

Transparency Report, Copyswede Ekonomisk Förening, 2022

Introduction

This Transparency Report has been compiled in accordance with the Act on Collective Management of Copyright (sv. Lagen om kollektiv förvaltning av upphovsrätt) for the financial year ending 31 December 2022. The Report should be read together with the *Annual Report 2022* and *Distribution of Revenue 2022* to get a complete picture of Copyswede's financial position. These publications are available at: <https://www.copyswede.se/english/publications/>

Legal structure

Copyswede is a non-profit collective rights management organisation and economic association founded in 1982 that is wholly owned by fourteen member organisations, all representing Swedish authors and performers.

Copyswede's Board of Directors ('Board') comprises seven members with expertise in agreements concerning literary and dramatic works, agreements concerning visual arts, agreements concerning performing artists performances and agreements concerning copyright in the field of music. Copyswede also co-operates with organisations representing music producers (International Federation of the Phonographic Industry, Sweden – IFPI), film and television producers (Filmproducenternas rättighetsförening, FRF), as well as television companies and broadcasters through their co-ordination body (Union of Broadcasting Organisations in Sweden - UBOS), to be able to offer comprehensive licensing solutions.

Copyswede has neither any subsidiaries nor control over any other legal entity.

Copyswede is under the supervision of the Swedish Intellectual Property Office (Patent och Registreringsverket, PRV), a governmental agency.

Licensing and collection of levies

Copyswede licences the retransmission of television and radio programmes via various media and manage the Swedish levy system for private copying. We work on behalf of our member organisations to ensure that creators are remunerated for their copyright. We have also been mandated by producer organisations and television companies to license rights in certain areas and to collect levies on their behalf.

We have not denied any licensing application over the past year.

Copyswede employs a 'year of use' to distribute collected levies. 'Year of use' means 1 January to 31 December.

We manage two categories of rights:

- use of rights in Sweden,
- use of Swedish rights outside Sweden.

These categories are broken down into the following areas of use:

- retransmission,
- private copy levy (PCL),
- other (DVD/VOD, some public service archives, etc.).

Use of rights in Sweden

Invoices for retransmission in Sweden are issued on a six-monthly basis and distributed approximately three months after the end of the six-month period.

Invoices for PCL in Sweden are issued monthly based on reports of products sold submitted by importers and resellers concerned within the electronics industry.

Other invoices are issued once or twice a year depending on type of use and agreement.

Use of rights outside Sweden

Remuneration for Nordic use is received based on reporting from the Nordic partners. This normally occurs approximately six months after the end of the year of use. The Nordic levies for Swedish TV channels are added to the Swedish levies collected for the year of use in question.

Levies from non-Nordic partners are received on an ongoing basis during the year for various years of use. Levies from non-Nordic partners normally include information about the production to which the use relates and which person should receive the remuneration.

Timetable for payments

Copyswede's distributions is split into four different categories that are separated and distributed at different times throughout the year, starting within nine months from the end of the financial year following collection. Distribution for some collections starts during the year of collection. The categories are as follows:

1. remuneration that Copyswede allocates to partners within the Nordic countries, and for member organisations with their own distribution systems,
2. remuneration that Copyswede distributes on behalf of certain member organisations to individual rightholders,
3. remuneration that Copyswede distributes to individual rightholders on behalf of certain member organisations who, after having received the remuneration from Copyswede, distribute them to its individual rightholders,
4. remuneration that Copyswede allocates to non-Nordic organisations with whom we have a representation agreement with.

The annual timetable is:

- **May:** distribution to UBOS and FRF for the collection of levies for retransmission during the autumn of the previous year, and PCL for the previous year.
- **June/July:** distribution of remuneration to Nordic partners for retransmission and private copy levy for the previous year of use.
- **June/July:** distribution to STIM (Swedish Performing Rights Society) and SAMI (Swedish Artists and Musicians' Interest Organisation) and IFPI (International Federation of Phonographic Industry) of their share of collected revenue relating to the previous year of use.
- **September:** first distribution to individual rightholders that Copyswede arranges on behalf of certain member organisations relating to retransmission and PCL in Sweden; normally starts no later than September for collections from the previous year. This also includes levies from the Nordic organisations relating to Swedish channels that were received in June of the current year. This is no later than nine months after expiry of the year of use. Distribution to individual rightholders for retransmission for the year of use 2021 started in November 2022.
- Revenue that cannot be allocated to an individual at this stage is reserved for allocation at a later date. The minimum amount for an individual payment is SEK 100. Amounts of less than SEK 100 are allocated to the individual rightholders and paid as soon as the total amount of various levies amounts to SEK 100. Individual allocation of levies is time-consuming as it is done in three stages:
 - o collection of transmission data for the relevant year of use,
 - o collection of rightholders in all productions,
 - o collection of personal data for all rightholders.

