

Policy for Inducement

Company	Lysa Fonder AB
Decision date	2023-11-29
Established by	The Board of Directors
Person responsible for the document	CEO
Version	2023:1

Table of contents

1. content information

1.1 Version history

1.2 Abbreviations and definitions

2. Background and purpose

3. responsibilities and organisation

3.1 Board of Directors of the Fund Management Company

3.2 Managing Director

3.3 Employee responsibilities

4. Management of inducement

4.1 Inducement in the Fund Management Company's operations

6. compliance and updating

1. Content information

1.1 Version history

Previously valid versions are shown below.

Version #	Date of adoption	Established by
2022:1	2022-11-28	CEO
2021:1	2021-12-01	CEO
2020:1	2020-12-17	CEO
2019:1	2019-11-07	CEO

1.2 Abbreviations and definitions

Abbreviation	Definition
Fund management company/company	Lysa Fonder AB
CEO	Chief Executive Officer
LVF	Act (2004:46) on investment funds
Fund regulations	Finansinspektionen's regulations (FFFS 2013:9) on mutual funds

2. background and purpose

Policy for inducement have been adopted by the Board of Directors of Lysa Fonder AB ("the Fund Management Company"/"the Company") and replace the previously applicable instructions. The Fund Company is a company authorised by the Swedish Financial Supervisory Authority to conduct fund operations.

A fund management company must, according to Chapter 21. Finansinspektionen's regulations (FFFS 2013:9) regarding UCITS funds (the Fund Regulations), a fund management company must fulfil a number of requirements when the company pays or receives a fee or commission, or gives or receives a benefit in kind. The purpose of this instruction is to regulate this procedure.

3. responsibilities and organisation

3.1 Board of Directors of the Fund Management Company

The Company's Board of Directors is ultimately responsible for the Fund Company's operations. The Board of Directors is responsible for ensuring that the Company has good internal governance and control in its operations in accordance with the laws and regulations that apply to the business. The board of directors of fund management companies also has a special responsibility to monitor the management of the funds.

3.2 Chief Executive Officer

The Chief Executive Officer ("CEO") is ultimately responsible for compliance with and implementation of the instructions. The CEO is also responsible for reporting to the Board on how the business is conducted.

3.3 Responsibilities of the employee

It is the responsibility of each member of staff to read and familiarise himself/herself with the content of all instructions and policies relating to his/her post.

4. Management of incentives

4.1 Inducement in the Fund Management Company's activities

Below is information on the incentives allowed by the Management Company in the context of its fund activities. No other incentives are allowed.

Remuneration in the context of fund activities

The Fund Management Company has outsourced the functions for certain services to Lysa AB ("Lysa") through an assignment agreement. The Fund Management Company will therefore pay compensation to Lysa for the outsourced services within the framework of the fund operations. The remuneration is designed to improve the quality of the fund operations concerned in such a way that it gives the Fund Management Company an opportunity to rationalise its operations and benefit from the knowledge and experience available within the Lysa group. The remuneration does not prevent the Management Company from acting in the interests of unitholders as it does not affect the management of the funds.

Inducement when investing in other funds

In cases where the Fund Management Company receives a discount on a fund investment included in one of the Fund Management Company's funds, this compensation shall always accrue to the fund in question and thus benefit the fund unit holders.

4.2 Information to unitholders

Marketing and distribution of the Fund Management Company's funds is outsourced to Lysa through an assignment agreement. The provision of information to potential fund unit holders regarding incentives is therefore specifically regulated in the assignment agreement between the Fund Management Company and Lysa. This is to ensure that Lysa fulfils the requirements established by the Fund Management Company in light of the requirements set out in external regulations and that potential fund unit holders thereby receive the necessary information in new business relationships with the Fund Management Company.

The Management Company shall also provide information on incentives to potential clients at the request of unitholders, both existing and potential, and keep the information available on the Management Company's website.

5. compliance and updating

The CEO is responsible for the compliance and implementation of this document. The Board of Directors shall adopt this document at least annually even if no changes have been made.

6. compliance and updating

The CEO is responsible for the day-to-day management of the Company in accordance with the Board's instructions and policies and is ultimately responsible for this document. The document manager has been delegated responsibility for compliance and implementation. The document manager is responsible for ensuring that the document is reviewed and updated annually or more frequently if necessary.