|--|--|

| | | | | |
|-------|-----------|--------|-----------------|---------|
| OO 01 | Mandatory | Public | Gateway/Peering | General |
|-------|-----------|--------|-----------------|---------|

| | |
|---------|--|
| OO 01.1 | Select the type that best describes your organisation or the services you provide. |
|---------|--|

- ☐ Non-corporate pension or superannuation or retirement or provident fund or plan
- ☐ Corporate pension or superannuation or retirement or provident fund or plan
- ☒ Insurance company
- ☐ Foundation
- ☐ Endowment
- ☐ Development finance institution
- ☐ Reserve - sovereign or government controlled fund
- ☐ Family office
- ☐ Other, specify

| | |
|---------|------------------------------------|
| OO 01.2 | Additional information. [Optional] |
|---------|------------------------------------|

| | | | | |
|-------|-----------|--------|---------|---------|
| OO 02 | Mandatory | Public | Peering | General |
|-------|-----------|--------|---------|---------|

| | |
|---------|--|
| OO 02.1 | Select the location of your organisation's headquarters. |
|---------|--|

Sweden

| | |
|---------|---|
| OO 02.2 | Indicate the number of countries in which you have offices (including your headquarters). |
|---------|---|

- ☒ 1
- ☐ 2-5
- ☐ 6-10
- ☐ >10

| | |
|---------|---|
| OO 02.3 | Indicate the approximate number of staff in your organisation in full-time equivalents (FTE). |
|---------|---|

| |
|-----|
| FTE |
|-----|

140

| | | | | |
|-------|-----------|--------|-------------|---------|
| OO 03 | Mandatory | Public | Descriptive | General |
|-------|-----------|--------|-------------|---------|

OO 03.1

Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- ☐ Yes
☒ No

OO 04

Mandatory

Public

Gateway/Peering

General

OO 04.1

Indicate the year end date for your reporting year.

31/12/2016

OO 04.2

Indicate your total AUM at the end of your reporting year, excluding subsidiaries you have chosen not to report on.

| | trillions | billions | millions | thousands | hundreds |
|---------------|-----------|----------|----------|-----------|----------|
| Total AUM | | 28 | 000 | 000 | 000 |
| Currency | SEK | | | | |
| Assets in USD | | 3 | 046 | 002 | 484 |

OO 06

Mandatory

Public

Descriptive

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

OO 06.1

How you would like to disclose your asset class mix.

- ☐ as percentage breakdown
☒ as broad ranges

| | Internally managed (%) | Externally managed (%) |
|----------------|------------------------|------------------------|
| Listed equity | 0 | >50% |
| Fixed income | 0 | 10-50% |
| Private equity | 0 | 0 |
| Property | 0 | 0 |
| Infrastructure | 0 | 0 |
| Commodities | 0 | 0 |
| Hedge funds | 0 | <10% |

| | | |
|--------------------|---|---|
| Forestry | 0 | 0 |
| Farmland | 0 | 0 |
| Inclusive finance | 0 | 0 |
| Cash | 0 | 0 |
| Other (1), specify | 0 | 0 |
| Other (2), specify | 0 | 0 |

OO 06.2 Publish our asset class mix as per attached image [Optional].

OO 06.3 Provide contextual information on your AUM asset class split. [Optional]

The AUM asset class split was carried out according to the following model:

Equity: 100% of funds classified as equity funds, and 55% of funds classified as multi asset funds

Fixed Income: 100% of funds classified as fixed income funds, and 37% of funds classified as multi asset funds

Hedge funds: 100% of funds classified as hedge funds, and 8% of funds classified as multi asset funds

Source of classification: Morningstar Direct

Gateway asset class implementation indicators

| OO 10 | Mandatory | Public | Gateway | General |
|-------|-----------|--------|---------|---------|
|-------|-----------|--------|---------|---------|

OO 10.1 Select the direct or indirect ESG incorporation activities your organisation implemented for listed equities in the reporting year.

- ☒ We address ESG incorporation in our external manager selection, appointment and/or monitoring processes
- ☐ We do not incorporate ESG in our directly managed listed equity and/or we do not address ESG incorporation in our external manager selection, appointment and/or monitoring processes.

OO 10.2 Select the direct or indirect engagement activities your organisation implemented for listed equity in the reporting year.

- ☐ We engage with companies on ESG factors via our staff, collaborations or service providers
- ☒ We require our external managers to engage with companies on ESG issues on our behalf
- ☐ We do not engage directly and do not require external managers to engage with companies on ESG factors.

| | |
|----------------|---|
| OO 10.3 | Select the direct or indirect voting activities your organisation implemented for listed equity in the reporting year |
|----------------|---|

- ☐ We cast our (proxy) votes directly or via dedicated voting providers
- ☒ We require our external managers to vote on our behalf
- ☐ We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf

| | | | | |
|--------------|------------------|---------------|----------------|----------------|
| OO 11 | Mandatory | Public | Gateway | General |
|--------------|------------------|---------------|----------------|----------------|

| | |
|----------------|--|
| OO 11.2 | Select the externally managed assets classes where you addressed ESG incorporation and/or active ownership in your external manager selection, appointment and/or monitoring processes (during the reporting year) |
|----------------|--|

- ☒ Fixed income – SSA
- ☒ Fixed income – corporate (financial)
- ☒ Fixed income – corporate (non-financial)
- ☒ Fixed income – securitised
- ☒ Hedge funds
- ☐ None of the above

| | | | | |
|--------------|------------------|---------------|----------------|----------------|
| OO 12 | Mandatory | Public | Gateway | General |
|--------------|------------------|---------------|----------------|----------------|

You will need to make a selection in OO 12.1 only if you have any voluntary modules that you can choose to report on.

| | |
|----------------|---|
| OO 12.1 | Select from below any additional applicable modules or sections you would like to report on voluntarily. You are only required to report on asset classes that represent 10% or more of your AUM. |
|----------------|---|

| | |
|--|--------------|
| | Core modules |
|--|--------------|

- ☒ Organisational Overview
- ☒ Strategy and Governance

| | |
|--|---|
| | RI implementation via external managers |
|--|---|

| | |
|--|---|
| | Indirect - Selection, Appointment and Monitoring of External Managers |
|--|---|

- ☒ Listed Equities
- ☒ Fixed income - SSA
- ☒ Fixed income - Corporate (financial)
- ☒ Fixed income - Corporate (non-financial)
- ☒ Fixed income - Securitised

| | |
|--|----------------|
| | Closing module |
|--|----------------|

- ☒ Closing module

N/A

Movestic Livförsäkring AB

Reported Information

Public version

Strategy and Governance

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Investment policy

SG 01

Mandatory

Public

Core Assessed

General

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 01.1

Indicate if you have an investment policy that covers your responsible investment approach.

☒ Yes

SG 01.2

Indicate the components/types and coverage of your policy.

Select all that apply

| Policy components/types | Coverage by AUM |
|---|--|
| <input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2) | <input type="radio"/> Applicable policies cover all AUM <input checked="" type="radio"/> Applicable policies cover a majority of AUM <input type="radio"/> Applicable policies cover a minority of AUM |

SG 01.3

Indicate if the investment policy covers any of the following

- ☒ Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- ☐ Your investment objectives that take ESG factors/real economy influence into account
- ☒ Processes / approaches to incorporating ESG
- ☐ Time horizon of your investment
- ☐ Governance structure of organisational ESG responsibilities
- ☐ ESG incorporation approaches
- ☐ Active ownership approaches
- ☒ Reporting
- ☐ Other RI considerations, specify (1)
- ☐ Other RI considerations, specify (2)

SG 01.4

Indicate what norms you have used to develop your investment policy that covers your responsible investment approach.