- Remuneration is distributed to non-Nordic partners **during the autumn**.
- **December:** distribution to UBOS and FRF in respect of revenue for retransmission collected during the spring of the current year.
- Remuneration received from non-Nordic partners, with which we have representation agreements, is normally distributed **no later than three months after collection** provided Copyswede has complete personal data so distribution can be made.
- **Monthly** supplements of individual distributions are made when supplementary personal data has been received.
- Remuneration for DVDs and audiobooks are calculated once per year and distributed to the individuals together with their monthly payments.

Remuneration is distributed to individuals through Copyswede's own distribution system. This system is continually being developed to improve the efficiency of the distribution work.

Exceptions from the annual timetable:

- New distribution principles will be determined in cooperation with member organisations and partners for PCL relating to 2021 and beyond. The work to determine the new principles is ongoing and a new PCL survey using Demoskop is developed as part of the work to identify private copying behaviour of Swedes, which is a basis for the distribution principles. The distribution of PCL for 2021 is preliminarily expected to be able to start at the end of 2023.
- The distribution principles in respect of the historical debt for PCL collected in 2021, amounting to approximately SEK 1.3 billion, is being determined with all concerned parties with the intention of being able to start distributions in 2023.

Overheads and use of resources

Copyswede has operational and financial costs only for its management of rights. Copyswede does not perform any other kind of service. No deductions were made for social, cultural, or educational services in 2022. The net financial items are allocated, according to the decision by the board, to the accumulated funds for the rightholders.

Total operating costs, including net financial items and tax expense in 2022, amounted to 36 989 KSEK. In 2022, 2 474 KSEK of this, which relates to costs for individual distribution and payment costs, was allocated as a cost deduction for individual distribution in respect of retransmission and PCL. The remaining costs of 34 155 KSEK will be deducted in the forthcoming year in conjunction with the distribution to rightholders. The cost deductions reported in 2022 relate to operating costs accrued during the previous financial year.

Model for the allocation of direct and indirect costs

Copyswede has different areas of expertise, for example, retransmission of Swedish channels and individual distribution. Direct and indirect costs are allocated to these areas where they are subsequently charged to the various resources (revenues) as a deduction. Direct costs such as legal fees for disputes relating to PCL, are allocated in their entirety to the 'PCL' focus area and charged to the collections for PCL. Other costs such as rental charges are indirect costs. Copyswede's largest cost item is personnel costs, which are approximately 21,5 MSEK. Personnel costs are apportioned to the various specialist areas during the budget process. The respective share of the personnel costs for the various focus areas is then used as a key for apportioning indirect cost, for example rent for premises, to the various focus areas. The budget is decided by the Board and approved by all member organisations and by our partners – FRF, IFPI and UBOS.

Use of resources

Deductions for both direct and indirect costs are made primarily from the resources collected from the licensing of retransmission in Sweden and in the Nordic countries, and from PCL. An estimated deduction for working hours and any direct costs referable to the use is made for some collections, such as remuneration for, for example, public service archive, audio books and DVDs. A direct deduction for the cost of statistical data relating to audio books borrowed is made for audio books. Only the costs for the focus area individual distribution are charged to the amount available for individual distribution.

The only deduction made for costs relating to resources (revenues) collected through representation agreements with organisations outside the Nordic countries is for bank charges on deposits made by the organisation. Otherwise, no deductions are made, and the revenue is distributed in its entirety according to the distribution for each rightholder that we received from each organisation.

Deductions for costs are primarily made from the collections for retransmission and PCL. Costs accrued during a financial year are mainly charged to the various resources as a deduction in the immediately following year depending on the level at which the distribution work is carried out, what type of distribution it is, and which partner is to be involved in covering the costs. Some of the costs relating to individual distribution and payment costs accrued during the year will be charged to the distribution for the current year.

