



Sustainability Policy
for
Resscapital AB

Responsible for the document:
Gustaf Hagerud

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The next annual update:
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Purpose

The purpose of this policy is to provide guidance for Resscapital and all its employees on how our sustainability efforts are to be carried out and the values our company stands for. Furthermore, the policy gives investors and other stakeholders information about the company's commitment to sustainability. The sustainability efforts are clearly linked to the business activities and the value-creating processes of the company.

Background

Resscapital wants to contribute to a sustainable development. Our guiding principle is to contribute to a sustainable development actively and responsibly, by ensuring that our business activities are carried out in a manner that maintains the company's values and with respect for people, our society, the environment and natural resources. Resscapital shall meet and exceed the expectations that the company's stakeholders have in relation to our business activities.

By making decisions that fairly balance the claims of various stakeholders, Resscapital shall contribute to a sustainable development and assume its share of responsibility for the common financial, social, and environmental aspects of the world around us. In terms of corporate responsibility, Resscapital's stakeholders include clients, owners, employees, business partners, the environment and society (such as civil society and the public sector), as well as stakeholders affected by our business.

Guidelines

Key principles

Resscapital has defined the following key principles regarding sustainability based on the Swedish Standard ISO 26000:2010 for social responsibility and the United Nations Global Compact initiative:

- Responsibility
- Transparency
- Business ethics
- Respect for stakeholder interests
- Respect for the rule of law
- Respect for international standards of conduct
- Respect for human rights

Strategy for sustainability efforts

The strategic direction for Resscapital's sustainability efforts shall be determined by the company's Board of Directors based on the company management's strategic planning and business planning processes. Management drafts policies for ethics, sustainability, codes of conduct and other documentation. Management also plans, reviews and follow-up regarding the company's sustainability efforts on an ongoing basis. The strategy shall be based on relevancy analyses, and analyses of the current situation.

Sustainable areas of responsibility

Sustainability in the investment process

Resscapital manages a portfolio of US life insurance policies. Life insurance policies are purchased from US households who no longer need life insurance coverage. The company therefore enables individual households to receive compensation for an unneeded insurance policy, for which premiums have been paid during many years.

The secondary market for US life insurance policies is regulated in most US states. The legislation regulating the market is there to safeguard the individual policyholder's, i.e. the consumer's interest.

When Resscapital purchases life insurance policies, the company uses intermediaries / brokers who facilitate the sale of life insurance policies from policyholders to financial investors. Resscapital only transacts with brokers who are registered and authorized by the regulator in each State, often the State Insurance Commissioner.

In order to enable the individual household to make an informed decision, it is important that the sales process is transparent. Therefore, brokerage fees must be reported in a clear and transparent manner to the seller/consumer. In addition, the consumer must receive information about the possible repurchase price that the life insurance company is willing to pay for the insurance policy.

For most life insurance policies, it is usually the policyholder's spouse or children who are beneficiaries. It is a requirement that these beneficiaries consent in writing to the sale of the life insurance policy. In addition, the policyholder must certify that he, or she, makes a conscious choice to sell the life insurance policy. The legislation aims to protect the consumer's freedom of choice and ensure that the sales process is transparent and correct.

Resscapital, as a manager of a portfolio of life insurance policies, will also receive personal data and health information about the individual policyholders. It is imperative that this information is treated in a confidential manner and with outmost respect for the integrity of each individual. All personal data is stored on protected servers and no documents containing any personal data are stored in paper format.

Financial responsibility

Resscapital has a principle of conducting business in a responsible and prudent manner. The company seeks to avoid financial decisions which could endanger the company's long-term survival.

The company values honesty, openness, and high ethical standards in business relationships. Employees keep their promises and view both clients and suppliers as important partners that must be treated with respect. The company actively works against all forms of bribery, payoffs and corruption which may affect business relationships.

As a market participant, Resscapital strives for honest, and open competition while observing good sales and marketing practices. The information provided by the company to the market must always be clear, transparent, and never intentionally deceptive.

