



INFORMATION BROCHURE — NORDIC EQUITIES STRATEGY

About the information brochure

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

About the Fund and the Fund Company

Nordic Equities Strategy, ISIN SE0001057928, was established on 29 Dec 2000. It is an investment fund (UCITS) under the Act (2004:46) on investment funds and managed by Nordic Equities Kapitalförvaltning AB (the fund Company), corporate id 556571-9126. Responsible manager since the start of the Fund is Lars-Olov Olsson. The Fund Management Company keeps a registry of unit holders.

Investor profile

The Fund targets institutions (e.g. pension funds and foundations), businesses and private individuals.

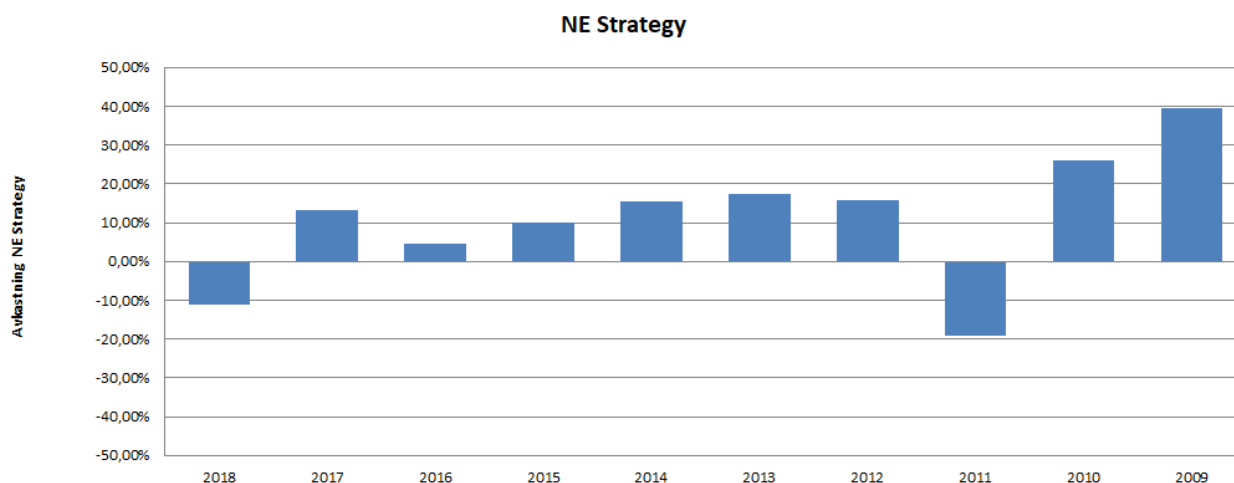
Focus and strategy

Nordic Equities Strategy is an equity fund focusing on the Nordic market. The Fund has a relatively concentrated portfolio and does not strive to achieve an even spread by geography or sector.

The Fund's assets may be invested in transferable securities (e.g. shares), money market instruments, derivative instruments, fund units and accounts with credit institutions. Typically, more than 90 percent of the Fund's assets are invested in shares.

The Fund's strategy is to invest in those securities that the fund management considers most attractive from a market evaluation and growth potential point of view. Based on ongoing evaluation, holdings are increased, decreased or replaced. We look at each stock individually, so called stock picking, which means that we are not dependent on industry weightings.

Past record – Performance NE Strategy



The Fund's risk profile

Historical return is no guarantee for future return. Money invested in the Fund may both increase and decrease in value, and there is no guarantee that an investor will recover the entire amount invested. For a fund there are different types of risks. The following risk groups, among others, have been identified:

- ✓ **Market Risk.** Market risk can be divided into three parts: general market risk, company-specific risk and currency risk. All investors face *general market risks* and it means that the value of shares may be affected by, for example, changes in economic conditions, interest rates, inflation and geopolitical events. *Company specific risk* is the risk associated with a specific company, e.g. that the company

may develop differently than the market. *Currency risk* arises as exchange rate fluctuations affect the value of a holding.

- ✓ **Credit and counterparty risk,** e.g. the risk that the fund's counterparty is unable to meet its obligations.
- ✓ **Liquidity risk.** The risk that a position can not be liquidated on time at a reasonable price.
- ✓ **External risks** can be divided into business risk, concentration risk, image risk and strategic risk. These risks are particularly relevant for the fund company.
- ✓ **Operational risk** is the risk of losses due to ineffective internal processes and procedures, human error, faulty systems and external events.