Distribution of remuneration to rightholders

Retransmission and PCL are distributed at three levels:

Level 1: separation of remuneration at partners level,

Level 2: separation of remuneration for member organisations with their own distribution systems,

Level 3: separation of individual remuneration that is either paid directly by Copyswede, via a member organisation, or a partner organisation.

When revenue is distributed to a partner at level 1, a deduction is only made for collection costs for retransmission and PCL, and this is deferred for one year. Costs accrued in 2021 relate to the year of use 2021 and are charged to revenue collected between 2021 and 2022, which is paid to the relevant partner in 2022. Any revenue that remains following payments to partners is passed on for distribution to rightholder groups at Level 2.

A deduction is also made at Level 2 for the cost of, for example Copyswede's own development issues with the same time deferment as above before revenue is paid to relevant member organisations. Any revenue that remains is passed on for individual distribution, Level 3.

A deduction is also made at Level 3 for individual distribution and payment costs. This is first deducted for the current year and then with a deferment of one year. Costs accrued in 2021 mainly relate to year of use 2021 and are charged to revenue collected from 2021 to 2022, which is paid to rightholders in 2022. A certain portion of the costs accrued in 2022 in relation to individual distribution has been allocated to the year of use 2021, which is paid to the rightholders in 2022.

This means that a certain portion of the costs accrued for the year has not yet been allocated to the resource to which it should be charged; this revenue will be allocated in 2023.

Reporting of overheads

Overheads are reported for each area of use, though not per payment to each counterparty, or at the level of rightholders. This is because cost deductions are made before distribution to a counterparty. The allocation model is being reviewed to see how we can report the costs for each counterparty in the future.

Membership of other organisations

Copyswede is a member of the Society of Audiovisual Authors (SAA) and became a member of the International Confederation of Societies of Authors and Composers (CISAC) in 2022.

Annual collections

As current reporting of collected revenue is based on the television programme's year of use, we cannot currently track how much of the revenue can be attributed to a specific year of collection. System support has been developed to report for each year of collection. The implementation of this support started in 2019 and continued in 2023. Consequently, only remuneration paid during the year is reported with the year of collection.

Copyswede collects revenue for the retransmission of Swedish and foreign channels over two years of collection, although this relates to the same year of use. To distribute a year of use, for example 2021, collections from 2021 and 2022 are added together. Amounts collected for 2021 are largely reported as having been collected in 2021 because the collection started in 2021 and it has not been systemically separated.

Collections received via representation agreements in 2022 are reported as having been collected in 2022 regardless of the year of use to which they relate, as this revenue is specified per person or per production and is paid separately.

Financial information about levies for rightholders

These tables show details of:

- revenue collected, allocated and paid to the rightholders over the year,
- remuneration reserved for the rightholders at the end of the financial year.

The information reported for use in Sweden is broken down into three areas of use:

- retransmission,
- private copy levy (PCL),
- other (DVD/VOD, Open Archive, etc.).

Levies for use outside Sweden are reported in aggregate and are not broken down by area of use.

(The amounts in all tables are reported as SEK '000.)

Financial information about levies for rightholders (RH)

Analysis of 'rights' category (SEK '000)

	Collected on assignment of RH, incl. net financial items	Cost deduction	Attributed to RH	Paid to RH and organisations	Overheads for the year, incl. tax
Use of rights in Sweden	479,568	-7,306	18,569	-152,433	
Use of rights outside Sweden	66,610	-2,615	-20,459	-11,683	
Total collected	546,178	-9,921	-1,891	-164,116	-36,989

	Opening liability to RH, 1 Jan 2022	Collected on the assignment of RH, incl. net financial items	Cost deduction	Attributed to RH	Paid to RH and organisations	Closing liability to RH, 31 Dec 2022
Use of rights in Sweden	2,034,449	479,568	-7,306	18,569	-152,433	2,372,847
Use of rights outside Sweden	97,053	66,610	-2,615	-20,459	-11,683	128,905
Total collected	2,131,502	546,178	-9,921	-1,891	-164,116	2,501,752

Liability to RH as of 31 December 202	Collected, not yet distributed	Distributed, not yet paid	Revenue that cannot be distributed	Total
Use of rights in Sweden	2,333,640	39,208	0	2,372,847
Use of rights outside Sweden	113,595	15,310	0	128,905
Total collected	2,447,235	54,518	0	2,501,752

Revenue paid for the year broken down per year of collection

	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012 and earlier	Unspecified	Total
Amount	62,782	60,052	20,765	2,952	1,521	1,903	2,243	5,669	151	2,272	3,695	111	164,116

