

## Sustainability-related disclosures

**Product name:** SEB Global Equal Opportunity Fund

**Legal entity identifier:** 52990050INBR1C8K4V50

### Summary

The investment team actively manages the Fund's holdings to identify companies in developed countries that contribute to its sustainable objective. The Fund is managed systematically, investment decisions are based on analysis of large amounts of sustainability and financial data.

Specifically the ESG strategy applied in the Fund is through:

ESG Integration – In the portfolio construction the investment team promotes companies:

With higher gender diversity score compared to peers. Measured as a weighted combination of indicators. The score is based on various metrics including gender balance across the workforce, the gender pay gap, paid parental leave and anti-sexual harassment policies.

Companies with higher sustainability score using the management company's internal proprietary sustainability score SIMS-S companies with contribution to UN SDGs related to social sustainability both from a product and services- and operational activity perspective.

Thematic

investments in companies with revenues from equal opportunity related themes such as obstetrics, breast cancer and childcare. The exposures to the different themes will vary significantly over time. The list of themes is not exhaustive and new themes can be added to the portfolio if they are deemed to contribute to the sustainability objective of the Fund. At any given point in time, the Fund might not have exposure to all identified themes, depending on available data and investment manager discretion.

ESG engagement

the Fund seeks to influence issuers towards a more sustainable direction through engagement dialogues, either in direct dialogues or in collaborations.

Exclusion

The Fund will comply with the Management Company's exclusion policy and therefore excludes issuers that:

- Breach international norms and standards
- Operate in controversial sectors or business areas such as tobacco, recreational cannabis, pornography, commercial gambling, civilian weapons, and alcohol.
- Have exposure to fossil fuels or other activities with a negative climate impact.
- companies that score low on the Management Company's internal proprietary sustainability score SIMS-S
- Companies that are involved in controversial behavior related to child labor according to our third-party controversy monitoring service.

The Fund can invest in companies that are assessed to be in transition in accordance with the Management Company's sustainability policy.

To construct the final portfolio, sustainability factors are combined with financial information, such as the valuation and quality of a company whilst balancing risk.

The Fund has sustainable investments as its objective within the meaning of Article 9 of SFDR. The Fund's sustainability objective seeks to create a positive impact from a gender equality and diversity perspective. The SEB Investment Management Sustainability Score (the "SIMS-S"), is central to our sustainability integration process and evaluation. SIMS-S focuses on risks and opportunities related to sustainable development in company management, products & services and operations, using metrics such as alignment with the Paris Agreement, gender diversity, Taxonomy alignment and sustainable development goals revenues. The Fund uses the SIMS-S framework and scores for attaining its sustainable investment objective. The SIMS-S consists of overall scores and underlying component scores. Each of them has two versions, a raw and an adjusted score. The raw score is the issuer's standalone overall sustainability score, whereas

the adjusted is sector and region adjusted. The underlying component scores, building up to the overall SIMS-S, make it possible to have a specific focus on specific sustainability topics. The SIMS-S ranges between 0 and 10, with 10 being the highest sustainability score. The sustainability approach is made up of either companies that are deemed as relatively better compared to peers to handle gender equality and gender diversity in their organisations. Examples are companies promoting gender balance at all levels in the organisations and companies recognising equal compensation. The Fund also includes companies delivering products or services or operates in a way, that promotes equal opportunities and contributes to the achievement of United Nation's sustainable development goals ("UNSDG") 5 (Gender Equality), UN SDGs 3 (Good Health and Wellbeing) and UN SDG 4 (Quality Education). All equities are assessed and measured regarding their ability to contribute to gender equality and diversity.

The Management Company and the Fund use a "pass/fail approach", where a company is classified and accounted for as sustainable, if the company, based on quantitative measurements provided by third party

data providers, fulfil one or more of the following conditions:

- Gender diversity score, measured as a weighted combination of indicators, in top 25% of regional peers, where Japan is considered a separate region. The score is based on various metrics including gender balance across the workforce, the gender pay gap, paid parental leave and anti-sexual harassment policies.
- Products and services with a positive contribution to one or several of UN SDGs, related to social sustainability including UN SDG 5 (Gender equality), UN SDG 4 (Quality education), UN SDG 10 (Reduced inequalities) and SDG 3 (good health).
- Operational activities supporting equal opportunities, measured as an average of UN SDG 5 (Gender equality), UN SDG 4 (Quality education), UN SDG 10 (Reduced inequalities), UN SDG 3 (good health) and UN SDG 8 (decent work) in top 25% of regional peers, where Japan is considered a separate region.
- Revenues from social sustainable activities with a minimum threshold of 5%.

