CARNEGIE FONDER

CARNEGIE FONDER AB

PROSPECTUS

2024

Date of First Publication: 2024-03-01
Last Update: 2024-12-02

CARNEGIE FONDER

TABLE OF CONTENTS

GENERAL INFORMATION

This document was prepared in accordance with the Swedish UCITS Act (SFS 2004:46), Finansinspektionen's regulations regarding Swedish UCITS, (FFFS 2013:9), the Swedish Alternative Investment Funds Act (2013:561) and Finansinspektionen's regulations regarding Alternative Investment Fund Managers (FFFS 2013:10).

FUND COMPANY

Name: Carnegie Fonder AB
Address: Box 7828, 103 97 Stockholm, Sweden
Phone: +46 8 12 15 50 00
Company registration number: 556266–6049
Founded: 1985-10-22
Share capital: SEK 3,000,000
Regulator: Finansinspektionen (Swedish Financial Supervisory Authority)
Company seat and head office: Regeringsgatan 56, 103 97 Stockholm, Sweden

AUTHORISATIONS

The fund company holds the following authorisations to conduct business:

- Authorisation to conduct fund operations under the Swedish UCITS Act
- Authorisation to conduct fund operations under the Swedish Alternative Fund Managers Act
- Authorisation to provide discretionary portfolio management relating to financial instruments
- Authorisation to provide safekeeping of fund units
- Authorisation to receive funds subject to mandatory reporting
- Authorisation to provide investment advice relating to financial instruments

BOARD OF DIRECTORS

Jan Bernhard Waage (Chair)
Karin Elisabet Burgaz (Director)
Anders Johan Antas (Director)

MANAGEMENT

Andreas Uller (CEO) Other directorships: Chair Carnegie Fonder Portfolio SICAV.
Simon Blecher (CIO)
Peter Gullmert (Head of Sales) Other directorships: Director Carnegie Fonder Portfolio SICAV
Jens Lindskog (COO)
Svante Lundberg (Compliance Officer, deputy CEO)
Henrik Hedblom (Head of Risk Management)

AUDITOR

Elected by annual general meeting: Ernst & Young AB
Auditor in charge: Mona Alfredsson

LIST OF FUNDS

UCITS and Special Funds		
Alternative Funds	**Fund Category**	**Country of Registration**
Carnegie Bear	UCITS	Sweden
Carnegie Bull	UCITS	Sweden
Carnegie Global Plus	UCITS	Sweden
Equity Funds	**Fund Category**	**Country of Registration**
Carnegie All Cap	UCITS	Sweden
Carnegie Fastighetsfond Norden	UCITS	Sweden
Carnegie Global Quality Companies	UCITS	Sweden
Carnegie Global Quality Small Cap	UCITS	Sweden
Carnegie Global Resilient Small Cap	UCITS	Sweden
Carnegie Indienfond	UCITS	Sweden
Carnegie Listed Infrastructure	UCITS	Sweden
Carnegie Listed Private Equity	UCITS	Sweden
Carnegie Micro Cap	Special fund (Non-UCITS)	Sweden
Carnegie Rysslandsfond	UCITS	Sweden
Carnegie Small & Micro Cap	UCITS	Sweden
Carnegie Småbolagsfond	UCITS	Sweden
Carnegie SPAR Global	UCITS	Sweden
Carnegie Spin-Off	UCITS	Sweden
Carnegie Sverigefond	UCITS	Sweden
Carnegie US Small & Micro Cap	UCITS	Sweden
D&G Aktiefond	UCITS	Sweden
D&G Global All Cap	UCITS	Sweden
D&G Småbolag	UCITS	Sweden
Fixed Income Funds	**Fund Category**	**Country of Registration**
Carnegie Investment Grade	UCITS	Sweden
Carnegie Likviditetsfond	UCITS	Sweden
Carnegie Obligationsfond	UCITS	Sweden

Mixed Funds	Fund Category	Country of Registration
Carnegie Multi	UCITS	Sweden
Carnegie SPAR Balanserad	UCITS	Sweden
Carnegie Strategifond	UCITS	Sweden

Managed UCITS		
Mixed Funds	**Fund Category**	**Country of Registration**
Carnegie Strategy Fund	Feeder	Luxembourg
Carnegie Total	UCITS	Luxembourg
Fixed Income Funds	**Fund Category**	**Country of Registration**
Carnegie Corporate Bond	UCITS	Luxembourg
Carnegie High Yield Select	UCITS	Luxembourg
Carnegie High Yield	UCITS	Luxembourg

DEPOSITARY

Skandinaviska Enskilda Banken AB (publ), 106 40 Stockholm, Sweden. The address of the company's registered office is Kungsträdgårdsgatan 8, 111 47 Stockholm, Sweden, and its main business is banking.

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund's assets and implements the fund company's instructions concerning the fund provided such do not contravene the provisions of the Swedish UCITS Act, other statutes, or the fund rules. The depositary furthermore verifies that management of the fund, and the subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions relating to the fund's assets are paid into the fund without delay. The depositary also monitors the fund's cash flows.

The depositary offers a wide range of financial services to customers and conducts financial activities on its own account. This means that conflicts of interest can arise. The depositary therefore has a system in place for handling conflicts of interest in the performance of its depository duties. The depositary is required to act solely in the interests of the unitholders and independently of the funds and the fund company. The depositary has procedures to identify, manage and monitor any conflicts of interest. To prevent conflicts of interest from arising, operations are segregated and, in cases where conflicts of interest cannot be avoided, internal rules are in place to ensure proper treatment of customers. Areas where conflicts of interest may arise are, for example, between the depositary's duties as the depositary and when the depositary is a counterparty to the fund company regarding other services such as trading in financial instruments. The current duties of the depositary, its activities and the conflicts of interest that may arise can be obtained from the fund company on request.