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Since the Fund is an equity fund with a Nordic profile, it will always be a fund exposed to risk. By diversifying the fund investments, by industry and by geography, the risk level can be reduced. Risk Profiling in the fact sheet (KIID) is calculated on volatility and the fund's risk class should be 6 or 7 at times. The Fund's overall risk profile, however, shall be relatively low through well-developed investment methods and safe practices. The Fund invests primarily in large and medium-sized leading Nordic companies which are traded on a well-regulated market. The holdings will thus be relatively easy to evaluate and follow.

Trading in derivative instruments and the granting of securities loans may take place in order to render more efficient management of the Fund's assets and to protect the Fund's assets against currency losses or other risks. Trading options and futures contracts have special features that could lead to substantially higher risks than trading shares.

Where derivatives are used in the Fund, the total exposure should be calculated according to the commitment approach.

Dividends

The Fund pays dividends. The aim is to redistribute dividends received by the Fund in the previous year. In the interests of the shareholders, the Board of the Fund Management Company may decide on a higher or a lower amount than the dividends received by the Fund.

Guidance for best possible result when placing orders

The Company has established internal rules in order to achieve the best results when placing the order. For example it is stated that the transaction will be implemented fairly, under market conditions, and by a well-established broker.

The fund's current and maximum charges

For management of the Fund a fixed fee is charged. Upon purchase and redemption of fund units, an acquisition/exit fee may be charged. Current fee levels and the maximum fee levels, according to the fund rules, are as follows:

- Exit charge, of fund units acquired during the most recent 12-months period, is maximum 1,5%
- Annual fixed compensation to the Fund Company in respect of fund management, custodian, supervision, auditors, and costs incurred in the protection of the Fund's interests is **1,5 %** (maximum 1,5 %).

Costs charged to the Fund are outlined in the Annual Report. Further information about the charges can be found in the Fund rules.

The fixed fee is calculated daily and charged twice per month. Costs charged to the fund are shown in the Annual Report.

In addition to the management fee that the company charges the Fund in accordance with the fund rules, the Fund pays commission in connection with securities transactions. Bank charges can also be charged in some cases. As a result of the fund's broker dealings, the Company may utilize data systems and analysis from the brokers, which are used for managing the Fund.

More about the fees is available in the fund rules and additional information may also be obtained from the Company.

Purchases and redemptions

New customer: All new customers with the Fund company must complete a new-customer notification with a certified copy of identification attached. For a legal entity, current documentation of the signatories must be attached.

Trading fund units: A completed purchasing/redemption notification will be sent to the Fund Company, and, in case of purchasing, paid cash to the Fund's account. Fund unit prices cannot be limited. Notification of purchase or redemption of units, and payment, shall be available at the fund company no later than two business days before the trading date.

Minimum deposit: Minimum purchase via the Fund company is SEK 50 000 on the first occasion, thereafter SEK 10 000 each time.

Minimum redemption: The minimum redemption amount is SEK 10 000.

France: The Fund may also be traded in France where the fund company uses CM-CIC Securities as Paying Agent and French customers are welcome to buy fund units through them. The contact is taken through the client's French bank. Additional information is available on the Fund's website.

Fund unit pricing and trading days

Fund unit pricing is done every banking day when all the markets in which the Fund invests are fully open. However, the Fund Company has the right to keep the fund open for trading and pricing also on the days when any of the markets in which the fund invests is partly closed. Detailed information about trading days may always be obtained from the Fund Company.

The Fund unit's price is determined by the Fund Company on the trading day at 4 pm at the earliest. The valuation of the Fund's financial instruments is done in accordance with Section 8 of the Fund rules.

Price information

The value of the Fund unit is determined each banking day when the Fund is open for trading. The fund unit value is published on the website of the Fund Company.

Opening and closing of the fund

The Fund Company shall be entitled to close the Fund from further deposits. This is described in more detail in the Fund Rules. The reasons for closure may, for example, be that the Fund Company believes that too large a fund will make it difficult to adhere to the Fund's objectives and strategy, and therefore be detrimental for the unit holders' return.