- ☒ UN Global Compact Principles
- ☐ UN Guiding Principles on Business and Human Rights
- ☐ Universal Declaration of Human Rights
- ☐ International Bill of Human Rights
- ☐ International Labour Organization Conventions
- ☐ United Nations Convention Against Corruption
- ☐ OECD Guidelines for Multinational Enterprises
- ☐ Other, specify (1)
- ☐ Other, specify (2)
- ☐ Other, specify (3)
- ☐ None of the above

SG 01.5

Describe your organisation's investment principles, and overall investment strategy, and how they consider ESG factors and real economy impact.

Movestic Liv & Pension (Movestic) works with longterm fund managers that mostly have an active management approach. We feel certain that our focus on sustainability, environment and ethics offers added value to our policyholders this is why sustainability is incorporated in our investment analysis.

Apart from the PRI, Movestic is a signatory of the UN Global Compact, thereby promising to promote implementation of the ten principles. Movestic works to ensure that all fund companies represented on the platform strive to meet international conventions regarding the environment, human rights, workers' rights and controversial weapons.

Movestic evaluates both funds and fund managers on an annual basis, using surveys and reviews of current policies. If Movestic finds that a fund manager does not meet its requirements, the manager will be informed about the actions they must take to ensure they are not excluded from Movestic's offering. Any dialogue deemed ineffective will result in the exclusion of the fund.

☐ No

SG 01.6

Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

Movestic's investment policy covers all asset classes included in its offering. The assessment of the ESG approach of the included funds is to some extent relative, and depends on the opportunities and limitations of the asset class. Equity funds (active), equity funds (passive), fixed income funds (all), and hedge funds are assessed in relation to their respective competitors, so that the basic requirements/minimum level match the limitations of the asset class being assessed.

SG 02**Mandatory****Public****Core Assessed****PRI 6**

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 02.1

Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

- ☒ Policy setting out your overall approach

| |
|----------------|
| URL/Attachment |
|----------------|

☒ URL

| |
|-----|
| URL |
|-----|

<https://www.movestic.se/om-oss/haallbarhet/>

☐ Attachment (will be made public)

☒ Screening / exclusions policy

| |
|----------------|
| URL/Attachment |
|----------------|

☒ URL

| |
|-----|
| URL |
|-----|

<https://www.movestic.se/om-oss/haallbarhet/>

☐ Attachment (will be made public)

☐ Engagement policy

☐ We do not publicly disclose our investment policy documents

| | |
|----------------|---|
| SG 02.2 | Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document. |
|----------------|---|

☒ Your organisation's definition of ESG and/or responsible investment and it's relation to investments

| |
|----------------|
| URL/Attachment |
|----------------|

☒ URL

| |
|-----|
| URL |
|-----|

<https://www.movestic.se/om-oss/haallbarhet/>

☐ Attachment

☐ Processes / approaches to incorporating ESG

☐ Reporting

☐ We do not publicly disclose any investment policy components

| | |
|----------------|--|
| SG 02.3 | Indicate if your organisation's investment principles, and overall investment strategy is publicly available |
|----------------|--|

☐ Yes

☒ No

| SG 03 | Mandatory | Public | Core Assessed | General |
|-------|-----------|--------|---------------|---------|
|-------|-----------|--------|---------------|---------|

SG 03.1

Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

☒ Yes

SG 03.2

Describe your policy on managing potential conflicts of interest in the investment process.

The aim of the policy is to ensure that conflicts of interest that arise within the Company are identified and managed, and that there are effective routines in place for dealing with and monitoring both actual and potential conflicts of interest.

The CEO holds the final responsibility for the ongoing identification, documentation and handling of conflicts of interest and for making sure that these are reported to the Board of Directors, as required.

All employees should be vigilant and watch out for situations that could potentially result in conflicts of interest. Such situations should immediately be reported to their immediate manager, who will in turn notify the Compliance function.

The Compliance function is responsible for ensuring that the Company's record of concrete situations that have resulted in, or may result in, a raised risk of conflicts is updated on an ongoing basis, as new conflicts of interest are identified.

Board members, alternate members and the CEO must report any instances of partiality and other conflicts of interest to the Chairman of the Board.

☐ No

Objectives and strategies

SG 05**Mandatory****Public****Gateway/Core Assessed****General****SG 05.1**

Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- ☐ Quarterly or more frequently
- ☐ Biannually
- ☒ Annually
- ☐ Less frequently than annually
- ☐ Ad-hoc basis
- ☐ It is not reviewed

SG 05.2

Additional information. [Optional]

The Sustainability Policy is reviewed annually. As part of this review, an action plan for the coming year is also put together.

Governance and human resources

SG 07**Mandatory****Public****Core Assessed****General**

SG 07.1

Indicate the roles present in your organisation and for each, indicate whether they have oversight and/or implementation responsibilities for responsible investment.

Roles present in your organisation

- ☐ Board members or trustees
- ☒ Chief Executive Officer (CEO), Chief Investment Officer (CIO), Investment Committee
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ Other Chief-level staff or head of department, specify
- ☒ Portfolio managers
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Investment analysts
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ Dedicated responsible investment staff
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☒ External managers or service providers
 - ☒ Oversight/accountability for responsible investment
 - ☒ Implementation of responsible investment
 - ☐ No oversight/accountability or implementation responsibility for responsible investment
- ☐ Investor relations
- ☐ Other role, specify (1)
- ☐ Other role, specify (2)

SG 07.2

For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.

Movestic's Investment Committee includes the CEO, CIO and Portfolio Manager. The RI Analyst and the Investment Analyst are rapporteurs. RI related matters are brought up for review. Decisions are made on future approach/implementation.

Movestic's CIO holds the overall responsibility for reviewing the insurance company's entire range of funds, and for making sure that sustainability issues are taken into account both when funds are selected, and in the fund management activities. The CIO reports to the CEO.

The RI Analyst is responsible for providing the CIO and the Portfolio Manager with RI information, and for making sure this is implemented.

ISS/Ethix assists Movestic Kapitalförvaltning in the screening of portfolios and provides general information about sustainable investments.

| | |
|----------------|--|
| SG 07.3 | Indicate the number of dedicated responsible investment staff your organisation has. |
|----------------|--|

| | |
|--|--------|
| | Number |
|--|--------|

0

Promoting responsible investment

| | | | | |
|--------------|------------------|---------------|----------------------|----------------|
| SG 09 | Mandatory | Public | Core Assessed | PRI 4,5 |
|--------------|------------------|---------------|----------------------|----------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

| | |
|----------------|---|
| SG 09.1 | Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played. |
|----------------|---|

Select all that apply

☒ Principles for Responsible Investment

| | |
|--|--|
| | Your organisation's role in the initiative during the reporting period (see definitions) |
|--|--|

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Movestic signed up to PRI in 2015

- ☐ AFIC – La Commission ESG
- ☐ Asian Corporate Governance Association
- ☐ Australian Council of Superannuation Investors
- ☐ BVCA – Responsible Investment Advisory Board
- ☐ CDP Climate Change
- ☐ CDP Forests
- ☐ CDP Water
- ☐ CFA Institute Centre for Financial Market Integrity
- ☐ Code for Responsible Investment in SA (CRISA)
- ☐ Code for Responsible Finance in the 21st Century
- ☐ Council of Institutional Investors (CII)
- ☐ ESG Research Australia
- ☐ Eumedion
- ☐ EVCA – Responsible Investment Roundtable
- ☐ Extractive Industries Transparency Initiative (EITI)
- ☐ Global Investors Governance Network (GIGN)
- ☐ Global Impact Investing Network (GIIN)
- ☐ Global Real Estate Sustainability Benchmark (GRESB)
- ☐ Green Bond Principles
- ☐ Institutional Investors Group on Climate Change (IIGCC)
- ☐ Interfaith Center on Corporate Responsibility (ICCR)
- ☐ International Corporate Governance Network (ICGN)
- ☐ Investor Group on Climate Change, Australia/New Zealand (IGCC)
- ☐ International Integrated Reporting Council (IIRC)
- ☐ Investor Network on Climate Risk (INCR)/CERES
- ☐ Local Authority Pension Fund Forum
- ☐ Principles for Sustainable Insurance
- ☒ Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify

Swesif

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Movestic is a member of Swesif. Funds managed by Movestic Kapitalförvaltning have described their working practices in Swesif's Sustainability Declaration for Funds.

