



# SEB Global Sustainable Companies Fund

## Information Brochure

Historical returns are no guarantee of future returns. The value of fund units and other financial instruments can rise and fall, and there is no certainty that you will recoup your invested capital.

The Information Brochure has been prepared in accordance with the Swedish Investment Funds Act (2004:46) and the Swedish Financial Supervisory Authority's regulations (FFFS 2013:9) regarding Swedish UCITS.



SEB

# 1. General information

This Information Brochure concerns SEB Global Sustainable Companies Fund ("the Fund"). The Fund is a UCITS fund, as defined in the Swedish Investment Funds Act (2004:46). Within the framework of its fund activities, SEB Investment Management AB (the "Company") manages both UCITS and alternative investment funds. The Information Brochure comprises the following:

1. General information
2. Investment policy and risk information
3. Past performance
4. Information about the Company
5. Fund Regulations

Information on the Fund's environmental and/or social characteristics can be found in the appendix to the Information Brochure.

## Legal nature of the Fund

A Fund is constituted through capital contributions from the general public, or a limited group of investors, and the Fund's assets are jointly owned by the unit holders. The Fund is managed by a fund management company that represents the unit holders in all issues related to the Fund. The assets are held in custody by a depository.

The Fund is not a legal entity, which among other things implies that it may not acquire rights or assume obligations. Assets included in a Fund may not be seized.

A fund unit is a right to a share of the fund equivalent to its net assets divided by the number of outstanding units. A fund unit may be redeemed, transferred and pledged.

All unitholders are treated equally and no preferential treatment of unitholders is applied by the Company.

## Unit classes

The Fund has seven unit classes and each fund unit in the same unit class carries an equal right to the property contained in the Fund.

- A) Non-distributing unit class, traded in SEK
- B) Non-distributing unit class, traded in SEK, minimum initial subscription amount of SEK 10,000,000
- C) Non-distributing unit class, traded in EUR
- D) Non-distributing unit class, traded in EUR, minimum initial subscription amount of EUR 1,000,000
- E) Non-distributing unit class, traded in EUR, with distribution conditions, minimum initial subscription amount of EUR 1,000,000
- F) Non-distributing unit class, traded in USD
- G) Non-distributing unit class, traded in USD, minimum initial subscription amount of USD 1,000,000

Unit classes A, C and F are open to the general public.

Unit class E is only open to

- Investors who, within the framework of a portfolio management agreement or investment advisory services in

accordance to Chapter 2, Section 1, Point 4 or Point 5 of the Swedish Securities Market Act (2007:528) or equivalent foreign regulations, invest in the Fund and where no remuneration is paid from the Company to the provider of the investment service; and

- Insurance companies that invest in the Fund within the framework of the agreement with insurance holders, provided that and only for as long as there is a written agreement between the Company and the insurance company, or an insurance distributor, which expressly permits investment in the unit class, without the insurance company or insurance distributor being entitled to any remuneration from the Company.

## Unit holder register

Bank of New York Mellon, hereinafter referred to as "BNYM", maintains a register of all unit holders and pledgees. Unit-linked insurance companies and pension savings institutes maintain their own registers of how insurance holders' and pension savers' premiums are invested in various funds.

## Sale and redemption of fund units

The Fund is normally open for sale (purchase orders) and redemption (sales orders) of fund units on every Swedish banking day, but not on any banking days on which the Fund's assets cannot be valued while ensuring the equal rights of fund unit holders, for example as a consequence of how one or more of the markets in which the Fund trades are fully or partly closed.

The Company has the right to postpone the sale and redemption of units in the Fund if particular circumstances arise and such action is justifiable with regard to the unit holders' interests. Sale or redemption requests received by the Company during this time must be executed in the order in which they are received, and at the price determined on the first banking day after such circumstances no longer prevail.

Fund units are traded via a fund account or custody account with SEB, or as specified on the Company's website, [www.seb.se/fondbolaget](http://www.seb.se/fondbolaget). The rules for fund accounts and terms and conditions for custody accounts can be obtained from all SEB offices.

Orders to buy and sell fund shares can be placed through SEB or in the manner described on the Company website, [www.seb.se/fondbolaget](http://www.seb.se/fondbolaget). Share buy and sell orders are normally executed on the banking day following the banking day on which the order is placed, if the order can be registered before 3:30 pm. Please note that orders to sell and buy fund shares through SEB AB must be placed before 1:30 pm, and through SEB Pension & Försäkring before 1:00 pm, for the order to be able to be registered before 3:30 pm. Some brokers of the fund may apply different deadlines for submitting orders. An order is executed at the rate applicable on the banking day on which the order is placed.

If the order is placed later, buy and sell orders are normally executed on the following banking day. Before certain holidays, the SEB system shuts down earlier, which means that the orders need to be placed and registered by an earlier

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deadline. This information is available at bank branches and the Internet helpline on the day in question. If the order cannot be registered within the specified time, buy and sell orders will normally be executed on the following business day under the same conditions as stated above.

If, upon a redemption request, the Fund does not have sufficient liquidity available, such liquidity will be acquired through the sale of assets in the Fund, and the redemption will be executed as soon as this is possible.

It is not possible to limit a request for sale and redemption of fund units. Fund unit sale and redemption requests may only be cancelled with the consent of the Company.

The sale and redemption of fund units will always take place at a price that is unknown to the unitholder. The price disclosed to the mass media is solely an indicative price and will not necessarily correspond to the day's trading price. The indicative price solely indicates the current price when the Company sent the price compilation to the mass media. The correct, fixed trading price is notified on the following day.

The Company has limited opportunities to offer services to customers who are permanently or temporarily resident in certain countries, e.g. the USA. The Company therefore reserves the right to refrain from selling fund units to persons resident in certain countries, and to legal entities domiciled in certain countries, e.g. if this is in conflict with current regulatory provisions in such countries. This is described in further detail in Section 17 of the Fund Rules, and further information can be obtained from SEB.

### The Fund's target group

The Fund is primarily suitable for investors with an investment horizon of at least five years. Fund investors must be willing to accept the possibility of significant price fluctuations.

The Fund is particularly suitable for clients who wish to invest sustainably in global markets in accordance with, among other things, the UN Sustainable Development Goals (UN SDGs) and seek to achieve a performance and risk profile in line with the Fund's benchmark index, the MSCI World Net Return Index.

### Base currency

The Fund's base currency is USD.

### Fees

Remuneration will be paid to the Company from the Fund's assets for the management of the Fund. Such remuneration will include costs of custody, supervision and auditors ("Management Fee"). This fee is set in advance as a percentage per annum.

Details of the size of the Management Fee paid by the Fund for preceding years are provided in the Fund's annual reports. Details of the unit holder's share of the total costs are provided in the annual statement.

The Fund's key investor information document uses the concept of ongoing costs, which consist of two elements.

- Management fees and other administrative or operating costs.
- Transaction costs.

Management fees and other administrative or operational costs are the sum of the actual costs incurred by the Fund over the past year, both one-off and ongoing costs. This includes the ongoing costs of the underlying funds, their possible performance-related fees and transaction costs.

Transaction costs are an estimate of the costs incurred by the Company when buying and selling the Fund's underlying investments. This includes both the Fund's direct transaction costs, such as brokerage fees and taxes, but also the Fund's indirect transaction costs, such as spread costs, i.e. the difference between the estimated market value of financial instruments and the price at which someone can buy/sell them during a trade.

The Fund's key investor information document also details the Fund's performance fees.

### Management fee in underlying funds

If the fund invests in other funds, the fund is charged with the fixed management fee in the underlying fund, however this does not include fixed management fees in funds managed by companies within the SEB Group. Any discount received on the fixed management fee accrues to the fund and thus to its unit holders. The fund is also charged any performance fee.

### Other expenses

Any tax costs arising, such as the distribution of dividends on the Funds holdings, must be charged to the Fund.

The Fund's published price and performance are shown after deduction of both the Management Fee and other expenses.

### Maximum and applicable fees

The deduction of fees is governed by the Fund Regulations, which state which fees may be charged in the Fund, and the maximum amounts allowed.

### Current fees

Below is a summary of the current fees for the Fund.

*Initial charge:* 0%

*Exit charge:* 0%

*Annual management fee for unit class A:*

0.45% of the unit class' share of the Fund's value.

*Annual management fee for unit class B:*

0.22% of the unit class' share of the Fund's value.

*Annual management fee for unit class C:*

0.45% of the unit class' share of the Fund's value.

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### *Annual management fee for unit class D*

0.22% of the unit class' share of the Fund's value.

### *Annual management fee for unit class E:*

0.13% of the unit class' share of the Fund's value.

### *Annual management fee for unit class F:*

0.45% of the unit class' share of the Fund's value.

### *Annual management fee for unit class G:*

0.22% of the unit class' share of the Fund's value.

### **Maximum fees**

Below is a summary of the maximum permitted fixed fees for the Fund.

*Initial charge:* 0%

*Exit charge:* 0%

### *Annual management fee for unit class A:*

0.45% of the unit class' share of the Fund's value.

### *Annual management fee for unit class B:*

0.22% of the unit class' share of the Fund's value.

### *Annual management fee for unit class C:*

0.45% of the unit class' share of the Fund's value.

### *Annual management fee for unit class D:*

0.22% of the unit class' share of the Fund's value.

### *Annual management fee for unit class E:*

0.13% of the unit class' share of the Fund's value.

### *Annual management fee for unit class F:*

0.45% of the unit class' share of the Fund's value.

### *Annual management fee for unit class G:*

0.22% of the unit class' share of the Fund's value.

## **Fund objectives, management strategy and benchmark index**

The Fund is an index exposure equity fund that invests in companies that contribute to the Fund's sustainable investment objective. The Fund's objective is to track the performance and risk profile of its benchmark index.

The Fund is a rule-based and systematically managed equity fund that invests in global markets in countries that make up the Fund's benchmark index. The Fund invests in shares of companies that the Company has classified as sustainable investments in accordance with the EU Sustainable Finance Disclosure Regulation (SFDR). The companies will contribute to environmental or social sustainability goals, not having any significant adverse impact on any of these goals, and complying with the requirement of good governance practices. In the Company's assessment, the investments will contribute posi-

tively to the UN Sustainable Development Goals (UN SDGs) or Regulation (EU) 2020/852 of the European Parliament and of the Council (EU Taxonomy). To select sustainable companies, the Company applies a rule-based approach and a systematic model that takes account of various specific parameters in investment decisions.