The Fund does not use an EU Climate Transition Benchmark or an EU Paris-aligned Benchmark. However, for performance comparison purpose, the Fund's return is compared with MSCI World Net Return Index (the "Benchmark"), which is a measure of performance of developed markets' companies. The Benchmark is not aligned with the Fund's sustainable investment objective.

In addition, the entire revenue is also subject to the do no significant harm ("DNSH") test (as further described below). The attainment of the Fund's sustainable investment objectives is monitored on a regular basis and is reported in the Fund's periodic reports.

Prior to the investment decision, the following PAIs are considered:

On an exclusionary basis:

- From Annex 1 – Table 1 of CDR (EU) 2022/1288
- PAI 4: Exposure to companies active in the fossil sector
- PAI 10: Violations of UN Global Compact Principles & OECD Guidelines for multinational enterprises
- PAI 14: Exposure to controversial weapons

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

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

- PAI 1: GHG emissions
- PAI 2: Carbon footprint
- PAI 3: GHG intensity of investee companies
- PAI 4: Exposure to companies active in the fossil sector
- PAI 7: Activities negatively affecting biodiversity-sensitive areas
- PAI 8: Emissions to water
- PAI 9: Hazardous waste ratio
- PAI 10: Violations of UN Global Compact Principles & OECD Guidelines for multinational enterprises
- PAI 11: Lack of processes and compliance mechanisms to monitor compliance with UN Global

Compact principles and OECD guidelines for Multinational Enterprises.

- PAI 12: Unadjusted gender pay gap
- PAI 13: Board gender diversity
- PAI 14: Exposure to controversial weapons

Summaries in multiple languages:

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_EN.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_EN.pdf)

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_NO.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_NO.pdf)

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_SV.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_SV.pdf)

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_DA.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_DA.pdf)

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_DE.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_DE.pdf)

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_NL.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_NL.pdf)

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_FL.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_FL.pdf)

[https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50\\_NL-Be.pdf](https://seb.se/pow/fmk/SFDR/52990050INBR1C8K4V50_NL-Be.pdf)

## No significant harm to the sustainable investment objective

The Management Company's sustainability policy is used to ensure no sustainable investment causes significant harm to any environmental or social sustainable investment objective.

Companies are excluded and not applicable for investment if they:

- do not comply with international norms and standards

- operate in controversial sectors and business areas
- have exposure to fossil fuels or other activities with negative environmental impact

The Fund is also screened for misalignment/obstruction towards the UN SDGs. A significant misalignment can lead to exclusion from the Fund's sustainable investments universe if the issuer is

considered at risk of causing significant harm to environmental and/or social objectives. Apart from the data-driven analysis and exclusion, each sustainable investment will be fundamentally

tested to identify whether it causes any significant harm to any other environmental or social sustainable

investment objective. The Management Company has developed internal tools and processes to assess and consider the negative consequences of the Principal Adverse Impact ("PAI") indicators in Annex I of the CDR 2022/1288, relevant PAIs in relevant PAI Tables 2 and 3 of Annex 1 of the CDR 2022/1288. However, the indicators are subject to current data availability. They will, together with the fundamental analysis,

the internal exclusion process, and the internal proprietary sustainability score from SIMS-S, affect the impact analysis in the do no significant harm ("DNSH") test. Principal Adverse Impacts Indicators (PAI) from Annex 1 - Table 1 of the CDR (EU) 2022/1288, are taken into account by the Management Company's sustainability policy, and are excluded from investments:

- PAI 4: Exposure to companies active in the fossil sector
- PAI 10: Violations of UN Global Compact Principles & OECD Guidelines for multinational enterprises
- PAI 14: Exposure to controversial weapons

PAIs from Annex 1 - Table 1 of the CDR (EU) 2022/1288, are taken into account through the SIMS-S and fundamental analysis by applying a threshold approach to remove the issuers causing significant harm:

- PAI 1: GHG emissions
- PAI 2: Carbon footprint
- PAI 3: GHG intensity of investee companies
- PAI 5: Share of non-renewable energy consumption and production
- PAI 6: Energy consumption intensity per high-impact climate sector
- PAI 7: Activities negatively affecting biodiversity-sensitive areas
- PAI 8: Emissions to water
- PAI 9: Hazardous waste ratio
- PAI 11: Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD guidelines for Multinational Enterprises.
- PAI 12: Unadjusted gender pay gap
- PAI 13: Board gender diversity
- PAI 4 from Annex 1 - Table 2 of CDR (EU) 2022/1288: Investments in companies without carbon emission reduction initiatives
- PAI 4 from Annex 1 - Table 3 of CDR (EU) 2022/1288: Lack of a supplier code of conduct

Prior to the investment decision, the following PAIs are considered:

On an exclusionary basis:

- From Annex 1 – Table 1 of CDR (EU) 2022/1288
- PAI 4: Exposure to companies active in the fossil sector
- PAI 10: Violations of UN Global Compact Principles & OECD Guidelines for multinational enterprises
- PAI 14: Exposure to controversial weapons

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

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

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

- PAI 13: Board gender diversity
- PAI 14: Exposure to controversial weapons

The sustainable investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human rights via the norm-based exclusion criteria stated in the Management Company's sustainability policy. Norm-based exclusions mean that the Management Company expects issuers to adhere to international laws and conventions such as:

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

Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. Companies with confirmed breach are not considered as sustainable.

## Sustainable investment objective of the financial product

The Fund has sustainable investments as its objective within the meaning of Article 9 of SFDR. The Fund's sustainability objective seeks to create a positive impact from a gender equality and diversity perspective. The SEB Investment Management Sustainability Score (the "SIMS-S"), is central to our sustainability integration process and evaluation. SIMS-S focuses on risks and opportunities related to sustainable development in company management, products & services and operations, using metrics such as alignment with the Paris Agreement, gender diversity, Taxonomy alignment and sustainable development goals revenues. The Fund uses the SIMS-S framework and scores for attaining its sustainable investment objective. The SIMS-S consists of overall scores and underlying component scores. Each of them has two versions, a raw and an adjusted score. The raw score is the issuer's standalone overall sustainability score, whereas

the adjusted is sector and region adjusted. The underlying component scores, building up to the overall SIMS-S, make it possible to have a specific focus on specific sustainability topics. The SIMS-S ranges between 0 and 10, with 10 being the highest sustainability score. The sustainability approach is made up of either companies that are deemed as relatively better compared to peers to handle gender equality and gender diversity in their organisations. Examples are companies promoting gender balance at all levels in the organisations and companies recognising equal compensation. The Fund also includes companies delivering products or services or operates in a way, that promotes equal opportunities and contributes to the achievement of United Nation's sustainable development goals ("UNSDG") 5 (Gender Equality), UN SDGs 3 (Good Health and Wellbeing) and UN SDG 4 (Quality Education). All equities are assessed and measured regarding their ability to contribute to gender equality and diversity.

The Management Company and the Fund use a "pass/fail approach", where a company is classified and accounted for as sustainable, if the company, based on quantitative measurements provided by third party data providers, fulfil one or more of the following conditions:

- Gender diversity score, measured as a weighted combination of indicators, in top 25% of regional peers, where Japan is considered a separate region. The score is based on various metrics including gender balance across the workforce, the gender pay gap, paid parental leave and anti-sexual harassment policies.
- Products and services with a positive contribution to one or several of UN SDGs, related to social sustainability including UN SDG 5 (Gender equality), UN SDG 4 (Quality education), UN SDG 10 (Reduced inequalities) and SDG 3 (good health).
- Operational activities supporting equal opportunities, measured as an average of UN SDG 5 (Gender equality), UN SDG 4 (Quality education), UN SDG 10 (Reduced inequalities), UN SDG 3 (good health) and UN SDG 8 (decent work) in top 25% of regional peers, where Japan is considered a separate region.
- Revenues from social sustainable activities with a minimum threshold of 5%.

The Fund does not use an EU Climate Transition Benchmark or an EU Paris-aligned Benchmark. However, for performance comparison purpose, the Fund's return is compared with MSCI World Net Return Index (the "Benchmark"), which is a measure of performance of developed markets' companies. The Benchmark is not aligned with the Fund's sustainable investment objective.

In addition, the entire revenue is also subject to the do no significant harm ("DNSH") test (as further described below). The attainment of the Fund's sustainable investment objectives is monitored on a regular basis and is reported in the Fund's periodic reports.

## Investment strategy

The investment team actively manages the Fund's holdings to identify companies in developed countries that contribute to its sustainable objective. The Fund is managed systematically, investment decisions are based on analysis of large amounts of sustainability and financial data.