Tax rules

As from January 1, 2012, the Fund is not taxable. Instead, individuals resident in Sweden are obliged to take up a standard capital income of 0.4% of its net asset value at the beginning of the year. Also taxable legal persons who own shares in mutual funds will declare such a standard income, however as income from business activity.

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Example: If the value of your fund shares is SEK 100 000 at the beginning of 2012, the standard income is SEK 400. This SEK400 income will be subject to a statement of earnings for 2012 (taxation year 2013). If you have no other capital income or deductions, the capital gains tax will amount to SEK 120 (30%).

For dividends received by individuals who are resident in Sweden, the Fund is obliged to withhold preliminary tax. For shareholders who are resident abroad, a coupon tax will be withheld.

For individuals who are resident in Sweden, the capital gains tax is currently 30 percent. Capital losses are deductible to varying degrees. Capital gains / losses are reported to the tax authorities.

A unit holder's tax may depend on individual circumstances, and investors who are unsure should seek expert help.

Ceasing and transferring fund operations

If the Fund Company wishes to cease managing the Fund, loses its license granted by the Swedish Financial Supervisory Authority to run operations subject to a license, is liquidated or declared bankrupt, the management of the Fund will be temporarily taken over by the depositary. The depositary shall, following the consent of the Swedish Financial Supervisory Authority, transfer the management to a mutual fund company as soon as possible. In other cases, the Fund will be dissolved and the net balance distributed to the unit holders. Following approval by the Swedish Financial Supervisory Authority, the Fund Company may transfer the management of the Fund to another mutual fund company. Notification thereof must be published in Post- och Inrikes Tidningar (The Swedish Official Gazette), and be kept available at the depositary and the Fund Company as soon as possible.

Damages

Chapter 2, § 21 in the act on investment funds states that:

If a unit holder has been inflicted damage by the Fund Company violating this law or the fund rules, the Fund Company will compensate for the damage. If a unit holder or a fund company has been damaged by the Custodian violating this law or the fund rules, the institute shall compensate for the damage.

More information is available in § 16 of the fund rules.

Amendment to the fund rules

The Fund Company may, upon approval by the FSA, change the fund rules. Changes may affect the fund's characteristics, such as its investment policy, fees and risk profile.

Custodian

The fund's custodian is Skandinaviska Enskilda Banken AB, corporate identity number 502032-9081, which is incorporated and headquartered in Stockholm. Its main business is banking and other financial activities.

The custodian's general information is to store the Fund's assets and to execute the fund company's instructions relating to the mutual fund if it does not violate any provisions of law or other constitution or against the fund rules and ensure that

1. The sale, redemption and cancellation of shares in the fund is carried out in accordance with the law and the fund rules,

2. The value of the shares in the fund is calculated in accordance with the law and the fund rules.

3. Payments for transactions affecting a Fund's assets shall be paid to the Fund without delay

4. Fund revenue is used in accordance with the Fund Rules.

About the Fund Company

The fund company Nordic Equities Asset Management Ltd, identity number 556571-9126 was founded in 1999 and has its headquarters and offices in Stockholm. The company's share capital is SEK 1,500,000 .

In 2000, the company obtained permission to manage the fund NE Strategy, and in 2006, received permission to operate as a fund manager. The Management Company currently offers three funds: Nordic Equities Strategy, Nordic Equities Sweden and Nordic Equities Select, and conducts discretionary management as well.

Remuneration policy

In order not to encourage excessive risk taking, the fund company has adopted a compensation policy. Remuneration to employees is based on fixed monthly salary, retirement provision and health insurance. There are no agreements on variable remuneration or similar.

Chapter 3, section 22 and chapter 9 section 3, of the Financial Supervisory Authority's regulations on investment fund managers (FFFS 2013: 10) and Chapter 3, section 8a, of the Financial Supervisory Authority's Securities Funds (FFFS 2013: 9) stipulates that the Company must have a compensation policy. According to the regulations, the Company must have a remuneration policy that is partly compatible with and promotes a salutary and efficient risk management and counteracts excessive risk taking.

The compensation policy shall be designed and applied in a manner appropriate to the size and internal organization of the enterprise and the nature, scale and complexity of the business. The remuneration policy must also agree with the business strategy, objectives, values, long-term interests of the trustee and the managed alternative investment funds or the investors of the alternative investment funds, as well as a list of measures to be taken to avoid conflicts of interest.