Movestic supports Swesif's work, and was one of the first providers to include information about the Sustainability Declaration on its web based platform. Movestic also encourages funds/fund companies that have not yet completed the Sustainability Declaration for Funds to do this at the earliest opportunity.

- ☐ Responsible Finance Principles in Inclusive Finance
- ☐ Shareholder Association for Research and Education (Share)
- ☐ United Nations Environmental Program Finance Initiative (UNEP FI)
- ☒ United Nations Global Compact

Your organisation's role in the initiative during the reporting period (see definitions)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Movestic signed up to UN Global Compact in 2015.

- ☒ Other collaborative organisation/initiative, specify
Sedex

Your organisation's role in the initiative during the reporting year (see definitions)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Movestic is a member of Sedex.

- ☒ Other collaborative organisation/initiative, specify
Insurance Sweden

Your organisation's role in the initiative during the reporting year (see definitions)

- ☒ Basic
- ☐ Moderate
- ☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Movestic is a member of Insurance Sweden which is the industry organization for insurance companies. About 50 insurance companies are members of Insurance Sweden and together they account for more than 90 per cent of the Swedish insurance market.

Insurance Sweden consists of around 20 employees who work with economic, legal and other analysis, as well as communication.

Insurance Sweden is a member of the European insurance and reinsurance federation, Insurance Europe (former CEA), and participates actively in its work on various issues at EU level.

Among other topics Insurance Sweden has focused on climate change

<http://www.svenskforsakring.se/Startsidan-EN/Huvudmeny/Our-work/Undersidor/Climate/Undersidor/High-time-for-more-climate-adaptation/>

☒ Other collaborative organisation/initiative, specify

Swedish Investment Fund Association

Your organisation's role in the initiative during the reporting year (see definitions)

☒ Basic

☐ Moderate

☐ Advanced

Provide a brief commentary on the level of your organisation's involvement in the initiative.
[Optional]

Movestic Kapitalförvaltning (a fully owned subsidiary of Movestic Liv & Pension) is a member of the Swedish Investment Fund Association.

The Swedish Investment Fund Association works to promote a sound industry that operates in the best interests of the savers. The Association monitors legislative work in relation to the sector and acts as a referral body at national and EU level. The Association has extensive contacts with decision-makers, authorities, and the media and has a well-established international network. One of the associations priority issues is Responsible Investments <http://fondbolagen.se/en/About-us/Priority-issues/Responsible-Investments/>

During 2016 one topic (among other) the Association focused on was the reporting of carbon footprint <http://fondbolagen.se/en/Press/Press-releases/2016/The-Swedish-fund-industry-agrees-on-carbon-reporting-for-funds/>

☐ Other collaborative organisation/initiative, specify

SG 10

Mandatory

Public

Core Assessed

PRI 4

SG 10.1

Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

☒ Yes

SG 10.2

Indicate which of the following actions your organisation has taken to promote responsible investment, independently of collaborative initiatives.

- ☐ Provided or supported education or training programmes for clients, investment managers, broker/dealers, investment consultants, legal advisers or other investment organisations
- ☐ Provided financial support for academic or industry research on responsible investment
- ☒ Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- ☐ Spoke publicly at events and conferences to promote responsible investment
- ☐ Wrote and published in-house research papers on responsible investment
- ☒ Encouraged the adoption of the PRI
- ☐ Wrote articles on responsible investment in the media.
- ☐ Other, specify

☐ No

SG 10.3

Describe any additional actions and initiatives that your organisation has taken part in during the reporting year to promote responsible investment [Optional]

Each year, Movestic carries out a survey of selected funds and managers. The responses given are combined to provide an overall rating, and all participants are given feedback on areas with room for improvement. Movestic also refers to other, positive examples, with the aim to gradually bring all managers up to a high minimum standard.

One criterion in the overall evaluation is whether the fund company has signed and follows the PRI principles. Managers that do not follow these principles are urged to start doing this as soon as possible.

Implementation not in other modules

SG 12**Mandatory****Public****Descriptive****PRI 1**

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SG 12.1

Indicate if your organisation executes scenario analysis and/or modelling in which the risk profile of future ESG trends at portfolio level is calculated.

- ☐ We execute scenario analysis which includes factors representing the investment impacts of future environmental trends
- ☐ We execute scenario analysis which includes factors representing the investment impacts of future social trends
- ☐ We execute scenario analysis which includes factors representing the investment impacts of future governance trends
- ☐ We execute other scenario analysis, specify
- ☒ We do not execute such scenario analysis and/or modelling

SG 12.2

Indicate if your organisation considers ESG issues in strategic asset allocation and/or allocation of assets between sectors or geographic markets.

- ☐ We do the following
- ☒ We do not consider ESG issues in strategic asset allocation

| | |
|----------------|------------------------------------|
| SG 12.3 | Additional information. [OPTIONAL] |
|----------------|------------------------------------|

N/A All management takes place within Movestic Kapitalförvaltning.

| | | | | |
|--------------|------------------|---------------|--------------------|----------------|
| SG 16 | Mandatory | Public | Descriptive | General |
|--------------|------------------|---------------|--------------------|----------------|

| | |
|----------------|--|
| SG 16.1 | Describe how you address ESG issues for externally managed assets for which a specific PRI asset class module has yet to be developed or for which you are not required to report because your assets are below the minimum threshold. |
|----------------|--|

| Asset Class | Describe what processes are in place and the outputs or outcomes achieved |
|--------------------|--|
| Hedge funds | <p>Hedge funds follow the same processes as other funds, although with certain limitations resulting from their investment approach, for example in relation to impact and voting. Hedge funds are assessed in comparison with other, comparable funds, which means that the assessment becomes a 'best practice' review of the managers included in our offering.</p> <p>Overall, hedge funds developed positively in 2016, as an increasing number of investors are demanding change. One example is that more managers have signed up to UNPRI, and that screening is becoming more common in areas where this is possible. Challenges remain within managed futures/CTA solutions, where it is difficult to implement ESG in a traditional manner.</p> |

Movestic Livförsäkring AB

Reported Information

Public version

Indirect – Manager Selection, Appointment and Monitoring

PRI disclaimer

This document presents information reported directly by signatories. This information has not been audited by the PRI Secretariat or any other party acting on their behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented, and no responsibility or liability can be accepted for any error or omission.

Overview

| | | | | |
|---------------|------------------|---------------|----------------------|--------------|
| SAM 01 | Mandatory | Public | Core Assessed | PRI 4 |
|---------------|------------------|---------------|----------------------|--------------|

New selection options have been added to this indicator. Please review your prefilled responses carefully.

SAM 01.1 Indicate whether your organisation uses investment consultants and/or fiduciary managers.

- ☐ Yes, we use investment consultants
- ☐ Yes, we use a fiduciary manager that delegates management of some or all of our assets to third-party managers.
- ☒ No, we do not use investment consultants or fiduciary managers.

| | | | | |
|---------------|------------------|---------------|----------------|--------------|
| SAM 02 | Mandatory | Public | Gateway | PRI 1 |
|---------------|------------------|---------------|----------------|--------------|

SAM 02.1 Indicate for which of the following externally managed asset classes your organisation, and/or your investment consultants, consider responsible investment factors in investment manager: (a) Selection, (b) Appointment (investment management agreements/contracts), and (c) Monitoring

Select all that apply

| Asset classes | (a) Selection | (b) Appointment | (c) Monitoring |
|--|-------------------------------------|--------------------------|-------------------------------------|
| Listed equity | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Fixed income - SSA | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Fixed income - Corporate (financial) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Fixed income - Corporate (non-financial) | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Fixed income - Securitised | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

SAM 02.2 Provide a brief description of how your organisation includes responsible investment considerations in your investment manager selection, appointment and monitoring processes.