THIRD-PARTY ENGAGEMENTS

The fund company has entered into an agreement with Harvest Advokatbyrå AB for the provision of internal auditing services. An agreement has been entered into with C.A.G. for operation and security regarding IT systems.

The fund company has also entered into an agreement with *UI efa S.A.* for fund administration, including portfolio and unit ledger systems.

In addition, the fund management company has entered into agreements with external fund distributors regarding the distribution of the company's funds.

UNITHOLDER REGISTER

The fund company maintains a register of all unitholders and their holdings. The holdings of unitholders are reported in semi-annual and annual statements. The annual statement shows information for tax returns.

LIMITATION OF SUBSCRIPTION AND REDEMPTION ORDERS

Subscription and redemption orders regarding fund units cannot be limited.

RESEARCH COSTS

The fund company has a policy of allowing the funds to pay for research. However, for research costs to be paid by a fund, the following conditions is required to be met:

- Continuous evaluation of analysis partners is conducted,
- The benefit of the research is assessed to be equivalent to the cost,
- The research pertains to matters covered by the fund’s investment strategy, and
- The cost is reported in the fund as it arises.

Each fund’s unitholders are informed about the fee in Carnegie Fonder’s annual report under “Other Key Figures” and the cost is included in the calculation of each fund’s annual fee.

PARTICULAR INFORMATION: SECURITIES LENDING AND LENDING OF TRANSFERABLE SECURITIES

According to the fund rules, the funds have the option to lend transferable securities included in the fund to a third party (securities loans). If the fund lends securities, the fund requests collateral from the borrower for the lent securities. The fund is also paid for the loan through interest which, after deduction of administrative costs, accrues to the fund and thus increases fund return.

Securities loans may be made up to a maximum of 20% of fund assets, but if such lending occurs it is expected to be well below that level. Information about a fund's possible use of securities lending is provided in the fund's half-yearly and annual reports.

Securities lending exposes the fund to the risk that the borrower will not be able to return the lent securities. Risks also arise regarding the interpretation of securities lending agreements. Lent securities are transferred to the counterparty and cash received is kept in an account with the fund's depositary.

Carnegie Fonder has adopted a counterparty policy, which regulates which criteria are to be used to select counterparties and what must always be done to achieve optimal terms and conditions for the fund. Carnegie Fonder also has internal guidelines for acceptable collateral and valuation of collateral. Carnegie Fonder only accepts cash as acceptable collateral. The collateral received shall each day correspond to the value of the securities lent, plus a suitable collateral margin. Collateral received may not be reinvested or pledged. The ongoing management of collateral gives rise to operational risks.

ADJUSTED FUND UNIT VALUE

In order to ensure fair treatment of fund unit holders and to safeguard the common interests of fund unit holders, the fund company applies a method for determining an adjusted fund unit value (swing pricing). The fund company's board has established a swing pricing policy that sets the framework for the fund company's application of swing pricing.

The fund company applies swing pricing when calculating the subscription and redemption price for the following funds:

- Carnegie Investment Grade
- Carnegie Likviditetsfond
- Carnegie Obligationsfond
- Carnegie Strategifond

The basis for calculating the subscription and redemption price for the fund units in a fund is stated in the fund rules.

The purpose of calculating an adjusted fund unit value is to prevent a fund unit holder from bearing transaction costs due to the subscription and redemption of fund units in the fund carried out by other unit holders in the fund. The transaction costs referred to in this case are those that arise in situations where assets are bought or sold in the fund to manage requests for subscription or redemption of fund units in the fund, i.e., in the case of net inflows or net outflows.

The fund unit value is adjusted upwards or downwards if the fund has a net inflow or net outflow that exceeds a threshold value predetermined by the fund company, expressed as a percentage of the fund's value, hereinafter referred to as the threshold value. On days when the net flow does not exceed the threshold value, no adjustment of the fund unit value is made. The level of the threshold value is determined based on the fund company's assessment of what is considered a significant net flow for the fund.

The size of the adjustment of the fund unit value, hereinafter referred to as the adjustment factor, is determined by the fund company and may vary over time. The adjustment factor is determined taking into account direct or indirect costs and includes, where relevant, brokerage, spread, market impact, currency exchange costs, and transaction taxes.

The adjustment factor may amount to a maximum of 2 percent of the fund unit value.

The fund unit value shall, in accordance with the above, be determined as follows:

- In the event that the fund has a net inflow that exceeds the threshold value, the fund unit value shall be adjusted upwards by the adjustment factor determined by the fund company.
- In the event that the fund has a net outflow that exceeds the threshold value, the fund unit value shall be adjusted downwards by the adjustment factor determined by the fund company.
- In the event that the net flow in the fund does not exceed the threshold value, no adjustment of the fund unit value is made.

The example below shows the effect of applying an adjusted fund unit value in four different scenarios. Note that the figures are illustrative only.

Threshold value: 0.50%

Fund unit value: 100 SEK

Adjustment factor: 0.25%

Subscription / Redemption	Scenario 1: Net in flow 0,40%	Scenario 2: Net in flow 0,60%	Scenario 3: Net out flow 0,40%	Scenario 4: Net out flow 0,40%
Unit holder buys 1000 units	100 000 SEK	100 250 SEK	100 000 SEK	99 750 SEK
Unit holder sells 1000 units	100 000 SEK	100 250 SEK	100 000 SEK	99 750 SEK

The threshold value and adjustment factor are continuously evaluated by the fund company's swing pricing committee.