The Fund's benchmark index is the MSCI World Net Return Index, a total return equity index focusing on large-cap and medium-cap companies in developed markets.

The Fund's benchmark index is assessed to be relevant for the Fund as it provides a good representation of the Fund's long-term investment focus in terms of performance and risk profile, geographical markets, sectors and size of the companies in which the Fund invests.

## **Activity level**

The fund's activity level is measured using tracking error, which shows by how much the difference between the Fund's return and that of the benchmark index varies over time. The activity level is reported as a percentage and calculated as the standard deviation, the average deviation from the mean deviation, for the difference between the Fund's return and that of the benchmark index. The higher the Fund's activity level, the greater the average deviation. The calculation does not take account of whether the deviation is positive or negative.

The fund is an index exposure fund but only invests in companies that meet the Fund's sustainable investment objectives, which means that a large proportion of the holdings in the Fund's benchmark index will be excluded. In addition, the Fund will apply exclusionary sustainability-related criteria in accordance with the Company's sustainability policy. This, together with other factors, affects the Fund's ability to track the performance and risk profile of its benchmark index. To minimize the deviation from the benchmark index, an optimization model is applied, which balances the weighting of the holdings by, among other things, including companies that are not included in the Fund's benchmark index.

The Fund commenced on 21 August 2024 and has existed for less than two calendar years. As a result, the information available is not sufficient to provide a representative view of the past activity level.

## **Service agreement/Primary broker**

The Company has commissioned Skandinaviska Enskilda Banken AB (publ) ("SEB") to be responsible for the Company's fund administration, etc. This entails, among other things, that SEB must provide the Company with a function for internal audit, complaints handling, and also handle the Company's accounting. The Company has also outsourced to SEB the task of managing IT operations and system administration and HR. The Company also has a service agreement with BNYM under which BNYM manages part of the Company's fund administration as well as maintaining the unit holder register. Furthermore, the Company has a distribution agreement with SEB Asset Management AB as the Company's global distributor.

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### Depository

The Fund's depository (the "Depository") is Skandinaviska Enskilda Banken AB (publ) ("SEB"), and its legal form is a banking institution (a limited liability company that is licensed to conduct banking activities). SEB core business comprises banking and financial activities, and it is domiciled in Stockholm.

The Depository's primary activity is to hold the Fund's assets and implement the Company's decisions concerning the Fund. The Depository must also ensure that the Company's instructions concerning management decisions for the funds are not in conflict with statutory or regulatory provisions, or the Fund Regulations. The Depository must conduct itself honourably, fairly, independently and professionally, and solely in the common interest of the Fund and the unit holders.

### Handling of conflicts of interest

SEB has procedures to identify, manage, monitor and report any conflicts of interest. Since the Depository is part of SEB, conflicts of interest may arise between the Depository's activities and other activities within SEB. To ensure that potential conflicts of interest do not negatively affect the funds and their unit holders, the Depository and other activities within SEB, and the Company's activities, are functionally and organisationally separated. The Depository acts independently of the funds and the Company, and solely in the interests of the unit holders. Areas in which conflicts of interest may arise include between the service for trading in financial instruments for its own and customers' account, and investment advisory services, as well as between the customers for these activities. Since the Company and the Depository are part of the same Group, this can also lead to conflicts of interest, such as concerning management and prioritisation within the Group. Updated information concerning the Depository and a description of its tasks and the conflicts of interest that may arise can be obtained from the Company.

The Depository may delegate elements of the activities to one or more external companies, including other custodian banks designated by the Depository from time to time. The tasks that may be delegated in accordance with the UCITS directive and applicable Swedish regulation are custody services and listing.

The Depository must act with due diligence, care and attention in its selection, continued involvement in and supervision of the party to which the depository functions have been delegated. A list of providers and providers to which further delegation has taken place, and any conflicts of interest that may arise as a consequence of such delegation, can be obtained from the Company.

### Annual reports and interim reports

The Company compiles fund reports, i.e. annual reports and interim reports. These are available on the Company's website: [www.seb.se/fondbolaget](http://www.seb.se/fondbolaget). Unit holders may receive such reports on request.

### Auditors

The auditors have the task of auditing the accounts on which the Fund's annual report is based. Details of the firm of auditors and designated auditors can be found in the Information about the Company section.

### Changes to the Fund Regulations

The Company may change the Fund Regulations by application to the Swedish Financial Supervisory Authority (FSA). The changes may affect the Fund's characteristics, such as its investment policy, fees and risk profile. Once the change has been approved, the decision must be made available at the Company and Depository and be announced as prescribed by the Swedish FSA.

### Tax rules

#### Taxation of the Fund:

Since 1 January 2012, Swedish UCITS and special funds have not been liable for tax on the income in the Fund. Taxation in the Fund has been replaced by a standard tax rate paid by the unit holders.

**Fund investor tax** (natural persons and estates that are tax liable in Sweden):

Since 1 January 2012, Swedish unit holders in investment funds have been subject to a standard taxation rate on their fund holdings each year. The basis for the standard taxation rate is the value of the unit holder's fund holdings at the start of the tax year. Standard income is calculated on the value of fund units at 0.4 % of the tax base. The standard income is then included as income from capital and taxed at 30%. This corresponds to taxation at 0.12 % of the value of the fund units. The annual standard income is reported in the statement of earnings the unit holder submits to the Swedish Tax Agency, but without any deduction for preliminary tax.

If the Fund distributes a dividend, the unit holder is taxed at 30 % on the dividend distributed. On distribution, preliminary tax is deducted at 30 %, and the dividend amount is reported in the statement of earnings submitted to the Swedish Tax Agency. Section 12 of the Fund Regulations states whether the Fund distributes dividends.

On divestment/redemption of fund units, any capital gain is taxed at a rate of 30 %, while a capital loss may be offset. The gain or loss must be reported as income from capital. Capital gains and capital losses on the redemption/divestment of fund units are reported in the statement of earnings submitted to the Swedish Tax Agency, but no tax is deducted.

If the Fund is linked to an investment savings account, unit linked insurance, IPS or premium pensions, special tax rules will apply. Special rules also apply to legal entities and fund unit holder's resident abroad.

The taxation may be affected by individual circumstances. Investors who are uncertain about possible tax consequences should seek expert advice.

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### Indemnification liability

In accordance with the Investment Funds Act, the fund management company and Depository hold certain liability for any damage or loss they have inflicted on the Fund or fund unit holders. The below mentioned will not limit unit holders' right to damages in accordance with Chapter 2, Section 21 of the Investment Funds Act, and Chapter 3, Sections 14 -16 of the same Act. The Company or the Depository is not liable for any loss or damage due to circumstances beyond the control of the Company or Depository, e.g. extraordinary circumstances such as strikes or acts of war. Any indirect loss or damage otherwise arising will only be indemnified in the event of gross negligence, or if the loss or damage is a consequence of a lack of due care on the part of the Company or Depository. The limit to the liability of the Company or the Depository is described in more detail in Section 16 of the Fund Regulations.

### Discontinuation of the Fund or transfer of the Fund's activities

The Company may decide that the Fund is to be discontinued, or merged with another fund, or that the Fund's management, as approved by the Swedish FSA, is to be transferred to another fund management company. A transfer may take place at the earliest three months after the changes are announced, unless the Swedish FSA grants permission for the Fund to be transferred at an earlier time.

If the Company decides to discontinue its management, the management of the Fund will be taken over by the Depository. The same will apply if the Swedish FSA revokes the Company's authorisation, or if the Company goes into liquidation or petitions for bankruptcy.

The Company may merge or split funds, if so authorised by the Swedish FSA. Funds may be merged or split at the earliest three months after the Swedish FSA has made its decision.

Unless exemption is granted by the Swedish FSA, changes of this type must be announced in "Post - och Inrikes Tidningar" (the Swedish government gazette), and information concerning the changes must be available from both the Company and the Depository and be announced as stipulated by the Swedish FSA.

### Marketing of fund units in other EEA countries

Units in the Fund are also marketed in Finland, Norway, Denmark, Estonia, Lithuania and Latvia.

The Company has therefore entrusted a representative in the country/countries in which the Fund is registered to make payments to fund unitholders, redeem units and provide information.



## 2. Investment policy and risk information

### Investment policy

The Fund is a rule-based and systematically managed equity fund that invests in equities in global markets in countries included in the Fund's benchmark index.

Investments are made in companies that make a positive contribution to the UN Sustainable Development Goals (UN SDGs) or Regulation (EU) 2020/852 of the European Parliament and of the Council (EU Taxonomy). The Fund's objective is to track the performance and risk profile of its benchmark index. The Fund's benchmark index is the MSCI World Net Return Index.

The Fund only invests in companies that the company has classified as sustainable investments under the EU Sustainable Finance Disclosure Regulation (SFDR), i.e. that contribute to environmental or social sustainability objectives, do not cause significant harm to any of these objectives and comply with the requirement of good governance practices.

The Company also takes account of other factors that affect the portfolio structure. These include seeking to limit active risk, liquidity risks, transaction costs and sustainability risks in the Fund. These factors may affect the Fund's performance and risk profile in relation to its benchmark index. An optimisation model is used to limit deviations from the Fund's benchmark index.

The Fund applies a "qualified/disqualified" methodology, according to the Company's definition of sustainable investment (in accordance with SFDR), where an investment is classified as environmentally or socially sustainable, if the investment is assessed to contribute to one or more of the following environmental and social objectives.

#### Environmental objectives

The environmental objectives included in the Company's definition of sustainable investments are:

*Environmental objectives considered environmentally sustainable under the EU Taxonomy:*

- The six objectives defined by the EU Green Taxonomy: mitigation of climate change, adaptation to climate change, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems.

*Environmental objectives that are not considered compatible with the EU Taxonomy:*

- UN Sustainable Development Goals (SDGs); SDG 6: (Clean Water and Sanitation), SDG 7: (Affordable and Clean Energy), SDG 9: (Industry, Innovation and Infrastructure), SDG 11: (Sustainable Cities and Communities), SDG 12: (Responsible Consumption and Production), SDG 13: (Climate Action), SDG 14: (Life Below Water), SDG 15: (Life on Land).
- Operational resource efficiency in key environmental areas such as carbon dioxide use, water use or use of raw materials.

*The quantitative thresholds used for the environmental objectives are:*

- 10% of the Company's revenues, capital expenditure or operating costs have been classified by estimation or reporting as a significant contribution to the six EU Taxonomy objectives.
- 20% of revenue has been assessed to contribute to other global environmental goals, directly or indirectly linked to the UN 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 materials consumption or waste production, according to quantitative data.
- The company has been fundamentally analysed and assessed to have a high contribution and exposure to environmental targets.