Selection: As part of the selection process, the fund managers' approach to responsible investments is initially assessed based on publically available information, responses to RFP requests, and official sustainability ratings.

As the screening process moves on towards a shortlist of funds, we ask detailed questions relating to the requirements we have when it comes to fund monitoring (see Monitoring item below).

Appointment: At present there are no specific contract clauses relating to responsible investments, however the fund managers are informed that they will be evaluated annually, and that they risk being excluded from our offering unless they meet our requirements.

Monitoring: We use a structured process to monitor our managers. Towards the end of each calendar year, a comprehensive survey is sent out, where managers are asked to provide answers for each fund included in our offering. The survey sent out in 2016 included around fifty questions, covering the companies' policies, incorporation

of ESG in investment processes, use of screening and exclusions, voting and other ways to influence, resources and incentives for incorporation in the investment process.

The responses from the survey are combined into a rating, where the cut-off points for the ratings 'green' (best practice/pass with distinction) and 'yellow' (pass) have been agreed in advance for each area. The fund manager's overall rating is determined once the various sub-ratings have been set, and the overall rating is given as red (fail), yellow (pass), or green (best practice/pass with distinction). Movestic has set a goal that 75 percent of the funds within the offering should have the rating 'green' or 'yellow'.

The fund managers are informed about their rating via letter, and given the opportunity to comment. All managers also participate in follow-up meetings. Managers given a yellow or red rating are told what they can do to improve their results. Managers with a red rating are also warned that they must improve or risk being excluded from our offering.

Listed Equity and Fixed Income Strategies

SAM 04

Mandatory

Public

Gateway

PRI 1,2

SAM 04.1

Indicate which of the following ESG incorporation strategies you require your external manager(s) to implement on your behalf:

Active investment strategies

| Active investment strategies | Listed Equity | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised |
|------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Screening | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Thematic | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Integration | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Passive investment strategies

| Passive investment strategies | Listed Equity | | | | |
|-------------------------------|-------------------------------------|--|--|--|--|
| Screening | <input checked="" type="checkbox"/> | | | | |
| Thematic | <input checked="" type="checkbox"/> | | | | |
| Integration | <input type="checkbox"/> | | | | |
| None of the above | <input type="checkbox"/> | | | | |

SAM 04.2

Explain how you integrate ESG factors in the selection, appointment and monitoring of your passive funds

The assessment of whether a manager reaches an acceptable level in relation to sustainability is based on an overall evaluation of the manager's efforts to incorporate ESG factors in their investment strategy.

Movestic requires all managers to incorporate ESG in their investment processes. If this is not currently being done, the manager is informed about this requirement and asked to implement it at the earliest opportunity.

SAM 04.3

Additional information. [Optional]

The category listed equity funds includes both passive and active funds with specific investment focuses (renewable energy, fossil-free, and ethical funds). We do not require all funds to have a thematic approach. The majority of our passively managed equity funds apply ethical screening.

Selection

SAM 05

Mandatory

Public

Core Assessed

PRI 1

SAM 05.1

Indicate what RI-related information your organisation typically covers in the majority of selection documentation for your external managers

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | | | |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--|--|--|
| Investment strategy and how ESG objectives relate to it | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| ESG incorporation requirements | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| ESG reporting requirements | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| No RI information covered in the RFPs | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |

SAM 05.2

Explain how your organisation evaluates the investment manager's ability to align between your investment strategy and their investment approach

Strategy

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | | | |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--|--|--|
| Assess the time horizon of the investment manager's investment strategy | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Assess the quality of investment policy and its reference to ESG | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Assess the investment approach and how ESG objectives are implemented in the investment process (asset class specific) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Assess the ESG definitions to be used | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |

ESG people/oversight

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitized | | | |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--|--|--|
| Assess ESG expertise of investment teams | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Review the ownership of the ESG implementation | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Review how is ESG implementation enforced /ensured | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Other | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |

Process/portfolio construction/investment valuation

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | | | |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--|--|--|
| Review the process ensuring the quality of the ESG data used | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Review and agree the investment decision making process (and ESG data use in it) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Review and agree the ESG incorporation strategy impact of ESG analysis on investment decisions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Review and agree how the manager is targeting returns and ESG objectives | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Review and agree how the manager identifies, measures and manages ESG risk | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Review and agree return and risk in combination at a portfolio level (portfolio construction) and ESG objectives | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Review how ESG materiality is evaluated by the manager in the monitored period | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Review process for defining and communicating on ESG incidents | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Other, specify | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |

If you select any 'Other' option(s), specify

We annually review if the manager has incentives for integrating ESG into the investment decisions.

SAM 05.3

Describe the selection process

- ☒ Review responses to RfP, RfI, DDQ etc.
- ☐ Review Limited Partners' Responsible Investment Due Diligence Questionnaire (PE DDQ)
- ☒ Review publicly available information
- ☐ Review assurance process
- ☐ Review PRI Transparency Reports
- ☐ Request and discuss PRI Assessment Reports
- ☒ Meetings with the potential shortlisted managers
- ☐ Site visits to potential managers offices
- ☐ Other, specify

SAM 05.4

When selecting external managers does your organisation set any of the following:

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | | | |
|----------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--|--|--|
| ESG score | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| ESG weight | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Real world economy targets | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Other RI considerations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |

SAM 06

Mandatory

Public

Additional Assessed

PRI 2

SAM 06.1

Indicate how your organisation typically evaluates the manager's active ownership practices in the majority of the manager.

Engagement

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Review the manager's engagement policy | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Review the manager's engagement process (with examples and outcomes) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Ensure that engagement outcomes feed back into the investment decision-making process | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other engagement issues in your selection process specify | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

(Proxy) voting

| | LE |
|---|-------------------------------------|
| Review the manager's voting ability within different ownership rights | <input type="checkbox"/> |
| Review the manager's voting policy | <input checked="" type="checkbox"/> |
| Ensure that voting outcomes feed back into the investment decision-making process | <input type="checkbox"/> |
| Other active ownership voting issues in your selection process; specify | <input type="checkbox"/> |
| None of the above | <input type="checkbox"/> |

SAM 06.2

Describe how you assess if the manager's engagement approach is effective.

- ☒ Impact on investment decisions
- ☒ Impact on company / asset level
- ☒ Impact on ESG profile or the portfolio
- ☐ Evidence of changes in corporate practices
- ☐ Other, specify
- ☐ None of the above

SAM 06.3

Describe how you assess if the manager's voting approach is effective/appropriate

- ☐ Impact on investment decisions
- ☐ Impact on ESG profile or the portfolio
- ☐ Evidence of changes in corporate practices
- ☐ Other, specify
- ☒ None of the above

Monitoring**SAM 08****Mandatory****Public****Core Assessed****PRI 1****SAM 08.1**

When monitoring managers, indicate which of the following types of responsible investment information your organisation typically reviews and evaluates from the investment manager in meetings/calls

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | | | |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--|--|--|
| ESG objectives linked to investment strategy | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Investment restrictions and any controversial investment decisions | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| ESG incorporation objectives (with examples) | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| ESG portfolio characteristics | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| How ESG materiality has been evaluated by the manager in the monitored period | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Information on any ESG incidents | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| Metrics on the real economy influence of the investments | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| PRI Transparency Reports | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| PRI Assessment Reports | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Other general RI considerations in investment management agreements; specify | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |

SAM 08.2

When monitoring external managers, does your organisation set any of the following to measure compliance/progress

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised | | | |
|----------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--|--|--|
| ESG score | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | | | |
| ESG weight | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Real world economy targets | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| Other RI considerations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | | |

SAM 08.3

Provide additional information relevant to your organisation's monitoring processes of external managers. [OPTIONAL]

We use a structured process to monitor our managers. Towards the end of each calendar year, a comprehensive survey is sent out, where managers are asked to provide answers for each fund included in our offering. The survey sent out in 2016 included around fifty questions, covering the companies' policies, incorporation of ESG in investment processes, use of screening and exclusions, voting and other ways to influence, resources and incentives for incorporation in the investment process.

