Landshypotek Bank

# Landshypotek Bank Green Bonds

For a richer life in the countryside

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## Introduction

#### Who we are

Landshypotek Bank is a Swedish member owned bank, with a clear purpose from our owners to finance land and forest. We want to give everyone in Sweden opportunities to live a richer life and we want the Swedish countryside to continue to develop. This is our vision today, and we have promoted and believed in this vision since 1836. While other banks focus on the major cities and their prevailing economic conditions — we lift our gaze beyond the major cities as Stockholm, Gothenburg and Malmö.

Landshypotek Bank is owned by 40,000 (2017) farmers and foresters across the country, organised in Landshypotek Ekonomisk Förening. All the bank's surplus goes back to the farmers and foresters or is reinvested in the bank. Over the years, we have financed hundreds of thousands of investments in a flourishing and sustainable countryside — in open landscapes, well preserved forests and locally produced food.

#### **Our mission**

Our clear assignment for the farming and forestry sectors makes us a unique bank in the Swedish banking market. Together with our customers, we make Sweden grow by financing the country's farmers and foresters.

We are not here solely for farmers and foresters; we offer a selection of well-chosen and key banking services to an increasing number of people. As an example, we provide people the opportunity to create a sustainable life through mortgage loans and we believe it is important that all Swedes have the possibility to save toward a better future. We are a small bank with a vital mission — to promote a richer life countrywide.

#### **Our responsibility**

Since its start in 1836, Landshypotek Bank has promoted living and entrepreneurship in the countryside. The majority of the bank's customers manage farming and forestry companies. The bank's sustainability efforts have always focused on our customers and their operations. Since the bank is owned by its farming and forestry loan customers, the bank's business model contributes to an economically and socially sustainable society.

A thriving countryside — fields and forests being cultivated and growing, thereby creating growth and jobs — these are the cornerstones for a well-developed business community and Swedish welfare. The country's sustainable development rests on the conditions for living and working throughout Sweden. Landshypotek Bank enables rural living and investments in rural enterprises, which lays the foundation for a future for the cities and the countryside. With this business model, the bank contributes to sustainable societal development — socially, environmentally and economically.

#### Sustainability for us

At Landshypotek Bank, sustainability means viewing all aspects of the bank's operations from a long-term and responsible perspective. Therefore, the bank's sustainability efforts permeate operations and affect all of the bank's stakeholders, such as its customers, employees, owners, association members and investors.

Swedish farms produce high-quality food and the production follows high standards, not least from an international perspective, in terms of environmental impact, animal husbandry<sup>1)</sup> and usage of antibiotics. Cultivation by Swedish farming and forestry contributes to biodiversity and sound management of the countryside<sup>2)</sup>.

#### Forests in a global perspective

Forests cover 30 per cent of the Earth's surface, providing food security and shelter, protecting biodiversity and the homes of the indigenous population<sup>3)</sup>. The forest is a key factor in the transition to a fossil-free society since forests absorb and store vast quantities of carbon dioxide, helping to mitigate the effects of greenhouse gas emissions<sup>4)</sup>. By addressing deforestation and embrace sustainable forest management, we could achieve up to one third of the carbon mitigation needed annually to keep temperature rises in check<sup>5)</sup>.

#### **Swedish Forestry**

Sweden's forests are considered as a national asset and resource. It is therefore important that the forest is managed to give sustainable high yields while biological diversity is maintained. Forest management is even required by law to show consideration to other interests, such as the public's need of forest environments for recreation.

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<sup>&</sup>lt;sup>1)</sup> Sverige har EU:s bästa djurskyddsregler, Gård & Djurhälsan (2016) http:// www.gardochdjurhalsan.se/sv/pressmedia/schysst-kott/fakta-omsvensk-griskottsproduktion/basta-djurskyddsreglerna/

<sup>&</sup>lt;sup>2)</sup> Antibiotika och djur inom EU, SVA (2017) http://www.sva.se/globalassets/redesign2011/pdf/om\_sva/publikationer/antibiotika-och-djur-ieu-2015.pdf

<sup>&</sup>lt;sup>3)</sup> UN Sustainable development Goal 15, http://www.un.org/sustainabledevelopment/biodiversity/

<sup>&</sup>lt;sup>4)</sup> Kissinger, G., M. Herold, V. De Sy, 2012, 'Drivers of Deforestation and Forest Degradation: A Synthesis Report for REDD+ Policymakers'

<sup>&</sup>lt;sup>5)</sup> The Prince's Charities, International Sustainability Unit, 2015, 'Tropical Forests: A Review'

Forest is renewable, it can be used to produce green fuel and provides raw material for a range of products. As a construction material, wood is superior to concrete, steel and other materials in terms of its climate impact. Growing forest and the use of wood has considerable significance for countering climate change and acting as a carbon sink. Today, only 80 per cent of the annual growth of Swedish forests is harvested <sup>6)</sup>, which means that the carbon sink is constantly growing as long as forests are managed in a sustainable way.