#### Social objectives

The social objectives included in the Company's definition of sustainable investment are:

- UN Sustainable Development Goals (SDGs); SDG 1: (No Poverty), SDG 2: (Zero Hunger), SDG 3: (Good Health and Well-being), SDG 4: (Quality Education), SDG 5: (Gender Equality), SDG 6: (Clean Water and Sanitation), SDG 8: (Decent Work and Economic Growth), SDG 10: (Reduced Inequalities), SDG 11: (Sustainable Cities and Communities), SDG 16: (Peace, Justice and Strong Institutions).

*The quantitative thresholds used for the social objectives are:*

- 20% of the company's revenues have been assessed to contribute to other global social goals, directly or indirectly linked to the UN Sustainable Development Goals (UN SDGs).
- The company outperforms its region in terms of equality factors, according to quantitative data.
- The company has been fundamentally analysed and assessed to have a high contribution and exposure to social goals.

The Fund's assets may be invested in negotiable securities, derivative instruments and money market instruments, and in accounts with credit institutions, and no more than 10% of its value in other funds or fund management companies. The Fund may also include the cash and cash equivalents required for management of the Fund. The Fund may invest in negotiable securities and money-market instruments as referred to in Chapter 5, Section 5 of the Swedish Investment Funds Act.

The Fund applies a physical replication strategy whereby it invests directly in the equities that contribute to the Fund improving its ability to achieve its objective.

The Fund is not limited to investing in negotiable securities that make up its benchmark index.

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The MSCI World Net Return Index is a total return equity index that aims to represent the performance of large-cap and medium-cap companies in global developed markets. The MSCI World Net Return Index is normally redefined four times a year. The number of companies may vary over time.

For more information about this index, click on the link: <https://www.msci.com/our-solutions/indexes>

As from 1 January 2018, new EU rules apply, entailing that an administrator who checks the provision of a reference value must be approved and registered with ESMA. The Fund's benchmark is provided by an administrator registered with ESMA.

The Company has drawn up a plan in the event that the administrator ceases to provide the MSCI World Net Return Index, or if the index changes significantly. The Company will then seek to find a corresponding index and switch to this.

Derivative instruments may be used to streamline management in order to reduce management costs and risks. The Fund may also use OTC derivatives. For investments in derivative instruments, the underlying assets must constitute or relate to such assets as are referred to in Chapter 5, Section 12 of the Swedish Investment Funds Act.

### Handling of security

If the Fund undertakes transactions with financial OTC derivatives and uses techniques to streamline securities management, in each case the Fund must adhere to the Company's collateral policy, pursuant to the ESMA guidelines (ESMA/2014/937).

In accordance with the Company's collateral policy, if eligible collateral does not comprise cash and cash equivalents, it must be highly liquid, subject to daily valuation, be issued by an issuer with a high credit rating and be diversified.

For each type of asset, an appropriate haircut policy is applied, depending on the asset's credit rating, volatility and maturity.

Collateral that does not comprise cash and cash equivalents may not be sold, reinvested or pledged. According to the haircut policy applied, its market value must be at least 100% of the counterparty's exposure value.

The Fund may realise the collateral received at any time, without the consent of the counterparty.

### General risk information

Investing in funds involves risk. Risk in the context of investment refers to uncertain returns. What is usually referred to as a fund's risk is how much the fund has changed in value over time. Investments in funds can include, among other things risks associated with stock, bond and currency markets such as changes in prices, interest rates, creditworthiness, etc. etc. Some of these risk factors are briefly presented below.

A fund often contains investments in or exposure to the following asset classes equities, bonds and currencies. Equities are generally associated with higher risk than bonds and cur-

rencies. currencies. Risk and the potential for higher returns are linked. A saver needs to take some form of risk in order to be able to be rewarded in the form of higher returns. Often a combination of investments in different types of assets can offer the individual saver the desired risk diversification.

The value of a fund is determined by the changes in value of the assets in which the in which the fund has invested. This means that the fund can both increase and decrease in value, and it is not certain that you will be return all the capital invested.

### Different types of risk

#### Market risk

Market risk concerns the macroeconomic price risks in the market, such as changes in the prices of fixed income instruments, equities, currencies and commodities. Investments have different sensitivities to different market risks, so that their prices vary to different degrees. Market risk has a significant impact on the value of an investment.

#### Interest-rate risk

Interest-rate risk describes the sensitivity of a fixed income instrument to changing market interest rates and is usually expressed as a percentage. The risk in fixed income funds is affected by such factors as the duration, i.e. average maturity adjusted for interest payments, of the fund's holdings, and the prevailing situation in the fixed income market. Falling interest rates increase the value of a fund's holdings of fixed income instruments, while rising interest rates decrease the value of the holdings. Fixed income funds investing in fixed income instruments with long maturities are exposed to higher risk, since there is a risk of the market value being more affected by changes in interest rates

#### Country risk/geographical risk

Investments in a limited geographical market, such as a single country or a small number of countries/markets, can entail a higher risk than more broadly diversified investments, due to greater concentration, lower market liquidity or greater sensitivity to changes in market conditions. A fund that invests all or some of its assets in equities, and in a limited geographical market, will usually be subject to market-related limitations. Opportunities to invest the fund's assets in a way that deviates significantly from the market in which the fund invests may therefore be limited to varying degrees. Investments in emerging markets often show greater variation in asset prices than investments in more mature markets. Investments in emerging markets may also be affected by such factors as low liquidity in local markets, economic and political instability, and significant currency fluctuations, etc. Many emerging markets are relatively young and often have a higher political risk than more developed markets. Therefore, they can be sensitive to external and internal influences of various types, and there are risks of military, social, ethnic and religious conflicts that can impact both political and economic developments in these countries. There can also be deficiencies in their legislation or custody of financial instruments.



## Investment policy and risk information, forts

### Concentration risk

Funds which invest in a limited segment or a particular sector, or a small number of issuers, normally face a higher concentration risk than funds which spread their risks by investing on a more diversified basis. By law, funds must spread risk by investing in instruments issued by several different issuers. The concentration risk can be significant for a fund that invests all or some of its assets in equities and in a specific segment of a market. Opportunities to invest the Fund's assets in a way that deviates significantly from the market in which the Fund invests may therefore be limited to varying degrees.

### Correlation and covariance

For funds that invest in several asset classes, such as mixed funds, where changes in the value of the different unit classes are affected by market movements in different ways, the asset classes in total will normally have low internal correlation/covariance. This entails a lower total risk for this type of fund, since the value changes in the different asset classes will offset each other to a certain extent. For the same reason, a fund in which the various asset classes' value changes are affected in the same way by market movements will have high internal correlation/covariance, and the fund's total risk will therefore normally be higher.

### Credit risk

Bonds or other fixed income instruments issued by issuers with a lower credit rating are usually deemed to be securities with a higher credit risk and greater risk of default, compared with securities issued by issuers with a higher credit rating. The credit rating (solvency and WTP) of an issuer can change significantly over time. If an issuer cannot make due payment of interest and nominal amounts, the bond may lose much or all of its value. Credit risk can be reduced by investing in several different companies.

### Currency risk

Currency risk may arise if a fund invests in financial instruments that are denominated in currencies other than the fund's base currency. This means the fund is exposed to currency risk due to fluctuating exchange rates. This can affect the value of the investments both positively and negatively.

### Liquidity risk

Liquidity risk is the risk that a security becomes difficult to value and cannot be sold at a particular time at a reasonable price. The Fund invests in corporate bonds, where liquidity is periodically low, which may indicate that the assets may be difficult to sell at a particular time and at a reasonable price and, in exceptional cases, that withdrawals cannot be made immediately upon request.

### Counterparty and settlement risks

Counterparty risk arises if a counterparty fails to fulfil its obligations, e.g. by defaulting on fixed payments or failing to deliver securities as agreed. If the fund undertakes "Over-The-Counter" (OTC) transactions, it may be exposed to risks related to these counterparties' credit rating. If the fund undertakes OTC transactions which include forward contracts, options and swap agreements, or uses other derivative techniques, this may expose the fund to the risk of non-perfor-

mance by a counterparty. Settlement risk is the risk that settlement in a payment transfer system cannot be executed as expected.

### Risks with derivative instruments

Derivative instrument is a generic term for instruments where returns are derived from the underlying assets. The instrument is an agreement to buy or sell the underlying asset on a future predetermined date at a predetermined price. The change in value of the agreement is determined to a great extent by the change in the value of the underlying asset. Standard derivative instruments are forward contracts, options and swap agreements. One characteristic of a derivative instrument is that it gives the holder access to the entire value change in the underlying instrument, without paying its full price. The risk with e.g. options transactions is that the market price falls below the price fixed in the agreement, which leaves the agreement without any value, or results in a liability. For certain derivative instruments, even small price changes in the underlying asset can lead to large price changes for derivative instruments.

### Operative risk

Operative risk is the risk of losses from causes including system failure, human error, errors in business processes, or external events.

## The Fund's Risk-Assessment Methodology

Derivative instruments are used to streamline the fund management. The commitment approach is used to calculate the Fund's total exposure.

## The Fund's risk/return profile

The fund is risk-categorised according to a seven-point scale, where 1 represents the lowest risk, and 7 the highest risk. Category 1 does not imply that the Fund is risk-free. Calculation of the risk indicator is based on a common method for all EU member states. The risk/return indicator shows the relationship between risk and potential return on an investment in the fund.

A fund's categorisation is based on volatility, which is a measure of the variation in the return over time. The categorisation can be based on calculations using returns from the fund's trading cycle over the last five years. If there is no historical data, information concerning the fund's benchmark index or other calculation methods can be used. For certain types of funds, other methods can be used to determine the risk category, such as the maximum risk level permitted by the fund, or the risk level for the Fund's reference portfolio. The Key Investor Information document shows how the Fund's categorisation has been determined. The risk categorisation must thus solely be viewed as an indication of the fund's future categorisation. This also means that a fund's risk category may change over time

Risk category	Volatility (%)
1	0 - 0,5
2	0,5 - 5
3	5 - 12

## Investment policy and risk information, forts

4	12	-	20
5	20	-	30
6	30	-	80
7	80	-	

The risks to which the Fund is exposed that are not captured by the risk/return indicator described above are described in the Fund's Key Investor Information document under "Risk indicator". This also shows the Fund's current risk categorisation, which can change over time.