The responses from the survey are combined into a rating, where the cut-off points for the ratings 'green' (best practice/pass with distinction) and 'yellow' (pass) have been agreed in advance for each area. The fund manager's overall rating is determined once the various sub-ratings have been set, and the overall rating is given as red (fail), yellow (pass), or green (best practice/pass with distinction). Movestic has set a goal that 75 percent of the funds within the offering should have the rating 'green' or 'yellow'.

The fund managers are informed about their rating via letter, and given the opportunity to comment. All managers also participate in follow-up meetings. Managers given a yellow or red rating are told what they can do to improve their results. Managers with a red rating are also warned that they must improve or risk being excluded from our offering.

SAM 09

Mandatory

Public

Additional Assessed

PRI 1

SAM 09.1

When monitoring managers, indicate which of the following active ownership information your organisation typically reviews and evaluates from the investment manager in meetings/calls

Engagement

| | LE | FI - SSA | FI - Corporate (financial) | FI - Corporate (non-financial) | FI - Securitised |
|---|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Report on engagements undertaken (outcomes and examples) | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Account on engagement ESG impacts | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Other RI considerations relating to engagement in investment management agreements; specify | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

If you select any 'Other' option(s), specify

As part of our annual survey, we review engagement and voting policies. Each fund manager is also asked to state how many dialogues they have taken part in, how they define engagement dialogues, and to specify the most important dialogues they took part in during the previous year. The managers are also given the opportunity to report which dialogues are public, and how/where they are reported.

(Proxy) voting

| | LE |
|---|-------------------------------------|
| Report on voting undertaken (with outcomes and examples) | <input type="checkbox"/> |
| Report on voting decisions taken | <input type="checkbox"/> |
| Other RI considerations relating to (proxy) voting in investment management agreements; specify | <input checked="" type="checkbox"/> |
| None of the above | <input type="checkbox"/> |

If you select any 'Other' option(s), specify

The survey is used to review that the managers are using their voting rights in a systematic manner.

Outputs and outcomes

| | | | | |
|--------|-----------|--------|---------------------|---------|
| SAM 12 | Mandatory | Public | Additional Assessed | PRI 1,6 |
|--------|-----------|--------|---------------------|---------|

SAM 12.1

Provide examples of how ESG issues have been addressed in the manager selection, appointment and/or monitoring process for your organisation during the reporting year.

☒ Add Example 1

| | |
|-------------------|---|
| Topic or issue | No entry in Swesif's Sustainability Declaration for Funds |
| Conducted by | <input checked="" type="checkbox"/> Internal staff |
| Asset class | <input checked="" type="checkbox"/> All asset classes <input type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – SSA <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – securitised |
| Scope and process | In 2016, those managers that had not filled in Swesif's Sustainability Declaration for Funds were identified, and asked to do this as soon as possible. |
| Outcomes | This year's review shows that the number of funds that have described their work in Swesif's Sustainability Declaration has increased. |

☒ Add Example 2

| | |
|-------------------|---|
| Topic or issue | Managers of Movestic Funds that have not signed the PRI |
| Conducted by | <input checked="" type="checkbox"/> Internal staff |
| Asset class | <input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – SSA <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – securitised |
| Scope and process | As part of a review of the Movestic funds (outsourced management) it was found that only one of ten appointed fund managers had not signed up to PRI. The manager in question was informed about this at the following review meeting. |
| Outcomes | The manager has decided to sign PRI during 2017. |

☒ Add Example 3

| | |
|-------------------|---|
| Topic or issue | Fund managers with an unsatisfactory general sustainability approach |
| Conducted by | <input checked="" type="checkbox"/> Internal staff |
| Asset class | <input checked="" type="checkbox"/> All asset classes <input type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – SSA <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – securitised |
| Scope and process | Managers given a 'red' rating in the annual survey were sent a letter informing them that they risk being excluded from our range of funds unless improvements were made. The letter was followed up with a meeting. |
| Outcomes | We note that selected managers have generally increased their focus on sustainability, and that improvements have been made. When all the meetings had been completed, it was decided that one of the managers given a red flag will be removed from our offering and replaced with more sustainable alternatives. |

☒ Add Example 4

| | |
|-------------------|--|
| Topic or issue | Nuclear weapon-related assets in Movestic Global |
| Conducted by | <input checked="" type="checkbox"/> Internal staff |
| Asset class | <input type="checkbox"/> All asset classes <input checked="" type="checkbox"/> Listed Equity <input type="checkbox"/> Fixed income – SSA <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – corporate (financial) <input type="checkbox"/> Fixed income – securitised |
| Scope and process | <p>When screening Movestic Global in June 2016, it was found that the fund had two holdings with verified connections to the manufacture of nuclear weapons (within the NPT).</p> <p>The manager was contacted via email, and asked to comment on these holdings.</p> <p>The manager submitted their comments, and these were later discussed at the annual review meeting.</p> <p>This discussion has continued throughout the year, with support from internal resources and ISS/Ethix, as Movestic has made a decision of principle not to invest in nuclear weapons.</p> |
| Outcomes | These holding will be sold in a controlled manner at the earliest opportunity |

☐ Add Example 5

☐ We are not able to provide examples

Communication

| SAM 13 | Mandatory | Public | Core Assessed | PRI 6 |
|--------|-----------|--------|---------------|-------|
|--------|-----------|--------|---------------|-------|

SAM 13.1

Indicate if your organisation proactively discloses any information about responsible investment considerations in your indirect investments.

☒ Yes, we disclose information publicly

provide URL

<https://www.movestic.se/om-oss/haallbarhet/>

provide URL

<https://www.movestic.se/fonder-foervaltning/fondlista/>

SAM 13.2

Indicate if the level of information you disclose to the public is the same as that disclosed to clients and/or beneficiaries.

☒ Yes

SAM 13.3

Indicate what type of information your organisation proactively discloses to the public and clients and/or beneficiaries about your indirect investments.

☒ How responsible investment considerations are included in manager selection, appointment and monitoring processes

☒ Details of the responsible investment activities carried out by managers on your behalf

☐ E, S and/or G impacts and outcomes that have resulted from your managers' investments and active ownership

☐ Other, specify

☐ No

☐ Yes, we disclose information to clients/beneficiaries only

☐ We do not proactively disclose information to the public and/or clients/beneficiaries

SAM 13.4

Additional information. [Optional]

Information on the level of sustainability for each individual fund is available for funds that have described their efforts in Swesif's Sustainability Declaration for Funds. The Sustainability Declaration for Funds is visible in our fund listings.

Anti-fraud Policy

| | |
|-----------------------|---------------------------|
| Adopted by: | The Board of Directors |
| Decision date: | 2017-12-07 |
| Replaces: | 2016-12-08 |
| Legal or other basis: | Chesnara Group Principles |
| Policy owner: | The HR Director |

The information above is not included in the Board's decision and can thus be changed without the Board's involvement. Such changes may only be carried out by the Compliance Officer. Policy owners are however appointed by the CEO.

1 Background

All employees of Movestic Livförsäkring AB (the Company) must at all times act honestly and with integrity, and protect the assets for which the Company is responsible, including both the Company's own assets and those belonging to its customers. Fraud is an ever present threat and therefore a matter for all employees, consultants and other persons working for the Company.

The Company takes fraud very seriously. All suspicions of fraud must be swiftly and thoroughly investigated and appropriate action taken.

2 Aim

The Company shall work preventively to counteract losses to the Company and its customers, to maintain confidence in the Company, and to protect its brand.

By continuously reviewing risks to the operation and suggesting ways in which processes can be improved, the Company can create the conditions needed to at an early stage prevent and/or detect attempts at fraud against the Company.

The policy details the division of responsibilities in relation to fraud prevention, and describes how suspected and detected instances of fraud should be handled. The risk of fraud is monitored by the Risk Management Function, in accordance with the processes for monitoring of operational risks, which are described in the Company's risk management policy.