Analysis of use in Sweden

Rights in Sweden broken down per category and per area of use

Analysis of revenue collected in Sweden during the financial year 2022	Opening liability 1 January 2022	Collected over the year and also net financial items	Allocated cost deduction	Attributed to rightholder	Paid to RH and organisations	Closing liability 31 December 2022
<i>Retransmission</i>	246,750	163,383	-6,295	18,635	-131,730	290,744
<i>PCL</i>	1,701,244	303,566	0	-66	-2,160	2,002,584
<i>Other</i>						
Video/DVD	3,324	560	-157	0	0	3,726
Audio books	1,707	0	0	0	-21	1,685
Hospital Recording	6	0	0	0	0	6
Public service archive	28,592	5,253	-694	0	0	33,151
UR	51,621	6,806	-159	0	-18,522	39,746
HKF (Merchant Fleet Culture and Leisure Council)	959	0	0	0	0	959
School Recording	246	0	0	0	0	247
<i>Total, Other</i>	<i>86,456</i>	<i>12,619</i>	<i>-1,011</i>	<i>0</i>	<i>-18,544</i>	<i>79,520</i>
Total	2,034,449	479,568	-7,306	18,569	-152,433	2,372,847

Closing liability as at 31 Dec 2022 of use in Sweden to RH	Collected, not yet distributed	Distributed to RH, not yet paid	Revenue that cannot be distributed	Total
Retransmission	264,261	26,219	0	290,480
Private copy levy	1,995,007	7,577	0	2,002,584
Other	74,372	5,411	0	79,783
Total	2,333,640	39,208	0	2,372,847

Analysis of revenue paid to Swedish organisations and RH	PCL Audio and Audio visual	Retransmission, Swedish and foreign channels	Other, DVD, Open Archive; UR, etc.	Total
Visual Copyright Society in Sweden (<i>Bildupphovsrätt</i>)	4	3,202	622	3,829
The Writers Guild of Sweden (<i>Dramatikerförbundet</i>)	0	1,612	8	1,621
Filmproducenternas rättighetsförening (FRF)	0	39,051	0	39,051
Swedish Writers' Union (<i>Författarförbundet</i>)	0	50	0	50
Swedish Publishers' Association (<i>Förläggareföreningen</i>)	0	0	0	0
International Federation of the Phonographic Industry, Sweden (<i>IFPI</i>)	0	1,420	4,364	5,783
Swedish Union of Journalists (<i>Journalistförbundet</i>)	0	0	0	0
Swedish Association of Educational Writers (<i>Läromedelsförfattarna</i>)	0	0	0	0
Swedish Musicians' Union (<i>Musikerförbundet</i>)	10	531	0	541
Swedish Independent Filmmakers Association (<i>Oberoende filmares förbund</i>)	0	75	0	75
Swedish Artists and Musicians' Interest Organisation (<i>SAMI</i>)	829	1,480	4,532	6,841
Swedish Union for Performing Arts and Film (<i>Scen och Film</i>)	545	12,394	136	13,075
Swedish Performing Rights Society (<i>Stim</i>)	0	26,556	6,265	32,821
Swedish Union of Professional Musicians (<i>Symf</i>)	0	0	0	0
Total, organisations	1,389	86,372	15,927	103,687
Total, individual rightholders¹⁾	3,060	13,735	2,655	19,450
Total, organisations and individual rightholders	4,449	100,106	18,582	123,137

¹⁾ Levies that Copyswede distributes and pays individually to rightholders on behalf of the Visual Copyright Society in Sweden, the Writers Guild of Sweden, the Swedish Writers' Union, the Swedish Union of Journalists, the Artists' Association of Sweden, the Swedish Association of Educational Writers, the Swedish Musicians' Union, the Swedish Union for Performing Arts and Film, the Swedish Association of Professional Photographers, the Association of Swedish Illustrators and Graphic Designers and the Swedish Union of Professional Musicians.

Refer to *Distribution of Revenues 2022* for more information about the kinds of remuneration paid to each organisation.