### Regular information on risk and financial leverage

The Company provides regular information on risk and financial leverage as follows:

Information regarding the current risk profile and the risk management systems applied is provided in the Fund's Information Brochure, which is updated annually. The annual report of the Fund also provides information on the maximum and minimum level of the total amount of financial leverage.

Information on changes in the maximum level of leverage that may be used on behalf of the Fund and the right to dispose of collateral or other guarantees provided under the leverage regime is disclosed in the fund's prospectus.

Information on changes in the conditions for redemption of fund units and information if there is a postponement of the redemption of fund units pursuant to chapter 4, section 13 a of the Swedish Investment Funds Act or if the fund is closed for redemption of fund units.

### The Fund's risk profile

The Fund seeks to achieve a similar level of risk to the MSCI World Net Return Index. It is the Fund's aim to maintain a well-balanced risk level in all situations.

Investments in equities are associated with a risk of major price fluctuations (market risk). However, because the Fund invests globally, its assets are not exposed to risk in any particular geographical market.

The Fund's net asset value can vary significantly based on its composition (the Fund invests in equities), the market or markets to which the Fund is exposed, and the management methods used by the manager.

As the Fund invests outside Sweden, it is affected by changes in exchange rates (currency risk).

The Fund is entitled to use derivative instruments, as both standardised and OTC derivatives, to make its management more effective. Derivative instruments have a leverage effect, which entails an increase or decrease in the Fund's exposure to market fluctuations (market risk). In accordance with the Swedish Investment Funds Act, the Fund may use a leverage effect equivalent to the Fund's market value.

In practice, the risk level will be well below this level. The Fund's risk taking is monitored and checked regularly and

meticulously to ensure compliance with statutory and regulatory provisions, and the Fund Regulations.

### The Fund's sustainability risk

The Fund has a sustainable investment objective (Article 9 of SFDR).

#### 1. Integration

The Fund integrates sustainability risks by, among other things, only investing in companies that are classified as sustainable investments under the EU Sustainable Finance Disclosure Regulation (SFDR), i.e. that contribute to environmental or social sustainability objectives, do not cause significant harm to any of these objectives and comply with the requirement of good governance practice.

The Fund also uses the Company's Sustainability Score (SIMS-S), which is the Company's proprietary sustainability model that rates all companies in the Fund's investment universe based on several aspects of sustainability, in order to create a comprehensive and impartial picture.

The model consists of two main components: sustainability risks and sustainability opportunities. The model uses data from several data providers and is continuously modified as new data and insights become available. The sustainability rating contains both a present value picture and a forward-looking perspective for the individual company. It enables the portfolio managers to assess present and future sustainability factors that may affect risk and returns in the long term.

SIMS-S uses metrics such as the existence and ambition of carbon reduction targets, physical climate risks, carbon footprint, gender diversity, compliance with the EU Taxonomy, and revenues in line with the UN Sustainable Development Goals (UN SDGs).

Examples of the types of sustainability-related risks assessed are as follows:

1. Conversion risk – the risk of an adverse impact on a company's economic value as a consequence of increased taxation of carbon emissions, fines from regulatory authorities related to carbon emissions, or increased prices of fossil fuels, in combination with relative inefficiency in the use of coal as a resource.
2. Physical risk – the risk of an adverse impact on a company's economic value as a consequence of a change in the physical climate, in the form of heatwaves, floods, rising sea levels, and so on, which might damage physical assets or adversely affect important supply chains or other key functions associated with a company's operations.
3. Reputation/controversy risk – the risk of an adverse impact on a company's economic value as a consequence of investors' perception of the company's governance being adversely affected, the risk of fines and penalties from supervisory authorities due to improper business conduct, and the risk of difficulties for the company in attracting suitable counterparties and business partners, as well as employees with the right skills.
4. Relevance risk – the risk of an adverse impact on a company's economic value as a consequence of a company's

## Investment policy and risk information, forts

products or services becoming irrelevant in terms of environmental or social aspects due to, for example, competing technologies, changed ethical norms or changed legal conditions.

5. Risk from alternative technologies – the risk of underinvestment in future green technology solutions that will solve or partially mitigate climate change or other sustainability-related goals.

### 2. Exclusion

Furthermore, certain business models are considered unethical or associated with a level of sustainability risk that is not accepted by the Fund. These are excluded from investment and therefore the Fund will not invest in companies that:

- Do not adhere to international norms and standards.
- Operate in controversial sectors or business areas, such as tobacco, non-medical cannabis, pornography, commercial gambling, civilian weapons and alcohol
- Have facilities/operations located in or close to biodiversity-sensitive areas, where the activities of these companies have a negative impact on these areas, or whose activities have a negative impact on endangered species.
- Have exposure to fossil fuels, or other activities with a negative climate impact. The Fund may invest in companies that are deemed to be in a transition process, in accordance with the Fund Management Company's sustainability policy.

### 3. Active ownership

To further address potential sustainability risks or further strengthen existing sustainability-related comparative advantages, the Fund exercises active ownership to influence companies in a more sustainable direction. This may include adopting new business models, reducing emissions from the company, or improving social requirements in the value chain. This can take place through direct company dialogues, in collaboration with other asset managers or partners, or through collaborative initiatives. It may also be exercised by voting at annual general meetings, in favour of or against specific shareholder or management proposals.

To assess the likely effects of sustainability risks on the Fund's returns, the Company uses a risk rating from an external independent supplier of sustainability analyses. The risk rating measures the extent to which a company's financial value is exposed to sustainability risks and the extent to which these are not managed by the company. Based on the risk rating, companies are grouped into one of five risk categories (negligible, low, medium, high, very high). The aggregated risk rating for this Fund indicates a low sustainability risk within the Fund and therefore the likely impact of sustainability risks on returns is deemed to be low.

### 3. Past performance

The Fund has existed for less than a full calendar year. As a result, the information available is not sufficient to present a representative view of the past performance.

Past performance is no guarantee of future returns.

## 4. Information about the Company

### Name of the Company

SEB Investment Management AB (the "Company") Wholly owned subsidiary of Skandinaviska Enskilda Banken AB (publ) ("SEB"). The Company is part of the SEB Asset Management division. Within the framework of the Company's fund activities, the Company manages UCITS and alternative investment funds. Since 5 April 2006, the Company has been authorised to conduct fund activities in accordance with the Swedish Investment Funds Act (2004:46). Since 20 May 2014, the Company has also been authorised to manage alternative investment funds in accordance with the Swedish Alternative Investment Fund Managers Act (2013:561).

### Date of establishment of the Company

1978-05-19

### Legal structure of the Company and size of the Company's share capital

Limited liability company, SEK 1,500,000

### Domicile and head office of the Company

Stockholm, Sweden

### Branches

#### SEB Investment Management AB, Luxembourg branch

4, rue Peternelchen, L-2370 Howald, Luxembourg  
Tel. no.: +352 26 23 1

#### SEB Investment Management AB, Helsinki Branch

Södra Esplanaden 18, SF-00130 Helsinki, Finland  
Tel. no.: +358 961628000

#### SEB Investment Management AB, Copenhagen branch

Bernstorffsgade 50, DK-1577 Copenhagen V  
Postbox 2098, Denmark Tel. no.: +45 33 28 10 00

### Members of the Board of Directors

Johan Wigh, Chairman, external member, Partner in the law firm Törngren Magnell & Partners Advokatfirma, Stockholm  
Mikael Huldt, external member, Head of Asset Management, AFA Insurance  
Louise Lundborg Hedberg, external member, CEO and senior counsel Penny to Pound AB

### Senior executives

Katarina Höller, CEO  
Elisabet Jamal Bergström, deputy CEO & Head of Sustainability, Governance  
Henrik Åhman, Chief Operating Officer  
Caroline Rifall, General Counsel  
Ulf Grunnesjö, Chief Financial Officer  
Anna Frey, Personnel Director, SEB  
Christian Lindstroem Lage, Chief Investment Officer  
Matthias Ewald, Branch manager Luxembourg  
Antti Katajisto, Branch manager Finland  
Erik Hallengren, Branch manager Denmark

### Other executives

Terese Cederlund, Risk Control Officer  
Fredrik Lundberg, Senior Compliance Officer  
Johan Lindqvist, Head of Internal Audit, SEB

### Remuneration policy

Details of the Company's remuneration policy can be found (in Swedish) at SEB Investment Management AB | SEB (sebgroup.com) under "Remuneration Policy" (More about the fund management company). This provides exhaustive information on the remuneration policy and how remuneration and benefits are calculated, who is responsible for approving them, and the composition of the remuneration committee. A hard copy of the information can be obtained on request from the Company, free of charge.

### Auditors

The auditors for the Company and the Fund are Ernst & Young AB, and the designated auditor is Carl Rudin.

### Investment funds and alternative investment funds managed by the Company

#### Sweden

Charlottes Fond,  
Ethos Aktiefond,  
Ethos Räntefond,  
Hercules Fonden,  
SEB Active 80,  
SEB Active 55,  
SEB Active 30,  
SEB Active 20,  
SEB Aktiesparfond,  
SEB Asienfond ex Japan,  
SEB Blandfond Sverige,  
SEB Blockchain Economy Exposure Fund,  
SEB Dynamisk Aktiefond,  
SEB Emerging Marketsfond,  
SEB Emerging Markets Exposure Fund (SEB Emerging Markets indexnära),  
SEB Europafond,  
SEB Europafond Småbolag,  
SEB Fastighetsfond Norden,  
SEB FRN Fond,  
SEB Företagsobligationsfond,  
SEB Global Aktiefond,  
SEB Global Sustainable Companies Fund,  
SEB Hybrid Capital Bond Fund,  
SEB Institutionell Obligationsfond SEK,  
SEB Korträntefond SEK,  
SEB Likviditetsfond SEK,  
SEB Läkemedelsfond,  
SEB NanoCap,  
SEB Nordamerikafond Små och Medelstora Bolag,  
SEB Nordamerikafond Småbolag,  
SEB Nordenfond,  
SEB Obligationsfond Flexibel SEK,  
SEB Obligationsfond SEK,