CESSATION OF THE FUND OR TRANSFER OF FUND OPERATIONS

If the fund company decides that a fund should cease or that fund management, following authorisation by Finansinspektionen, should be transferred to another fund company, all unitholders will be informed. If Finansinspektionen withdraws the fund company’s authorisation or if the fund company enters liquidation proceedings or is declared bankrupt, fund management shall immediately be taken over by the depositary.

MARKETING OF FUND UNITS IN OTHER EEA COUNTRIES

To comply with the requirements placed upon the fund company through legislation regarding marketing in another country within the EEA, the fund company has entered into the following distribution agreements:

- Netherlands SNS Reaal
- Norway: Nordnet, Skandiabanken, Skandinaviska Enskilda Banken AB (publ) Oslofilialen
- Finland: Aktia, Skandinaviska Enskilda Banken AB (publ) Helsingforsfilialen
- Luxembourg: Skandinaviska Enskilda Banken AB, publ Luxembourg Branch

These counterparties manage payments to unitholders and redemptions of units and provide information concerning the fund to unitholders in our stead.

TAX RULES

Tax Liability of the Fund

As of 2012, fund income is not taxable. Funds do, however, pay withholding tax on dividends received on their foreign equity holdings. The withholding tax varies from country to country. For reasons including legal uncertainty about the application of double taxation treaties and developments within the EU in the tax area, the withholding tax may be either higher or lower than the preliminary withholding tax deducted when the dividend is received.

Tax Liability of Fund Investors

A description of the rules that apply in connection with direct investments in funds follows. Other rules apply to deposits in investment savings accounts (Swedish “ISK”) or endowment insurance. Swedish unitholders pay income tax on an annual standardised income calculated on the value of fund units held at the beginning of the year, as well as on any profits and on any dividends received on fund units.

A standardised income of 0.40% is calculated on the value of fund holdings. The resulting sum is taxed as capital income at 30%. For legal persons, the standardised income is taxed as business income, currently at 22%. Income statements for tax purposes are issued for natural persons and estates taxable in Sweden, while legal persons must independently calculate the standardised income and pay the tax. The tax may be affected by individual circumstances and investors who have questions about possible tax consequences should seek expert advice.

Investment Savings Accounts (ISK)

Carnegie Fonder began offering investment savings accounts (Swedish “ISK”) on 17 September 2018. Information about ISKs, tax rules applicable to ISK and how to open an ISK is available on our website.

TORT LIABILITY

The fund company has a liability in accordance with Swedish UCITS Act (SFS 2004:46) Ch 2, § 21 for the Swedish UCITS managed by the fund company and in accordance with Swedish Alternative Investment Funds Act (2013:561) Ch 8, § 28-31 for the special funds managed by the fund company. These provisions stipulate that if a unit holder has suffered harm due to the fund company’s violation of the relevant law or fund regulations, the fund company must compensate for the damage.

The fund company shall not be held liable for loss or injury resulting from a legal enactment (Swedish or foreign), government intervention (Swedish or foreign), act of war, strike, blockade, boycott, lockout or other comparable circumstance. The reservation in respect of strike, blockade, boycott, and lockout applies whether the fund company initiates or is the target of such labour actions.

The fund company will not pay compensation for loss or injury that occurs under other circumstances if the fund company has observed a customary standard of care. The fund company shall not be liable under any circumstance for indirect loss or injury or for loss or injury caused by a custodian bank or other contractor engaged by the fund company with due care, or for any loss or injury arising by reason of restrictions in disposal that may be imposed on the fund company.

Where a circumstance as referred to in the first paragraph above prevents the fund company from taking measures, such measures may be deferred until the obstacle no longer exists.

The fund company adheres to the guidance provided by the Fondbolagens förening for handling compensation related to incorrect fund unit valuation, ensuring that shareholders negatively affected by a material error receive appropriate compensation.

REMUNERATION POLICY

The fund company’s Remuneration Policy is based on Finansinspektionen's regulations regarding Swedish UCITS (FFFS 2013: 9), Finansinspektionen's regulations regarding Alternative Investment Fund Managers (FFFS 2013: 10), and the EU Sustainable Finance Disclosure Regulation (SFDR) Article 5. The policy is adopted by the company's Board of Directors. Matters relating to the preparation of the policy and decisions made by the Board of Directors in connection therewith are prepared by a committee of the Board of Directors (the Remuneration Committee), which consists of the Board members Jan Bernhard Waage (Chairman) and Anders Antas. The Remuneration Committee meets at least twice a year. Detailed information on the company's remuneration policy and how remuneration and benefits are calculated and who is responsible for approving remuneration is documented on the company's website www.carnegiefonder.se in the tab *"About us"* and *"Legal information"*.

A printed copy of the information can be obtained free of charge on request, please contact the fund company.

AMENDMENT OF FUND RULES

The fund company is permitted to amend the fund rules. Amendments of fund rules are decided by the board of directors of the fund company. The decision of the board is subject to the approval of Finansinspektionen. Amendments to the fund rules may affect fund characteristics such as its investment strategy, fees and charges and risk profile.

RESELLERS

Carnegie Fonder has partnerships with a number of banks, insurance companies, online brokers and platforms in Sweden. The following partners offer the company's funds in their range. If you wish to invest in any of the funds, you may choose the bank or reseller through which you wish to invest from among those listed below.

