Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: SEB Green Bond Fund

Legal entity identifier: 529900BAVG20FVDM1A51

Sustainable investment objective

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Did this financial product have a sustainable investment objective?

●● ☑ **Yes**	●○ ☐ **No**
☑ It made **sustainable investments with an environmental objective**: 77.60%	☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of ____**%** of sustainable investments
☑ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☑ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☑ It made **sustainable investments with a social objective**: 14.79%	☐ It promoted E/S characteristics, but **did not make any sustainable investments**

To what extent was the sustainable investment objective of this financial product met?

The fund had, for the previous year, sustainable investments as its objective within the meaning of Article 9 of SFDR.

The fund aimed to contribute to a reduction in greenhouse gas emissions globally in accordance with the Paris Agreement. This was achieved by investing in green bonds that contributed to projects with a clear focus on generating renewable energy, energy efficiency, green buildings, and sustainable transport. The fund supported companies' efforts to reduce climate impact and develop new sustainable technologies, thus contributing to sustainable development. The alignment of the companies' activities with the objectives of the EU Taxonomy was based on data availability and quality from third-party vendors. Depending on the investment opportunities, the fund could contribute to any of the six objectives detailed in Article 9 of the Taxonomy Regulation.

The benchmark was the Bloomberg MSCI Green Bond Index 1-5 yrs Index, which did not qualify as an EU Climate Transition Benchmark or an EU Paris-aligned Benchmark, and did not fully comply with all the methodological requirements in the Commission Delegated Regulation (EU) 2020/181. The benchmark was purely for performance comparison.

The objective of reducing carbon emissions was instead achieved by identifying and investing, with continued effort, in green bonds with underlying projects that had a clear focus on renewable energy, sustainable transport, and the development of new sustainable technology in line with achieving the long-term objective of the Paris Agreement. The impact was measured by the avoided emissions from the green bonds' underlying projects.

Green bonds were classified and accounted for as sustainable, as their use of proceeds contributed to environmental objectives. The fund company had procedures in place to ensure that the bonds in which the fund invested were aligned with relevant principles, such as the Green Bond Principles ("GBP"), from the International Capital Market Association ("ICMA"), or similar organisations.

The SEB Investment Management Sustainability Score ("SIMS-S") was central to the sustainability integration process and evaluation. SIMS-S focused on risks and opportunities related to sustainable development in company management, products & services, and operations, using metrics such as alignment with the Paris Agreement, carbon footprint, gender diversity, Taxonomy alignment, and sustainable development goals' ("SDG") revenues. The fund used the SIMS-S framework and ratings for additional ESG integration.

SIMS-S consists of overall scores and underlying component scores, each with two versions - a raw and an adjusted score. The raw score was the issuer's standalone overall sustainability score, while the adjusted score was sector and region adjusted. The underlying component scores, building up to the overall SIMS-S, made it possible to focus on specific sustainability topics. SIMS-S ratings ranged between 0 and 10, with 10 being the highest sustainability score.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

How did the sustainability indicators perform?

The SEB Investment Management Sustainability Score ("SIMS-S"), is central to the fund's sustainability integration process and evaluation. SIMS-S focuses on risks and opportunities related to sustainable development in company management, products & services, and operations, using metrics such as alignment with the Paris Agreement, carbon footprint, gender diversity, Taxonomy alignment and sustainable development goals' ("SDG") revenues.

The purpose of SIMS-S is to both produce a relevant forward-looking sustainability score for companies/issuers and to be a guide in relation to current and future sustainability factors possibly influencing long-term risks and opportunities. Together with fundamental analysis, SIMS-S is a tool in the fund company's sustainability analysis toolbox that enables the fund to invest in issuers that promote sustainability.

To compare issuers appropriately, the main tool was the adjusted SIMS-S ratings, which are normalised within the relevant sectors and regions. An issuer with an adjusted score higher than five is above average in handling risks and opportunities related to sustainability. The fund had an adjusted SIMS-S rating of 6.0, which means that the fund was primarily invested in issuers who perform above average in their respective sector and region.