## Information about the Company, forts

SEB PB Aktiv 25,  
SEB PB Aktiv 50,  
SEB PB Aktiv 75,  
SEB Start 100,  
SEB Start 75,  
SEB Start 50,  
SEB Start 25,  
SEB Stiftelsefond Balanserad,  
SEB Stiftelsefond Sverige,  
SEB Stiftelsefond Utland,  
SEB Sverige Expanderad,  
SEB Sverige Indexfond,  
SEB Sverige Indexnära,  
SEB Sverigefond,  
SEB Sverigefond Småbolag,  
SEB Sverigefond Småbolag Chans/Risk,  
SEB Swedish Value Fund,  
SEB Teknologifond,  
SEB Världenfond,  
SEB WWF Nordenfond,  
SEB Östeuropafond,  
Sophiahemmets Fond,  
Specialfond SLS,  
Svenska Läkaresällskapets Fond

### **Luxembourg**

SEB Active Owners Impact Fund,  
SEB Arkadia Bostad,  
SEB Artificial Intelligence Fund,  
SEB Asset Selection Fund,  
SEB Climate Focus High Yield Fund,  
SEB Concept Biotechnology,  
SEB Corporate Bond Fund EUR,  
SEB Corporate Bond Fund SEK,  
SEB Credit Opportunity V,  
SEB Danish Mortgage Bond Fund,  
SEB Domestica V,  
SEB Dynamic Bond Fund,  
SEB Eastern Europe Small and Mid Cap ex Russia Fund,  
SEB ELTIF- Private Equity I  
SEB Emerging Markets Fund,  
SEB Euro Bond Fund,  
SEB Euro Short Rate Fund,  
SEB Euroland Free of Management Fee,  
SEB Europe Equity Fund  
SEB Europe Exposure Fund,  
SEB European Equity Small Caps,  
SEB Finland Optimized Exposure Fund,  
SEB Finland Small Cap Fund,  
SEB Global Climate Opportunity Fund,  
SEB Global Equal Opportunity Fund,  
SEB Global Exposure Fund,  
SEB Global Focus Fund,  
SEB Global High Yield Fund  
SEB Green Bond Fund,  
SEB Index Linked Bond Fund SEK,  
SEB Listed Private Equity Fund,  
SEB Micro Cap Fund SICAV-SIF,  
SEB Microfinance IX EUR,  
SEB Microfinance IX SEK,  
SEB Microfinance X EUR,

SEB Microfinance X SEK,  
SEB Microfinance XI EUR,  
SEB Microfinance XI SEK,  
SEB Microfinance XII EUR,  
SEB Microfinance XII SEK  
SEB Mixed Fund 30,  
SEB Mixed Fund 50,  
SEB Mixed Fund 80,  
SEB Modern Aggressive Fund,  
SEB Modern Growth Fund,  
SEB Nordic Energy,  
SEB Nordic Future Opportunity Fund  
SEB Nordic Small Cap Fund,  
SEB Pension Fund,  
SEB Pension Fund Extra,  
SEB Pension Fund Plus,  
SEB Private Equity Global Direct III,  
SEB Private Equity Global Partnership II,  
SEB Private Equity Global Partnership II Access  
SEB Private Equity Nordic Direct II EUR,  
SEB Private Equity Nordic Direct II SEK,  
SEB Private Equity Opportunity Fund I  
SEB Private Equity Opportunity Fund II  
SEB Private Equity Opportunity Fund III,  
SEB Private Equity Opportunity IV,  
SEB Private Equity Sustainable Direct I,  
SEB Sweden Equity Fund,  
SEB U.S. Exposure Fund,  
SEB US Focus Core Fund,  
SEB USD Currency Fund.



# 5. Fund Regulations

## Section 1 The Fund

The Fund's name is SEB Global Sustainable Companies Fund (hereinafter referred to as the "Fund")

The Fund is a UCITS fund, as defined in the Swedish Investment Funds Act (2004:46) ("LVF").

The Fund is constituted through capital contributions from the general public, and the Fund's assets are jointly owned by the unitholders. Units in a unit class carry an equal right to the property contained in the Fund. The Fund is not a legal entity and is not entitled to acquire rights or assume obligations. Property included in the Fund may not be seized, and the unitholders are not responsible for any commitments concerning a Fund. The fund is managed by a fund management company, which represents the shareholders in all matters relating to the fund.

The Fund consists of the following unit classes:

- A) Non-distributing unit class, traded in SEK
- B) Non-distributing unit class, traded in SEK, minimum initial subscription amount of SEK 10,000,000
- C) Non-distributing unit class, traded in EUR
- D) Non-distributing unit class, traded in EUR, minimum initial subscription amount of EUR 1,000,000
- E) Non-distributing unit class, traded in EUR, with distribution conditions, minimum initial deposit EUR 1,000,000
- F) Non-distributing unit class, traded in USD
- G) Non-distributing unit class, traded in USD, minimum initial subscription amount of USD 1,000,000

The content of the Fund Regulations is common to all unit classes, with the exception of the provisions concerning fees in section 11 and the provisions concerning minimum amounts on initial subscription in section 9.

The Fund's base currency is USD.

## Section 2 Fund manager

The Fund is managed by SEB Investment Management Aktieföretag, 556197-3719 (hereinafter referred to as the "Fund Management Company").

## Section 3 Depository

The Fund's assets are held in custody by Skandinaviska Enskilda Banken AB (publ), Swedish corporate reg. no. 502032-9081 (hereinafter referred to as the "Depository").

The Depository will receive and hold in custody the assets contained in the Fund and execute the Fund Management Company's instructions concerning the Fund, unless they are in breach of the provisions of the Swedish Investment Funds Act, other statutory provisions or the Fund Regulations, and ensure that

- the sale, redemption and cancellation of fund units takes place in accordance with the provisions of the Swedish Investment Funds Act and the Fund Regulations,

- the value of the fund units is calculated in accordance with the provisions of the Swedish Investment Funds Act and the Fund Regulations,
- remuneration for transactions relating to a fund's assets is paid to the Fund immediately, and
- the Fund's income is used in accordance with the provisions of the Swedish Investment Funds Act and the Fund Regulations.

The Depository will operate independently of the Fund Management Company and exclusively in the interests of the Fund's unitholders.

## Section 4 Nature of the Fund

The Fund is a rule-based and systematically managed equity fund that invests in global markets in countries that make up the Fund's benchmark index. Investments are made in companies that contribute to the Fund's sustainable investment objective.

The Fund invests in companies that the Fund Management Company has classified as sustainable investments under the EU's Sustainable Finance Disclosure Regulation (SFDR). In the Fund Management Company's assessment, the companies must make a positive contribution to the UN Sustainable Development Goals (UN SDGs) or Regulation (EU) 2020/852 of the European Parliament and of the Council (EU Taxonomy).

The objective is that the Fund track the performance and risk profile of its benchmark index. The Fund's benchmark index is an equity index that represent the performance of global developed markets and is disclosed in the Information Brochure.

## Section 5 The Fund's investment policy

The Fund invests in companies that the Fund Management Company has classified as sustainable investments under the EU's Sustainable Finance Disclosure Regulation (SFDR). The companies will contribute to environmental or social sustainability goals, not having any significant adverse impact on any of these goals, and complying with the requirement of good governance practices. Together with other factors affecting the portfolio structure, this means that the Fund's performance and risk profile may deviate both positively and negatively from its benchmark index. For more information on these factors, see the Fund's Information Brochure.

Investment decisions are governed by the Fund Management Company's criteria for sustainable investments in accordance with SFDR, which is in line with Regulation (EU) 2020/852 of the European Parliament and of the Council (the EU Taxonomy) or the UN Sustainable Development Goals (UN SDGs). A detailed explanation of these criteria can be found in the Fund's Information Brochure. In order to select sustainable companies, the Fund Management Company applies a rule-based approach and a systematic model that takes account of various specific parameters when investment decisions are made.

## Fund Regulations, forts

### (i) Asset classes

The Fund's assets may be invested in negotiable securities, derivative instruments, fund units and money market instruments, and as deposits with credit institutions. The Fund may also include the cash and cash equivalents required for management of the Fund.

For investments in derivative instruments, the underlying assets must constitute or relate to such assets as are referred to in Chapter 5, Section 12 of the Swedish Investment Funds Act. Derivatives are not used to achieve the Fund's sustainable investment objective.

### (ii) Allocation, etc.

The Fund's assets will be placed in sustainable investments globally, in the form of shares and transferable securities equivalent to shares.

The Fund is not limited to solely investing in transferable securities that make up its benchmark index.

A maximum of 10% of the Fund's value may be invested in other funds or fund management companies.

## Section 6 Markets

The Fund's assets may be invested in a regulated market or in an equivalent market outside the EEA, and in other markets, within or outside the EEA, that are regulated and open to the general public and are covered by the Fund's investment policy.

## Section 7 Special investment policy

The Fund may invest in negotiable securities and money-market instruments as referred to in Chapter 5, Section 5 of LVF.

Derivative instruments may be used to streamline management in order to reduce management costs and risks.

The Fund may also use OTC derivatives.

## Section 8 Valuation

- The Fund's net asset value is calculated by deducting the amount of the liabilities related to the Fund from the Fund's assets. The value of a fund unit in a specific unit class is the unit class' net asset value divided by the number of outstanding fund units, taking into account the terms associated with the respective unit class.

The value of fund units is normally calculated on each Swedish banking day by the Fund Management Company.

The Fund Management Company has the right to suspend the valuation of the Fund if valuation of the Fund's assets is not possible in a way that ensures the equal rights of the unitholders, i.e. if the Fund's assets cannot be valued at market value. In these circumstances, the Fund must be valued as soon as the unitholders' equal rights can be ensured.

Financial instruments included in the Fund are valued at market value. For financial instruments traded in an active market, the market value is determined by the latest price paid, in the first instance. For financial instruments that are not

traded in an active market, the market value is derived from information concerning equivalent transactions subject to market conditions during the most recent period of time. If these methods cannot be applied, or will be obviously misleading, in the assessment of the Fund Management Company, the market value will be determined on the basis of the latest bid or ask price, or alternatively via a valuation model that is established in the market. For OTC derivatives, normally no published information is available concerning the latest price paid, as well as the latest bid and ask price. The market value of OTC derivatives is therefore normally determined on the basis of a generally adopted valuation model. The value of forward exchange rate contracts is determined, for example, on the basis of the market rate on the business day, with adjustment for the difference in interest rates between the currencies traded and the maturity of the forward contract.

For transferable securities and money-market instruments referred to in Chapter 5, Section 5 of the Swedish Investment Funds Act, if there is no active market a special valuation will be made by which a market value is determined on objective grounds, whereby the following factors may be taken into consideration:

- The instrument's convertibility
- Market prices from a non-regulated market or other independent sources
- The acquisition value
- Discounted cash flows (present value calculation)
- Proportion of equity (year-end valuation)
- Company events that impact the market value.