Banks	Insurance Companies	Online Brokers	Platforms
Carnegie Investment Bank	Ancoria	Aktieinvest	Garantum
Danske Bank	Danica	Avanza	Strivo
Handelsbanken	Folksam	Fondmarknaden	MFEX
ICA Banken	Länsförsäkringar	Nordnet	Allfunds
Länsförsäkringar Bank	Movestic	Nordnet Norge	Pareto Securities Norge
Nordea	Skandinaviska Enskilda Banken	Sbanken	Trac Services AS
Skandinaviska Enskilda Banken	Skandia	Skandiabanken	
Sparebanken Syd	SPP		
Swedbank			
Ålandsbanken			
Sparebank1			
Norne Securities AS			

UNIT CLASSES

The unit classes in all categories below differ in terms of currency, initial subscription amount and management fee. For more information about each fund's unit classes, see the fund-specific section "Fund-level information".

- Accumulation - All returns are reinvested in the fund.
- Income - The return can be distributed in whole or in part to the unitholders.
- Institutional - Aimed at institutional investors, the unit class has a minimum amount for investment.

- Distribution - Reserved for investors who subscribe for units via distributors that, in accordance with an agreement with the fund company, do not receive retrocession fees from the fund company, in whole or in part.
- Distribution Norway - Reserved for investors who subscribe for units via distributors that, within the framework of their operations distribute the fund units on the Norwegian market, and which in accordance with the agreement with the fund company do not receive retrocession fees from the fund company for distribution on the Norwegian market. A prerequisite for investing in the unit class is that the holding is registered in an account in the distributor's name on behalf of the customer (nominee registration).

PERFORMANCE HISTORY

Per 31 Dec 2023	Return, %			
Alternative Funds	**1 year**	**3 years**	**5 years**	**10 years**
Carnegie Bear[1]	-12.4	-27.7	-52.4	-
Carnegie Bull[1]	28.5	50.0	137.2	-
Carnegie Global Plus A[2]	-	-	-	-
Equity Funds	**1 year**	**3 years**	**5 years**	**10 years**
Carnegie All Cap A[3]	14.8	21.9	103.2	-
Carnegie Fastighetsfond Norden A	16.8	-3.9	49.8	262.6
Jämförelseindex: Carnegie Real Estate Return	18.3			
Carnegie Global Quality Companies A[4]	15.8	37.7	86.7	-
Carnegie Global Quality Small cap A[5]	8.4	-	-	-
Carnegie Global Resilient Small Cap A[6]	-	-	-	-
Carnegie Indienfond A	14.5	39.4	66.6	295.7
Carnegie Listed Infrastructure A[7]	3.7	-	-	-
Carnegie Listed Private Equity A[8]	29.2	53.7	136.2	260.4
Carnegie Micro Cap[8]	5.0	-3.8	105.1	-
Carnegie Rysslandsfond A[10]	13.5	-80.9	-75.6	-72.1
Benchmark index: MSCI Russia 10/40 Net Total Return	-	-	-	-
Carnegie Small & Micro Cap[11]	-5.5	-12.4	39.8	113.3
Carnegie Småbolagsfond A	17.8	12.0	80.0	238.0
Carnegie SPAR Global[12]	14.9	-	-	-
Carnegie Spin-Off A[13]	15.9	10.4	68.7	131.5
Benchmark index: SIX Portfolio Return	17.2	27.3	98.8	191.8

	1 year	3 years	5 years	10 years
Carnegie Sverigefond A	19.8	29.8	86.5	176.6
Carnegie US Small & Micro Cap[14]	22.3	56.6	99.1	-
D&G Aktiefond[15]	13.1	14.3	69.8	133.9
D&G Global All Cap[16]	12.5	31.6	71.7	190.7
D&G Småbolag[17]	11.9	3.1	65.6	196.8
Fixed Income Funds	1 year	3 years	5 years	10 years
Carnegie Investment Grade A[18]	5.6	4.3	6.1	16.6
Carnegie Likviditetsfond A	4.3	4.2	4.9	6.1
Carnegie Obligationsfond A	5.4	-7.6	-4.4	12.4
Benchmark index: OMRX Treasury Bond Index	4.3	-9.2	-6.1	11.4
Mixed Funds	**1 year**	**3 years**	**5 years**	**10 years**
Carnegie Multi A[19]	9.1	11.2	-	-
Carnegie SPAR Balanserad[12]	11.2	-	-	-
Carnegie Strategifond A	14.1	23.6	67.5	135.4