The main part of the fund's sustainability strategy is to invest in green bonds. At the end of the year, 100% of the bonds in the fund were green bonds, totalling 92% of the funds AuM. The impact is measured as the avoided emissions from the underlying projects of the green bonds. This is measured as tonnes of GHG emissions avoided per 1 MEUR invested. For a 1 MEUR investment into the fund, the impact was a reduction of 335 tonnes GHG.

Engagement dialogues are also a central part of the sustainability strategy, and during the year 146 different engagements with 37 issuers on the account of the fund were performed, either directly or indirectly.

...and compared to previous periods?

During the year, the fund company implemented the process of defining sustainable investments on the issuer level, and compared to last year, not only were 100% of the bonds in the fund green bonds but also an increasing number of the bonds were issued by issuers deemed sustainable by the fund company.

The adjusted SIMS-S rating was in line with last year's score. The number of issuers with whom the fund engaged was higher during 2023, going from 32 to 37.

How did the sustainable investments not cause significant harm to any sustainable investment objective?

To ensure that no sustainable investment caused significant harm to any environmental or social sustainable investment objective, the fund worked with the following principles during the reference period:

- Excluded companies that did not comply with international norms and standards;
- Excluded companies operating in controversial sectors and business areas;
- Excluded companies that had exposure to fossil fuels or other activities with negative environmental impacts;
- Excluded companies that were not considered to fulfil the levels of minimum social safeguards as defined by the EU Taxonomy; and
- Used an external research partner's assessment of the companies' corporate governance structure, labour relations, tax compliance and remuneration.

The fund was also screened for misalignment/obstruction towards the UN SDGs. A significant misalignment led to exclusion from the fund's sustainable investments universe if the issuer was considered at risk of causing significant harm to environmental and/or social objectives.

Apart from the data-driven analysis and exclusion, each sustainable investment was subject to fundamental tests (challenges) to identify whether it causes any significant harm to any other environmental or social sustainable investment objective.

The fund company developed internal tools and processes to assess and consider the negative consequences of the Principal Adverse Impact ("PAI") indicators in Annex I of the CDR 2022/1288, and relevant PAIs in relevant PAI Tables 2 and 3 of Annex 1 of the CDR 2022/1288. However, the indicators were subject to current data availability. They were, together with the fundamental analysis, the internal exclusion process, and the internal proprietary sustainability score from SIMS-S, included in the impact analysis in the do no significant harm ("DNSH") test.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

How were the indicators for adverse impacts on sustainability factors taken into account?

During the reference period, the fund company's model for detecting companies with extreme values among the negative principal impact indicators (PAI) was used to avoid investing in companies that have caused significant harm. The negative impact indicators for sustainability factors used are those outlined in Annex I of the Sustainable Finance Disclosure Regulation's technical standard (CDR 2022/1288) - as well as the relevant PAIs in Tables 2 and 3 of Annex 1 of CDR 2022/1288. However, the indicators are dependent on the current availability of data.

Where sufficient coverage has been available, companies with significant negative performance in a geographical and sectoral context have not been included as sustainable investments.

Some indicators are considered through the exclusions outlined in the fund company's sustainability policy, in particular:

- Companies with activities in the fossil fuel sector;
- Companies with facilities/operations located in or near biodiversity-sensitive areas where the activities of these companies negatively impact these areas;
- Companies that do not comply with international norms and standards, such as the UN Global Compact principles and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- Companies involved in the manufacture or sale of controversial weapons (landmines, cluster bombs, chemical and biological weapons); and
- Companies whose activities affect endangered species.

Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?

During the reference period, the fund's sustainable investments have been aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights through both the norm-based exclusion criteria set out in the fund company's sustainability policy and using SIMS-S.