## Section 9 Sale and redemption of fund units

The Fund is normally open for sale and redemption of fund units on every Swedish banking day, but not on any banking days on which the Fund's assets cannot be valued while ensuring the equal rights of fund unitholders, for example as a consequence of how one or more of the markets in which the Fund trades are fully or partly closed.

The Fund Management Company has the right to postpone the sale and redemption of units in the Fund if particular circumstances exist and such action is justifiable with regard to the unitholders' interests. Sale or redemption requests received by the Fund Management Company during this time will be executed in the order in which they are received, and at the price determined on the first banking day after such circumstances no longer prevail.

The respective sales price and redemption price of a fund unit will amount to the fund unit value on the banking day on which the request to sell (buying order) or to redeem (selling order) is received by the Fund Management Company.

The sale and redemption of a fund unit will be executed on the banking day after the banking day on which the request is received by the Fund Management Company, provided that the request is received before the cut-off time stated in the Fund's Information Brochure. Execution refers to both purchase and sales orders.

## Fund Regulations, forts

Fund units are sold and redeemed at a price that is unknown to the unitholder at the time of the sale or redemption request. Details of sale and redemption prices concerning the preceding banking day may be obtained from the Fund Management Company, the Depository and Skandinaviska Enskilda Banken AB.

Sales and redemptions of fund units are processed via Skandinaviska Enskilda Banken AB or as stated by the Fund Management Company.

Requests for sale or redemption of fund units may only be revoked with the consent of the Fund Management Company.

If no liquidity is available in the Fund when a redemption request is received, such liquidity will be acquired by selling assets in the Fund, and the redemption will be executed as soon as possible.

### Terms of distribution

Unit classes A, C and F are open to the general public.

Unit class E is only open to:

- Investors who, within the framework of a portfolio management agreement or investment advisory services in accordance with part 2, section 1(4) and (5) of the Swedish Securities Market Act (2007:528), or equivalent foreign regulations, invest in the Fund and where no remuneration is paid from the Fund Management Company to the provider of the investment service; and
- Insurance companies that invest in the Fund within the framework of the agreement with insurance holders, provided that and only for as long as there is a written agreement between the Fund Management Company and the insurance company, or an insurance distributor, which expressly permits investment in the unit class, without the insurance company or insurance distributor being entitled to any remuneration from the Fund Management Company.

### Minimum amount for initial subscription

For unit class A there is no minimum amount for initial subscription. The unit class is traded in SEK.

For unit class B, the minimum amount for initial subscription is SEK 10,000,000.

For unit class C there is no minimum amount for initial subscription. The unit class is traded in EUR.

For unit class D, the minimum amount for initial subscription is EUR 1,000,000.

For unit class E, the minimum amount for initial subscription is EUR 1,000,000.

For unit class F, there is no minimum amount for initial subscription. The unit class is traded in USD.

For unit class G, the minimum amount for initial subscription is USD 1,000,000.

## Section 10 Extraordinary circumstances

The Fund may be closed for the sale and redemption of fund units in the event of extraordinary circumstances which mean that the Fund cannot be valued in accordance with section 8 in a manner that ensures the equal rights of the unit holders or their interests.

## Section 11 Fees and remuneration

Remuneration will be paid to the Fund Management Company from the Fund's assets for its management. Such remuneration shall include costs for custody, supervision and audit of the Fund, at the maximum amounts stated below.

For unit class A, fixed remuneration is paid at an amount equivalent to a maximum of 0.45% per annum of the unit class' share of the Fund's net asset value

B, fixed remuneration is paid at an amount equivalent to a maximum of 0.22% per annum of the unit class' share of the Fund's net asset value.

C, fixed remuneration is paid at an amount equivalent to a maximum of 0.45% per annum of the unit class' share of the Fund's net asset value.

D, fixed remuneration is paid at an amount equivalent to a maximum of 0.22% per annum of the unit class' share of the Fund's net asset value.

E, fixed remuneration is paid at an amount equivalent to a maximum of 0.13% per annum of the unit class' share of the Fund's net asset value.

F, fixed remuneration is paid at an amount equivalent to a maximum of 0.45% per annum of the unit class' share of the Fund's net asset value.

G, fixed remuneration is paid at an amount equivalent to a maximum of 0.22% per annum of the unit class' share of the Fund's net asset value.

Such remuneration is calculated daily on a basis of 1/365th.

Transaction costs, such as brokerage, taxes, and delivery and other expenses related to the Fund's purchase and sale of assets, will be debited to the Fund. Moreover, statutory taxes will be debited to the Fund.

## Section 12 Dividends

The Fund does not distribute dividends.

## Section 13 Financial year

The financial year of the Fund is the calendar year.

## Section 14 Interim report, annual report and amendments to the Fund Regulations

The Fund Management Company will submit an annual report regarding the Fund within four months of the end of the financial year, and an interim report for the financial year's first six months within two months of the end of the half-

## Fund Regulations, forts

year. The annual report and interim report must be available at the Fund Management Company and the Depository and will be sent to those unitholders who so request.

Amendments to the Fund Regulations must be approved by the Swedish Financial Supervisory Authority (FSA). Further to the Swedish Financial Supervisory Authority's approval of an amendment to the Fund Regulations, the amended Fund Regulations will be made available at the Fund Management Company and the Depository and, where applicable, be notified in the manner instructed by the Swedish Financial Supervisory Authority.

### Section 15 Pledging

Unitholders may pledge their units in the Fund, provided that the unitholder is not a pension savings institution that has invested pension savings assets on behalf of pension savers, or an insurance company that has invested pension savings assets on behalf of pension savers.

Pledging takes place by the pledger or pledgee notifying the Fund Management Company of the pledge in writing. Such notification must include the following:

- name of the unit holder/pledger,
- name of the pledgee,
- which fund units the pledging concerns, and
- any limitations to the extent of the pledging.

The notification shall be signed by the pledger.

The Fund Management Company shall record the pledging in the unit holder register, and inform the unit holder in writing of the registration of the pledging. The pledging will lapse when the pledgee has informed the Fund Management Company in writing thereof. The Fund Management Company is entitled to apply a registration charge to the unitholder. Details of the current fee are set out in the Fund's Information Brochure.

### Section 16 Limitation of liability

If the Depository or a custodian bank has lost financial instruments held in custody by the Depository or a custodian bank, without undue delay the Depository must provide financial instruments of the same type or pay an amount equivalent to the value thereof to the Fund Management Company on behalf of the Fund. However, the Depository will not be liable in the event that the loss of the financial instruments is caused by an external event beyond the Depository's reasonable control, and of which the consequences were impossible to avoid, despite all reasonable efforts being made, such as damage caused by Swedish or foreign legal orders, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts or other similar circumstances. Exemption from liability with regard to strikes, blockades, boycotts and lockouts will apply even if the Depository is the object or implementer of such conflict measures.

The Depository will not be liable for any damage other than such damage as referred to in the first paragraph, unless the Depository has intentionally or negligently caused such other

damage. Nor shall the Depository be liable for such other damage if circumstances specified in the first paragraph exist.

The Fund Management Company will not be liable for any claims arising from Swedish or foreign statutes, measures implemented by Swedish or foreign authorities, acts of war, strikes, blockades, boycotts, lockouts or other similar circumstances. Exemption from liability with regard to strikes, blockades, boycotts and lockouts will apply even if the Fund Management Company is the object of or implements such conflict measures. No compensation will be paid by the Fund Management Company for loss or damage arising from other circumstances, provided that the Fund Management Company has shown due diligence. The Fund Management Company or Depository is not liable for indirect loss or damage under any circumstances.

The Fund Management Company or Depository will not be liable for damage caused by a Swedish or foreign stock exchange or other marketplace, custodian bank, central securities depository, clearing organisation, or other party that provides similar services, nor for any other service provider that the Fund Management Company or Depository may have engaged with appropriate diligence. The same will apply regarding loss or damage that may be caused by one of the aforementioned organisations or service providers becoming insolvent. The Fund Management Company or Depository shall not be liable for damage that may arise further to restrictions to the right of disposal that may be applied against the Fund Management Company or Depository with regard to securities.

Should the Fund Management Company or Depository, due to circumstances set forth in this section, be fully or partly prevented from executing measures pursuant to these Regulations, or executing purchase or redemption orders regarding fund units, such measures may be postponed until such impediments no longer exist. Should the Fund Management Company or Depository not be obliged, as a consequence of such circumstances, to execute or receive payment or delivery, the Fund Management Company or Depository, and the unit holder, shall not be obliged to pay any penalty interest. Should interest be pledged, the Fund Management Company or the Depository shall pay interest at the rate prevailing on the due date.

The aforementioned terms of this section will not limit unitholders' right to indemnification in accordance with Chapter 2, Section 21 and Chapter 3, Sections 14-16 of the Swedish Investment Funds Act.

### Section 17 Restriction of right to sell, etc.

The Fund or units in the Fund are not, nor are they intended to be, registered in accordance with the applicable United States Securities Act of 1933 or the United States Investment Companies Act of 1940, or other relevant U.S. legislation.

Units in the Fund (or rights to fund units) may not and will not be offered, sold or otherwise distributed to or on behalf of US Persons (as defined in Regulation S of the United

## Fund Regulations, forts

States Securities Act and interpreted in the United States Investment Companies Act of 1940).

In addition, fund units may not be offered, sold or in any other way distributed to private individuals or legal entities if the Fund Management Company considers that this would entail or involve a risk of

- (i) violation of Swedish or foreign legislation or statutes,
- (ii) the Fund Management Company having to adopt special registration or other measures, or suffering considerable tax or financial losses which cannot be reasonably claimed by the Fund Management Company; or
- (iii) the Fund incurring damage or costs that are not in the interest of the unit holders.

Persons who wish to acquire units in the Fund shall inform the Fund Management Company of their national domicile. A unitholder is also obliged to notify the Fund Management Company of any changes in their national address.

Buyers of fund units must also confirm to the Fund Management Company that they are not a US Person and that the fund units are being acquired through a transaction outside the USA, in accordance with Regulation S. Subsequent transfer of the units or rights to such units may only be made to a non-US Person, and must take place through a transaction outside the USA covered by exemptions pursuant to Regulation S.