1 As the fund started on 5 February 2015. sufficient data to report historical return at 10 years is not available. The fund was taken over by Carnegie Fonder AB from CAAM Fund Services AB effective 1 April 2023.
2 As the fund started on 26 August 2024 sufficient data to report historical return at 1. 3. 5 and 10 years is not available.
3 The fund changed its name from CF Tillväxt Sverige to Carnegie All Cap effective 1 April 2021.
4 The fund was taken over by Carnegie Fonder AB from CAAM Fund Services AB effective 1 April 2021. In connection with the takeover. the fund changed its name from OPM Global Quality Companies to Carnegie Global Quality Companies.
5 As the fund started on 1 December 2022. sufficient data to report historical return at 1. 3. 5 and 10 years is not available.
6 As the fund started on 30 November 2023 sufficient data to report historical return at 1. 3. 5 and 10 years is not available. The fund was taken over by Carnegie Fonder AB from Didner & Gerge Fonder AB effective 10 October 2024. In connection with the takeover. the fund changed its name from Didner & Gerge Resilient World Small Cap to Carnegie Global Resilient Small Cap.
7 As the fund started on 18 August 2018. sufficient data to report historical return at 1. 3. 5 and 10 years is not available. The fund was merged with the Carnegie Global fund effective 27 Jan 2022 through absorption of the net assets of Carnegie Global by Carnegie Listed Infrastructure.
8 The fund was taken over by Carnegie Fonder from CAAM effective 1 April 2021. In connection to the takeover. the fund changed its name from OPM Listed Private Equity to Carnegie Listed Private Equity.
9 Carnegie Micro Cap started 31 January 2017. sufficient data to report historical return at 10 years is not available.
10 The fund has been closed since 24 February 2022. The relevant benchmark index. MSCI Russia 10/40 Net Total Return Index has. given the market conditions in Russia. ceased to be calculated and there are no longer relevant benchmark indices available.
11 The fund was taken over by Carnegie Fonder AB from Didner & Gerge Fonder AB effective 10 October 2024. In connection with the takeover. the fund changed its name from Didner & Gerge Small and Micro Cap to Carnegie Small & Micro Cap.
12 As the fund started 15 September 2021. sufficient data to report historical return at 3. 5 and 10 years is not available.
13 As the fund changed its name and adjusted its investment strategy effective 21 October 2019 (previously Carnegie Sverige Select) historical returns were achieved under conditions that no longer apply.
14 As the fund started on 31 August 2016 sufficient data to report historical return at 10 years is not available. The fund was taken over by Carnegie Fonder AB from Didner & Gerge Fonder AB effective 10 October 2024. In connection with the takeover. the fund changed its name from Didner & Gerge US Small and Microcap to Carnegie US Small & Micro Cap.
15 The fund was taken over by Carnegie Fonder AB from Didner & Gerge Fonder AB effective 10 October 2024. In connection with the takeover. the fund changed its name from Didner & Gerge Aktiefond to D&G Aktiefond.
16 The fund was taken over by Carnegie Fonder AB from Didner & Gerge Fonder AB effective 10 October 2024. In connection with the takeover. the fund changed its name from Didner & Gerge Global to D&G Global All Cap.
17 The fund was taken over by Carnegie Fonder AB from Didner & Gerge Fonder AB effective 10 October 2024. In connection with the takeover. the fund changed its name from Didner & Gerge Småbolag to D&G Småbolag.
18 As the fund changed its name and adjusted its investment strategy effective 3 June 2019 (previously Carnegie Obligationsfond) historical returns were achieved under conditions that no longer apply.
19 As the fund started 4 March 2019. sufficient data to report historical return at 5 and 10 years is not available.

KEY DATA[1]

Per 31 Dec 2023	Relevant Benchmark Index for Calculation[1]	Active Risk (Tracking Error) %									
		2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Carnegie All Cap A[2]	*SIX Portfolio Return*	-	-	-	-	3.2	3.2	5.3	6.3	5.6	4.7
Carnegie Bear[3]	*Nasdaq OMX Stockholm 30 ESG Responsible Gross Index*	-	-	-	19.2	21.3	29.9	36.1	32.2	34.0	33.9
Carnegie Bull[3]	*Nasdaq OMX Stockholm 30 ESG Responsible Gross Index*	-	-	-	6.4	6.2	8.2	10.7	9.6	9.6	9.7
Carnegie Fastighetsfond Norden A	*Carnegie Real Estate Return*	3.6	2.7	3.4	3.0	2.6	3.3	4.0	4.0	4.5	3.9
Carnegie Global Plus A[4]	*MSCI World Climate Paris Aligned Index*	-	-	-	-	-	-	-	-	-	-
Carnegie Global Quality Companies A[5]	*MSCI World Net Total Return*	-	-	-	3.6	3.3	3.9	7.5	7.7	5.2	5.4
Carnegie Global Quality Small Cap A[6]	*MSCI World Small Cap Net Total Return USD Index*	-	-	-	-	-	-	-	-	-	-
Carnegie Global Resilient Small Cap A[7]	*MSCI World Small Cap Net Total Return USD Index*	-	-	-	-	-	-	-	-	-	-
Carnegie Indienfond A	*MSCI India 10/40 Net Total Return*	5.9	6.0	6.5	5.8	5.4	5.5	7.0	6.8	4.2	3.9
Carnegie Likviditetsfond A	*Nasdaq OMRX Treasury Bill*	0.2	0.2	0.3	0.2	0.2	0.2	1.3	1.3	0.5	0.6
Carnegie Listed Infrastructure A[8]	*MSCI World Infrastructure Net Total Return*	-	-	-	-	-	-	-	-	-	8.4
Carnegie Listed Private Equity A[5]	*LPX50 Listed Private Equity Index Total Return*	3.6	4.7	4.2	3.4	3.5	2.7	6.5	8.2	6.3	4.6
Carnegie Micro Cap[9]	*Carnegie Micro Cap Return*	-	-	-	-	-	7.2	8.8	8.5	8.6	9.5
Carnegie Obligationsfond A	*Nasdaq OMRX Treasury Bond*	0.5	0.5	0.7	0.6	0.5	0.4	0.5	0.7	1.4	1.7
Carnegie Rysslandsfond A[10]	*MSCI Russia 10/40 Net Total Return*	6.5	5.4	7.7	8.1	6.6	5.2	3.6	5.2	-	-
Carnegie Small & Micro Cap[11]	*MSCI Europe Small + Microcap TR Net*	-	-	4.4	4.3	6.1	7.5	12.0	10.7	7.5	8.9
Carnegie Småbolagsfond A	*Carnegie Small Cap Return*	5.0	6.2	7.0	5.9	6.0	6.7	6.0	6.0	7.8	8.6
Carnegie SPAR Balanserad[12]	*48% MSCI World Net Total Return. 12% SIX Portfolio Return. 40% Solactive SEK IG Credit*	-	-	-	-	-	-	-	-	-	2.4
Carnegie SPAR Global[12]	*80% MSCI World Net Total Return. 20% SIX Portfolio Return*	-	-	-	-	-	-	-	-	-	4.3

