

Sustainability-related disclosures

Product name: SEB Nordic Future Opportunity Fund

Legal entity identifier: 529900W8404Z9S4UFF18

Summary

The Sub-Fund is actively managed and invests mainly in Nordic companies ranging from growth stage to larger companies. To create a positive and/or social impact the investment team seeks to identify companies with enabling technologies that contribute to specific themes.

Thematic Impact Investing

- The themes are amongst others, energy transition (Companies that contribute to reducing greenhouse gas emission by increasing renewable capacity or enable the transition from fossil based economy to renewable thus creating a positive societal impact), resource efficiency and circularity (Companies that accelerate and enable the necessary green transition by providing eco-friendly products and services or enable others save resources and/or energy consumption), sustainable mobility (Companies that offer sustainable mobility and infrastructure solutions described in EU regulatory frameworks, e.g. EU Sustainable and Smart mobility strategy) and healthy societies (Companies that enable the transition to plant-based nutrition, improve the societal level of health, safety and education creating more inclusive communities).

ESG Integration

- The investment team fundamentally explores and assesses how companies contribute to positive change through their business models and evaluate their alignment and contribution to the set themes.
- The Sub-Fund uses the SIMS-S framework for initial evaluation of the business models. 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 companies' standalone overall sustainability score, whereas the adjusted is sector and region adjusted. The underlying component scores, building up to the overall SIMSS, 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 investment team assesses each company included into the fund where the investment team takes into account whether a company is causing a significant negative impact on both social and environmental sustainability using data from third party and through direct dialogue with the companies. The sustainability risks are considered both from a systematic and fundamental analysis point of view.
- A comprehensive assessment of sustainability risks and opportunities and how the selected companies through their business models contribute to positive change within the themes, assessing alignment with set themes with the purpose of verifying sustainable revenue streams. A company that materially contributes to one or more of the set themes through sustainable revenue streams from its products, services, or processes, qualifies for inclusion in the sub-fund's investment universe.
- Aspects that are evaluated: Governance and adaptation, a company's governing practices in relation to regulatory changes, investor and other stakeholder sustainability expectations that support long term sustainable value creation and a sound sustainable capital allocation. Analysis focusing on if alignment of company policies and improvements within, management of the companies' operational risks, company transparency and sustainability-related disclosures in order to assure good governance; Sustainable operations; Company's current operational alignment, preparedness and structure supporting continued sustainable value creation, mid to long-term, considering sustainability challenges that may lead to changes in business model or capital allocation. Analysis focusing on direct company financial material risks and opportunities in relation to climate change; like greenhouse gas emissions, waste management and energy efficiency in operations. This factor is assessed in combination with the companies' overall governance and adaptation strategies and management insight; Climate and social adherence in supply chain and operations, company's operational and production set up from a climate and social perspective.

Analysis focusing on risk and opportunity perspective from a climate and social perspective to sustain market position, growth and long-term sustainable value creation integrating companies' dedication to provide an equitable, diverse and inclusive environment for its employees (supply chain and direct), social

and environmental dimension practices (physical risks) in its day-to-day decision-making processes, product governance and products/services impacting sustainable development; Management Insight, management knowledge, structural belief, and strategic insights in relation to underlying sustainability risks and opportunities that enable growth and continued competitive market position. Fundamental view on management from a sustainability perspective is compiled.

ESG Engagement

- The Sub-fund seeks to influence companies towards a more sustainable direction. This could include adopting new business models, lowering the emissions of the company or improving social requirements in the value chain. This could be done through direct dialogues with companies, collaboration with other asset managers or partners, or via collaborative initiatives. This could also be done by voting at the shareholder meetings, in support of, or against, specific shareholder- or management proposals.

Exclusions

- The management company excludes companies that are verified not to comply with international standards and conventions concerning human rights, the environment, anti-corruption, or employment rights, and where the company cannot present clear goals and ongoing measures to address the issue(s). If the identified infringements are confirmed and the company does not show an interest in change, or if the change process is unusually protracted, the management company will divest the holdings. Sudden divestment may not take place if this is detrimental to the unit holders or the management company. The management company also excludes companies that produce fossil fuels or use unconventional extraction methods, companies engaged in developing, processing and exploiting coal, oil and/or natural gas resources, companies generating energy from fossil fuels, companies where distribution linked to fossil fuels exceeds 5% of total revenues, and companies for which services related to fossil fuels exceed 50% of total revenues. Product-based exclusions are exclusions based on ethical positions. SEB Investment Management's product-based exclusions are tobacco, recreational cannabis, pornography, commercial gambling, civilian weapons and alcohol. All funds exclude companies that, in conflict with international conventions, are engaged in the manufacturing, development or sale of nuclear and controversial weapons. The sustainable investments that the sub-fund intends to make do not include companies that receive more than 5% of their revenue from the defence industry.

