



# Nordic Equities

## INFORMATION BROCHURE – NORDIC EQUITIES STRATEGY

Published: Stockholm, January 16, 2026

### General information

This information brochure has been prepared in accordance with the Swedish Investment Funds Act (2004:46) and the Swedish Financial Supervisory Authority's regulations on investment funds (FFFS 2013:09).

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

### Information about the fund company

The fund company Nordic Equities Kapitalförvaltning AB, reg. no. 556571-9126 was founded in 1999 and has its registered office in Stockholm. The company's share capital is SEK 1 500 000.

In 2000, the company received a licence to manage the Nordic Equities Strategy fund and in 2006 the company became a fund company and received a licence to conduct fund operations. In May 2015, the company received a licence to manage alternative investment funds. The fund company currently offers five funds: Nordic Equities Our World, Nordic Equities Global Stars, Nordic Equities Strategy, Nordic Equities Sweden and Nordic Equities Select, and conducts discretionary management.

### Board of directors, senior executives, and auditor

- Fredrik Boström, lawyer, Chairman of the board of directors
- Jonas Jakobson, board member
- Brita Lagström, board member
- Lars-Olov Olsson, board member
- Mikaela Fredriksson, CEO
- Lars Kinnunen, Deputy CEO, Complaints Officer
- Oskar Askelöf, Risk Control Manager
- Anders Tagde, KPMG, Auditor

### Assignment agreements

The fund company has entered into the following assignment agreements:

- Skandinaviska Enskilda Banken (publ) AB as custodian of the fund.
- Harvest Advokatbyrå AB, as controller of the fund.
- Aspia AB for accounting and financial reports.
- Lüsch & Co Revision AB as internal auditor.

### The depositary

The depositary of the funds is Bankaktiebolaget Skandinaviska Enskilda Banken AB, reg. no. 502032-9081, which has its registered office and head office in Stockholm. The general tasks of the depositary are to hold the fund's assets and to execute the fund company's instructions relating to the securities fund if they do not contravene provisions of law or other statutes or the fund rules and to ensure that:

- Sale, redemption and cancellation of units in the fund are carried out in accordance with the law and the fund rules,
- The value of the units of the fund is calculated in accordance with the law and the fund rules,
- Compensation for transactions involving the assets of a fund is paid to the fund without delay, and
- The income of the fund is used in accordance with the provisions of the law and the fund rules.

### Contact information

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## Fund information

Nordic Equities Strategy, ISIN SE0001057928 (share class A), ISIN SE0019913625 (share class B), was launched on 29 December 2000 and is a UCITS fund in accordance with the Swedish Investment Funds Act (2004:46) and is managed by Nordic Equities Kapitalförvaltning AB (the fund company), reg. no. 556571-9126. The fund is managed by the Nordic Equities portfolio team. The fund company maintains the register of unit holders.

## Target group

The fund's target groups are institutions (such as pension funds and foundations), companies and individuals.

## Share classes

The fund has share classes A, SEK dividend paying and B, EUR non-distributing. Share class B is traded in Euro. The units in a share class carry equal rights to the property included in the fund.

## Dividends

The fund's share class A, SEK is dividend paying. Share class B, EUR is non-distributing. The aim is for the fund to redistribute the previous year's dividend received in respect of share class A, SEK. If the board of the fund company considers that it may be in the common interest of the unit holders, the dividend may be set at a higher or lower amount.

The dividend affects the relationship between the value of units that are accumulating and the value of units that are distributing by reducing the value of the distributing fund units in relation to the size of the dividend.

## The fund's focus and strategy

Nordic Equities Strategy is an equity fund specialising in the Nordic market. The fund has a relatively concentrated portfolio and does not seek an even geographical or sectoral spread.

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

Using an empirical approach, global and historical correlations are analysed based on the company's "Outside View" investment philosophy. Investments are based on historical data in a global context where

the investment theme GURAIS (Globalisation, Urbanisation, Artificial Intelligence, Internet, Robotics and Standardisation) plays an important role. Regular travel and meetings with portfolio companies contribute to investment decisions.

The fund's strategy is to invest in the financial instruments that the company considers to be most worth buying, based on an assessment of the markets' valuation and growth potential. Evaluation takes place on an ongoing basis, after which holdings are increased, reduced or replaced. We look at each share individually, so-called stockpicking, which means that we are not dependent on industry weighting.

## The risk

The fund has a risk factor of 4 out of 7, which corresponds to a medium risk class for increases and decreases in the unit value. The fund is therefore suitable for people with a risk tolerance corresponding to 4 out of 7.

## The fund's risk profile

Historical returns are no guarantee of future returns. The money invested in the fund may increase or decrease in value and there is no guarantee that an investor will get back the full amount invested.

There are different types of risks for a fund. Among others, the following risk groups have been identified:

- **Market risk:** Market risk can be divided into three parts. General market risk, holder-specific risk and exchange rate risk. All investors are exposed to general market risk, which means that the value of shareholdings can be affected by, for example, changes in the economy, interest rates, inflation and geopolitical events. Holding-specific risk is the risk associated with a specific company, which means that the company can develop differently from the market. Foreign exchange risk arises from changes in exchange rates affecting the value of a holding.
- **Credit/counterparty risk:** This refers to the risk that the fund's counterparty cannot fulfil its obligations.
- **Liquidity risk:** The risk that a position cannot be liquidated in time at a reasonable price.
- **External risks:** Can be divided into business risk, concentration risk, reputation risk and strategic risk. These risks mainly affect the fund company.



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- Operational risk: refers to the risk of losses due to inappropriate internal processes and procedures, human error, faulty systems and external events.
- Sustainability risk: Refers to environmental, social or corporate governance related circumstances or events that could have a significant negative impact on the value of the investment. This risk is managed by integrating sustainability into investment decisions and through the exclusion criteria applied by Nordic Equities.