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

	Relevant Benchmark Index for Calculation[1]	Active Risk (Tracking Error) %									
Carnegie Spin-Off A	*SIX Portfolio Return*	3.5	4.7	5.1	4.1	3.8	6.8	5.2	5.4	6.2	7.0
Carnegie Sverigefond A	*SIX Portfolio Return*	2.6	3.4	3.6	3.3	2.6	3.7	3.7	3.8	6.0	5.7
Carnegie US Small & Micro Cap[13]	*MSCI USA Small Cap TR Net*	-	-	-	-	6.7	9.1	11.1	10.6	9.7	9.7
D&G Aktiefond	*SIX Portfolio Return*	4.4	4.6	4.3	3.7	4.6	5.6	7.0	6.6	5.6	5.8
D&G Global All Cap	*MSCI ACWI TR Net*	4.3	4.8	6.1	5.5	3.5	4.5	5.0	4.2	5.6	5.9
D&G Småbolag	*Carnegie Small Cap Return*	5.3	6.6	6.3	2.9	4.0	5.6	6.7	6.9	7.8	8.0

Per 31 Dec 2023	Relevant Benchmark Index	Active Share (Tracking Error) %									
		2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Carnegie All Cap A	*SIX Portfolio Return*	-	-	-	-	-	80	79	77	78	72
Carnegie Bear[14]	*Nasdaq OMX Stockholm 30 ESG Responsible Gross Index*	-	-	-	-	-	-	-	-	-	-
Carnegie Bull[14]	*Nasdaq OMX Stockholm 30 ESG Responsible Gross Index*	-	-	-	-	-	-	-	-	-	-
Carnegie Fastighetsfond Norden A	*Carnegie Real Estate Return*	-	-	-	-	34	34	41	33	28	34
Carnegie Global Quality Companies A[5]	*MSCI World Net Total Return*	-	-	86	86	85	84	87	87	86	83
Carnegie Global Quality Small Cap[6]	*MSCI World Small Cap Net Total Return*	-	-	-	-	-	-	-	-	99	99
Carnegie Indienfond A	*MSCI India 10/40 Net Total Return*	-	-	70	72	58	59	54	52	48	52
Carnegie Listed Infrastructure A	*MSCI World Infrastructure Net Total Return*	-	-	-	-	-	-	-	98	97	95
Carnegie Listed Private Equity A[5]	*LPX50 Listed Private Equity Index Total Return*	-	-	67	70	69	55	54	46	44	39
Carnegie Micro Cap	*Carnegie Micro Cap Return*	-	-	-	86	89	89	86	90	91	89
Carnegie Rysslandsfond A[5]	*MSCI Russia 10/40 Net Total Return*	-	-	61	68	65	48	54	55	-	-
Carnegie Småbolagsfond A	*Carnegie Small Cap Return*	-	-	84	87	87	86	88	91	93	88
Carnegie Spin-Off A	*SIX Portfolio Return*	-	-	70	70	71	77	82	88	91	86
Carnegie Sverigefond A	*SIX Portfolio Return*	-	-	61	60	61	61	61	64	63	58

1 The selected benchmark index is considered relevant as it aligns with the fund's investment strategy. The benchmark index is only used for calculating active risk (tracking error) and active share. Funds where there is no relevant benchmark index that aligns with the fund's investment strategy have not been added to the table.
2 As the fund started 10 February 2016 sufficient data to report active risk before 2018 is not available since the calculation is based on a 24-month period.
3. As the fund started 5 February 2015 sufficient data to report active risk before 2017 is not available since the calculation is based on a 24-month period.
4 As the fund started 26 August 2024 sufficient data to report active risk (tracking error) is not available.
5 The fund changed the benchmark on 1 April 2021. All historical data has been calculated based on this benchmark.
6 As the fund started 1 December 2022 sufficient data to report active risk (tracking error) is not available.
7 As the fund started 30 November 2023 sufficient data to report active risk (tracking error) is not available. The fund changed the benchmark on 10 October 2024. All historical data has been calculated based on this benchmark.
8 As the fund started 18 August 2021 sufficient data to report active risk before 2023 is not available since the calculation is based on a 24-month period.
9 As the fund started 31 January 2017 sufficient data to report active risk before 2019 is not available since the calculation is based on a 24-month period.
10 The fund has been closed since 24 February 2022. The relevant benchmark index. MSCI Russia 10/40 Net Total Return Index has. given the market conditions in Russia. ceased to be calculated and there are no longer relevant benchmark indices available.
11 As the fund started 28 August 2014 sufficient data to report active risk before 2016 is not available since the calculation is based on a 24-month period
12 As the fund started 17 September 2021 sufficient data to report active risk before 2023 is not available since the calculation is based on a 24-month period.
13 As the fund started 31 August 2016 sufficient data to report active risk before 2023 is not available since the calculation is based on a 24-month period.
14 Active share is not calculated for the fund.