Specifically the ESG strategy applied in the Fund is through:

ESG Integration – In the portfolio construction the investment team promotes companies:

With higher gender diversity score compared to peers. Measured as a weighted combination of indicators. The score is based on various metrics including gender balance across the workforce, the gender pay gap, paid parental leave and anti-sexual harassment policies.

Companies with higher sustainability score using the management company's internal proprietary sustainability score SIMS-S companies with contribution to UN SDGs related to social sustainability both from a product and services- and operational activity perspective.

Thematic

investments in companies with revenues from equal opportunity related themes such as obstetrics, breast cancer and childcare. The exposures to the different themes will vary significantly over time. The list of themes is not exhaustive and new themes can be added to the portfolio if they are deemed to contribute to the sustainability objective of the Fund. At any given point in time, the Fund might not have exposure to all identified themes, depending on available data and investment manager discretion.

ESG engagement

the Fund seeks to influence issuers towards a more sustainable direction through engagement dialogues, either in direct dialogues or in collaborations.

Exclusion

The Fund will comply with the Management Company's exclusion policy and therefore excludes issuers that:

- Breach international norms and standards
- Operate in controversial sectors or business areas such as tobacco, recreational cannabis, pornography, commercial gambling, civilian weapons, and alcohol.
- Have exposure to fossil fuels or other activities with a negative climate impact.
- companies that score low on the Management Company's internal proprietary sustainability score SIMS-S
- Companies that are involved in controversial behavior related to child labor according to our third-party controversy monitoring service.

The Fund can invest in companies that are assessed to be in transition in accordance with the Management Company's sustainability policy.

To construct the final portfolio, sustainability factors are combined with financial information, such as the valuation and quality of a company whilst balancing risk.

The Fund has the following binding elements of the investment strategy to attain its sustainable investment objective:

The Fund commits to a minimum proportion of sustainable investments of 85%.

ESG Integration –:

- The portfolio has a higher gender diversity scoring compared to Benchmark. Measured as a weighted combination of indicators. The score is based on various metrics including gender balance across the workforce, the gender pay gap, paid parental leave and anti-sexual harassment policies.
- The portfolio has a higher sustainability score compared to the Benchmark, using the management company's internal proprietary sustainability score SIMS-S.

Thematic

• Have investments in at least one equal opportunity related theme such as obstetrics, breast cancer and childcare. The list of themes is not exhaustive and new themes can be added to the portfolio if they are deemed to contribute to the sustainability objective of the Fund.

ESG engagement

- The Fund will seek to influence issuers towards a more sustainable direction through engagement dialogues, either in direct dialogues or in collaborations.

Exclusion

• The Fund will comply with the Management Company's exclusion policy and therefore excludes issuers that:

- Breach international norms and standards
- Operate in controversial sectors or business areas such as tobacco, recreational cannabis, pornography, commercial gambling, civilian weapons, and alcohol.
- Have exposure to fossil fuels or other activities with a negative climate impact.
- companies that score low on the Management Company's internal proprietary sustainability score SIMS-S
- Companies that are involved in controversial behavior related to child labor according to our thirdparty controversy monitoring service.

The Management Company's exclusions are also laid out in the sustainability policy available here: [SEB IM Sustainability Approach](#)

The Management Company ensures good governance of the securities in the financial product, partly by exclusions and screenings based on:

- sector screenings
- norm breaches
- safeguards, such as adherence to the UN Global Compact, ILO conventions and OECD Guidelines in the investment decision process.

- Screening for relevant sanctions is also applied. The Fund's investments are monitored in these regards as well, as stated in the Management Company's sustainability policy.

- The governance of each company held in the Fund is assessed by several additional factors, including:

- sustainability and independence of board directors
- board and management diversity
- appropriate levels of pay and variable remuneration (including sustainability-linked incentives)
- separation of senior management and board positions
- anti-corruption
- tax evasion practices
- environmental and climate impacts
- human rights
- working conditions, both regarding the company's own operations and through its supply chain.