Since the fund is an equity fund with a Nordic profile, a fund investment will always be risky. By diversifying the investments, both in terms of industry and geography, the risk level is reduced. The risk profile in the fact sheet (PRIIP KID) is calculated on volatility and the fund's risk class should be 4. The fund invests primarily in large and medium-sized well-known Nordic companies listed on a regulated market. The holdings should therefore be relatively easy to value and monitor.

Trading in derivative instruments and the granting of securities loans may take place in order to rationalise the management of the fund's assets and to protect the fund's assets against exchange rate losses or other risks. Trading/transactions in options and futures contracts have special characteristics that may entail significantly higher risks than trading in shares.

Where derivative instruments are used in the fund, total exposure shall be calculated using the commitment approach.

## Activity level in fund management

The fund's benchmark is the MSCI Nordic Countries Gross Index in local currencies. The fund management company believes this index reflects a relevant market composition aligned with the fund's investment universe. It is a well-established and frequently used benchmark for Nordic equity funds. The fund's returns are reported net of dividends and fees, in line with its benchmark.

Nordic Equities Strategy is actively managed with a focused investment strategy aimed at achieving strong long-term returns through a select portfolio of high-quality companies. We assess thousands of companies through our "Outside View" model, which takes a horizontal and vertical approach, incorporating both a global perspective and historical as well as forward-looking analyses. Holdings within the portfolios are continuously monitored and evaluated. Our model is fact-based rather than index-based, allowing us to selectively avoid many companies and sectors. Consequently, the fund's returns are expected to diverge from its benchmark.

The measure of active risk, or Tracking Error, is calculated over 24 months, based on how the fund's performance varies with the market and how its holdings compare to the benchmark. Equities often fluctuate more in return than fixed-income instruments, so active risk metrics tend to vary more in an actively managed equity fund compared to an index fund or bond fund. The higher the fund's active risk, the more its performance diverges from its benchmark.

## Active Risk: 24-Month Tracking Error

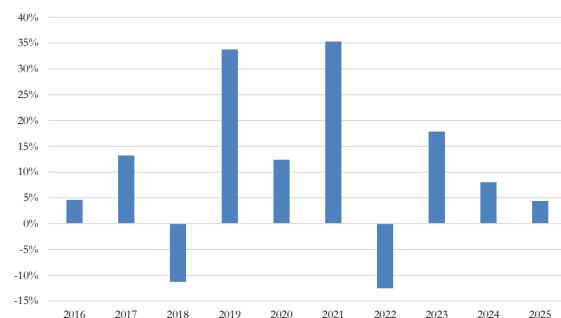
In 2023, the fund's tracking error, showing the variation in returns relative to its benchmark, was 5.71%. This higher level of active risk for the year reflects the fund's more concentrated portfolio and fewer holdings compared to its benchmark.

2025	8,48
2024	5,71
2023	4,47
2022	3,23
2021	4,13
2020	5,67
2019	6,09
2018	5,75
2017	5,27
2016	4,25



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## Historical annual returns



## Fees and charges

A fixed fee is charged for the management of the fund.

No fees are charged for the purchase or redemption of fund units other than for the redemption of fund units acquired in the last 12 months.

The current fee level and the maximum possible fee levels according to the fund rules are as follows:

- The fixed fee to the fund company for management, custody, supervision, auditors and costs for safeguarding the interests of the fund is 1.5% annually (maximum 1.5%) for both share class A and B.
- Fee for the redemption of fund units, acquired during the last 12 months, is 0% (maximum 1.5%) for both share class A and B.

The fixed fee is calculated daily and charged once or twice a month. Costs charged to the fund are shown in the annual report.

In addition to the management fee charged by the company from managed portfolios in accordance with the fund rules, the funds pay brokerage fees in connection with securities transactions. There are also bank charges in some cases. As a result of the funds' trading with brokers, the company receives price data systems and analyses from brokers, which are used in the management of the fund.

In accordance with the Swedish Financial Supervisory Authority's letter (Dnr 14-6664), the company has chosen to divide the brokerage cost into equal parts in an analysis and an execution part. The execution part accrues to the broker when trading as compensation for the transaction, while the analysis part is accumulated by the broker to be distributed by the company on occasion, at given intervals or when the balance reaches a sufficiently high amount. The analysis costs charged directly to the fund in the form of brokerage fees shall be distributed as the company

deems appropriate, taking into account how analysis services and technical aids are available to, or used by, the management.

More about the fees can be read in the fund rules and further information can also be obtained from the company.

## Rules on best possible result when placing orders

The company has established internal rules to achieve the best possible result when placing orders. Among other things, the rules state that the transaction must be carried out fairly and in accordance with the market and that the broker must be well established. The company evaluates counterparties and order placement performance on an ongoing basis. The company does not currently use a primary broker.

## Purchase and redemption of units

**New customer:** A new customer of the fund company must complete a customer registration form. The client application must be signed by an authorised person using BankID, or a certified copy of identification must be attached to the client application. For legal entities, current documentation on company authorisation must also be attached.

**Trading fund units:** Completed purchase/redemption notification is sent to the fund company and, in the case of purchase, payment is made to the fund's account. Fund units cannot be price-limited. The notification of purchase or redemption of fund units, as well as the purchase payment, must be received by the company no later than two banking days before the business day.

**Minimum deposit:** The minimum deposit in the fund, when purchasing via the company, is initially SEK 50,000 (EUR 5,000), thereafter SEK 10,000 (EUR 1,000).