Norm-based exclusions mean that the fund company expects issuers to adhere to international laws and conventions such as the following:

- The UN Principles for Responsible Investment
- The UN Global Compact
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights

How did this financial product consider principal adverse impacts on sustainability factors?

During the reference period, the fund considered principal adverse impacts on sustainability factors through the exclusions outlined in the fund company's sustainability policy where companies with operations in the following were excluded:

- Companies with activities in the fossil fuel sector;
- Companies with facilities/operations located in or near biodiversity-sensitive areas where the activities of these companies negatively impact these areas;
- Companies that do not comply with international norms and standards, such as the UN Global Compact principles and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- Companies involved in the manufacture or sale of controversial weapons (landmines, cluster bombs, chemical and biological weapons); and
- Companies whose activities affect endangered species.

In the fund's fundamental analysis process, a sustainability assessment of, among other things, each company's products, services, operations, and suppliers is conducted. To support the work of assessing the companies' sustainability risks and opportunities, the fund managers used a quantitative tool in the form of the SEB Investment Management Sustainability Score, SIMS-S.

In the fund's fundamental analysis process, the fund manager conducted a sustainability assessment of, among other things, each company's products, services, operations and suppliers. To support the work of assessing the companies' sustainability risks and opportunities, the fund manager used a quantitative tool in the form of the SEB Investment Management Sustainability Score, SIMS-S.

Using SIMS-S, the fund company's proprietary sustainability model, the following indicators for adverse impacts were considered:

- Greenhouse gas emissions of the investee companies;
- The carbon footprint of the investee companies;
- Greenhouse gas intensity of the investee companies;
- Whether companies operate in the fossil fuel sector;
- Energy consumption intensity per sector with high climate impact, for the investee companies;
- Whether the investee companies have facilities/operations located in or near biodiversity-sensitive areas where the operations of these companies negatively impact these areas;
- Emissions to water generated by the investee companies;
- The amount of hazardous waste generated by the investee companies;

- Whether the investee companies lack processes and compliance mechanisms to monitor compliance with the UN Global Compact and the OECD Guidelines for Multinational Enterprises;
- The unadjusted gender pay gap in the investee companies;
- Gender distribution of the board of directors of the investee companies;
- Whether the investee companies have decarbonisation initiatives in place to align with the Paris Agreement; and
- Whether the investee companies have a supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour).
- PAI 4: Exposure to companies active in the fossil sector
- PAI 10: Violations of UN Global Compact Principles & OECD Guidelines for multinational enterprises
- PAI 14: Exposure to controversial weapons

During the ESG integration process using the SIMS-S combined with fundamental analysis:

From Annex 1 - Table 1 of CDR (EU) 2022/1288

- PAI 1: GHG emissions
- PAI 2: Carbon footprint
- PAI 3: GHG intensity of investee companies
- PAI 4: Exposure to companies active in the fossil sector
- PAI 7: Activities negatively affecting biodiversity-sensitive areas
- PAI 8: Emissions to water
- PAI 9: Hazardous waste ratio
- PAI 10: Violations of UN Global Compact Principles & OECD Guidelines for Multinational Enterprises
- PAI 11: Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises.
- PAI 12: Unadjusted gender pay gap
- PAI 13: Board gender diversity
- PAI 14: Exposure to controversial weapons

During the investment period, the following PAIs were considered.

In engagement dialogues with issuers:

- PAI 13: Board gender diversity - from Annex 1 - Table 1 of CDR (EU) 2022/1288

What were the top investments of this financial product?