Environmental and climate responsibility

Resscapital shall proactively strive to reduce environmental, climate and health-related risks as

a result of its business activities and of the products and services the company provides. Factors such as energy consumption, water consumption and waste management shall be taken into account when conducting business.

At Resscapital we choose sustainable travel and prioritise telephone and video conferences whenever possible. Resscapital also compensates for the CO2 footprint of its business activities by using the service of *Tricorona Climate Partner*. In addition, we sort our office waste to recycle it efficiently.

Social responsibility

Resscapital shall be a responsible social actor. The company shall respect human rights, denounce corruption, bribery, and payoffs, as well as money laundering. The company shall also strive to create good health and well-being regardless of whether this pertains to their employees, customers, owners, or other stakeholders. The company shall not make any direct or indirect contributions to political parties or political organisations.

Legal responsibility

Resscapital shall comply with applicable legislation and international conventions on all markets where the company is active. The company shall comply with environmental legislation, agreements, safety requirements and other binding requirements and regulations.

Employer responsibility

As part of its employer responsibility, Resscapital shall ensure a good organisational and social work environment and a safe and secure workplace. Processes shall also be created to stimulate our employees' ideas and initiatives. The company shall strive for a healthy balance between work and personal life among the employees. Clear and well communicated guidelines and policies regarding equality and diversity shall be put in place. The company shall support and encourage its employees' civic participation. Emphasis shall be placed on promoting the employees' health and wellbeing. The company shall allocate resources to further develop and enhance its employees' competences.

Investors

The investor relationship and client needs shall always be at the forefront for Resscapital. A high degree of transparency, dialogue and clarity shall guide Resscapital's relationship with its customers. Complaints procedures and investor support shall be efficient, thorough, and handled with professionalism. Continuous efforts to improve the quality should be made.

Follow-up and reporting

The company's management shall perform an annual follow-up based on this policy. The work includes a systematic approach to reporting.

UNPRI's Principles for Responsible Investment

As an essential part of Resscapital's commitment to sustainability, Resscapital signed the United Nations Principles of Responsible Investment (UNPRI) in 2017. Resscapital thus supports the work carried out by UNPRI to promote sustainability work in the asset management industry. In this way, Resscapital supports an approach where sustainability should be an integral part of asset management. More information about UNPRI's six principles

can be found on the organisation's website www.unpri.org. The principles briefly state the following:

1. We will incorporate Environmental, Social and Governance (ESG) issues into investment analysis and decision-making processes.
2. We will be active owners and incorporate ESG issues into our ownership policies and practices.
3. We will seek appropriate disclosure on ESG issues by the entities in which we invest.
4. We will promote acceptance and implementation of the Principles within the investment industry.
5. We will work together to enhance our effectiveness in implementing the Principles.
6. We will each report on our activities and progress towards implementing the Principles.

Resources and sustainability commitments

Resscapital mainly used internal analysis when designing and evaluating the company's sustainability strategy. The company has also commissioned external consultants to analyse various ethical aspects in relation to the life insurance market and how these should be handled.

In the case of the life insurance market, Resscapital participates several times every year in international conferences attended by managers, brokers, and service providers. In this context, Resscapital supports initiatives aimed at improving ethical guidelines for the industry.

Resscapital is a member of ILMA (The Institutional Longevity Markets Association). ILMA is a trade association comprised of a number of the world’s leading institutional investors and intermediaries in the mortality and longevity marketplace, formed to encourage the prudent and competitive development of a suite of evolving mortality and longevity related financial businesses, including the businesses of life settlements. ILMA acknowledges that prudent regulation of the life settlement market is critically important to a consumer’s ability to acquire such assets and to realize all the economic opportunities associated therewith. To help bring consensus among the various life insurance companies, life settlement providers, brokers, banks, financial institutions, and other participants in the life settlement market and to facilitate the promulgation of appropriate regulation and the development of industry “best practices,” ILMA has formulated guiding principles to be considered when conducting business in this market. More information about ILMA and the guiding principles can be found on lifemarketsassociation.org.

Contacts

An employee, an investor, or other stake holder who has questions or concerns about this sustainability policy can contact one of the following persons.

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