**Minimum redemption amount:** The minimum redemption amount is SEK 10,000 (EUR 1,000).

The fund company is entitled to decide to cancel or postpone the business day for a unit transaction if the fund company deems that sufficient documentation has not been presented in time.

## Fund valuation and opening hours

The fund's unit value is determined each day when all the markets on which the fund's holdings are traded are fully open. However, the fund company is entitled



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to keep the fund open for trading and valuation on a day when one or more of the markets on which the fund's holdings are traded are fully or partially closed. Information on the day of trading can always be obtained from the fund company.

The fund unit value is calculated by the fund company at 16:00 (CET) at the earliest. The valuation of the fund's financial instruments takes place in accordance with the fund rules § 8.

## Price information

The unit value is calculated each day the fund is open for trading. The unit value is published on the fund company's website.

## Opening and closing of the fund

The fund may be closed to entries and exits in the event that extraordinary circumstances have arisen that make it impossible to value the fund's assets in a way that ensures the equal rights of unitholders.

## Marketing outside Sweden

Nordic Equities Strategy is authorised for marketing in France, Norway, and Finland in addition to Sweden. The company is responsible for the distribution of information materials to investors as well as for managing the redemption of units and payments to unit holders in these countries. In France, the company has appointed Caceis Bank as the local Paying Agent. Caceis provides a point of contact for investors in France and ensures that all relevant information about the fund is submitted to the French supervisory authority, AMF (Autorité des Marchés Financiers), in accordance with local regulations. Payments and redemptions of fund units are handled directly by the company, including for investors in France.

## Tax rules

As of 1 January 2012, mutual funds are not subject to tax. Instead, natural persons resident in Sweden must report a standardised capital income of 0.4% of the value of the fund units at the beginning of the year. Legal persons with unlimited tax liability who own units in mutual funds must also report such a standardised income, but as income from business activities.

Example: If the value of your fund units is SEK 100,000 at the beginning of 2023, the standardised income amounts to SEK 400. This SEK 400 is sent as control

information for the tax return for 2023 (tax year 2024). If you have no other deductions or income from capital, the tax amounts to SEK 120, i.e. the actual tax is 0.12% (0.4 \* 30%) of the value.

For dividends to natural persons who are taxable in Sweden, the fund is obliged to withhold preliminary tax. For unit holders resident abroad, withholding tax is withheld.

For natural persons liable to tax in Sweden, the tax on capital gains is currently 30%. Capital losses are deductible to varying degrees. Capital gains/losses are reported on a control statement to the Swedish Tax Agency.

A fund unit holder's tax may be affected by individual circumstances and investors who are unsure should seek expert advice.

## Termination and transfer of the fund business

If the fund company wishes to discontinue the management of the fund, loses the Financial Supervisory Authority's authorisation to conduct business subject to authorisation, goes into liquidation or is declared bankrupt, the management of the fund shall be temporarily taken over by the depositary. The depositary shall, with the consent of the Financial Supervisory Authority, promptly transfer the management of the fund to another fund company, failing which the fund shall be dissolved and the net assets distributed to the unit holders. With the consent of the Financial Supervisory Authority, the fund company may transfer the management of the fund to another fund company.

An announcement to this effect shall be published in Post- och Inrikes Tidningar and be made available at the depositary and at the fund company as soon as possible.

## Damages

Chapter 2, section 21 of the Swedish Investment Funds Act states that:

If a fund unit holder has suffered damage as a result of the company's violation of this Act or the fund rules, the company shall compensate the damage. If a unitholder or a fund company has suffered damage as a result of the depositary's violation of this Act or the fund rules, the depositary shall compensate the damage.

More information can be found in the fund rules §16.



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## Remuneration policy

In order not to encourage excessive risk-taking, the fund company has adopted a remuneration policy. Employees are paid a fixed monthly salary, pension provision and health insurance. There are no agreements on variable remuneration or similar.

Chapter 3, Section 22 and Chapter 9, Section 3 of the Swedish Financial Supervisory Authority's regulations on managers of alternative investment funds (FFFS 2013:10) and Chapter 8a, Section 3 of the Swedish Financial Supervisory Authority's regulations on mutual funds (FFFS 2013:9) state that the company shall have a remuneration policy. Furthermore, it follows from Article 1 in conjunction with Article 27 of Commission Delegated Regulation 2017/565 of 25 April 2016 that the company shall establish and implement a remuneration policy and remuneration practices in accordance with appropriate internal procedures that take into account all of the company's clients, in order to ensure that clients are treated fairly and that their interests are not adversely affected by the remuneration policy adopted by the company in the short, medium or long term. In addition, Regulation (EU) 2019/2088 of the European Parliament and of the Council on sustainability-related disclosures in the financial services sector (the "Disclosure Regulation") requires the company to provide information in its remuneration policy on how the policy is compatible with the company's integration of sustainability risks.

The company has decided to integrate sustainability risks into its investment decision-making process and has therefore established a specific policy for the integration of sustainability risks. Consequently, the employees whose tasks are related to the investment decision-making process must specifically comply with the company's policy for integrating sustainability risks and must also analyse and integrate any sustainability risks in decisions taken on behalf of the funds. Against this background, the fact that sustainability risks have been integrated into the investment decision-making process is a basis for assessment when deciding on variable remuneration for such personnel.

According to the regulations, the company shall have a remuneration policy that is compatible with and promotes sound and effective risk management and prevents excessive risk-taking.

The remuneration policy shall be formulated and applied in a manner appropriate to the size and internal organisation of the company and the nature, scope and complexity of its activities, and shall be consistent with the business strategy, objectives, values and long-term interests of the manager and the alternative investment funds managed or the investors in the alternative investment funds, and shall include a list of measures to be taken to avoid conflicts of interest.