The Swedish forests make a large contribution to replace fossil-based products and materials. By using biomass from the forest and allowing fossil fuels to remain in the earth's crust, we can reduce the volume of new carbon dioxide added to the atmosphere. Managing forests and replacing fossil material with renewable biomass leads to a lasting reduction in emissions. On average, every harvested cubic metre of timber used in a wooden product eliminates 470 kg of CO<sub>2</sub> emissions<sup>7</sup>). If forest is continued to be managed in the same productive way as it is today 60 billion tonnes of CO<sub>2</sub> emissions could be avoided to be released into the atmosphere. That is equal to the amount Sweden release every year. If the productivity could be increased even more the climate utility could be even higher.<sup>8)</sup>

#### **Our forestry customers**

Landshypotek Bank's customer relationships are longstanding and frequently span several generations. It takes up to a hundred years for a forest to be ready for harvest, which means that what our customer's plant today will be harvested by future generations. At some point in their lifetime, our customers implement a generation shift and it is important for the bank to assist and be there for our customers during these events. Through its longstanding relationships the bank can identify the potential, as well as the need, for successful ownership handovers.

The forests that our customers own are privately owned and managed – often within the same family for generations. In Sweden, 50 per cent of the forest is owned by 330 000 private individual owners, which encourage a diverse landscape which is one of society's primary goal expressed in the Swedish Forestry Act<sup>9)</sup> (Sw. Skogsvårdslagen).

A forest management plan is fundamental for an active and sustainable forestry management in order to overview the forest land and stand. Plans that are issued today are often "green" which means that they consider all values in the forest land – economic, environmental and social values. It gives the forest management a long-term perspective and a clear action plan to maintain a varied forest with places for particular species, conservation of nature values and economic feasible revenue<sup>10)</sup>. A green forest management plan is necessary to attain a third part certification through either the Forest Stewardship Council (FSC) or the Programme for the Endorsement of Forest Certified (PEFC). The demand for certified forest products has increased the last decades but there is still a debated opinion if a certification is a warrant of a more sustainable forestry. Some forest owners find it hard to justify the extra costs compared to the premium price given, considering that they already fulfil the same or even more progressive standards, without paying the fee of certifications.

Nevertheless, the establishment of a green forest management plan is a requirement and hence a proactive way for the forest owner to show a long-term interest in managing the forest in a way where more than economic values are considered.

#### **Credit granting at Landshypotek Bank**

Credit granting at Landshypotek is managed by 80 account managers, located in 19 offices all over Sweden in order to be close to the customers and market – both for a good relation but also in order to be aware of specific and local differences (e.g. markets prices, yields and land conditions). The absolute majority of all account managers have a double degree from the Swedish University of Agricultural Sciences, in both business management and agriculture or forestry. Landshypotek also has experts within each category of its core business, i.e. forestry, poultry, dairy, swine, grain and wind power that can provide additional advise to the account managers. In addition to these experts the account managers can further consult credit experts within the credit risk department as needed.

<sup>&</sup>lt;sup>6)</sup> Skogen lagrar kol, Skogsstyrelsen (2017) https://www.skogsstyrelsen. se/miljo-och-klimat/skog-och-klimat/skogen-lagrar-kol/

<sup>&</sup>lt;sup>7)</sup> Gustavsson, L. och Sathre, R., 2006. Variability in energy and carbon dioxide balances of wood and concrete building materials. Building and environment, 41. pp. 940-951

<sup>&</sup>lt;sup>8)</sup> Lundmark, T., Bergh, J., Hofer, P., Lundström, A., Nordin, A., Poudel, B.C., Sathre, R., Taverna, R., och Werner, F. (2014) Potential Roles of Swedish Forestry in the Context of Climate Change Mitigation, Forests 2014, 5(4), 557-578.

