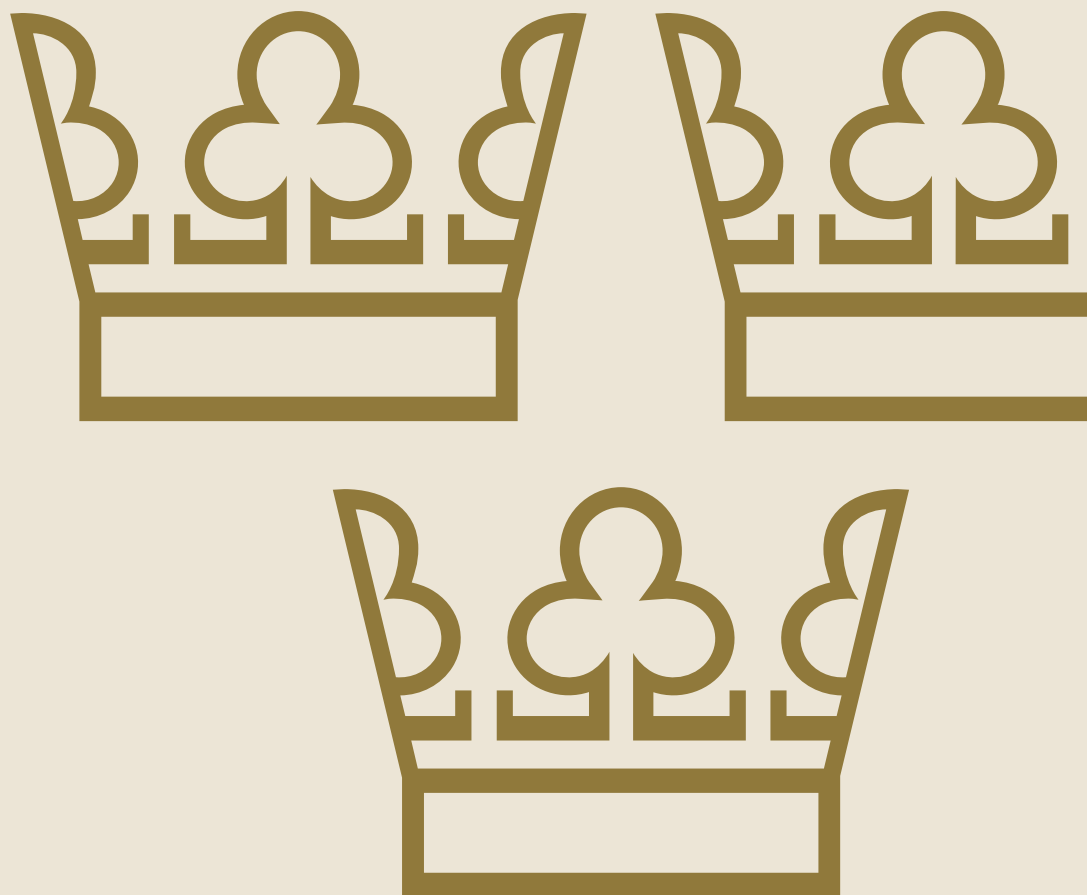


# Policy for internal governance and control



Adopted: 2025-12-10  
Adopted by: Board of Directors of the Swedish National Debt Office  
Information owner: Head of Risk Unit

## Policy for internal governance and control

The purpose of this policy is to ensure that the Swedish National Debt Office conducts systematic and effective internal governance and control. This shall ensure that the agency is with reasonable assurance carrying out its assignments, achieving its objectives, and complying with laws in force, regulations, and other requirements.

This policy describes the components that form the basis of the Debt Office's process for internal governance and control. The policy applies to all operations within the agency.

# 1. Introduction

Internal governance and control refers to the process of ensuring that:

- the agency carries out its assignments, achieves the objectives of its operations, and meets the operational requirements
- the operations are conducted effectively and in accordance with laws in force
- the reporting is reliable and fair
- the agency uses public funds responsibly.

This work shall also prevent and counteract corruption, undue influence, fraud, and other improprieties.

The policy is based on:

- The Government Agency Ordinance (2007:515)
- The Internal Governance and Control Ordinance (2007:603)
- The Agency for Financial and Public Management's regulations and general guidelines.

## 2. Process for internal governance and control

The Debt Office is to conduct ongoing internal governance and control covering the internal environment, improprieties, the management system for operational governance, and risk management. The process also includes follow-up and documentation as well as a comprehensive assessment.

### 2.1 Internal environment

The Debt Office is to maintain a good internal environment by operating on the basis of the core values of the Swedish central government. The work shall be legally certain, objective, and impartial. To promote effective internal governance and control, the Debt Office is to have governing documents, procedures, and methods that shall be documented, of high quality, well-established, and communicated within the agency.

### 2.2 Improprieties

The Debt Office is to prevent improprieties in its operations. Examples of improprieties are corruption, undue influence, fraud, or conflicts of interest.

The operations are to be developed on an ongoing basis and work for constant improvement with the aim of mitigating the risk of improprieties.

## **2.3 Management system for operational governance**

The term *management system* refers to the processes and procedures used to plan, manage, and follow up on as well as improve the operations. The core components of the management system include rules of procedure, governing documents, budget review, and operational planning. It is intended to provide assurance for the Board that the responsibility to the Government is being fulfilled. The Debt Office's management system shall foster an integrated approach that ensures sound internal governance and control.

## **2.4 Risk management**

The risk management process shall ensure that there is a systematic working method and include risk identification, valuation, measures and prioritisation, implementation, follow-up, and reporting. The principles for the Debt Office's risk management are regulated by the agency's Risk Policy.

## **2.5 Follow-up**

The Debt Office is to perform systematic and regular follow-up to assess whether the internal governance and control is adequate. The follow-up shall cover the operations' activities, finances, risks, and measures taken.

## **2.6 Documentation**

Documentation shall be made to the extent required to show that the agency's risk analyses are conducted and measures are taken. The results of the follow-up carried out in accordance with section 2.5 shall also be documented.

An overview document shall be prepared at minimum annually as a basis for the Board's assessment of the internal governance and control work.

## **2.7 Assessing and reporting internal governance and control**

At least once a year, the Board is to evaluate and assess whether the agency's internal governance and control is adequate. This assessment shall cover all operations within the agency that are conducted according to laws, regulations, appropriation directions, or other Governmental decisions. The assessment shall also take into account observations and recommendations issued by external and internal audit.

### 3. Roles and responsibility

**The Board of Directors of the Debt Office** is responsible for a process being in place that ensures the agency has internal governance and control that is functioning effectively.

**The Debt Office Director General** is accountable to the Board and is to lead and manage the Debt Office's day-to-day operations in accordance with the directives decided on by the Board.

Responsibility for internal governance and control in the operations is organised according to the Three Lines Model.

**The first line of responsibility** covers all operations that are conducted by the agency and that do not constitute the second or third line of responsibility. Department heads, unit heads, and certain officials manage operations under the first line of responsibility through their assigned responsibility. This means that they are responsible for the operations being conducted with good and effective internal governance and control.

**The second line of responsibility** – which comprises the risk control function, the compliance function, and the data protection officer – acts independently in relation to the operations under the first line of responsibility and supports, reviews, and follows up on activities conducted under the first line.

**The third line of responsibility** consists of the internal audit function, which independently reviews the operations of the entire organisation including the work of the second line of responsibility.