The company has identified that an incorrect design of the remuneration system and payments of variable remuneration could have a negative impact on the company's liquidity and result in the company not meeting the requirements of the regulations regarding, *inter alia*, capital adequacy and create conflicts with the interests of the unit holders. Risk takers could potentially, with a poorly designed remuneration system, take excessive risk or violate the fund rules and the company's internal rules in order to increase their own level of remuneration in the short term. Furthermore, the assets of the fund could potentially be valued at a higher amount than the market price in order to increase the company's fees.

Against this background, it is of the utmost importance that the company ensures that its remuneration policy and remuneration systems are compatible with and promote sound and effective risk management. One part of this work is to identify and report on the measures to be taken. Remuneration models that may exist in the company shall have an appropriate balance between fixed and variable components. Guaranteed variable remuneration may not occur.

The fixed components should represent a sufficiently high proportion of the employee's total remuneration to enable the variable components to be set at zero. The company shall specify in its remuneration policy the maximum size of the variable components in relation to the fixed components for all categories of employees eligible for variable remuneration.

All employees may be eligible for variable remuneration. Variable remuneration to employees may in no case be set at a higher amount than the equivalent of 24 months' salary.

Variable remuneration shall be decided by the Board of Directors on a proposal from the Chairman of the



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Board. The variable remuneration is not calculated based on a predetermined formula but is discretionary in nature. The company bases the possibility of variable remuneration on, among other things, the following criteria for each staff category.

Investment personnel:

- Company performance
- The employee's contribution to the company's earning power
- Seniority
- Customer care/ Investor satisfaction
- Management tasks
- Training efforts
- Compliance with internal/external rules/risk management policy/sustainability risk integration policy

Distribution:

- Customer care/ Investor satisfaction
- Strategic objectives
- Structural issues
- New shareholders
- Compliance with internal/external rules

Non-investment personnel:

- Audit results
- Strategic objectives
- Structural issues
- Adaption to new regulations
- Compliance with internal/external rules/risk management policy/sustainability risk integration policy
- Teamwork/motivation
- Leadership

When deciding how much of the total remuneration shall 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 to strengthen the capital base if necessary. This means that the company shall consider, inter alia:

- The amount and cost of the additional capital required to cover the risks affecting the result for the period,
- The amount and cost of liquidity risk, and
- The possibility that expectations of future revenues will not be realised

For specially regulated staff, at least 60% of the variable remuneration is deferred for three years

before it is paid out or ownership of shares is transferred to the employee. For others, at least 60% of the variable remuneration is also deferred for three years before being paid.

Deferred variable remuneration is only paid or transferred to the employee to the extent that it is justifiable in view of the company's financial situation and justified by the company's and the employee's performance. The deferred part of the remuneration may also be cancelled entirely, for the same reasons.

Information on the fund company's remuneration is published in the funds' annual report and on the fund company's website. Information on the remuneration policy can also be sent by post free of charge on request. Compliance with the remuneration policy is monitored annually by the compliance function.

The company's remuneration policy has been complied with and has not undergone any significant changes beyond what is required by law. The above information is also available on the company's website [www.nordeq.se](http://www.nordeq.se) and can be obtained free of charge upon request.

## Sustainability information

Information on the fund's environmental and social characteristics can be found below, in the Annex, to this document.

## Integration of sustainability risks

Sustainability risks are integrated into the investment decision-making process by subjecting all potential investments to a norms-based ESG screening against international standards (UN Global Compact, ILO, OECD, UNGP), supported by Morningstar/Sustainalytics. Only companies that meet these standards may be included in the fund. Prior to each investment, a sustainability analysis is conducted in which the company's disclosures, climate impact, sector exposure, and contribution to the UN Sustainable Development Goals are assessed. The fund excludes sectors with significant adverse effects on sustainability factors and actively selects companies with ambitious climate targets. During the holding period, portfolio companies are continuously monitored through ESG alerts and ongoing dialogue. Companies that no longer fulfil the fund's sustainability requirements may be divested.

## Assessment of the likely impact of sustainability risks on returns



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The assessment of the likely impact of sustainability risks on the fund's returns indicates that exposure to companies with elevated sustainability risks may have adverse long-term effects, for example through increased costs, regulatory changes, or reputational damage. By integrating sustainability risks into the investment process, excluding certain sectors, and selecting companies with clearly defined climate targets, the fund's long-term return potential is considered to be protected and potentially enhanced. The fund's low exposure to companies with high PAI indicators supports this assessment.

## **Amendments to the fund rules**

The company may, with the approval of the Swedish Financial Supervisory Authority, amend the fund rules for the fund. Changes may affect the fund's characteristics, such as its investment policy, fees and risk profile.



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## Fund rules

### § 1 Legal status of the mutual fund

The name of the fund is Nordic Equities Strategy (the fund). The fund is a securities fund under the Swedish Securities Funds Act (2004:46). Operations are conducted, in addition to the Act, in accordance with the fund rules and other regulations issued pursuant to law or statute. The fund cannot acquire its own rights or assume obligations. However, the fund is an independent taxable entity. The assets of the fund are jointly owned by the unitholders and the units of a share class carry equal rights to the assets of the fund.

The fund consists of share classes with the following condition:

A. SEK, distributing

B. EUR, accumulating (non-distributing)

### § 2 Fund manager

Nordic Equities Kapitalförvaltning AB (the fund company), reg. no. 556571-9126, manages the fund and represents the unit holders in all matters concerning the fund.