Should the Fund Management Company deem that it does not have the right to offer, sell, or in any other way distribute fund units in accordance with the above, the Fund Management Company shall have the right to refuse the execution of such request to purchase units in the Fund and, where applicable, and without prior consent, to redeem such unitholders' holdings of units in the Fund for their account, and to pay out the subsequent amounts received.

**Product name:** SEB Global Sustainable Companies Fund

**Legal entity identifier:** 636700NPVUTNTAZG3U75

## Sustainable investment objectives

**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.

### Does this financial product have a sustainable investment objective?

<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>Yes</b>	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <b>No</b>
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 20.00%</b> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that are not considered environmentally sustainable according to the EU Taxonomy</li> </ul> <input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 30.00%</b>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S)</b> characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of <b>___%</b> sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes Environmental/Social (E/S) characteristics, but <b>will not make any sustainable investments</b>



## What is the sustainable investment objective for this financial product?

The Fund has sustainable investments as its objective in the sense referred to in Article 9 of the SFDR. The Fund is an equity fund that invests in companies that contribute to the fund's sustainable investment goals. The goal is for the fund's development and risk profile to be in line with its benchmark index. The Fund invests in shares of companies that the Management Company has classified as sustainable investments under the EU's Sustainable Finance Disclosure Regulation (SFDR). The companies must contribute to environmental or social sustainability goals, not cause significant damage to any of these goals, and comply with the requirement of good corporate governance practices. The investments must, according to the Management Company's assessment, contribute positively to the UN Sustainable Development Goals (UN SDG) or to European Parliament and Council Regulation (EU) 2020/852 (EU taxonomy).

Sustainable investments are investments in companies whose economic activities are deemed to contribute to one or more of the following environmental and social objectives:

Social objectives:

- UN Social Sustainable Development Goals (UN SDGs); SDG 1: (No poverty), SDG 2: (No hunger), SDG 3: (Good health and well-being), SDG 4: (Quality education), SDG 5: (Gender equality), SDG 6: (Clean water and sanitation), SDG 8: (Decent work and economic growth), SDG 10: (Reduced inequalities), SDG 11: (Sustainable cities and communities), SDG 16: (Peace, justice and strong institutions)

Environmental objectives that are considered environmentally sustainable according to the EU taxonomy:

- The six objectives defined by the EU's taxonomy; climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems.

Environmental objectives not considered aligned with EU taxonomy:

- UN environment-related Sustainable Development Goals (UN SDGs); SDG 6: (Clean water and sanitation), SDG 7: (Affordable and clean energy), SDG 9: (Sustainable industry, innovation and infrastructure), SDG 11: (Sustainable cities and communities), SDG 12: (Responsible consumption and production), SDG 13: (Climate action), SDG 14: (Life below water), SDG 15: (Life on land).
- Operational resource efficiency in key areas for the environment such as carbon usage, water use or raw material use.



The sustainability goals included in the fund company's definition of sustainable investments and quantitative threshold values are:

Environmental objectives:

- 10% of the company's revenue, capital expenditure or operational costs have been classified by estimation or reporting as significantly contributing to the six objectives of the EU Taxonomy.
- 20% of the company's revenues have been assessed as contributing to other global environmental objectives, directly or indirectly linked to the 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.
- The company has been fundamentally analysed and assessed as having a high contribution and exposure to environmental objectives.

Social objectives:

- 20% of the company's revenues have been assessed as contributing to other global social objectives, directly or indirectly linked to the UN SDGs.
- The company outperforms 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 objectives.

The fund company applies a pass/fail methodology, where an entire investment is classified and reported as sustainable if the requirements for contributing, not doing significant harm and good corporate governance are met.

The Fund undertakes to have a minimum level of sustainable investments of 90%.

A large part of the fund's holdings are constituents of its benchmark index, MSCI World Net Return, which does not qualify as an EU benchmark for climate change or an EU benchmark for adaptation to the Paris Agreement and does not meet all the methodological requirements of Commission Delegated Regulation (EU) 2020/1818. Therefore, the index is for performance comparison only and is not designated as a benchmark to meet the goal of sustainable investment.

A more detailed description of the fund's sustainability objectives can be found under the heading "What investment strategy does this financial product follow".

Read more about the Fund Management Company's sustainability work in the Fund Management Company's Sustainability Policy: <https://sebgroup.com/sv/om-seb/vara-divisioner/asset-management/seb-investment-management-ab/vart-hallbarhetsarbete>

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

## ● **What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?**

The Fund uses the following sustainability indicators to measure the achievement of the fund's environmental/social goals:

- Share of the fund assets that are invested in companies that contribute to each individual goal within the fund's strategy based on the UN's sustainable development goals.
- Share of the fund assets that are invested in companies whose operations are compatible based on each individual environmental goal in the EU's taxonomy.

## ● **How do the sustainable investments not cause significant harm to any environmental or social objective of sustainable investment?**

To ensure that the sustainable investments made do not cause significant harm to any environmentally or socially sustainable investment objective, the fund applies exclusion criteria in the Sustainability Policy of the Fund Management Company. In accordance with the exclusion criteria, the fund excludes investments in enterprises that do not comply with international norms and standards, operate in controversial sectors and business areas, have exposure to fossil fuels and are not considered to fulfil the levels of minimum social requirements defined in the EU taxonomy.

For an investment to be considered not to cause significant harm, the company must follow good corporate governance practices. To ensure this, an external assessment of the enterprise's governance structure, employment relations, tax compliance and remuneration structure is used.

## ● *How have the indicators for adverse impacts on sustainability factors been taken into account?*

The fund management company has developed internal tools and processes to assess and consider the indicators of negative impacts on sustainability factors. However, the indicators are dependent on the availability of data. Where reliable data with sufficient coverage is available, enterprises with negative performance by indicator in a geographical and sectoral context are excluded. Examples of this are enterprises with extremely high CO2 emissions in relation to comparable enterprise.

The fund also applies the Fund Management Company's exclusion criteria in the Fund Management Company's Sustainability Policy and excludes enterprises with operations in the fossil fuel sector, companies with operations in or near areas sensitive to biodiversity, where the operations risk negatively affecting these areas, enterprises that do not comply with international norms and standards, enterprises with

operations in the manufacture or sale of controversial weapons (landmines, cluster bombs, chemical and biological weapons) and enterprises whose operations affect endangered species.

Read more about the Fund Management Company's exclusions in the Fund Management Company's Sustainability Policy.

- *How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?*

The fund applies the Fund Management Company's Sustainability Policy and therefore excludes enterprises with verified violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights.

Companies with verified violations are not considered sustainable investments.



## Does this financial product consider principal adverse impacts on sustainability factors?

**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, anticorruption and anti-bribery matters.

Yes, the Fund takes into account the main negative impacts of sustainability factors through the exclusions set out in the Sustainability Policy of the Fund Management Company. This includes the exclusion of enterprises with operations in the fossil fuel sector, enterprises with operations in or near areas sensitive to biodiversity, where the operations risk negatively affecting these areas, enterprises that do not comply with international norms and standards, enterprises with operations in the manufacture or sale of controversial weapons (landmines, cluster bombs, chemical and biological weapons) and enterprises whose operations affect endangered species.

The fund manager uses the Fund Management Company's proprietary sustainability model (SIMS-S), when considering main negative impacts. Through the use of SIMS-S, the fund manager receives a sustainability rating on an investment object and can therefore exclude companies that are deemed to have high risks linked to the management of negative impacts on sustainability factors. The indicators identified and analysed in SIMS-S are the enterprise's greenhouse gas emissions, carbon footprint, greenhouse gas intensity, water emissions, hazardous waste emissions and energy consumption intensity for enterprises in sectors with a high climate impact. Furthermore, enterprises with fossil fuel operations, enterprises with operations in or near biodiversity-sensitive areas, where the operations risk negatively impacting these areas, and whether the enterprise in which the fund invests have initiatives to reduce carbon emissions with the aim of adapting to the Paris Agreement are identified and analysed. In addition, the sustainability model analyses whether the enterprise in which the fund invests lack processes and compliance mechanisms to monitor compliance with the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, gender pay gaps, gender balance on boards, and whether the enterprise in which the fund invests have a code of conduct for suppliers (against unsafe working conditions, precarious work, child labour and forced labour).

A more detailed description of SIMS-S can be found under the heading "What investment strategy does this financial product follow".

Information on the main negative impacts on sustainability factors is presented in the fund's annual report, which is available on the Fund Management Company's website.

No



## What investment strategy does this financial product follow?

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The Fund has sustainable investments as its objective in the sense referred to in Article 9 of the SFDR. The Fund is an equity fund that invests in companies that contribute to the fund's sustainable investment goals. The goal is for the fund's development and risk profile to be in line with its benchmark index. The Fund is a regulated and systematically managed equity fund that invests in global markets in countries included in the fund's benchmark index. The Fund invests in shares of companies that the Management Company has classified as sustainable investments under the EU's Sustainable Finance Disclosure Regulation (SFDR). The companies must contribute to environmental or social sustainability goals, not cause significant damage to any of these goals, and comply with the requirement of good corporate governance practices. The investments must, according to the Management Company's assessment, contribute positively to the UN Sustainable Development Goals (UN SDG) or to the EU's taxonomy. In order to select sustainable companies, the Fund Management Company applies a rules-based approach and a systematic model that takes into account various specific parameters when making investment decisions. The Fund's sustainability strategies consist of integration, exclusions and active ownership.

Integration:

The Fund only invests in companies classified as sustainable investments under SFDR 2.17, i.e.:

- Contributes to environmental or social sustainability objectives
- Does not cause significant damage to environmental or social sustainability goals
- Complies with the requirement of good corporate governance practices

Sustainable investments are investments whose economic activities are deemed to contribute to one or more of the following environmental and social objectives:

Social objectives:

- UN Sustainable Development Social Goals

Environmental objectives that are considered environmentally sustainable according to the EU taxonomy:

- The six goals defined by the EU's taxonomy

Environmental targets beyond the EU taxonomy:

- UN Sustainable Development Goals

- Operational resource efficiency in key areas for the environment such as carbon usage, water use or raw material use.

Sustainability analysis: The fund manager uses the Fund Management Company's proprietary sustainability model, SIMS-S, for investment analysis. SIMS-S assigns sustainability ratings to the enterprises that are possible for the fund to invest in based on several aspects of sustainability to create a comprehensive and unbiased picture. The SIMS-S model consists of two main components: sustainability risks\* and sustainability opportunities. The model uses data from multiple data providers and is continuously modified as new data and insights become available. The sustainability rating contains both a present value picture and a forward-looking perspective for each individual enterprise. It allows fund managers to assess current and future sustainability factors that may affect long-term risk and return.