<sup>&</sup>lt;sup>9)</sup> Vem äger Sveriges skogar?, SkogsSverige (2014), https://www.skogssverige.se/skog/fakta-om-skog/vem-ager-sveriges-skogar

<sup>&</sup>lt;sup>(10)</sup> Grön skogsbruksplan, Hushållningssällskapet (2018) http://hushallningssallskapet.se/tjanster-produkter/skog/gron-skogsbruksplan/

## Landshypotek Bank Green Bonds

By setting up this green bond framework, aligned with the Green Bond Principles published in June 2017 by the International Capital Market Association, Landshypotek Bank offer investors further insight on our sustainability strategy in line with our commitments and offer investors the opportunity to support the transition to a low carbon economy.

Landshypotek Bank has worked with Danske Bank to develop the green bond framework. CICERO (Center for International Climate and Environmental Research-Oslo) has provided a second opinion to the green bond framework, which is publicly available at Landshypotek Bank's website: www.landshypotek.se

The UN Sustainable Development Goals ("SDG") were adopted by the United Nations general assembly on 25 September 2015. The SDG's and agenda have been mapped against the Use of Proceeds in this Framework, targeting the SDG's most relevant - affordable and clean energy (7), sustainable cities and communities (11), climate action (13) and life on land (15).

2018-04-24

Per Lindblad Chief Executive Officer Fredrik Sandberg Chief Financial Officer Martin Kihlberg Chief Sustainability Officer



### 1. Landshypotek Bank Green Bond Framework

The legal documentation for each individual Landshypotek Bank green bond (Green Bond) shall provide a reference to this framework under the use of proceeds section.

Landshypotek Bank (Landshypotek) can issue Green Bonds as (i) covered bonds issued in accordance with the Swedish Act on Issuance of Covered Bonds, (ii) unsubordinated notes and (iii) subordinated notes and is committed to using the proceeds of Green Bonds to finance and/or refinance Green Assets, as defined below. The Green Assets remain on Landshypotek's balance sheet.

Green Assets can, in accordance with the Swedish Act on Issuance of Covered Bonds, form part of Landshypotek's cover pool.

### 2. Use of Proceeds

Green Assets means loans provided by Landshypotek, financing or refinancing investments related to Sustainable Forestry, Renewable Energy and Green Buildings as defined under Green Asset criteria.

Green Bond net proceeds will not be allocated or linked, inter alia, to fossil energy generation, nuclear energy generation, research and/or development within weapons and defence, potentially environmentally negative resource extraction (such as rare-earth elements or fossil fuels), gambling or tobacco. Landshypotek does not provide any loans to either of the above.

Green Bonds will, initially, largely refinance existing Green Assets. However, Landshypotek makes efforts to increase its lending to Green Assets, why the proportion of Green Bond net proceeds allocated to loans disbursed less than 12 months prior to the issuance of a Green Bond (new Green Asset) is likely to increase. Landshypotek will, in its annual Green Bond reporting, disclose the proportion of Green Bond net proceeds financing new Green Assets.

Green Assets have to meet the eligibility criteria at the time they are marked as Green Assets. If Landshypotek decides to enhance eligibility criteria in an updated Green Bond framework, these new criteria are not automatically applied retroactively to the existing Green Assets already financed with a Green Bond, as long as the Green Bond is outstanding.

## 3. Green Asset Criteria

The criteria for each individual asset are set based on the UN SDG's and categorized depending on its key components – *Sustainable Forestry, Renewable Energy* and *Green Buildings*. Each category and asset criteria are described below.



#### **3.1 Sustainable Forestry**

Sweden's forest policy places equal emphasis on two main objectives: production goals and environmental goals. All Swedish forestry needs to show compliance with the Swedish Forestry Act<sup>11</sup>, and the Swedish Forestry Agency (Sw. *Skogsstyrelsen*) is responsible for enforcing compliance with the law and is thus the national governmental authority in charge of forest-related issues. The law states that the forest is a renewable resource that is to be managed sustainably yielding good revenue. At the same time the owner has an obligation to take consideration to nature, cultural heritage and other interests.