### § 3 The depositary and its tasks

The fund's custodian is Skandinaviska Enskilda Banken AB, reg. no. 502032-9081. The tasks of the custodian are to receive and store the fund's property and to ensure that the assets of the fund reach the custodian without delay. Furthermore, the depositary shall ensure that the valuation, redemption and sale of fund units and the management of the fund are carried out in accordance with the law, regulations and fund rules. The depositary shall act independently of the fund company and exclusively in the interests of the fund's unitholders.

### § 4 Nature of the fund

The fund is an equity fund specialising in the Nordic market with a Swedish emphasis. Based on an assessment of the growth potential of companies and markets, the fund's strategy is to invest in the financial instruments that the fund company considers to be most worth buying.

The fund may have a relatively concentrated portfolio, which may lead to higher volatility in the fund.

The fund's objective is to achieve long-term growth in value. Long-term means five to ten years or more.

### § 5 The fund's investment objectives

The fund's assets may be invested in transferable securities, money market instruments, fund units and in accounts with credit institutions.

At least 90 per cent of the fund's assets are invested in equities or equity-related instruments. In connection with the purchase and redemption of fund units, this limit may be exceeded.

A maximum of 10 per cent of the fund's assets may be invested in an account with a credit institution. With exceptions in connection with the purchase and redemption of fund units

The fund has a Nordic profile with normally more than 75 per cent of the fund assets invested in shares traded in Sweden, Norway, Finland or Denmark.

The fund does not seek an even geographical or sectoral spread of investments. The focus is also diversified and thus not specialised in any particular industry.

Up to 10 per cent of the fund's value may be invested in other mutual funds or in foreign UCITS.

### § 6 The fund's investment area

The fund's assets may be invested on regulated markets in the EEA or on equivalent markets in Europe and North America. Trading may also take place on other marketplaces in Europe or North America.

### § 7 Specific investment objectives

The fund's assets may not be invested in such transferable securities and money market instruments as referred to in Chapter 5, Section 5 of the Swedish Investment Funds Act (2004:46) other than as authorised under Chapter 5, Section 3 of the Swedish Investment Funds Act (2004:46). Nor may the fund's assets be invested in OTC derivatives.

Trading in derivative instruments and the granting of securities loans may take place in order to improve the efficiency of the management of the fund's assets and to protect the fund's assets against exchange rate losses or other risks.

### § 8 Valuation

The value of the fund is calculated by deducting from the assets (financial instruments and cash and cash equivalents including accrued income) the liabilities that are charged to the fund (accrued expenses, taxes and other liabilities). The value of a fund unit is the



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value of the fund divided by the total number of fund units.

The unit value is calculated daily when the fund is open for trading. Financial instruments included in the fund are valued at market value. This means the price paid or, in the absence thereof, the bid price. If there are no such prices or if the price is misleading in the opinion of the fund company, the fund company may determine the value on objective grounds.

For transferable securities, a market value is determined on objective grounds according to a special valuation based on information on the last price paid or an indicative purchase price from a market maker, if one has been appointed for the issuer. If such information is not available or is deemed unreliable by the fund company, the market value is determined based on information from independent brokers or other external independent sources. Such information may, for example, be the issue price with an independent party at a different value or knowledge that a transaction has been made at a certain price in the relevant asset with an independent party.

The time of market valuation is stated in the information brochure.

The price information the fund company provides to the media or similar is always preliminary, may be subject to change and is therefore not binding on the fund company. The latest calculated fund unit value can be obtained from the fund company.

The calculation of fund units and the fund unit value is made to at least four decimal places.

The value of each fund unit is calculated taking into account the conditions associated with each share class.

## **§ 9 Sale and redemption of fund units**

Fund units are sold (unit holder's purchase) and redeemed (unit holder's sale) at the fund company. Sales and redemptions take place in the currency specified in §1 for each share class. The fund is open for sale and redemption every banking day (hereinafter referred to as a business day). However, the fund is not open on days when one or more of the markets on which the fund's holdings are traded are fully or partially closed (e.g. "half days"). However, the fund company is entitled to be open on such days.

The sale and redemption price (fund unit value) is unknown at the time of the purchase and redemption notification. The sale price and redemption price for a fund unit shall be the fund unit value on the banking day on which the sale or redemption takes place. Information on the fund unit value is obtained from the fund company no later than the third banking day after the business day.

Notification of purchase of fund units shall be made on the form prescribed by the fund company. A complete application and payment must be received in the fund's account no later than two banking days before the business day. If the application or payment is received later, the fund company is nevertheless entitled to decide that the purchase will take place. Once payment has been received by the fund's account, the purchase cannot be cancelled by the buyer. The purchase of units cannot be limited by price. The minimum amount for the fund company's first sale (the unit holder's purchase) is SEK 50,000. Thereafter, the minimum deposit in the fund is SEK 10,000 per occasion.

Notification of redemption of fund units shall be made on the prescribed form. The complete notification must be received by the fund company no later than two banking days before the business day. If the notification is received later, the fund company is nevertheless entitled to decide that the redemption will take place. The minimum redemption amount is SEK 10,000, or if the value of the unitholder's total unit holdings is less than this amount, the unitholder's total holdings. The redemption notice can only be revoked if the fund company so authorises. The redemption of units cannot be limited by price. A fee for the redemption of fund units may occur in certain cases, see § 11.

The fund company is entitled to decide to cancel or postpone the business day for a unit transaction if, for example, the fund company deems that sufficient documentation for customer information has not been presented in time.

## **§ 10 Extraordinary circumstances**

The fund may be closed for entry and exit in the event that extraordinary circumstances have arisen such that a valuation of the Fund's assets cannot be carried out in a way that ensures equal rights for unitholders.



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## § 11 Fees and remuneration

Current fees are presented in the fund's information brochure or related appendix.

The price at redemption of a fund unit, acquired during the last 12 months, amounts to the value of the fund unit on the transaction date less a fee of a maximum of 1.5 per cent of the value of the fund unit.