Analysis of use outside Sweden

Analysis of revenue to and from foreign organisations during the financial year 2022 for retransmission, PCL and other	Opening liability 1 January 2022	Gross collections over the year for retransmission of Swedish programmes, channels and PCL, also net financial items	Deduction according to settlement	Gross collections over the year for retransmission of Swedish programmes, channels and PCL, and also net financial items	Attributed to RH	Paid to RH and organisations	Closing liability 31 December 2022	Paid by Copyswede for retransmission of channels, foreign programmes and PCL
AISGE (Spain)	-117	357	-16	341	0	-13	211	28
ALCS (Great Britain)	-138	256	-24	231	0	-227	-134	4,785
ASDACS (Australia, New Zealand)	0	0	0	0	0	0	0	744
BECS (Great Britain)	248	107	0	107	0	-87	268	0
Copydan (Denmark) 1)	9,803	11,832	-1,158	10,674	-7,350	-1,562	11,566	8,199
Directors UK (Great Britain)	7	97	-8	89	0	-88	7	1,295
IHM (Iceland)	534	0	0	0	0	0	534	147
Kopiosto (Finland) 1)	52,004	14,807	-586	14,221	-2,002	-64	64,159	4,029
Lita (Slovakia)	3	0	0	0	0	-1	2	0
Literar-Mechana (Austria)	8	25	0	25	0	-23	10	9
Norwaco (Norway) 1)	20,670	29,596	0	29,596	-11,131	-2,685	36,450	2,323
SACD and SCAM (Belgium, France, Luxembourg, Monaco)	980	1,017	-142	875	0	-968	887	1,433
Screen Craft Rights (Great Britain)	0	0	0	0	0	0	0	1,757
SGAE and DAMA (Spain)	0	867	0	867	0	0	867	460
Suissimage (Lichtenstein, Switzerland)	1,066	744	0	744	0	-860	950	5
VdFS (Austria)	269	583	-229	354	0	-515	107	4
VEVAM (the Netherlands)	2,321	1,191	-119	1,072	0	-1,940	1,453	0
VG Bild-Kunst (Germany)	8,180	4,292	-332	3,960	0	-2,392	9,747	172
VG Wort (Germany)	1,216	838	0	838	24	-257	1,821	437
UBOS	0	0	0	0	0	0	0	12,546
Yle (Finland)	0	0	0	0	0	0	0	2,606
Total	97,053	66,610	-2,615	63,995	-20,459	-11,683	128,905	40,979

Closing liability as of 31 Dec 2022 to RH	Collected not yet distributed	Distributed not yet paid	Revenue that cannot be paid	Total
AISGE (Spain)	0	211	0	211
ALCS (Great Britain)	0	-134	0	-134
ASDACS (Australia, New Zealand)	0	0	0	0
BECS (Great Britain)	0	268	0	268
Copydan (Denmark) ¹⁾	11,566	0	0	11,566
Directors UK (Great Britain)	0	7	0	7
IHM (Iceland)	534	0	0	534
Kopioisto (Finland) ¹⁾	64,159	0	0	64,159
Lita (Slovakia)	0	2	0	2
Literar-Mechana (Austria)	0	10	0	10
Norwaco (Norway) ¹⁾	36,450	0	0	36,450
SACD and SCAM (Belgium, France, Luxembourg, Monaco)	887	0	0	887
Screen Craft Rights (Great Britain)	0	0	0	0
SGAE and DAMA (Spain)	0	867	0	867
Suissimage (Lichtenstein, Switzerland)	0	950	0	950
VdFS (Austria)	0	107	0	107
VEVAM (the Netherlands)	0	1,453	0	1,453
VG Bild-Kunst (Germany)	0	9,747	0	9,747
VG Wort (Germany)	0	1,821	0	1,821
UBOS	0	0	0	0
Yle (Finland)	0	0	0	0
Total	113,595	15,310	0	128,905

1) Revenue collected for use of rights in the Nordic countries relating to Swedish channels are attributed to RH in conjunction with revenue being added to use of rights in Sweden.

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Report on agreed-upon procedures pertaining to 2022 Transparency Report

To Copyswede (Corp. Reg. No. 769602–0036)

Purpose of this Agreed-Upon Procedures Report and restriction on Use and Distribution

We have performed the audit procedures that we have agreed upon and that are described below regarding Copyswede's Transparency Report for the 1 January 2022–31 December 2022 period that presents the information set out in the Annex of Directive 2014/26/EU of the European Parliament and of the Council ("Annex of the Directive"), which Copyswede has prepared in accordance with the Swedish Act on Collective Management of Copyright (2016:977) and which is to be published on Copyswede's website under law. Our audit procedures were based on the supporting material that Copyswede prepared as the basis for the Transparency Report and were carried out only as part of Copyswede's compliance with current legislation by publishing a Transparency Report.