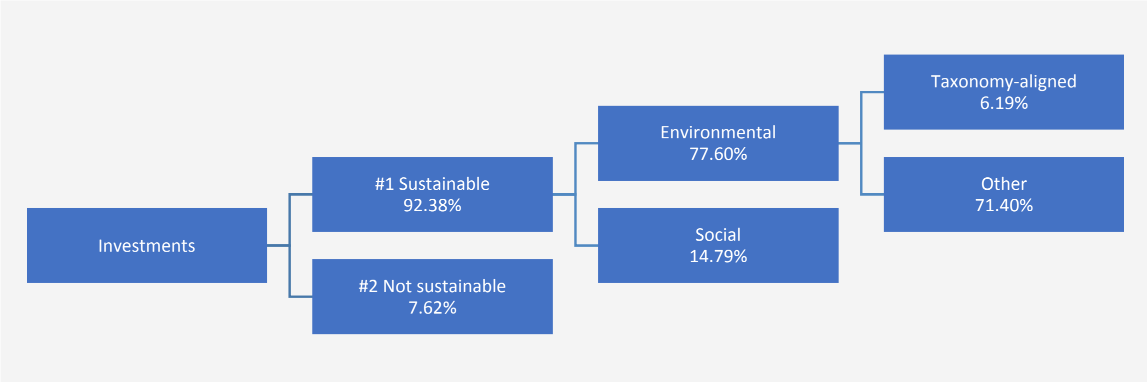
The list includes the investments constituting **the greatest proportion of investments** of the financial product during the reference period which is: 31 December 2023

Largest investments	Sector	% Assets	Country
ABN AMRO Bank NV	Financials	2.77	Netherlands
Vasakronan AB	Real Estate	2.55	Sweden
SBAB Bank AB	Financials	2.29	Sweden
ING Groep NV	Financials	2.12	Netherlands
Svenska Handelsbanken AB	Financials	2.08	Sweden
SKF AB	Industrials	2.08	Sweden
CaixaBank SA	Financials	1.98	Spain
Fortum Varme Holding samagt med Stockholms stad AB	Utilities	1.97	Sweden
Skandinaviska Enskilda Banken AB	Financials	1.89	Sweden
Norske Tog AS	N/A	1.81	Norway
Banco Santander SA	Financials	1.79	Spain
Fabege AB	Real Estate	1.77	Sweden
Mizuho Financial Group Inc	Financials	1.73	Japan
TenneT Holding BV	Utilities	1.73	Netherlands
Danske Bank A/S	Financials	1.70	Denmark

What was the proportion of sustainability-related investments?

Asset allocation describes the share of investments in specific assets.

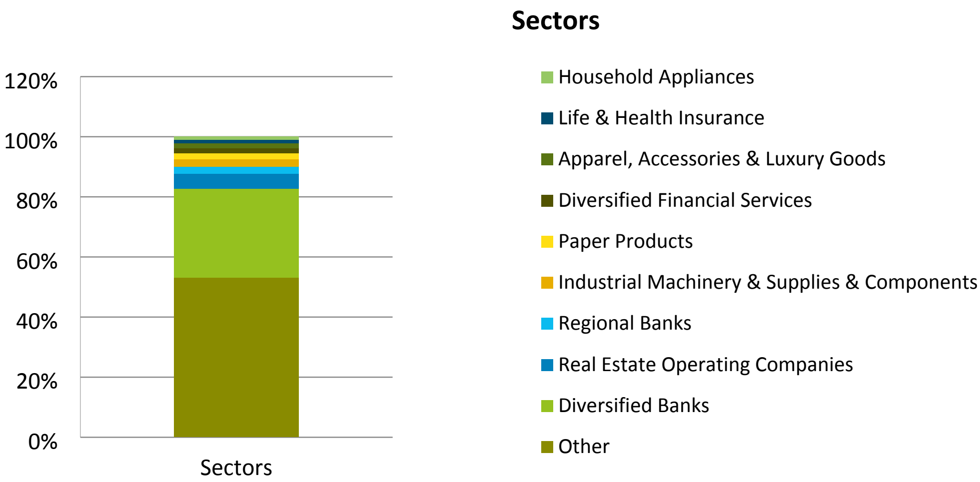
What was the asset allocation?



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

In which economic sectors were the investments made?