The sustainability policy ensures that no investments, sustainable investments or not, are made in companies that do significant harm to environmental and/or social objectives. The Sub-Fund can invest in companies that are assessed to be in transition in accordance with the Management Company's sustainability policy. More information on exclusion criteria can be found at: <https://sebgroupl.lu/private/our-funds>

The Sub-Fund has sustainable investments as its objective within the meaning of Article 9 of SFDR".

The objective of the Sub-Fund is to create a positive environmental and social impact to achieve, inter alia, the long-term objectives of the Paris Agreement.

This is performed by investing in companies that offer products or services within specified themes considered to align with the Paris Agreement, UN Sustainable development goals (SDGs), EU Taxonomy, and EU Green Deal's long-term objectives. The themes are amongst others, energy transition (Companies that contribute to reducing greenhouse gas emission by increasing renewable capacity or enable the transition from fossil based economy to renewable thus creating a positive societal impact), resource efficiency and circularity (Companies that accelerate and enable the necessary green transition by providing eco-friendly products and services or enable others save resources and/or energy consumption), sustainable mobility (Companies that offer sustainable mobility and infrastructure solutions described in EU regulatory frameworks, e.g. EU Sustainable and Smart mobility strategy) and healthy societies (Companies that enable the transition to plant-based nutrition, improve the societal level of health, safety and education creating more inclusive communities).

For the Sub-Fund to reach its sustainable objective, companies are evaluated from a business model perspective, starting with the thematic view where the respective business model is assessed based on its contribution to the sustainable objective. Since all equities of the Sub-Fund are assessed and measured regarding their ability to contribute to

climate change mitigation and adaptation and/or social contribution, the investment team is able to identify companies that are involved in economic activities that are considered environmentally sustainable, and/or those involved in enabling and transitional activities, according to the Taxonomy Regulation.

A large part of the Sub-Fund's holdings are constituents of the benchmark, VINX All Cap, which does not qualify as an EU Climate Transition Benchmark nor an EU Paris-aligned Benchmark and does not fully comply with all the methodological requirements in the Commission Delegated Regulation (EU) 2020/181.) Hence, the benchmark is purely for performance comparison and not designated as a reference benchmark to meet the sustainable investment objective.

The objective of reducing carbon emissions is instead attained by identifying and investing in companies with verifiable revenue streams in relation to the identified structural themes. The Sub-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:

- A minimum of 10% of their revenue is potentially EU taxonomy-aligned based on the last available data either from company or third party
- A minimum of 20% of their total revenue attributable to enablement or direct contribution to any UN SDG
- A combination of minimum of 20% of their total revenue attributable to enablement or direct contribution to any UN SDG or revenue streams potentially EU Taxonomy aligned based on the last data available from company or third party

In addition to complying with at least one of the conditions above, the issuer must pass the do no significant harm ("DNSH") test (as further described below) applied on the issuer's entire revenue.

PAIs 4, 10 and 14 of Table 1 of Annex I of the RTS are, via the management company, subject to exclusionary screening and thus taken into account by exclusion.

All PAIs in Table 1, and relevant in Tables 2 and 3 of Annex I, are also screened to find underperformance that indicates that there is a risk of significant harm. This is done in relation to where the company is located geographically, and in which sector and sub-sector the company operates within to provide context for the analysis. This tries to capture the specific challenges, and thus the most material risks for significant harm to environmental and/or social objectives across various conditions for business.

Summaries in multiple languages:

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_EN.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_LT.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_NO.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_SV.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_DA.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_ET.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_LV.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_FR.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_DE.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_IT.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_NL.pdf

https://seb.se/pow/fmk/SFDR/529900W8404Z9S4UFF18_FI.pdf

No significant harm to the sustainable investment objective

The management company excludes companies that are verified not to comply with international standards and conventions concerning human rights, the environment, anti-corruption, or employment rights, and where the company cannot present clear goals and ongoing measures to address the issue(s). If the identified infringements are confirmed and the company does not show an interest in change, or if the change process is unusually protracted, the management company will divest the holdings. Sudden divestment may not take place if this is detrimental to the unit holders or the management company. The management company also excludes companies that produce fossil fuels or use unconventional extraction methods, companies engaged in developing, processing and exploiting coal, oil and/or natural gas resources, companies generating energy from fossil fuels, companies where distribution linked to fossil fuels exceeds 5% of total revenues, and companies for which services related to fossil fuels exceed 50% of total revenues. Product-based exclusions are exclusions based on ethical positions. The management