CHARGES: ACTIVE UNIT CLASSES

	Management Fee. %		Ongoing Charge. %	Entry Charge. %		Exit Charge. %	
Alternative Funds	**Applicable**	**Maximum**	**Ongoing Charge**	**Applicable**	**Maximum[1]**	**Applicable**	**Maximum[1]**
Carnegie Bear	0.95	0.95	0.97		0.05		0.05
Carnegie Bull	0.95	0.95	0.97		0.05		0.05
Carnegie Global Plus	0.80	0.85	-[2]				
	Management Fee. %		**Ongoing Charge. %**	**Entry Charge. %**		**Exit Charge. %**	
Equity Funds	**Applicable**	**Maximum**	**Ongoing Charge**	**Applicable**	**Maximum[1]**	**Applicable**	**Maximum[1]**
Carnegie All Cap A[3.4]	1.35	1.50	1.36	-	-	-	-
Carnegie All Cap H	0.95	1.15	0.97	-	-	-	-
Carnegie Fastighetsfond Norden A	1.60	1.75	1.64	-	-	-	-
Carnegie Fastighetsfond Norden B	0.80	0.80	0.85	-	-	-	-
Carnegie Fastighetsfond Norden C	1.60	1.75	1.65	-	-	-	-
Carnegie Fastighetsfond Norden F	0.80	0.90	0.85	-	-	-	-
Carnegie Fastighetsfond Norden G	1.20	1.40	1.24	-	-	-	-
Carnegie Global Quality Companies A	1.40	1.45	1.40	-	-	-	-
Carnegie Global Quality Companies B	0.80	0.85	0.80	-	-	-	-
Carnegie Global Quality Small Cap A	1.40	1.45	1.40	-	-	-	-

	Management Fee. %		Ongoing Charge. %	Entry Charge. %		Exit Charge. %	
	Applicable	Maximum	Ongoing Charge	Applicable	Maximum[1]	Applicable	Maximum[1]
Carnegie Global Resilient Small Cap A	1.40	1.60	1.40	-	-	-	-
Carnegie Global Resilient Small Cap B	0.98	1.12	1.00	-	-	-	-
Carnegie Global Resilient Small Cap C	0.84	0.96	0.90	-	-	-	-
Carnegie Global Resilient Small Cap D	0.70	0.80	0.70	-	-	-	-
Carnegie Indienfond A	2.20	2.20	2.23	-	1.00	-	1.00
Carnegie Listed Infrastructure A	1.40	1.50	1.41	-	-	-	-
Carnegie Listed Infrastructure C	0.85	0.85	0.86	-	-	-	-
Carnegie Listed Infrastructure E	0.75	0.80	0.73	-	-	-	-
Carnegie Listed Infrastructure F	1.00	1.20	1.01	-	-	-	-
Carnegie Listed Private Equity A	1.50	1.50	1.51	-	-	-	-
Carnegie Listed Private Equity B	0.80	0.85	0.81	-	-	-	-
Carnegie Listed Private Equity E	0.75	0.90	0.77	-	-	-	-
Carnegie Listed Private Equity F	1.10	1.30	1.11	-	-	-	-
Carnegie Micro Cap	2.00	2.00	2.03	-	-	-	-
Carnegie Rysslandsfond A	2.50	2.50	-[5]	-	-	-	-
Carnegie Rysslandsfond C	2.00	2.00	-[5]	-	-	-	-
Carnegie Small & Micro Cap	1.60	1.60	1.70	-	-	-	-
Carnegie Småbolagsfond A	1.60	1.60	1.63	-	-	-	-
Carnegie SPAR Global	1.60	1.65	1.61	-	-	-	-
Carnegie Spin-Off A[6]	1.00[2]	1.05	1.04	-	-	-	-
Carnegie Spin-Off B	1.50	1.55	1.53	-	-	-	-
Carnegie Spin-Off C	1.50	1.55	1.53	-	-	-	-
Carnegie Sverigefond A	1.40	1.50	1.42	-	-	-	-
Carnegie Sverigefond B	0.90	1.05	0.92	-	-	-	-
Carnegie Sverigefond C	0.90	1.05	0.92	-	-	-	-
Carnegie US Small & Micro Cap	1.60	1.60	1.60	-	-	-	-
D&G Aktiefond	1.22	1.50	1.50	-	-	-	-
D&G Global All Cap	1.60	1.60	1.80	-	-	-	-
D&G Småbolag	1.40	1.60	1.70	-	-	-	-

Fixed Income Funds	Management Fee. %		Ongoing Charge. %	Entry Charge. %		Exit Charge. %	
	Applicable	Maximum	Ongoing Charge	Applicable	Maximum[1]	Applicable	Maximum[1]
Carnegie Investment Grade A	0.50	0.55	0.50	-	-	-	-
Carnegie Investment Grade B	0.50	0.55	0.50	-	-	-	-
Carnegie Investment Grade D	0.50	0.55	0.50	-	-	-	-
Carnegie Investment Grade E	0.25	0.30	0.25	-	-	-	-
Carnegie Investment Grade G	0.25	0.35	0.25	-	-	-	-
Carnegie Investment Grade H	0.30	0.35	0.30	-	-	-	-
Carnegie Likviditetsfond A	0.30	0.60	0.30	-	-	-	-
Carnegie Likviditetsfond B	0.13	0.30	0.13	-	-	-	-
Carnegie Obligationsfond A	0.50	0.50	0.50	-	-	-	-
Carnegie Obligationsfond B	0.08	0.08	0.08	-	-	-	-