\*Sustainability risks refer to environmental, social or governance-related events or circumstances that, if they were to occur, would have an actual or potential significant negative impact on the value of the investment.

Exclusions: The fund applies the Fund Management Company's exclusion criteria in the Fund Management Company's Sustainability Policy and excludes investments in enterprises in sectors or business areas that are deemed by the Fund Management Company to have major sustainability challenges.

The Fund Management Company applies the following exclusion criteria and excludes enterprises that:

- Contribute to the development of nuclear weapons programmes or the production of nuclear weapons,
- Produce tobacco or tobacco products, or that derive more than 5% of their revenue from the distribution of tobacco products,
- Produce cannabis for non-medical purposes,
- Derive more than 5% of their revenue from the production of alcohol,
- Derive more than 5% of their revenue from commercial gaming production, distribution or services,
- Are involved in the manufacture, development or sale of prohibited weapons,
- Derive more than 5% of their revenue from the production or sale of civilian weapons,
- Derive more than 5% of their revenue from the development, production and services linked to weapons consisting of combat materiel or certain other military equipment,
- Are involved in the production of pornography, or where more than 5% of revenue comes from the distribution of pornography,
- Produce fossil fuels, including unconventional fossil fuel extraction, such as tar sands and deep sea drilling in particularly sensitive areas,
- produces energy from fossil fuels,
- Have operations in or near biodiversity-sensitive areas, where the activities risk adversely affecting these areas, and
- Whose activities affect endangered species.

Furthermore, enterprises with verified violations of international norms and standards relating to human rights, the environment, anti-corruption or labour law, or where enterprises do not follow good corporate governance practices or are deemed to have inadequate corporate governance structures, are also excluded.

Exceptions to the exclusion criteria can be made in individual cases, for example when the Fund Management Company has an ongoing dialogue, or for other reasons has insight into the enterprise's operations and change work. Exceptions to exclusion in transition companies involved in fossil fuels can be made if it is considered that the enterprise is undergoing a transition process. For an enterprise to be considered a transition company, it must demonstrate a strategic understanding and plan for managing climate-related risks and opportunities, an ability to achieve the 1.5°C target under the Paris Agreement within set timeframes, and actual work and investment towards the 1.5°C target – a Company must demonstrate its financial commitment to strategic plans.

Active ownership management and dialogues: As a shareholder, the Fund Management Company exercises active ownership by voting at general meetings, in favour of or against specific shareholder or management proposals, and through proxy voting in accordance with the Fund Management Company's principles of shareholder engagement. Active ownership is carried out on the basis of the equity holdings of the Fund Management Company's funds but also affects the fund's bond holdings.

In Nordic enterprises, where the Fund Management Company is among the largest shareholders and bondholders, the Fund Management Company maintains an ongoing direct dialogue with management and boards. When the Fund Management Company is a significant shareholder in terms of number of votes, the Fund Management Company also participates in nomination committees to influence, among other things, sustainability expertise and diversity in the enterprises.

Outside the Nordic region, the Fund Management Company co-operates with other investors through, among others, The Institutional Investors Group on Climate Change (IIGCC), Principles for Responsible Investment (PRI) Collaboration Platform, Access to Medicine, and Global Child Forum. The management company also has direct dialogues with Companies outside the Nordic region.

The fund company collaborates with Sustainalytics and Institutional Shareholder Services ESG (ISS ESG), two international leaders in company dialogues. By working together with other asset managers, led by Sustainalytics and ISS, the Fund Management Company can be more successful in dialogues with enterprises outside the Nordic region, where the Fund Management Company's ownership is usually relatively small.

Read more about the Fund Management Company's work as an active owner in the Fund Management Company's principles for shareholder engagement: <https://sebgroup.com/sv/om-seb/vara-divisioner/asset-management/seb-investment-management-ab/vart-hallbarhetsarbete/aktivt-agarskap>

● **What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?**

The binding elements of the investment strategy of the fund are:

**Minimum share of sustainable investments:** The Fund has a minimum percentage of sustainable investments of 90% according to the pass/fail methodology applied by the Management Company, whereby an entire investment is classified and recognised as sustainable if all the requirements for a sustainable investment are met.

**Exclusions:** The fund applies an exclusion strategy in accordance with the Fund Management Company's Sustainability Policy.

● **What is the policy to assess good governance practices of the investee companies?**

The fund manager applies norm-based exclusion criteria and excludes enterprises that are not considered to be in line with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. In addition to the norm-based exclusion criteria, an external assessment of the enterprises' governance structure, employment relations, tax compliance and remuneration is used to ensure good governance in the enterprise in which the fund invests.

A more detailed description of how the Fund Management Company works to ensure good corporate governance can be found in the Fund Management Company's Sustainability Policy.

**Good governance practices** include sound management structures, employee relations, remuneration of staff and tax compliance.



**What is the asset allocation and the minimum share of sustainable investments?**

**Asset allocation** describes the share of investments in specific assets.

The schematic description below illustrates the fund's minimum proportion of sustainable investments. At least 90% are sustainable investments. The minimum percentage of sustainable investments with an environmental objective is 20%. The minimum percentage of sustainable investments with a social objective is 30%.

The remaining assets consist of cash and cash equivalents and derivatives. The purpose of cash and cash equivalents is to manage liquidity and flows. The purpose of derivatives is efficient portfolio management and as part of the fund's investment strategy.



**# 1 Sustainable** covers sustainable investments with environmental or social objectives.  
**# 2 Not sustainable** includes investments that are not considered sustainable investments.

● **How does the use of derivatives attain the sustainable investment objective?**

The Fund does not use derivatives to achieve the fund's sustainable investment objective.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The Fund does not commit to a minimum level of sustainable investments in line with the EU taxonomy, but may make investments in line with the EU taxonomy.

### ● Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?<sup>1</sup>

- Yes:
- In fossil gas  In nuclear energy
- No

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

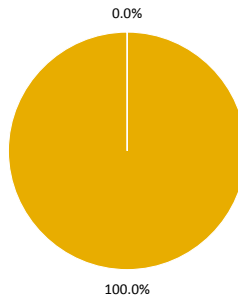
Taxonomy-aligned activities are expressed as a share of:

- **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 two graphs below show in green the minimum percentage of investments that are 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.

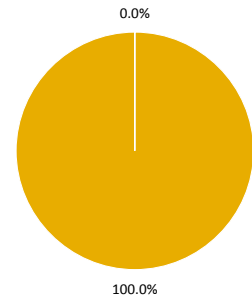
#### 1. Taxonomy-alignment of investments including sovereign bonds\*

- Taxonomy-aligned (no gas and nuclear)
- Non Taxonomy-aligned



#### 2. Taxonomy-alignment of investments excluding sovereign bonds\*

- Taxonomy-aligned (no gas and nuclear)
- Non Taxonomy-aligned



This graph represents 100% of the total investment

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

### ● What is the minimum share of investments in transitional and enabling activities?

The Fund does not promise investments in transition and enabling activities according to the EU taxonomy. However, the Fund can invest in transition and enabling activities according to the EU taxonomy.

**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.

<sup>1</sup> Fossil gas and/or nuclear energy related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm 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.



## What is the minimum share of sustainable investments with an environmental objective that are not aligned with the requirements of the EU Taxonomy?

The Fund has the possibility to make sustainable investments in economic activities that cannot currently be classified as compatible with the EU taxonomy. The EU's taxonomy does not cover all economic sectors that are relevant for the fund to invest in, and that contribute to sustainability objectives. There are also relatively few enterprises that report in accordance with the EU Taxonomy. This may be due to both the size of the enterprises and/or their geographical location. It is likely that, in the vast majority of cases, these objectives are clearly linked to the objectives of the EU's taxonomy, but there is no reliable data for such a classification.

The Fund is committed to maintaining an overall minimum level of sustainable investment of 90%. However, the fund does not commit to having a minimum share of environmentally sustainable investments that are not compatible with the EU taxonomy.

The Fund's sustainable investments are made in enterprises whose economic activities are deemed to contribute to one or more of the following environmental objectives:

Environmental objectives that are considered environmentally sustainable according to the EU taxonomy:

The six objectives defined by the EU's Taxonomy; climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems.

Environmental objectives not considered aligned with EU taxonomy:

UN Sustainable Development Goals (UN SDGs): SDG 6: (Clean water and sanitation), SDG 7: (Affordable and clean energy), SDG 9: (Sustainable industry, innovation and infrastructure), SDG 11: (Sustainable cities and communities), SDG 12: (Responsible consumption and production), SDG 13: (Climate action), SDG 14: (Life below water), SDG 15: (Life on land).

Operational resource efficiency in key areas for the environment : such as carbon emissions, water use or raw material use.



## What is the minimum share of sustainable investments with a social objective?

The minimum percentage of sustainable investments with a social objective is 30%.

The Fund's sustainable investments are made in enterprises whose economic activities are deemed to contribute to one or more of the following social objectives:

UN Social Sustainable Development Goals (UN SDGs); SDG 1: (No poverty), SDG 2: (No hunger), SDG 3: (Good health and well-being), SDG 4: (Quality education), SDG 5: (Gender equality), SDG 6: (Clean water and sanitation), SDG 8: (Decent work and economic growth), SDG 10: (Reduced inequalities), SDG 11: (Sustainable cities and communities), SDG 16: (Peace, justice and strong institutions).

## Which investments are included in "# 2 Not sustainable", what is their purpose and are there any minimum environmental or social safeguards?

"# 2 Not Sustainable" consists of cash and derivatives. The purpose of cash and cash equivalents is to manage liquidity and flows. The purpose of derivatives is efficient portfolio management and as part of the Fund's investment objective.

Investments in "# 2 Not Sustainable" must comply with the Fund Management Company's Sustainability Policy as environmental or social minimum protection measures. Therefore, investments will only be permitted if their underlying exposure complies with the Fund Management Company's Sustainability Policy.



are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities according to the EU Taxonomy.



## Is a specific index designated as a reference benchmark to meet the sustainable investment objective?

The Fund does not use a benchmark to determine whether it fulfils the sustainable investment objective.

**Reference Benchmarks** are indexes to measure whether the financial product fulfils the objective of sustainable investment.





## Where can I find more product specific information online?

More product-specific information is available on the website: <https://seb.se/marknaden-och-kurslistor/fondlista#funds/filter-retail>