company's product-based exclusions are tobacco, recreational cannabis, pornography, commercial gambling, civilian weapons and alcohol. All funds exclude companies that, in conflict with international conventions, are engaged in the manufacturing, development or sale of nuclear and controversial weapons. The sustainable investments that the sub-fund partially intends to make do not include companies that receive more than 5% of their revenue from the defence industry. The exclusions ensure that no investments, sustainable investments or not, are made in companies that do significant harm to environmental and/or social objectives.

The management company permits investments in transition companies. These are certain companies with exposure to fossil fuels, mainly in the energy sector, or in sectors which face other sustainability challenges, such as materials, mining or transportation. This is done in order to finance, support, and hasten the transition to sustainable business models. The transition companies need to meet SEB Investment Management's minimum requirements for company conduct and have a high future potential to contribute to the Paris Agreement or the UN Sustainable Development Goals, either via their own products and services or by enabling other companies. The transition companies must also have a strategic decarbonization plan, be open to investor dialogue on sector specific issues and challenges and commit to either net-zero emission targets or Science Based Targets.

In addition to excluding companies with verified controversies, alleged controversies are examined to make sure that the company does not do any significant harm over time. A verified severe controversy, where no action to address the issue by the company is shown, will lead to an exclusion of the company from the management company's investment universe. Less severe controversies, where the company shows little or no credible action, will lead to an exclusion of the company from the investment universe for the sustainable investments. Controversies with a clear link to environmental and/or social objectives will be subject to extensive scrutiny to ensure that no significant harm will be done by the company going forward.

The sub-fund is also screened for misalignment/obstruction towards the UN Sustainable Development Goals (SDGs), where a significant misalignment is researched and can lead to exclusion from the sustainable investments universe, if the company is considered to be at risk of doing significant harm to environmental and/or social objectives. To capture the specific challenges, and the most material risks for significant harm to environmental and/or social objectives across various conditions for business, SEB Investment Management screens principle adverse impacts ("PAIs") in Table 1, and relevant PAIs in Tables 2 and 3 of Annex I of Regulation (EU) 2022/1288, as amended (the "RTS"). Geographical location, sector and sub-sector of the company's operations are taken into account.

Apart from the data-driven analysis, the risk for significant harm is an important part of the investment analysis for both fundamental and quantitative strategies that make sustainable investments. For fundamental strategies, this is a core part of the analysis of each investment, and for quantitative strategies, the strategy is designed with long-term sustainability in focus.

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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

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The objective of the Sub-Fund is to create a positive environmental and social impact to achieve, inter alia, the long-term objectives of the Paris Agreement.

This is performed by investing in companies that offer products or services within specified themes considered to align with the Paris Agreement, UN Sustainable development goals (SDGs), EU Taxonomy, and EU Green Deal's long-term objectives. The themes are amongst others, energy transition (Companies that contribute to reducing greenhouse gas emission by increasing renewable capacity or enable the transition from fossil based economy to renewable thus creating a positive societal impact), resource efficiency and circularity (Companies that accelerate and enable the necessary green transition by providing eco-friendly products and services or enable others save resources and/or energy consumption), sustainable mobility (Companies that offer sustainable mobility and infrastructure solutions described in EU regulatory frameworks, e.g. EU Sustainable and Smart mobility strategy) and healthy societies (Companies that enable the transition to plant-based nutrition, improve the societal level of health, safety and education creating more inclusive communities).

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Investment strategy

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ESG Engagement

- The Sub-fund seeks to influence companies towards a more sustainable direction. This could include adopting new business models, lowering the emissions of the company or improving social requirements in the value chain. This could be done through direct dialogues with companies, collaboration with other asset managers or partners, or via collaborative initiatives. This could also be done by voting at the shareholder meetings, in support of, or against, specific shareholder- or management proposals.