This report is only intended for Copyswede economic association and the concerned counterpart and shall not be used for any other purpose.

Responsibilities of the Engaging Party

Copyswede (as the Engaging Party and the responsible party) is responsible for the Transparency Report and its supporting material, which are the subject of the agreed-upon procedures. Copyswede economic association has acknowledged that the agreed-upon procedures are appropriate for the purpose of the engagement.

Practitioner's Responsibilities

We have conducted the agreed-upon procedures engagement in accordance with International Standard on Related Services (ISRS) 4400 (Revised), Agreed-Upon Procedures Engagements. An agreed-upon procedures engagement involves us performing the procedures that have been agreed with Copyswede economic association, and reporting the findings, which are the factual results of the agreed-upon procedures performed. We make no representation regarding the appropriateness of the agreed-upon procedures.

This agreed-upon procedures engagement is not an assurance engagement. Accordingly, we do not express an opinion or an assurance conclusion.

Had we performed additional procedures, other matters might have come to our attention that would have been reported.

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Professional ethics and quality control

We have complied with the ethical requirements in Sweden and the IESBA Code and we are independent according to professional ethics for accountants in Sweden.

The audit firm applies ISQM 1 (International Standard on Quality Management 1), which requires the firm to design, implement and manage a quality management system including guidelines or routines regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Procedures and observations

	Procedures	Observations
1	Examine the Transparency Report, including, or referring to, the following information or corresponding financial information:	
	a) financial statements comprising a balance-sheet or a statement of assets and liabilities, an income and expenditure account for the financial year, and a cash-flow statement. <i>(corresponding to 1a in the Annex of the Directive)</i>	With respect to item 1a, we found no irregular observations to report.
	b) financial information on rights revenue, per category of rights managed and per type of use (e.g., broadcasting, online, public performance), including information on the income arising from the investment of rights revenue and the use of such income (whether it is distributed to rightholders or other collective management organisations, or otherwise used). <i>(corresponding to 2a in the Annex of the Directive)</i>	With respect to item 1b, we found no irregular observations to report.
	c) financial information on the cost of rights management and other services provided by the collective management organisation to rightholders, with a comprehensive description of at least the following items: <ul style="list-style-type: none"> All operating and financial costs, with a breakdown per category of rights managed and, where costs are indirect and cannot be attributed to one or more categories of rights, an explanation of the method used to allocate such indirect costs. 	With respect to item 1c, we found no irregular observations to report.

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	Procedures	Observations
	<ul style="list-style-type: none"> Operating and financial costs, with a breakdown per category of rights managed and, where costs are indirect and cannot be attributed to one or more categories of rights, an explanation of the method used to allocate such indirect costs, only with regard to the management of rights, including management fees deducted from or offset against rights revenue or any income arising from the investment of rights revenue in accordance with Article 11(4) and Article 12(1), (2) and (3). Operating and financial costs with regard to services other than the management of rights, but including social, cultural and educational services. Resources used to cover costs. Deductions made from rights revenues, with a breakdown per category of rights managed and per type of use as well as the purpose of the deduction, such as costs relating to the management of rights or to social, cultural or educational services. The percentages that the cost of the rights management and other services provided by the collective management organisation to rightholders represents compared to the rights revenue in the relevant financial year, per category of rights managed, and, where costs are indirect and cannot be attributed to one or more categories of rights, an explanation of the method used to allocate such indirect costs. <i>(corresponding to 2b in the Annex of the Directive)</i> 	
	<p>d) Financial information on amounts due to rightholders, with a comprehensive description of at least the following items:</p> <ul style="list-style-type: none"> The total amount attributed to rightholders, with a breakdown per category of rights managed and type of use. The total amount paid to rightholders, with a breakdown per category of rights managed and type of use. 	<p>With regard to item 1d, we noted that Copyswede did not have any information regarding which year the various collections per category and uses applied to. Since the reporting of collected remuneration is currently based on the year of use of the TV programmes, Copyswede cannot, as per today, monitor the amount of remuneration that can be derived to a specific year of collection. Copyswede has developed systems support in order to report by</p>