The Swedish Forestry Act includes all phases of a sustainable forestry. The forest land owner has an obligation to take consideration to nature, cultural heritage, reindeer husbandry and other interests such as outdoor recreation. To achieve felling permissions, the site has to been promoted through pre-commercial thinning, commercial thinning or in other ways allowing sufficient tree spacing. Regeneration on sites (0.5 hectares or larger) has to be reported to the Swedish Forest Agency. The forest owner has an obligation to restock woodland, no later than the third year after harvest, using established methods and tree species suitable. Environmental consideration during all forest operations include establishment of buffer zones along rare biotopes, cultural heritages sites, watercourses, wetland and large bird nests. These considerations are vital to enhance conservation values and to prevent leakage of nutrition and silts as well as limitation of clearfelling areas and the retention of snags and groups of trees to maintain elements of natural species that grow on the site<sup>12)</sup>.

<sup>&</sup>lt;sup>(11)</sup> The Forestry Act, Skogsstyrelsen (2018), https://www.skogsstyrelsen. se/en/laws-and-regulations/skogsvardslagen/

<sup>&</sup>lt;sup>12)</sup> The Forestry Act, Skogsstyrelsen (2018), https://www.skogsstyrelsen. se/en/laws-and-regulations/skogsvardslagen/

#### **Criteria Sustainable Forestry**

Loans financing or refinancing an environmentally responsible, economically viable and socially beneficial forestry.

- Loans financing or refinancing the acquisition and the refinancing of forest land.
- Loans financing or refinancing investments in sustainable forest management to maintain a good rate of return, while maintaining important natural values.

#### **Green Asset conditions**

In order to fulfil Landshypotek's green asset conditions, either A or B needs to be fulfilled.

- **A** (i) Compliance with the Swedish Forestry Act;
  - (ii) an up-to-date green forest management plan, including nature conservation action plans for at least five per cent of productive area (section nature protection (NO) and habitat management (NS)). A green forest management plan provides a detailed inventory of the forest land holding and is an important tool for the forest owner to manage the forest in an active and sustainable way; and
    - (iii) a minimum target of five per cent deciduous tree noted in the green forest management plan.
      Deciduous trees are beneficial to many species and make the forest more resistant in the event of storms.

(together i, ii and iii fulfill the same criteria and condition as a PEFC certification)

or

**B** A certification through the Forest Stewardship Council (FSC) and/or the Programme for the Endorsement of Forest Certified (PEFC) which means that criteria (i), (ii) and (iii) above is fulfilled.

Besides fulfilling A or B, all forest land holdings must be insured, ensuring monetary value and adoption measures such as forest fire proliferation prevention, storms and extreme precipitation.

#### 3.2 Renewable Energy

Loans financing or refinancing the development, the construction, the acquisition and the installation of wind and solar power production units in Sweden.

#### **3.3 Green Buildings**

#### **Energy Efficient Buildings**

Loans financing or refinancing the development, acquisition or otherwise completed building that have, or if under construction is expected to receive, an Energy Performance Certificate (EPC) with energy class A or B, meaning at least 25% less total energy use (kWh) per heated square meter (Atemp) and year than required by the Swedish National Building regulations (BBR – Boverkets Byggregler).

#### **Energy Efficient Renovation**

Loans financing or refinancing substantial retrofit or renovation of existing buildings, either on-going or completed, leading to reduced energy use per year of at least 30 per cent.

### 4. Process for Green Asset Evaluation and Selection

### Sustainability aspects in the credit approval process in general

The corporate governance principles of Landshypotek are stated in several of the policies, guidelines and instructions regarding risk management, credit granting, sustainability, ethics, human resources, contingency planning and anti-money laundering. A list of the main governing documents is included at the end of this framework.

Environmental impact and sustainability risks of the customers' operations are key components in the bank's credit approval process and cannot be separated from financial risks. Long-term sustainable production and management means lower risk — for the bank and the customer. The bank's internal guidelines support accurate assessments of customers' operations and related risks and the bank's employees are educated in sustainability analysis.

As set out in Landshypotek group's Appraisal Policy, environmental concerns are one of the factors considered in the property appraisal process. Certified appraisers with specific knowledge within agriculture and forestry consider e.g. the forest management plan for a forestry property, any potential environmental concerns related to the property, if the property is located nearby a water protection area or if the property or part of it is classified as nature conservation area. A forest management plan is in general required for all properties with a minimum of 50 acres of forest.

All necessary findings and documentation is electronically stored in Landshypotek's credit process system.

#### **Evaluation and Selection of Green Assets**

As all Landshypotek activities, Green Assets are evaluated through the general corporate governance principles, policies, laws and regulations.