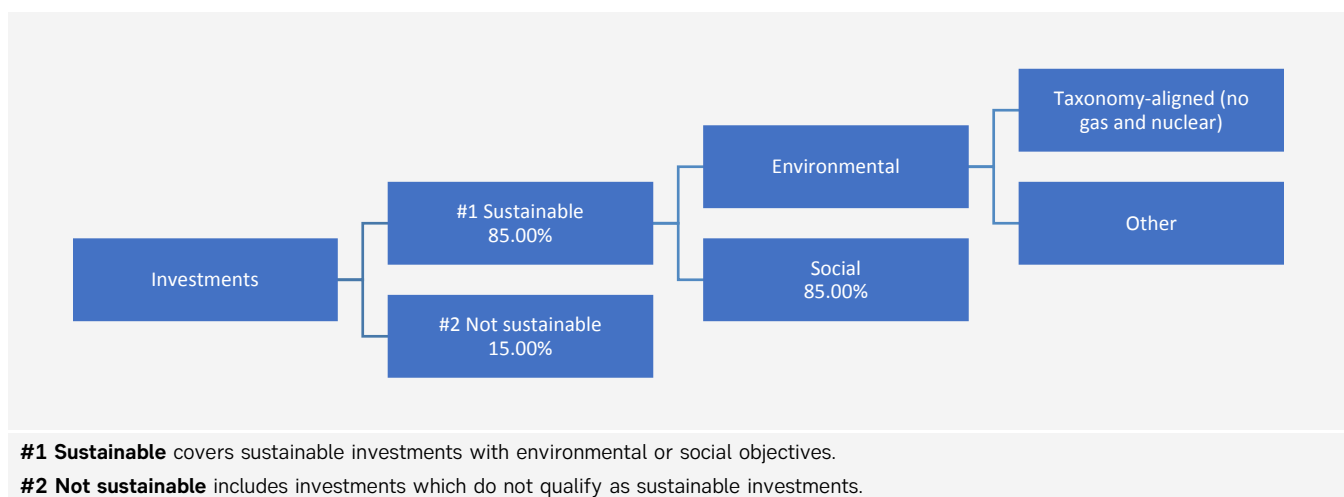
More information about the Management Company's policy for good governance can be found here: [Principle for Shareholder Engagemen](#)

## Proportion of investments

The Fund commits to a minimum proportion of sustainable investments with social objective of 85%. The other non-sustainable investments are cash and/or cash equivalents or derivatives. The investments included under #2 Not Sustainable are used for hedging purposes, while cash is used in the meaning of ancillary liquid assets.

The investments in #2 Not Sustainable need to comply with the Management Company's exclusion policy as the minimum environmental and social safeguards. Hence investments will be allowed only if all their underlying exposures comply with the Management Company's exclusion policy.

Not applicable. The Fund does not use derivatives to attain its sustainable investment objective.



## Monitoring of sustainable investment objective

The fund management company's exclusion policy is implemented through an exclusion list of issuers, along with continuous screening for relevant sanction breaches. The fund management company implements pre-trade and post-trade controls for all fund holdings in reference to the exclusion list. The fund management company also publishes an annual report, which includes a list of the fund's holdings, which is audited by an external auditor.

All assets classified as sustainable investments are, in addition, monitored regularly to ensure the fulfilment of the fund management company's criteria for sustainable investments. This includes DNSH criteria on environmental and social targets as well as minimum social safeguards.

## Methodologies

The fund management company uses a data-driven method, using data delivered by third party actors, in order to construct an exclusion list, as mentioned above, and to identify issuers based on additional screening criteria. The method is also used for the selection process which defines a credible sustainable investment. The additional screening criteria consists of probable or suspected breaches towards international norms, minimum safeguards as specified in the EU Taxonomy and significant obstruction towards any of the UN Sustainable Development Goals.

Given that an investment passes the tests above, it is checked for contribution based on several factors, namely:

- Taxonomy aligned revenue of a minimum of 10%, based on estimations by third-party data providers.
- SDG aligned revenue of a minimum of 20%, based on estimations by third-party data providers.
- Carbon Key Resource Efficiency, as determined by the threshold of sector-normalized carbon emissions intensity, set by the top 10% of companies within the relevant regional benchmark. This is then applied to all potential companies within the investment universe. This is done in order to remove dependencies and potential resulting skewness in the results due to varying levels of data coverage and distribution of the metrics within the investment universe.
- Equality Performance, as determined by the threshold of a third-party data provider equality scoring, set by the top 25% companies within the relevant regional benchmark. This is then applied to all potential companies within the investment universe. This is done in order to remove dependencies and potential resulting skewness in the results due to varying levels of data coverage and distribution of the metric within the investment universe.