To what extent were the sustainable investments with an environmental objective aligned with the EU Taxonomy?

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to fully renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy [1]?

☑ Yes:

☐ In fossil gas ☑ In nuclear energy

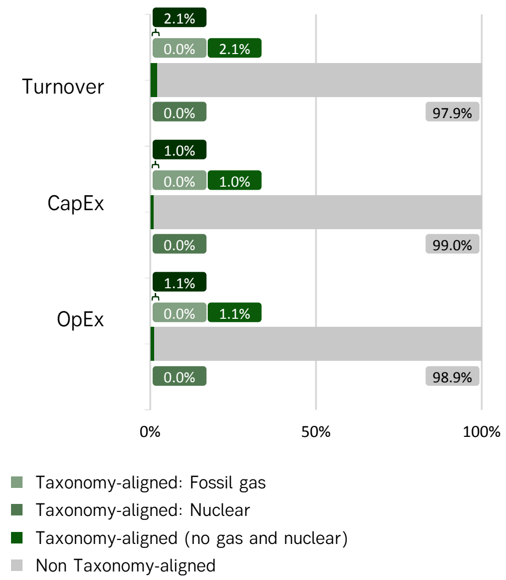
☐ No

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significant harm to any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

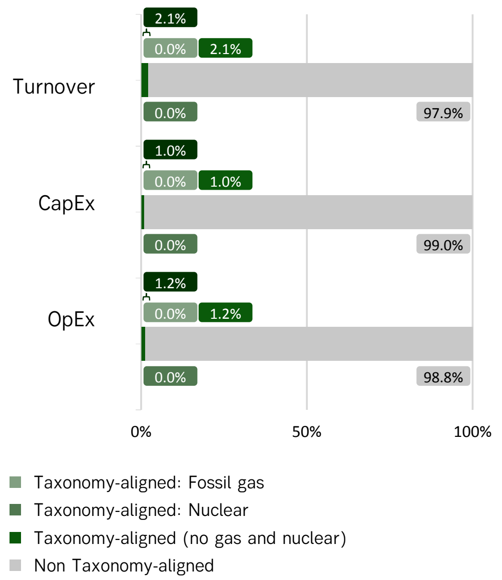
Taxonomy-aligned activities are expressed as a share of:
- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.*

1. Taxonomy-alignment of investments including sovereign bonds*



2. Taxonomy-alignment of investments excluding sovereign bonds*



This graph represents 97.93% of the total investments.

* *For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures*

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

What was the share of investments made in transitional and enabling activities?

During 2023, the share of investments in transitional activities was 0.0%. The share in enabling activities was 0.0%.

How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?

For the previous reference period (2022), the share of investments whose revenue was compatible with the EU Taxonomy was 0.9%, compatible capital expenditure was 0.1%, and operating expenditure was 0.0%, including sovereign bonds. Excluding sovereign bonds, the values were 1.1%, 0.1%, and 0.0%, respectively.

What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

are sustainable investments with an environmental objective that **do not take into account the criteria** for environ-

At the end of 2023, the fund had an equivalent of 71% of investments that were classified as sustainable investments with environmental objectives but not compliant with the EU Taxonomy.

The fund invested exclusively in green bonds. The funding from these bonds must be used to contribute to an environmental goal in order to receive their green label, but for a majority of them, taxonomy reporting for individual financial securities were lacking.

It is likely that in the vast majority of cases, these goals have a clear connection to the goals found in the EU's Green Taxonomy, but that reliable data is lacking for such a classification. The EU Green Taxmentally sustainable economic activities under the EU Taxonomy.

onomy does not cover all economic sectors that are relevant for the fund to invest in and that contribute to sustainability goals. There were also relatively few companies that reported in accordance with the EU Green Taxonomy. This may have been due both to their size and their geographical location.