The process for Green Asset evaluation and selection is a two-step process:

i. Landshypotek Account Managers record all the necessary data of every single loan. A list of loans disclosing amount financed and relevant data to ensure compliance with its related Green Asset Criteria is extracted. ii. The list of suggested loans is presented to the Green Bond Committee, who solely makes the decision to finance Green Assets, in line with the Green Asset Criteria definition, with net proceeds from any issuance of Green Bonds. A decision to allocate net proceeds will require a consensus decision by the Green Bond Committee. The final list and the decision is documented and filed.

The Green Bond Committee consists of:

- Chief Executive Officer
- Chief Financial Officer
- Chief Sustainability Officer
- Forest Expert
- Head of Corporate Banking

For the avoidance of doubt, the Green Bond Committee holds the right to exclude any Green Asset already funded by Green Bond net proceeds. If the Green Asset is redeemed early, or for other reasons loses its eligibility, funds would then follow the procedure under Management of Proceeds until reallocated to other Green Assets.

#### **Annual Review**

Landshypotek's independent and internal risk management department is appointed to, at least annually, control and review that the allocations of Green Bond net proceeds are made in accordance with Landshypotek's green bond framework.

## 5. Management of Proceeds

An amount equal to the Green Bond net proceeds credits a separate account and will only support Landshypotek's financing of Green Assets, or to repay a Green Bond. The proceeds in such account are kept separated from other accounts to ensure and enable separate monitoring and tracking of the Green Bonds net proceeds. Landshypotek will document all transfers to and from such separate account, to secure tracking of the funds and to simplify the annual review.

In the event the separate account has a positive balance, Landshypotek will have the right to either: (i) temporary deposit such positive balance with financial institutions or (ii) temporary invest in (a) debt securities issued by the Swedish government and/or Swedish municipalities (b) green bonds or (c) covered bonds.

Temporary investments or deposits will not be made in entities with a business plan focused on fossil energy generation, nuclear energy generation, research and/ or other carbon dioxide intense activities, development within weapons and defence, potentially environmentally negative resource extraction (such as rare-earth elements or fossil fuels), gambling or tobacco. Temporary investments will be made in debt securities with at least AA- rating from Standard & Poor's or equivalent rating from another rating institute.

As long as Green Bonds are outstanding and the separate account has a positive balance, such positive account balance will in relation to amounts allocated to Green Assets, be adjusted at least every fiscal quarter. Landshypotek will, until full allocation of such Green Bond net proceeds has taken place, in its reporting disclose the amount equal to the Green Bond net proceeds not yet allocated to Green Assets.

## 6. Reporting

Landshypotek will annually, and until the maturity of Green Bonds issued, provide at least the following information to investors on its website www.landshypotek.se.

- i. A summary of Green Bond developments.
- ii. The outstanding amounts of issued green covered bonds, green unsubordinated notes and green subordinated notes.
- iii. The total proportion of Green Bond net proceeds used to finance new Green Assets (loans disbursed less than 12 months prior to the issuance of a Green Bond) and the proportion of Green Bond net proceeds used to refinance existing assets.
- iv. The balance of the separate account (including any, temporary investments and Green Bond repayments).
- v. The total aggregated proportion of Green Bond net proceeds used per Green Asset category.
- vi. A summary of the findings from the independent and internal risk management review of Green Asset eligibility performed under the Green Asset evaluation and selection process.
- vii. Green Asset reporting (Sustainable Forestry, Renewable Energy and Green Buildings)

The impact assessment is provided with the reservation that not all related data can be covered and that calculations therefore will be on a best intention basis.

Given the large number of loans financed with Green Bonds, and to live up to the requirements in relation to Landshypotek's customers and the General Data Protection Regulation (GDPR), Landshypotek intends to show an aggregation of the loan volume and greenhouse gas absorbed by Green Assets financed with Green Bonds.

#### **Sustainable Forestry**

- Brief description of, at least, two examples of Green Assets financed with Green Bonds.
- The aggregated loan volume, as per area North, Middle and South in Sweden.

- The aggregated annual absorption of greenhouse gas (tonnes) based on the average geographic growth rate, in proportion to the aggregated loan volume financed with Green Bonds, per area North, Middle and South in Sweden.

#### **Renewable Energy**

- Brief description of, at least, two examples of Green Assets financed with Green Bonds (if applicable).
- The aggregated loan volume allocated (per wind and solar).
- The aggregated installed capacity added (MW) (per wind and solar).
- The aggregated expected annual electricity generation (kWh) (per wind and solar).
- Expected aggregated annual greenhouse gas emissions avoided (tonnes).