No fees are charged in connection with the purchase of units.

Remuneration may be paid to the fund company from the fund's assets. The fixed remuneration to the fund company for the management of the fund, custody of the fund's assets, supervision, auditors and costs of safeguarding the fund's interests, such as legal fees, is calculated daily and may amount to a maximum of 1.5 per cent of the fund's value each year. The remuneration is taken from the fund each month.

Brokerage fees, bank charges and other transaction costs are paid by the fund and are in addition to what is stated above.

All fees and remunerations are also subject to the value added tax applicable at any given time.

## § 12 Dividends

The fund pays dividends to unit holders in share class A. SEK during the month of September–November after the end of the financial year. The basis for the dividend is the dividend received by the fund. The fund's information brochure states how the calculation is made. The board of directors of the fund company may, in the interest of the unit holders, set the dividend at a higher or lower amount than the dividend received by the fund. Dividends may be increased by accrued dividends paid on unit purchases and decreased by accrued dividends paid on unit redemptions.

Dividends are payable to unitholders who are registered for fund units at the beginning of the distribution date set by the fund company. After deduction of preliminary tax, new fund units shall be allocated to the unitholder for the dividend payable on the fund unit.

Unitholders in share class A. SEK, who instead wish to receive dividends in cash, shall notify the fund company on a form provided by the fund company no later than 31 July of the year following the end of the financial year. If the fund company receives a

notification of a cash distribution later than the above-mentioned date, the fund company is nevertheless entitled to approve a cash distribution.

Share class B does not pay dividends.

The dividend affects the relationship between the value of units that are accumulating and the value of units that are distributing by reducing the value of the distributing fund units in relation to the size of the dividend. Further information on dividend targeting is set out in the fund's prospectus.

## § 13 Financial year of the fund

The financial year of the fund is the calendar year.

## § 14 Half-yearly and annual report, amendment to the fund rules

The fund company shall prepare half-yearly and annual reports for the fund within two and four months of the end of the half-year and financial year respectively. The half-yearly and annual reports shall be kept available at the fund company and the depositary and sent to unit holders who have requested them.

If the fund company decides to amend the fund rules, the decision shall be submitted to the Swedish Financial Supervisory Authority for approval. The decision shall be published by being made available at the fund company and the depositary and announced in the manner determined by the Financial Supervisory Authority.

## § 15 Pledging and transfer

Fund units may not be pledged. The transfer of fund units requires that the fund company authorises the transfer. Such consent is given by the fund company if the transfer is made in order to carry out division of property, inheritance or relates to a transfer between different legal entities within the same group. Other transfers may be authorised in exceptional cases. When transferring fund units, the acquirer assumes the transferor's acquisition value of the fund unit. The fund company is entitled to charge compensation for the cost of transfer, trustee registration and re-registration.

## § 16 Other necessary and reasonable information

Neither the fund company nor the custodian is liable for damage caused by Swedish or foreign legislation, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts, interruptions in



## Nordic Equities

data and telecommunications or other similar circumstances. The reservation with regard to strikes, blockades, boycotts and lockouts also applies if the fund company or the depositary is subject to or takes such industrial action itself.

Damage incurred in other cases shall not be compensated by the fund company or depositary if they have exercised normal care. Under no circumstances shall the fund company or the depositary be liable for indirect damage. The fund company is not liable for damage caused by the depositary.

The fund company or the depositary is not liable for damage caused by a marketplace, custodian bank, central securities depository, clearing organisation, other providers of similar services, or any other agent engaged by the depositary with due diligence or assigned by the fund company. Nor is the fund company or the depositary liable for any loss arising from a restriction on disposal that may be applied to the depositary in respect of financial instruments. The fund company is not liable for any loss caused by a unit holder or other party violating a law, ordinance, regulation or these fund rules. Unit holders are responsible for ensuring that documents submitted to the fund company are correct and duly signed and that the fund company is informed of any changes in the information provided.

If the fund company or depositary is prevented from implementing all or part of a measure due to circumstances referred to in the first paragraph of this section, the measure may be postponed until the obstacle has ceased.

The fund company or depositary shall not pay penalty interest in the event of deferred payment.

For further information regarding the fund company's and depositary's liability for damages, please refer to Chapter 2, Section 21 and Chapter 3, Sections 14–16 of the Swedish Investment Funds Act (2004:46).

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The fund rules have been approved by Finansinspektionen 2023-01-01 to apply from 2023-01-01.

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852.**

**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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordic Equities Strategy

**Legal entity identifier:** SE0001057928

## Environmental and/or social characteristics

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

● ●  Yes

● ●  No

<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%</p>	<p><input type="checkbox"/> It promotes <b>Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% sustainable investments</p> <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> <p><input checked="" type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>
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### What environmental and/or social characteristics are promoted by this financial product?

The fund promotes the environmental characteristics of reducing greenhouse gas emissions and increasing the use of renewable energy.

#### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

The fund uses the following sustainability indicators to measure the achievement of each of the environment-related characteristics promoted by the fund:

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

- Greenhouse gas emissions (scope 1, 2 and 3 and total emissions)
- Share of non-renewable energy consumption and energy production
- Energy consumption intensity by sector with high climate impact

The fund has access to data from Morningstar / Sustainalytics to carry out the measurement of the sustainability indicators above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

The “do no significant harm” principle applies only to those investments underlying the financial product that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

*Any other sustainable investments must also not significantly harm any environmental or social objectives.*



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



Yes, the fund considers principal adverse impacts on sustainability factors ("PAIs") by excluding investments in sectors and industries that have a significant negative impact on the identified sustainability factors. The Fund purchases data from an external third party provider to carry out the measurement of the PAI indicators.