3 Roles and responsibilities

The final responsibility for safeguarding the Company's assets and maintaining good internal controls rests with **the board of directors**. The board must always be notified about serious incidents and suspicions of fraud (both external and internal). Incidents and suspicions relating to the company management are always considered to be serious.

The Company's management is responsible for:

- identifying the risks to which systems, operation and procedures are exposed,

- developing and maintaining effective controls to detect and prevent fraud (external and internal),
- ensuring that these controls are enforced,
- conducting vigorous and swift investigations when fraud is detected,
- taking appropriate legal or disciplinary action against suspects and perpetrators of fraud, and
- taking appropriate action against managers and supervisors, whose actions or failure to act have enabled fraud to be carried out.

The CEO carries the overall responsibility for the prevention of fraud, but the responsibility for carrying out the abovementioned measures applies to all managers, and can even involve all Company personnel.

All personnel, including managers, are responsible for behaving correctly and responsibly when using the Company's resources and assets.

4 Definition of fraud

4.1 External fraud

External fraud includes all conscious actions intended to deceive others and which are to the detriment of the affected party and the benefit of the perpetrator. The act would be carried out by an external party, against the Company.

Examples of external fraud include:

- Payment fraud

4.2 Internal fraud

Internal fraud includes all conscious actions intended to deceive others and which are to the detriment of the affected party and the benefit of the perpetrator. The act would be carried out by an employee or other party hired by the Company.

Examples of internal fraud include:

- Embezzlement
- Salary system fraud

5 Prevention measures and controls

By implementing fraud prevention measures and controls in the day-to-day operation, the Company can avoid potential serious events and mitigate fraud. To ensure that the Company's control systems are performing adequately, it is important that for example the following routines and documents are updated, implemented and communicated to everyone within the operation:

- Policies and instructions
- Permissions and authorisations*)
- Requirement to have two signatories
- Reconciliations

- Incident response mechanisms
- Segregation of duties

*) Made up of two parts. One part relates to a co-worker being granted certain permissions, for example in a computer system, i.e. access is given to a particular system. The second part concerns the time when this permission is used, and involves verification of the identity of the person using it, so that the right person is able to access the systems for which they are authorised.

6 Action plan when fraud is detected

The Company has produced a separate action plan for fraud, which can be used as a checklist and guide to actions to be carried out in situations where fraud is suspected.

7 Reporting

7.1 External fraud

Suspicious of external fraud must immediately be reported to the immediate manager and to the CEO.

7.2 Internal fraud

Suspicious of internal fraud must immediately be reported to the HR Department and the CEO. If the suspicions relate to the HR department, they should be reported to the CEO. If the suspicions relate to the CEO, they should be reported to the HR Department and the Compliance Function. In these situations, the chairman of the board shall also be notified.

8 Disciplinary action

8.1 External fraud

Where external fraud is suspected, the Company reserves the right to refer the matter to the Police at the earliest opportunity. The CEO determines whether any disciplinary action should be taken.

8.2 Internal fraud

Where internal fraud has been proven or there is suspicion of internal fraud of a serious nature, the Company reserves the right to refer the matter to the Police at the earliest opportunity. The CEO determines whether any disciplinary action should be taken. If the matter relates to the CEO, the chairman of the Company's board of directors determines whether disciplinary action should be taken.

9 Entry into force and review

This policy has been adopted by the board of directors for Movestic Livförsäkring AB and enters into force immediately upon adoption.

The policy will be adopted annually, even when no amendments have been made to its content. The policy should be reviewed and adjusted as needed over the course of the year, after which it should again be adopted by the board.

Ethics Policy

| | |
|-----------------------|--|
| Adopted by: | Board of directors |
| Date of adoption: | 2017-08-16 |
| Replaces: | 2016-12-08 |
| Legal or other basis: | General guidelines (FFFS 1998:22) regarding guidelines for handling ethical issues at institutions under the supervision of the supervisory authority |
| Policy owner: | CEO |

The information above is not included in the Board's decision and can therefore be changed without the Board's involvement. Such changes may only be carried out by the Compliance Officer. Policy owners are however appointed by the CEO.

1 Background and aim

The aim of the Ethics Policy of Movestic Livförsäkring AB (the Company) is to maintain the customers' and general public's confidence in the Company. The business activities shall be characterised by the expertise of those working for the Company. All matters arising within the Company shall be handled in an efficient and appropriate manner.

As a financial services operation, the Company works in an industry that is highly reliant on public confidence. The Company shall conduct business in such a manner that the public's confidence in the institution and the financial market is maintained and that the business may otherwise be deemed to be sound. This requires employees to always, both on and off duty, act in a manner that builds long-term confidence and respect with customers, colleagues, business partners, media, authorities and other societal stakeholders. The customers should feel trust and confidence in the way the Company meets and manages the particular needs of each individual person or business. They should also feel confident that any information they share with the Company is not at risk of being spread.

The Company's business activities shall comply with all regulations that apply to the industry in which it is active and be characterised by good business practice. Attention should also be paid to guidelines and statements on handling of ethical issues from the Swedish Financial Supervisory Authority and other authorities. Internal rules, such as policies and instructions, must also be considered. Each individual employee must have a clear understanding of the Company's standpoint on these matters, not just from a legal perspective, but also from an ethical and moral point of view.

When an employee encounters a situation that may have ethical implications they shall bring this up with their immediate manager.

Against this background, the Company has put together this policy, to ensure that the operation is always carried out in accordance with current regulations and in an ethically sound way.

2 Scope

This policy applies to board members, employees, and other persons active within the Company, such as consultants and other contractors.

3 Confidentiality

Anyone who is or has been affiliated with the Company, as board member, employee, consultant or other contractor must not without authorisation disclose or use something that they, through the Company, have found out about the business or personal circumstances of a person or entity. All business relationships and other business-related information must also be treated as confidential. The confidentiality requirement remains in place even after the termination of an employment/assignment. All Company employees shall, when they take up their employment, be informed about the confidentiality obligations and sign a confidentiality agreement. Confidentiality agreements must also be signed by consultants, other contractors and external suppliers.

4 Policy on the giving and accepting of bribes

An employee or contractor must not receive, accept a promise of, or request an improper benefit for the carrying out of the employment or assignment (passive bribery). It is also not permitted to provide, promise or offer an employee or contractor undue rewards for the carrying out of the employment or assignment (active bribery).

Situations where for example representation or travel are in fact veiled forms of bribery are not uncommon. As a rule of thumb, a benefit should be considered improper if it cannot be considered to be a natural part of the recipient's work, or deviates from generally acceptable forms of social interaction.

If there is any suspicion that an offer or similar could be regarded as bribery, the offer shall be rejected. All such incidents must immediately be reported to the CEO. The Company keeps a register in which all representation in excess of 1,000 SEK per person must be recorded, and which is regularly reported to its parent company, Chesnara Plc (Chesnara).

The Company follows *the Code of Gifts, Rewards and other Benefits in Business* from the Swedish Anti-Corruption Institute.

5 Employees' own trading in financial instruments

The way in which employees handle their own trading in financial instruments affects both the trust in the Company and in the financial markets. In relation to trading in financial instruments, the *Recommendations for ethical rules relating to trading in financial instruments, currencies etc. by employees, contractors and persons related to them* from Insurance Sweden should be followed. The CEO has adopted an instruction on employees' own trading, which lists the company functions for which reporting requirements apply and what these requirements entail.

Particular rules for trading in Chesnara shares

Anyone intending to trade in shares in Chesnara, or whose closely related person has such intention, must, prior to carrying out the transaction, receive formal consent from Chesnara. There are also periods when no trading of shares in Chesnara is permitted. Anyone wishing to buy shares in Chesnara must contact Chesnara for approval, in accordance with the rules of the 'Chesnara plc Share Dealing Policy', which is annexed to this policy. Once the transaction has been completed, it should be reported to the Compliance function within five days. The shortest permitted holding period is one year. These restrictions apply to all employees and consultants, as well as their immediate family. For further information on routines and requirements for dealing in Chesnara shares, see Annex.