The company has identified that an incorrect design of compensation systems and variable payment payments could adversely affect the Company's liquidity and result in the Company failing to comply with the regulatory framework for capital adequacy and conflicts with shareholders' interests. Risk takers could potentially take an excessive risk or violate the fund rules and the Company's internal rules with a view to shortening their own remuneration level in the short term. Furthermore, the assets of the Fund could potentially be valued at an amount higher than the market price in order to increase the Company's charging.

Against this background, it is essential for the Company to ensure that its compensation policy and remuneration systems are consistent with and promote a salutary and efficient risk management. A part of this work is to identify and report what measures are to be taken. Compensation models that may occur

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in the Company must have an appropriate balance between fixed and movable parts. Guaranteed variable compensation may not occur.

The fixed part shall represent a sufficiently high proportion of the employee's total remuneration for it to be possible to put the moving parts to zero. The company shall state in its remuneration policy the extent to which the movable shares can be highest in relation to the fixed parts for all categories of employees who receive variable remuneration.

All employees may be entitled to variable remuneration. Variable compensation to employees may in no case be set at a higher amount than the corresponding 24 month salary.

Variable remuneration shall be decided by the Board on a proposal from the Chairman of the Board. The variable remuneration is not calculated on the basis of any predetermined formula but is by its nature discretionary. The company is based on the possibility of variable remuneration on, among other things, the following criteria for the respective personnel category.

Investment Staff:

- The company's result
- The employee's contribution to the company's earnings ability
- Seniority
- Customer Care/Investor Satisfaction
- Management tasks
- Training programs
- Compliance with internal / external rules / risk management policy

Distribution

- Customer Care / Investor Satisfaction
- Strategic goals
- structural issues
- New unit owners
- Compliance with internal / external rules

Non-investment staff:

- Audit Results
- Strategic goals
- structural issues
- Adaptation to new regulations
- Compliance with internal / external rules, risk management policy
- Teamwork / motivation
- Leadership

When the Company decides how much of the total remuneration to be variable, the Company shall always ensure that its total remuneration does not limit the Company's ability to maintain a sufficient capital base or, if necessary, strengthen the capital base. This means that the company, among other things, shall take into account:

- size and cost of the additional capital required to cover the risks affecting the profit for the period,
- the size of and the cost of the liquidity risk, and
- the possibility that expectations of future earnings can not be realized

For specially regulated staff, at least 60 percent of the variable compensation shall be postponed for three years before it is paid out or ownership of shares will pass on to the employee. For others, at least 40 percent of the variable compensation is postponed for five years before it is paid out.

Variable remuneration that is postponed is paid only or transferred to the employee to the extent that it is justified in view of the Company's financial situation and justified according to the Company and the employee's result. The deferred part of the remuneration may also fall completely for the same reasons. An information about the fund company's remuneration is published in the Fund's annual report and on the fund company's website. Information on the remuneration policy can also be sent in writing free of charge on request. Follow-up of compliance with the remuneration policy is performed annually by the compliance function.

Statement of the remuneration 2018:

The total amount of remuneration for the fund company 2018 was SEK 5 878 240. The amount was divided into fixed remuneration of SEK 3 993 240 as well as variable remuneration of SEK 1 885 000. 16 employees have been paid fixed or variable remuneration during the year. Variable remuneration to employees in leading strategic positions was SEK 1 372 000. No variable remuneration was paid to risk takers. No other employee has been paid remuneration that exceeds the total remuneration to anyone in a leading strategic position. Remuneration to employees has been calculated according to the company's results, the company's positions as well as the employee's contribution to the earnings capacity, seniority, customer care, compliance with internal rules etc.

Sustainability

- Sustainability aspects are taken into account in the management of the fund
- Sustainability aspects are not taken into account in the management of the fund

Company's comment:

ESG aspects are of great importance to both the company and our clients as investors and partners in the portfolio companies. We use both positive and negative screening in the selection process.