Companies can also be determined to contribute on other grounds if:

- there is a lack of data on the above-mentioned data points, but at least 20% of the revenue can be classified as contributing to Environmental and/or Social objectives;
- there are other data points, apart from the above-mentioned, that prove that the company is contributing to Environmental and/or Social objectives by Key Resource Efficiency;
- there is a fundamental case that is visual through data, that indicates that the company is clearly contributing to Environmental and/or Social objectives.

These other cases need to be approved by the sustainability team, and a full written justification is required.

An issued bond is classified as sustainable if the instrument is either green (climate related), blue (water related) or socially sustainable.

Other management companies may use another approach and other criteria to classify sustainable investments. Therefore, the definition of a sustainable investment may differ between different fund management companies.

## Data sources and processing

Sustainability data is retrieved from external data providers, which provide data on company level. This includes emissions and other environmental indicators, as well as assessments of social and governance indicators. The data provider(s) collects data either directly from the companies' annual or sustainability reports, or by estimating the data themselves.

The sustainability data is processed at SEB in a central data hub, where it is governed and quality-assured, in close collaboration with the data providers. Having multiple data providers for the same datapoints enables cross-checking and more opportunities for data quality assessment.

The estimated data that is being used is essentially the emissions data, mostly indirect Scope 3 emissions, and the proportion of estimated data depends on the specific financial product. A high degree of estimated data is present for approximately 70% of the total number of issuers mapped by the data providers, but companies with a high degree of reported data comprise a much larger part of the fund's portfolio weight and share of issuers present in the fund's portfolio. This will probably decrease as reported data becomes more readily available.

Data for exclusions and screening of sustainable investments is obtained from ISS, Sustainalytics, Equileap and RBICS.

## Limitations to methodologies and data

The main limitation of the data sources is lack of data in general for those datapoints that are not estimated but gathered from annual- and sustainability reports. In the cases where the environmental or social characteristics of the product are related to those datapoints, measures are taken to increase coverage through continuous dialogue with our data provider(s) or directly with the affected companies. If relevant data points are missing, similar variables from another data provider can be used. Secondly, relevant proxy variables or analyses of peer groups can be used. Thirdly, a fundamental analysis can be made in order to ensure that limitations in data availability or data quality do not affect the environmental or social characteristics of the financial product.

## Due diligence

Internal due diligence for sustainability aspects of the fund's investments is carried out via the fund management company's exclusions, along with screening processes, in order to ensure that all investment meets DNSH criteria, minimum social safeguard criteria and practice good governance. The fund management company ensures pre-trade rules and restrictions on the portfolio management and trading systems. Sustainable investments are monitored by the sustainability team at the fund management company, which also monitors the reported indicators for the fund.

## Engagement policies

The fund management company's strategies for engagements apply for all the fund's assets. The fund management company's engagement with the companies can be via direct dialogues, participation at general meetings, participation in election committees, dialogues through collaborative initiatives and investor collectives, and both proactive and reactive dialogues, either through partners or directly.

Proactive dialogues mean to influence companies to, on the one hand, improve the general sustainability work, and also to work proactively with companies based on specific topics. Through ownership dialogues, the fund seeks to influence companies through the methods mentioned above.

Reactive company dialogues are carried out in response to situations where the fund management company has a credible assessment of breaches towards international guidelines and norms. Through dialogue, the fund management company examines the facts, and any mitigating or corrective actions planned by the company. The target of each dialogue is to ensure that routines and frameworks are in place in order to avoid future breaches, and that the company adheres to all relevant frameworks and international norms. All investments are regularly screened in order to identify holdings in breach of the fund management company's policies and values on human rights, environment, labour rights and anti-corruption. The assessment can be made through the mediation of a third party. For these purposes, the fund management company makes a detailed assessment of the nature and severity of the charges. If an identified breach is verified and the issuer refuses to mitigate or remediate the issue, or if the change process is stalling for too long, the fund will divest the holding.

## Attainment of the sustainable investment objective

The fund does not have an index as reference benchmark for sustainable investments. The fund does not have a EU reference benchmark for climate change mitigation or adaptation as specified by the Paris Agreement. The fund is covered by the fund management company's climate commitment of net-zero emissions by 2040 according to the Paris Agreement and the 1.5-degree target. The greenhouse gas emissions of the fund are measured by the corresponding PAI indicators, total financed emissions and emissions intensity for the portfolio.

**14/03/2023**

Past performance is not indicative of future results. The value of investments and income derived from investments may rise as well as fall. Future returns are not guaranteed, and a loss of principal may occur. Key information documents and prospectuses are available on [www.sebgroup.lu](http://www.sebgroup.lu)