6 Employees' own business transactions

In their activities, employees must not, neither within nor outside the Company, be involved in business transactions that could be considered unethical. Employees must not take part in speculative transactions, nor enter into loan guarantees to such an extent that it has a significant effect on their personal financial situation.

7 Partiality

It is not permitted for persons employed by the Company to put their own interests ahead of those of the Company in the performance of their duties. It is also not permitted to use the Company's business opportunities for personal gain. Employees are not permitted to handle matters between the Company and themselves, or between the Company and a third party, in which the personal interests of the employee may be opposed to the interests of the Company. Employees are also not permitted to handle matters relating to agreements between the Company and a third party, in which the employee or a person closely related to the employee, has a personal interest.

8 Interactions with customers and claims handling

There are rules and regulations for how the Company should act in relation to marketing and sales. The information communicated by the Company must for example be serious and factual, and promote sound competition. Trustworthiness and honesty shall characterise the Company's behaviour, both towards customers and competitors. It is also important that external contacts are treated the same in interactions with different functions within the Company.

The Company's employees must strive to ensure that the interests of the customers are met at all times. The immediate manager is responsible for informing employees on the guidelines that apply to their respective activities, and for monitoring that these are followed. The manager shall also keep employees updated on any changes on a regular basis.

9 Interactions with suppliers

Any employee who comes into contact with businesses acting as suppliers to the Company must maintain their integrity and independence in relation to these suppliers. To avoid situations that could be considered unethical or improper in some other way, employees are not permitted to

accept any benefits from the Company's suppliers, nor from businesses that may become suppliers in the future.

10 Procurement of services

All procurement of services must be handled in a business-like manner. Suppliers shall be selected based on price and quality. Tenders shall be submitted on equal terms and offers received must not be disclosed. Procurement from a close relative or acquaintance is not permitted without prior consent from the immediate manager.

If the service to be provided is of such a nature that it affects the Company's ability to fulfil its commitments to policyholders, it should be considered to meet the Company's definition of outsourcing agreements, and therefore be covered by the Company's Policy on outsourcing. This policy explains for example how potential conflicts of interest between the Company and the intended contractor shall be assessed.

11 Other assignments

Persons employed by the Company are not allowed to accept any assignment alongside his or her position that may be in conflict with the interests of the Company, or could have a detrimental effect on their performance within the Company. All secondary activities of a professional nature and any running of a business operation via an owned company must be disclosed to the HR department and approved by the CEO. The CEO's secondary activities must be disclosed to the Chairman of the Board. Consent for secondary activities are given in writing and kept in the HR department.

12 Money laundering and terrorist financing

Any undertaking operating on a financial market is at risk of being affected by the economic criminality that exists in society. There are a number of laws in place to support the fight against financial crime and terrorism, the Act (2017:630) on Measures against Money Laundering and Terrorist Financing, the Act (2002:444) on Criminal Responsibility for the Financing of Particular Serious Crime, and the Act (2014:307) on Penalties for Money Laundering Offences. To provide an overview of how the Company shall act to avoid being used for money laundering or terrorist financing, it has put in place both a general Policy on prevention of money laundering and terrorist financing and a detailed Instruction with internal procedures for dealing with matters related to money laundering.

13 Conflicts of interest

To identify and deal with conflicts of interest is of vital importance to financial undertakings. For this reason, it is important that all employees and, where applicable, board members are aware of and take responsibility for identifying and dealing with any conflicts of interest that may arise in the operation. To safeguard its trustworthiness and reputation, the Company must have in place effective routines for identifying and dealing with conflicts of interest, to prevent them from having a detrimental effect on the Company itself, or on its customers. To achieve this, the Company has adopted a Policy on dealing with conflicts of interest.

14 Administration

To ensure that the Company's business operation is run in a way that is appropriate from a legal and ethical perspective, the Company shall have in place clear and distinct administrative instructions, for matters such as signatories, contracting, and delegation of authority.

15 Media contacts

All contacts with the media take place through the CEO, unless otherwise agreed with the CEO in each individual instance.

16 Information and training

The Company's HR function is responsible for making sure that all new employees and contractors receive a copy of the Company's Ethics Policy at the start of their employment/assignment. The Compliance function is responsible for making sure employees are given ongoing training and information about ethical matters. All managers within the Company shall work to ensure that both employees and contractors comply with the Ethics Policy.

17 Monitoring and reporting

As a step in the monitoring of the operation, the CEO is responsible for notifying the board of directors of any issues of principle or other important ethical issues which concern the business or the behaviour of employees. The board of directors shall review the Ethics Policy on a regular basis and follow up how it is applied, by issuing instructions about internal reviews.

18 Entry into force and review

This policy has been adopted by the board of directors for Movestic Livförsäkring AB and enters into force immediately upon adoption.

The policy will be adopted annually, even when no amendments have been made to its content. The policy should be reviewed and adjusted as needed over the course of the year, after which it should again be adopted by the board.

Policy on measures against money laundering and terrorist financing

| | |
|-----------------------|---|
| Adopted by: | Board of directors |
| Date of adoption: | 2017-08-16 |
| Replaces: | 2016-12-08 |
| Legal or other basis: | Act on Measures against Money Laundering and Terrorist Financing (2017:630), the Swedish Financial Supervisory Authority's Regulations (FFFS 2017:11) governing measures against money laundering and terrorist financing |
| Policy owner: | Chief Legal Counsel |

The information above is not included in the Board's decision and can therefore be changed without the Board's involvement. Such changes may only be carried out by the Compliance Officer. Policy owners are however appointed by the CEO.

1 Background and aim

All undertakings must implement measures in order to prevent the operations from being used for money laundering or terrorist financing. The aim of this policy is to give a general overview of what Movestic Livförsäkring AB (the Company) shall do to avoid being used for money laundering or terrorist financing.

2 Scope

In addition to this policy that outlines the general principles for the Company's efforts to prevent money laundering and financing of terrorism, the CEO has adopted an instruction on measures against money laundering and terrorist financing (the Money Laundering Instruction). The Money Laundering Instruction includes detailed descriptions of the routines and processes put in place by the Company to prevent it being used for money laundering and terrorism financing.

3 Roles and responsibilities

The Compliance Officer is appointed as Money Laundering Reporting Officer. Further information on the duties and responsibilities of the Money Laundering Reporting Officer is available in the Money Laundering Instruction.

The Chief Legal Counsel is appointed Money Laundering Compliance Principal. Further information on the duties and responsibilities of the Money Laundering Compliance Principal is available in the Money Laundering Instruction.

All employees are responsible for reporting, either to the money laundering reporting officer or to the CEO, any circumstances that may give reason to assume the presence of a transaction that constitutes money laundering or terrorist financing, or any proposed such transactions.

4 Definitions

Money laundering refers to measures relating to property acquired through crime that may result in the property's link to crime being concealed, the criminal being able to avoid legal sanctions, or the recovery of the property being impeded, as well as measures involving control, acquisition, possession or use of such property.

Actions related to other property than that referred to in the previous section (such as tax or customs offences) may also be money laundering, provided the actions are aimed at concealing the fact that someone has profited from criminal acts.

Terrorist financing means the collection, provision or receipt of money or other assets for the purpose of being used to, or in the knowledge that they are intended to be used to, commit particularly serious crimes (e.g. terrorism).

5 Information, decisions and reporting to the Swedish Financial Intelligence Unit (Sw. Finanspolisen)

5.1 Decision-making and reporting

The Money Laundering Instruction sets out the Company's routines for decision-making and reporting in relation to matters where there are reasonable grounds to suspect that actual or proposed transactions relate to money laundering or terrorist financing.

5.2 Information from the business operation

All employees concerned have an obligation to inform the Company's Money Laundering Reporting Officer about any circumstances that are relevant to its duties under this policy.