Sustainability aspects taken into account in the management of the fund

- Environmental aspects (eg companies impact on environment and climate).
- Social aspects (eg human rights, labor rights and equal treatment).
- Corporate governance aspects (eg shareholders' rights, issues of remuneration to senior executives and counter-corruption)
- Other sustainability aspects

Methods used for sustainability work

- The Fund selects

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- Sustainability aspects are crucial for the manager's choice of companies. The Fund has specific and explicit criteria for selecting companies based on environmental, social and business ethics issues. Analysis of the companies' work with sustainability is crucial for the selection of companies in the fund.

- The fund's trustees take into account sustainability issues. Sustainability aspects are taken into account in financial corporate analyzes and investment decisions, which is effective but does not have to be decisive for which companies are selected in the fund.

Company's comment: We favor companies that work with ESG issues. We believe that companies that focus on ESG factors both contribute to a better society and are attractive investments.

- Other things it applies to choose

- Fund opt out

The fund does not invest in companies that are involved in the following products and services. A maximum of five percent of the turnover in the company where the placement takes place may relate to activities that are attributable to the specified product or service.

Products and services

- Cluster bombs, personal mines

Company's comment: 0% acceptance level

- Chemical and biological weapons

Company's comment: 0% acceptance level

- Nuclear weapons

Company's comment: 0% acceptance level

- Weapons and / or war material

Company's comment: Companies whose significant activities are included in the area are excluded

- Alcohol

Company's comment: Companies whose significant activities are included in the area are excluded

- Tobacco

Company's comment: Companies whose significant activities are included in the area are excluded

- Commercial gaming

Company's comment: Companies whose significant activities are included in the area are excluded

- Pornography

Company's comment: Companies whose significant activities are included in the area are excluded

- Fossil fuels

Company's comment: Companies whose significant activities are included in the area are excluded

- Charcoal

Company's comment: Companies whose significant activities are included in the area are excluded

- Uranium

Company's comment: Companies whose significant activities are included in the area are excluded. Funding company's comment: Companies whose significant activities are included in the area are excluded

- Genetically modified organisms (GMOs)

- Other

International Standards

The Fund avoids investing in companies involved in violations of international norms and conventions (at least the UN Global Compact and OECD Guidelines for Multinational Enterprises) on environment, human rights, working conditions and business ethics.

- The Fund avoids investing in all identified companies that do not comply with international standards.

Company's comment: Nordic Equities is based on GES International's process where the portfolios are screened twice a year. A so-called norm based screening based on an analysis model based on the principle that companies have a responsibility to comply with international standards. They also identify potential incidents of companies that are informed by regular alerts by mail. GES Global Ethical Standard Screening covers the UN Global Compact's ten principles within the four standards; Human Rights, Labor Rights, Environment and Corruption.

- Companies in which the fund does not see willingness to change or where the fund assesses that the companies will not address the problems over an acceptable time horizon are rejected for investment.

Countries

- For reasons of sustainability, the fund does not invest in companies involved in certain countries / interest-bearing securities issued by certain states.

- Other

- The fund company affects

The fund company uses its ownership influence to influence companies in sustainability issues.

The fund company has contact with companies in order to influence them in a more sustainable direction.

- Company impact on its own

Funding company's comment: A letter is sent to all portfolio companies annually, in which Nordic Equities addresses its position on sustainability issues, and points out possible controversies that the company has been involved in during the year. The company has a regular dialogue with the portfolio companies management regarding the company's sustainability work.

- Company impact in cooperation with other investors

- Company impact through external suppliers / consultants

- Voting at general meetings

- Participates in election committees to influence the composition of the board

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Other Company Impact

Board of directors, executive officers and auditors

Fredrik Boström, lawyer, Chairman

Jonas Jakobson, Board member

Lennart Hager, lawyer, Board member

Lars-Olov Olsson, managing director, Board member

Lars Kinnunen, customer ombudsman

Rune Evertsson, REVAC redovisningsbyrå, risk control manager

Mattias Lötbörn, KPMG, auditor

Supervision

The fund and the fund company are under the supervision of Finansinspektionen (The Swedish Financial Supervisory Authority).

Assignment agreements

The Management Company has entered into the following assignments:

Skandinaviska Enskilda Banken (publ) AB as custodian of the fund.

REVAC Redovisningsbyrå Ltd for accounting and financial reporting.

Harvest Law for compliance function.

KPMG as internal auditor.

About the information brochure

The information brochure has been prepared under the Act (2004:46) on investment funds and the regulations on investment funds (FFFS 2008:11).

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