Exclusions

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standards and conventions concerning human rights, the environment, anti-corruption, or employment rights, and where the company cannot present clear goals and ongoing measures to address the issue(s). If the identified infringements are confirmed and the company does not show an interest in change, or if the change process is unusually protracted, the management company will divest the holdings. Sudden divestment may not take place if this is detrimental to the unit holders or the management company. The management company also excludes companies that produce fossil fuels or use unconventional extraction methods, companies engaged in developing, processing and exploiting coal, oil and/or natural gas resources, companies generating energy from fossil fuels, companies where distribution linked to fossil fuels exceeds 5% of total revenues, and companies for which services related to fossil fuels exceed 50% of total revenues. Product-based exclusions are exclusions based on ethical positions. SEB Investment Management's product-based exclusions are tobacco, recreational cannabis, pornography, commercial gambling, civilian weapons and alcohol. All funds exclude companies that, in conflict with international conventions, are engaged in the manufacturing, development or sale of nuclear and controversial weapons. The sustainable investments that the sub-fund intends to make do not include companies that receive more than 5% of their revenue from the defence industry.

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Thematic

- The sub-fund will invest in companies with a minimum of 20% of revenue derived from economic activities related to the themes.
- Weighted revenues a minimum of 50% at portfolio level from economic activities related to the sub-fund strategy's themes.

ESG Integration

- The sub-fund commits to a minimum proportion of sustainable investments of 85% out of which at least 5 % are Taxonomy aligned.

ESG engagement

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

Exclusion

The Sub-Fund will comply with the Management Company's sustainability policy and therefore excludes companies that:

- Breach international norms and standards
- Receive more than 5% of their revenue from the defence industry
- 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.
- generating energy from fossil fuels, companies where distribution linked to fossil fuels exceeds 5% of total revenues, and companies for which services related to fossil fuels exceed 50% of total revenues.
- that score low on the Management Company's internal proprietary sustainability score SIMS-S
- that are involved in controversial behavior related to child labor according to our third-party controversy monitoring service.

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 Sub-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 Sub-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.

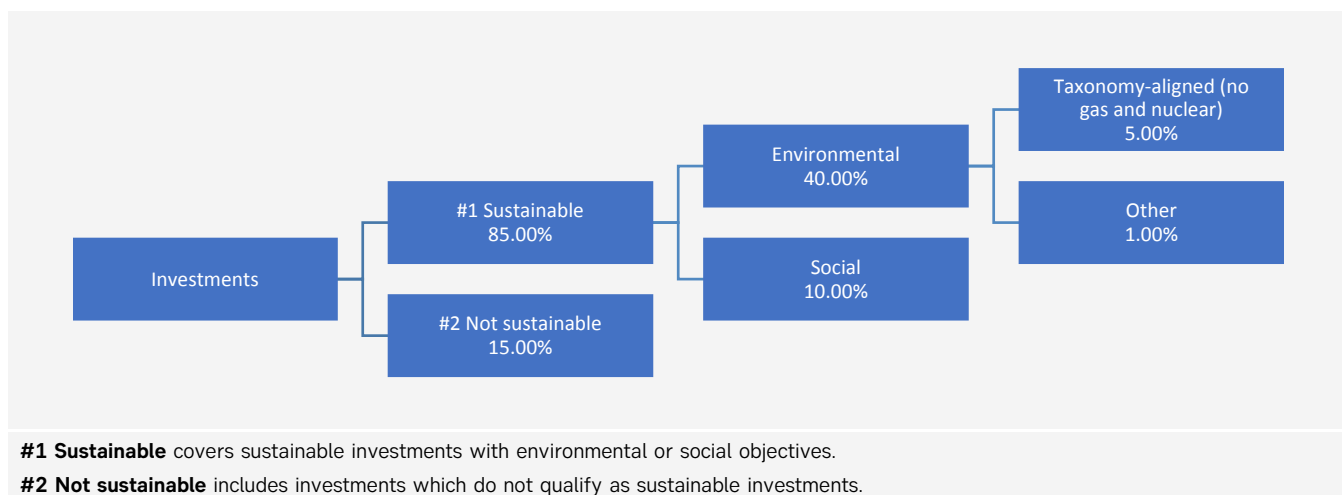
More information about the Management Company's policy for good governance can be found here: [Principle for Shareholder Engagement](#)

Proportion of investments

The sub-fund commits to a minimum proportion of sustainable investments of 85% out of a minimum of 5% are Taxonomy aligned. Out of those 85%, a minimum of 40% will be in companies deemed to contribute to environmental objectives, and a minimum of 10% will be in companies deemed to contribute to social objectives. "#2 Not sustainable" includes cash and derivatives. Where derivatives are used for hedging and liquidity 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.

Not applicable. The sub-fund does not use derivatives as a way to attain the sustainable investment objectives.



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

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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, Sustanalytics, 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