6 Customer due diligence

In its Money Laundering Instruction, the Company has put in place appropriate routines for how to carry out risk-based customer due diligence procedures re. both policyholders and beneficiaries, which must be followed by all employees involved in the handling of insurance policies. Insurance must not be granted unless customer identification procedures and customer due diligence measures have been carried out.

7 General risk assessment

The Company shall continuously analyse the risk of the operation being used for money laundering or terrorist financing. The general risk assessment shall take into account the

operation's complexity, customers, products, services, and other factors relevant to the business. The risk assessment shall be reviewed on a regular basis, at least annually, and always, for example at times when changes have been made to products or services. The Money Laundering Compliance Principal is responsible for ensuring that the general risk assessment is updated at all times.

8 Individual risk assessment

The Company shall also assess the risk for money laundering or financing of terrorism associated with each specific customer relation (the customer's risk profile). The risk profile of each customer shall be determined on the basis of the general risk assessment and the Company's knowledge of the customer. The process of risk assessment of customers is described in more detail in the Money Laundering Instruction.

9 Monitoring of transactions

All transactions and proposed transactions that may be suspected to be used for money laundering or terrorist financing shall be scrutinized. Further information on procedures for monitoring of transactions is available in the Money Laundering Instruction.

10 Independent review function

The internal or external independent review shall include a review of the Company's routines for handling measures against money laundering and terrorist financing. The Company has outsourced the independent review function to an external supplier.

11 Archiving of documentation

The Company shall ensure that all material that form the basis for the customer due diligence procedures are documented and archived in an appropriate way. Further information on routines for archiving of documentation is available in the Money Laundering Instruction.

12 Routines for fit and proper assessment

The HR function ensures that all employees, procurers and others who participate in the operations and carry out tasks related to the efforts against money laundering and financing of terrorism are fit and proper according to separately documented routines.

13 Training of employees

The Company has a training program for matters relating to money laundering and terrorist financing that was designed in accordance with the requirements in Chapter 2 Section 14 of the Act on Measures against Money Laundering and Terrorist Financing. Further information on training of employees is available in the Money Laundering Instruction.

14 Whistleblowing system

The Company has set up a system whereby employees and procurers anonymously can file reports on suspected violations of the anti-money laundering and counter terrorist financing regulations.

15 Protection of employees

In the Money Laundering Instruction, the CEO sets out the procedures put in place to protect employees as well as procurers who carry out tasks related to the efforts against money laundering and financing of terrorism from threats or hostile action as a consequence of them reviewing or reporting suspicions of money laundering or terrorist financing according to the Act of Measures against Money Laundering and Terrorist Financing.

16 Processing of personal data

The Company processes personal data in accordance with at the time applicable legislation including Chapter 5 of the Act on Measures against Money Laundering and Terrorist Financing. Further information about responsibilities and routines for the processing of personal data is available in the Money Laundering Instruction.

17 Annual supervisory reporting

The procedures for the annual reports about performed risk assessments and routines for preventing money laundering and financing of terrorism that must be filed with the Swedish Financial Supervisory Authority are laid down in the Money Laundering Instruction. The Money Laundering Compliance Principal is responsible for ensuring that the reports are filed in time and that the content meets the regulatory expectations.

18 Entry into force and review

This policy has been adopted by the board of directors for Movestic Livförsäkring AB and enters into force immediately upon adoption.

The policy will be adopted annually, even when no amendments have been made to its content. The policy should be reviewed and adjusted as needed over the course of the year, after which it should again be adopted by the board.

Whistleblowing Policy

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| Adopted by: | Board of Directors |
| Date of adoption: | 2017-12-07 |
| Replaces: | 2016-12-08 |
| Legal or other basis: | Swedish Act (2016:749) on Whistle-blower protection and Chesnara Group Principles |
| Policy owner: | HR Director |

The information above is not included in the Board's decision and can therefore be changed without the Board's involvement. Such changes may only be carried out by the Compliance Officer. Policy owners are however appointed by the CEO.

1 Background and aim

The operation of Movestic Livförsäkring AB (the Company) should be characterised by transparency, accuracy and accountability. From time to time, a situation may arise where an employee has serious concerns about irregularities in the way the business is conducted or about the actions of colleagues. Such concerns could relate to for example financial irregularities, giving or accepting bribes, non-compliance with external or internal rules and routines, or with other obligations required for efficient management and control.

The aim of this policy is to encourage employees and other persons working within the Company to report any suspicion of irregularities and other serious infringements relating to the operation. Anyone who reports suspected irregularities or other serious infringements should feel safe in the knowledge that such reports can be submitted without the whistle-blower being subjected to reprisals or harassment.

The Policy is based on the Swedish Act (2016:749) on Whistle-blower protection and shared Group Principles, adopted by Chesnara Plc. According to these principles, the Company should have in place a set of rules and routines that encourage employees and other persons active within the Company to report suspected or confirmed incidences of illegal, unethical or otherwise inappropriate incidences, without any effect on their own employment or duties.

2 Scope and limitations

The Policy relates to board members, employees and other persons active within the Company. It does not cover matters of labour rights relating to individual employees, such as matters relating to occupational health, equality, complaints, harassment, or disciplinary matters, which should be reported in accordance with separate guidelines produced by the HR Department.

3 Processes and reporting

3.1 Reporting

Reports on irregularities and/or other serious infringements in the operation shall be submitted to the nearest line manager, the HR Department, or one of the Company's independent Swedish board members. If the suspicions concern the HR Department, the report should be submitted to the Company's Compliance function or to one of the Company's independent Swedish board members. The CEO must always be notified about the receipt of any reports of this type. If the report concerns the CEO, the Company's chairman should be notified about the receipt of the report.

If there is enough legal base according to the Swedish Act (2016:749) on Whistle-blower protection, the report can be submitted to, e.g., the Swedish Financial Supervisory Authority and/or to the Police or be published.

3.2 Investigation and actions

Any employee or board member who receives a report on irregularities should immediately make sure that the matter is investigated and resolved. The investigation process is determined by, and in consultation with, the HR Department, CEO and – where applicable – the independent board member, to ensure that correct procedures are followed in cases where an individual is under investigation. Should the report concern the HR Department, the investigation process will be determined by one of the Company's independent Swedish board members.

In all except the most exceptional circumstances, the individual being accused of misconduct should be informed of the claims made and any evidence provided, and given the opportunity to respond to the allegations.

Any actions from a manager or any other person aimed at obstructing or preventing an employee from submitting a report in accordance with this policy will be regarded as a disciplinary offence.

3.3 Anonymity

Any person submitting a report should be ensured that their report will be treated seriously and with care. If the person wishes to remain anonymous, this will be respected as far as possible given the nature of the report and the outcome of the investigation. It is, however, not always possible to guarantee anonymity. The Company will under any circumstances support the whistle-blower and protect them from reprisals and similar.

3.4 Reports of investigations

Reports on all investigations must be provided to the Company's board of directors and to Chesnara's Audit and Risk Committee.

4 Information and documentation

This policy does not give any person the right to disclose confidential information relating to the Company, its employees, customers, partners, etc. All employees are reminded of the professional secrecy they are obliged to maintain.

The individual who submitted the report should, if appropriate, be notified of the outcome of the investigation, but is never entitled to access to any documentation relating to the matter. Where a report is dismissed after investigation, the person reporting the matter should be notified.

The person who is being investigated must be notified of the outcome of the investigation and is entitled to a copy of the report and details of any actions that will be taken as a result of the investigation.

The investigation, including any plans of action and measures to be put in place, shall be documented in writing and archived by the HR Department. All documentation relating to an investigation initiated as the result of a report submitted under this policy should be treated as confidential and only be available to authorised personnel.

5 Entry into force and review

This policy has been adopted by the board of directors for Movestic Livförsäkring AB and enters into force immediately upon adoption.

The policy will be adopted annually, even when no amendments have been made to its content. The policy should be reviewed and adjusted as needed over the course of the year, after which it should again be adopted by the board.