Disclosure of main negative impacts on sustainability factors will be provided through the Fund's annual report.

No



### What investment strategy does this financial product follow?

Nordic Equities Strategy is an equity fund specialising in the Nordic market. The fund's strategy is to invest, based on an assessment of the markets' valuation and growth potential, in the financial instruments that the fund company considers most worth buying. The company looks at each share individually, so-called stockpicking, which means that the fund is not dependent on industry weighting. The fund company has established a sustainability policy, which is part of the company's management policy, and includes sustainability criteria for the management.

Within the framework of the fund's investment process, sustainability criteria are applied through three methods: opt-out, opt-in and influence. The following describes how the sustainability criteria are continuously implemented in the investment strategy.

#### Before investment

##### *ESG screening*

The company has purchased an ESG screening tool Global Standards Screening through Morningstar / Sustainalytics. The screening tool is a standards-based tool that evaluates the extent

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

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

to which potential portfolio companies cause, contribute to or are attributable to violations of international norms and standards. The assessments cover screening against the UN Global Compact, the International Labour Organisation (ILO) conventions, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs). The negative screening means that a potential portfolio company is first screened by Morningstar / Sustainalytics to identify any sustainability risks associated with the portfolio company. For the fund to invest in the portfolio company, the portfolio company must be compliant with the screening tool.

#### *ESG analysis*

Prior to each investment, the company conducts an analysis of the company based on specific sustainability aspects. This sustainability analysis includes, among other things, the ESG screening described above. The fund company reviews the sustainability reporting that the portfolio company has published, carbon dioxide emissions, any involvement of the portfolio company's products in such sectors that the fund company excludes (see below regarding exclusion criteria) and the portfolio company's possible contribution to one or more of the UN's 17 global sustainability goals.

#### *Exclusion criteria*

The fund is actively managed and the exclusion criteria applied therefore have a self-cleansing effect. The fund company acts in its daily work in such a way that confidence in the fund company's operations is maintained and that the operations are sound. The Fund strives to conduct its business in an ethical manner characterised by good business practice, morality, consistency and ethics. Against this background, the fund has established criteria for the exclusion of certain sectors and industries in which the fund company does not see any long-term sustainability or social benefit. These exclusion criteria are described under the question below.

#### *Opt-in*

Several of the fund's portfolio companies have committed to climate-related targets in accordance with the 2030 Agenda or the Paris Agreement's global warming goals with the aim of reducing the carbon dioxide or other greenhouse gas emissions of their operations and increasing the use of renewable energy sources. The Fund actively chooses to invest in such companies ("promoter companies") as they contribute to the achievement of the environmental characteristics the Fund intends to promote. The fund company has established a framework for the criteria that a portfolio company needs to fulfil in order to be classified as a promotional company. In order for the fund company to classify a portfolio company as a "promoting company", the portfolio company must fulfil the following criteria: (1) The portfolio company has committed to climate-related objectives in accordance with Agenda 2030 or the Paris Agreement, which means that the portfolio company must work to reduce the carbon dioxide emissions or greenhouse gas emissions of its operations or increase the use of renewable energy sources in its operations. (2) In addition to point (1), it is required that:

- a. The portfolio company's climate-related targets have been validated through the Science Based Targets Initiative, or
  - b. The portfolio company has been committed to climate-related targets for several years and the milestones have been achieved so far, or
  - c. The portfolio company is a solution company, which means that the portfolio company provides a product or service that contributes to solving the world's climate and sustainability challenges.
- (3) In addition, the portfolio company shall comply with the fund company's policy on good governance practice.

The fund does not invest exclusively in promotional companies, however, any climate-related objectives that the portfolio companies have undertaken are included in the fund company's ESG analysis, which is why promotional companies are actively selected. The fund will always have a minimum share of 50% in so-called promotional companies. See further under the heading "Share of investments".

### **Under investment**

#### *Continuous monitoring*

The fund receives regular alerts from Morningstar / Sustainalytics regarding ESG events in the Fund's portfolio companies. By receiving regular alerts, the fund can monitor any events that could lead to the materialisation of sustainability risks in the portfolio companies. The fund company also has close and regular contact with the portfolio companies, which means that the fund company can continuously monitor any events in the portfolio companies that could have consequences for the fund's sustainability strategy.

#### *Advocacy work*

Due to the size of the fund company, it has been decided that the fund company will not conduct advocacy work in the portfolio companies by voting at general meetings. Instead, the fund company conducts advocacy work by sending annual letters to the portfolio companies in which the fund company expresses its position on any sustainability-related issues and also questions any incidents that have been discovered through the screening tool the fund company uses. As described above, the fund company has close and ongoing contact with the fund's portfolio companies, which means that the fund company has an ongoing advocacy dialogue with the portfolio companies regarding the fund company's views on sustainability issues.

#### *Selling off*

The company has decided that investments placed on the Morningstar / Sustainalytics Watchlist should be further reviewed and considered whether it should be retained within six months if the portfolio company has not changed its outlook to positive within the period or if new information has emerged upon confrontation with the company. Portfolio companies that have become non-compliant should be further reviewed and considered for sale within three months unless action has been taken or new information has emerged.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The fund applies exclusion criteria, which means that the company does not invest in companies involved in coal power, fossil fuels, tobacco, alcohol, commercial gambling, pornography, weapons, cannabis or testing on animals that do not relate to the research of new drugs that require animal testing by law. The exclusion criteria applied by the fund company in its investment strategy mean that no more than five per cent of the turnover of a portfolio company may relate to activities attributable to the production of any of the excluded industries/sectors.

According to the fund company's sustainability policy, the fund company may not invest in portfolio companies that are included in any of the sectors or industries that the fund company excludes.