The fund company uses an internal process to define the contributions to environmental objectives and the classification of sustainable investments. The environmental goals included in the Fund Company's definition of sustainable investments and quantitative thresholds are:

• 20% of the company's revenues have been assessed to contribute to other global environmental goals, directly or indirectly linked to the United Nations Sustainable Development Goals (UN SDGs);

• The company outperforms its sector and region in terms of emission factors according to quantitative data;

• The company outperforms its sector and region in other resource efficiency areas, such as water use, raw material consumption or waste generation, according to quantitative data; and

• The company has been fundamentally analysed and assessed as having a high contribution and exposure to environmental objectives.

The fund company applies a "pass/fail" methodology, where an investment is classified and recognised as contributing if the investment meets one or more of the above criteria.

What was the share of socially sustainable investments?

At the end of 2023, 15% of the AuM of the fund's investments in green bonds were issued by issuers classified as socially sustainable investments.

The fund company uses an internal process to define the contribution to social goals and the classification of sustainable investments.

The social goals included in SEB Investment Management's definition of sustainable investments and quantitative thresholds are:

• 20% of the company's revenue has been assessed to contribute to other global social goals, directly or indirectly linked to the UN SDGs.

• The company outperforms relative to its region in terms of gender equality factors, according to quantitative data.

• The company has been fundamentally analysed and assessed as having a high contribution and exposure to social goals.

The fund company applies a "pass/fail" methodology, where an investment is classified and recognised as sustainable if the investment meets one or more of the above criteria.

The fund also had the option of investing in sustainability-labelled bonds such as social bonds. The funding from these bonds was required to be used to contribute to a social goal.

What investments were included under "not sustainable", what was their purpose and were there any minimum environmental or social safeguards?

Cash, which had the purpose of liquidity and flows.

What actions have been taken to attain the sustainable investment objective during the reference period?

The main part of the fund's sustainability strategy is to invest in green bonds. Green bonds are bonds where proceeds are earmarked for investments with a clear positive environmental impact. At the end of the year, 100% of the bonds were green bonds, constituting of 92% of the fund's AuM, while the rest of the investments were in cash or derivatives. The impact is measured as the avoided emissions from the underlying projects of the green bonds. This is measured as tonnes GHG emissions avoided per 1 MEUR invested. For a 1 MEUR investment into the fund, the impact was a reduction of 335 tonnes GHG.

An example of the fund's green bond investments during the year is Tomra's green bonds. The bonds' underlying projects are part of their net-zero strategy and focused on improved circular solutions for plastic, aluminium and glass waste; the installation of renewable energy-powered equipment; and clean transportation investments, among other things. The bond is rated dark green by Cicero. Green bonds from Adif Alta Velocidad, rated excellent by Fitch, is another example of the fund's green bond investments. The projects in Adif Alta Velocidad's green bonds are focused on new rail lines and maintenance, upgrades, and energy efficiency of the rail system, among other green projects.

The fund excludes companies that do not meet the fund company's extensive criteria for sustainability. As an example, Korea Electric Power Corporation was excluded due to the use of fossil fuels. The fund managers have had engagement dialogues with companies related to their sustainability work. The dialogues have focused on environmental characteristics, with reducing greenhouse gas emissions being the main target. Reporting on Scopes 1-3 emissions, and a clear pathway to reduce these by committing to science-based targets, were main points of engagement. During the year, fund managers had engagement dialogues with ING, and Stockholm

Exergi, among others, and in total, 146 dialogues either directly or indirectly through our external partners with 37 different issuers.

How did this financial product perform compared to the reference benchmark?

Reference benchmarks are indexes to measure whether the financial product attains the sustainable objective

- **How does the reference benchmark differ from a broad market index?**

  The fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.

- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?**

  The fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.

- **How did this financial product perform compared with the reference benchmark?**

  The fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.

- **How did this financial product perform compared with the broad market index?**

  The fund did not use a benchmark index to achieve its promotion of environmental and social characteristics.