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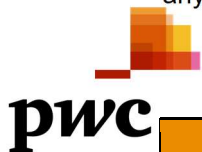
	Procedures	Observations
	<ul style="list-style-type: none"> The frequency of payments, with a breakdown per category of rights managed and per type of use. The total amount collected but not yet attributed to rightholders, with a breakdown per category of rights managed and type of use, and indicating the financial year for which those amounts were collected. The total amount attributed to but not yet distributed to rightholders, with a breakdown per category of rights managed and type of use, and indicating the financial year for which those amounts were collected. Where a collective management organisation has not carried out the distribution and payments within the deadline set in Article 13(1), the reasons for the delay. The total non-distributable amounts, along with an explanation of the use to which those amounts have been put. <i>(corresponding to 2c in the Annex of the Directive)</i> 	<p>year of collection, which has been partly implemented. Implementation will continue in 2023. For this reason, only paid amounts are reported by year of collection on page 9 of the Transparency Report.</p> <p>Regarding the item addressing the deadline pursuant to Article 13(1), we refer to page 4 of the Transparency Report, which states the following:</p> <p>For the private copying levy pertaining to 2021 and after, new distribution policies are being prepared together with the member organisation and partners. This work on preparing new policies is under way and as part of the process a new private copying levy survey is being prepared with Demoskop to analyse copying patterns among Swedes, which will serve as a basis for the distribution policies. The private copying levy for 2021 is preliminarily expected to start at the end of 2023. A distribution agreement on previous liabilities for the private copying levy collected in 2021, amounting to approximately SEK 1.3 billion, is being prepared with the relevant parties with the aim of starting payments in 2023.</p>
	<p>e) information on relationships with other collective management organisations, with a description of at least the following items:</p> <ul style="list-style-type: none"> Amounts received from other collective management organisations and amounts paid to other collective management organisations, with a breakdown per category of rights, per type of use and per organisation. Management fees and other deductions from the rights revenue due to other collective management organisations, with a breakdown per category of rights, per type of use and per organisation. 	<p>With regard to item 1e, we noted that Copyswede did not report any deductions per organisation. Instead, cost deductions were made at group level based on the total management fees the association had before distribution.</p>

This is a translated copy of the original. Translation has been made from Swedish to English. PwC does not take responsibility for any translation errors.



	Procedures	Observations
	<ul style="list-style-type: none"> • Management fees and other deductions from the amounts paid by other collective management organisations, with a breakdown per category of rights and per organisation. • Amounts distributed directly to rightholders originating from other collective management organisations, with a breakdown per category of rights and per organisation. <i>(corresponding to 2d in the Annex of the Directive)</i> 	
	<p>f) Information to be included in the special report pursuant to Article 22(3):</p> <ul style="list-style-type: none"> • The amounts deducted for the purposes of social, cultural and educational services in the financial year, with a breakdown per type of purpose and, for each type of purpose, with a breakdown per category of rights managed and per type of use. <i>(corresponding to 3a in the Annex of the Directive)</i> • An explanation of the use of those amounts, with a breakdown per type of purpose including the costs of managing amounts deducted to fund social, cultural and educational services and of the separate amounts used for social, cultural and educational services. <i>(corresponding to 3a in the Annex of the Directive)</i> 	With respect to item 1f, we found no irregular observations to report.
2	<p>Examine to check that the financial information in the Transparency Report is true and fair, which in this context means:</p> <ul style="list-style-type: none"> • Random checks that the financial information can be reconciled against Copyswede’s accounting, or using standard templates that can be reconciled against Copyswede’s accounting or other relevant supporting data and peripheral systems. • Random checks that the revenue and inward payments reported in the Transparency Report: <ul style="list-style-type: none"> – can be linked to the period in time stated in the Transparency Report. 	With respect to item 2, we found no irregular observations to report. We have conducted spot checks that the economic information in the Transparency Report correspond to Copyswede’s supporting data.

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	Procedures	Observations
	<ul style="list-style-type: none">- can be linked to the categorisation stated in the Transparency Report, either directly (for example, based on the nature of the revenue) or indirectly based on a documented distribution method.• Random checks that the expenses, deductions and outward payments reported in the Transparency Report:<ul style="list-style-type: none">- can be linked to the period in time stated in the Transparency Report.- can be linked to the categorisation stated in the Transparency Report, either directly (for example, based on the nature of the expenses) or indirectly based on a documented distribution method.	

Stockholm, on the date stated in our electronic signature

Öhrlings PricewaterhouseCoopers AB

Erik Stenbeck
Authorised Public Accountant