#### **Green Buildings**

- Brief description of, at least, two examples of Green Assets financed with Green Bonds (if applicable).
- The aggregated loan volume allocated (per Green Asset Energy Efficient Buildings and Energy Efficient Renovation).
- Annual aggregated energy savings (kWh)<sup>13)</sup>.
- Expected aggregated annual greenhouse gas emissions avoided (tonnes).

<sup>(3)</sup> When Landshypotek has knowledge of the calculated or actual energy use per heated square meter (Atemp), energy savings will be calculated as the difference to the Swedish National Building regulation code (BBR). If the actual energy use is unknown, Landshypotek will use a conservative calculation as 50 per cent of the energy use as per relevant BBR code if EPC class A and 25 per cent if EPC class B to calculate energy savings. Energy savings for Energy Efficient Renovations are seen as the energy use prior to renovation compared to energy use post renovation.



## Main corporate governance documents governing Landshypotek's environmental and sustainability work and relevant information to investors

General Corporate Governance and Ethics			Reference page in the framework
Code of Conduct (Sw. <i>Etikpolicy</i> )	Public	https://www.landshypotek.se/ globalassets/dokument/hallbarhet/c.1- etikpolicy-1-juni-2017.2.pdf	1
Compliance Policy (Sw. Policy för regelefterlevnad)	Non-Public		5
Corporate Governance (Sw. Bolagsstyrningsrapport)	Public	https://landshypotek.se/globalassets/ dokument/hallbarhet/corporate-gover- nance.pdf	1
Diversity policy Landshypotek Bank Board (Sw. Policy för mångfald i styrelsen)	Public	https://landshypotek.se/om-landshypotek/ landshypotek-bank/bolagsstyrning/ mangfaldspolicy/	1
Owner Directives included in the Annual report for Landshypotek Ekonomisk Förening (Sw. Ägardirektiv)	Public	https://landshypotek.se/globalassets/ dokument/finansiell-info/rapporter/ ekfor-ar-2017_180316.pdf	1
Sustainability Overview (Sw. Hållbarhetsöversikt)	Public	https://landshypotek.se/globalassets/ dokument/hallbarhet/hallbarhetsoversikt- for-landshypotek-bank_april-2018.pdf	1
Sustainability Report	Public	https://www.landshypotek.se/ globalassets/dokument/landshypotek- bank/lhab-sustainability-2017-eng.pdf	1
Sustainability and Environmental			
Appraisal Policy (Sw. Värderingspolicy Landshypotek Ekonomisk Förening)	Non-Public		5
Instruction for sustainability analysis (Sw. Instruktion för hållbarhetsanalys)	Non-Public		5
Procedure of Green Bond Committee (Sw. Arbetsordning kommitté gröna obligationer)	Non-Public		5
Sustainability Policy (Sw. Hållbarhetspolicy)	Public	https://landshypotek.se/globalassets/ dokument/landshypotek-bank/ hallbarhetspolicy-20171214.pdf	1
Credit Approval Process			
Credit Policy (Sw. Kreditpolicy)	Non-Public		1, 5
Guideline for credit granting (Sw. Riktlinje Kreditgivning)	Non-Public		5
Guideline of customer due diligence (Sw. Riktlinje för kundkännedom)	Non-Public		5
Social Governance			
Guideline regarding outsourcing (Sw. Riktlinje för utlagd verksamhet)	Non-Public		5
HR Policy (Sw. HR Policy)	Public	https://landshypotek.se/globalassets/ dokument/landshypotek-bank/hr-policy- 12-mars-2018.pdf	1, 2, 5
Policy Anti-Money Laundering and terrorism financing (Sw. Policy om åtgärder mot penningtvätt och finansiering av terrorism)	Public	https://landshypotek.se/globalassets/ dokument/landshypotek-bank/policy- om-atgarder-mot-penningtvatt-och- finansiering-av-terrorism-20170801.pdf	5
Policy on Declarations of Interests (Sw. Policy för intressekonflikter)	Public	https://landshypotek.se/globalassets/ dokument/landshypotek-bank/policy- for-intressekonflikter-2018-03-12.pdf	5
Work Environment Guideline (Sw. Riktlinje kring Landshypotek Banks arbetsmiljöarbete)	Non-Public		5

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