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

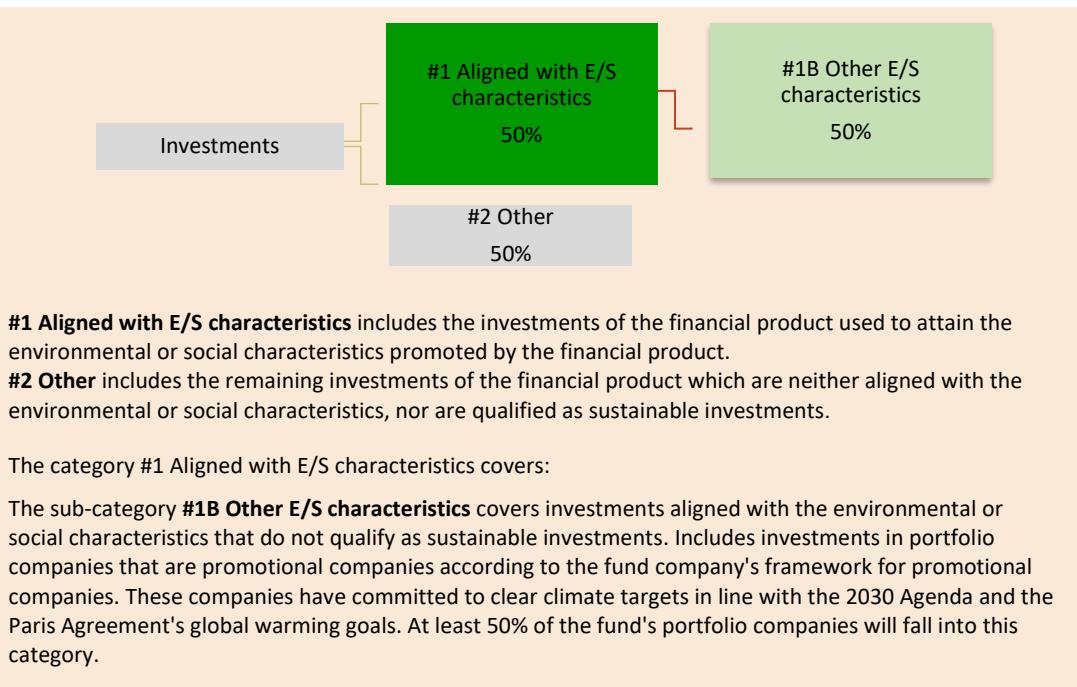
The fund company has adopted a policy for assessing good governance practices in the fund's portfolio companies, which is part of the fund company's sustainability policy. The fund company's policy for assessing good governance practices includes an obligation for

the fund company to check that the portfolio company has a sound management structure and a sound relationship with its employees.

Prior to investing in a new investee company, the fund company reviews the governance structure of the investee company, including with respect to the portfolio company's code of conduct and whether the portfolio company complies with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. In addition, the fund company monitors the portfolio company's compliance with good governance practices through the regular alerts that the fund company receives regarding ESG events linked to the portfolio companies from Morningstar / Sustainalytics (which have been described above). In the event that an incident has occurred in one of the fund's portfolio companies, the fund company conducts a dialogue with the portfolio company and the portfolio company is given the opportunity to comment on the incident.



## What is the asset allocation planned for this financial product?



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

As the availability of sufficiently reliable data on taxonomy alignment is limited, a meaningful commitment to a minimum percentage of taxonomy aligned investments in the fund cannot be made. However, it cannot be excluded that some of the fund's holdings are classified as taxonomy-aligned investments.

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

Yes:

In fossil gas

In nuclear energy related activities

No

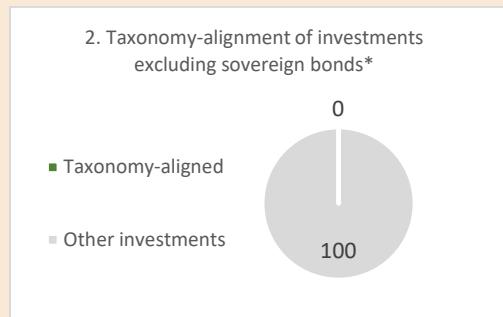
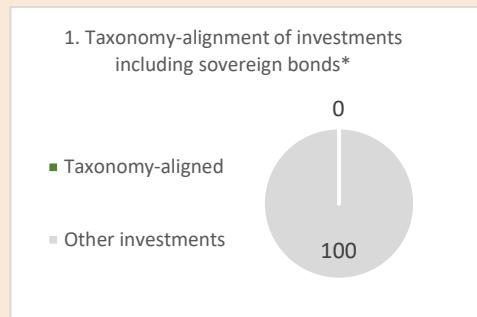
<sup>1</sup>Fossil gas and/or nuclear energy related activities will only fulfil the EU taxonomy if they contribute to climate change mitigation (climate change mitigation) and do not cause significant harm to any of the objectives of the EU taxonomy - see explanatory note in the left margin. The full criteria for fossil gas and nuclear energy economic activities that fulfil the EU taxonomy are set out in Commission Delegated Regulation (EU) 2022/1214.

Taxonomy-aligned activities are expressed as a share of:

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



*The 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.*



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

### What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?

"#2 Other" includes all investments in the fund that are not categorised as promotional companies. As described above, the fund categorises promotional companies as companies with clear climate objectives. Furthermore, the category "#2 Other" includes cash or other liquid assets in the fund or holdings used for hedging. All portfolio companies in the fund follow good governance practices and, as a result, certain minimum ethical and social safeguards.



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

More product-specific information can be found on the website:

[NE Strategy Sustainability Information - Nordic Equities](#)