


Dokumentnamn / Innehåll Placeringspolicy	Dokument nummer	Version	Dokumenttyp Instruktion el policy från styrelse	
Upprättad av Emma Bergwall	Upprättad datum 2014-10-15	Avser enhet ISEC Services AB		
Godkänd av Styrelsen	Giltig från datum 2021-02-25	Uppdateras senast	Sekretess (tillåten spridning)	

## 1 BACKGROUND

1.1 Chapter 7, section 10 of the Swedish Financial Supervisory Authority's Regulations (FFFS 2013:9) regarding Swedish UCITS and Chapter 3, section 5 of the Swedish Alternative Investment Fund Managers Act provide, among other things, that the board of directors of a company which conducts fund operations shall:

- (i) adopt internal rules specifying which investment strategies the company applies to each fund it manages,
- (ii) adopt internal rules specifying the procedures in place for decisions about investments of fund assets that the company applies to each fund it manages, or ensure that the managing director adopts such internal rules,
- (iii) regularly follow up and monitor that the general investment policy, the investment strategies and the risk limit system for each fund managed by the company are implemented correctly and effectively and are complied with, and
- (iv) regularly follow up and monitor the effectiveness of the company's risk management system.


1.2 Article 3 of Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector provides that the Company shall publish information regarding its policies on the integration of sustainability risks in its investment decision-making process.

1.3 Against this background, ISEC Services AB (the "Company") has adopted this investment policy.

## 2 INVESTMENT STRATEGIES

2.1 The investment rules according to law, regulation and fund rules shall be complied with in conjunction with management. As regards each fund, the board of directors has taken a decision to adopt special investment strategies.

2.2 In conjunction with management, the manner in which sustainability risks are integrated in the investment decision-making process shall be apparent.

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### 3 DECISIONS REGARDING INVESTMENTS

- 3.1 Decisions shall be reported per fund and shall also include any delegation.
- 3.2 The following persons shall be entitled to carry out transactions on behalf of the fund:
- The managing director
  - Responsible fund managers
  - Persons who are allowed to carry out transactions pursuant to outsourcing agreements

### 4 FOLLOW-UP AND VERIFICATION

- 4.1 The Company's risk manager shall, in accordance with the Company's guidelines for risk management, regularly follow up and monitor compliance with the general investment policy, the investment strategies and the risk limit system for the fund or funds managed by the Company. The risk manager shall, once per month, compile a report regarding relevant issues and submit the report to the board of directors.
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