Mixed Funds	Management Fee. %		Ongoing Charge. %	Entry Charge. %		Exit Charge. %	
	Applicable	Maximum	Ongoing Charge	Applicable	Maximum[1]	Applicable	Maximum[1]
Carnegie Multi A	1.40	1.55	1.58	-	-	-	-
Carnegie SPAR Balanserad A	1.60	1.65	1.67	-	-	-	-
Carnegie Strategifond A	1.50	1.60	1.51	-	-	-	-
Carnegie Strategifond D	1.50	1.60	1.51	-	-	-	-
Carnegie Strategifond G	0.90	1.00	0.91	-	-	-	-
Carnegie Strategifond H	1.05	1.15	1.06	-	-	-	-

1 Carnegie Fonder does not apply entry or exit charges. The fund rules for Carnegie Indienfond state that the fund company has the option to apply entry and exit charges but does not do so in practice.
2 As the fund started 26 August 2024 there is not sufficient data to calculate the ongoing costs.
3 Note that the maximum management fee for the unit class was lowered from SEK 1.75 to SEK 1.50 effective 1 April 2021.
4 Note that the fund changed its name from CF Tillväxt Sverige to Carnegie All Cap effective 1 April 2021.
5 The Fund has been closed since 24 February 2022. No ongoing costs have been charged during the period.
6 A performance-based fee is charged in addition to ongoing charges. The performance-based fee is capped at 20% of daily return above the fund’s hurdle rate. See Appendix 1 for a definition of “hurdle rate”. The total of the ongoing charge and the performance-based fee is capped at 3% of the 2020 value of the unit class. See Appendix 1 for a sample calculation of the performance-based fee. See the fund rules in the sections on each fund for further information about the fee structure.

FUND-LEVEL INFORMATION

CARNEGIE MULTI

INVESTMENT STRATEGY

The fund is a fund of funds, which means that it invests its assets substantially in units in other funds and UCITS. The fund invests without restriction regarding company, sector or geography. The fund has a global focus but with significant Nordic elements, which means that at least 25% of the fund's assets will be directly or indirectly invested in financial instruments issued by companies based in the Nordic region or their wholly owned subsidiaries, or in financial instruments that are admitted to trading or frequently traded on a regulated market or multilateral trading facility (MTF) in the Nordic region. The fund is actively managed, which means that the holdings in the fund are selected based on an assessment of the funds that are considered to have the best prospect of maximising the long-term return considering the fund's risk level.

The fund's proportions of equity funds, fixed income funds and alternative funds may vary over time depending on the market situation. Alternative funds means funds, including hedge funds, that directly or indirectly allow elements of commodities, real estate or exposures other than equities or fixed income that are permitted by an investment fund and that are intended to have diversifying properties for the fund.

At least 90% of the fund's assets will at all times be invested in other funds. The fund may invest in both funds managed by Carnegie Fonder and funds managed by another fund company or UCITS management company. At least 50% of the fund's assets should always be invested in funds managed by Carnegie Fonder.

The objective of the fund is to generate a positive return over a period of approximately seven years with a lower volatility than the global stock market.

The fund's assets may be invested in the following asset classes: fund units (including exchange-traded funds, ETFs), transferable securities, money market instruments, derivatives, and accounts with credit institutions. The fund may invest in OTC derivatives and may use currency derivatives to hedge its holdings in whole or in part. The fund may enter into securities lending agreements.

The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

INTENDED INVESTOR

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – NOK, Accumulation
- C – SEK, Accumulation Distribution
- D – NOK, Accumulation Distribution

When the fund invests in another fund or UCITS management company managed by Carnegie Fonder, the fund is compensated for the fixed management fee that the fund pays for the underlying fund. This is done by Carnegie Fonder repaying amounts corresponding to the management fee paid to the fund, which means that no fixed management fee is paid for underlying funds in these cases. If any performance-based fee is deducted from an underlying fund or UCITS management company, this is also repaid to the fund.

When the fund invests in funds managed by a fund company or UCITS management company other than Carnegie Fonder, the fixed management fee in the underlying fund or UCITS management company may not exceed 3% after considering any part of the management fee reimbursed to the fund. The performance-based management fee in the underlying fund or UCITS management company may not exceed 30% of the excess return in relation to the benchmark parameter of the fund or the UCITS management company.

RISK PROFILE

The fund largely invests its assets in funds with investments in the global capital markets but with a Nordic focus. These markets are both mature and transparent. The fund is also able to invest its assets in emerging markets, which are not as developed in terms of, for example, legislation that protects investors' rights. The financial infrastructure is also often less well developed than we are used to in the West.

The fund is able to invest freely, irrespective of sector and region, which gives the opportunity to spread the risk but can also mean that the fund has concentrated investments in a certain industry or region, which in that case normally increases the risk. Investments in funds and other financial instruments made abroad are usually unhedged in local currency, which means that fund assets are affected by exchange rate movements of local currencies against SEK. It is also possible to vary the fixed income proportion of the fund assets, which reduces the volatility of NAV per unit.

To the extent that derivatives are used, this can be done as part of the investment strategy, with the aim of increasing returns or with the aim of reducing costs and risks in the fund. Investments in derivatives can mean that the fund's sensitivity to market changes increases.

Fund assets are invested in liquid assets that can be sold in the event of redemptions. The funds that the fund intends to invest in are expected to have good liquidity even under extreme market conditions, but a number of emerging markets are not as well developed, which means that liquidity in these markets may sometimes be deficient. However, investments in emerging markets are considered limited.

The fund may suffer losses due to counterparty risk, which refers to the risk that a counterparty is unable to fulfil its obligations in accordance with the agreed terms for a securities transaction, such as failing to deliver securities or cash. Cash and cash equivalents are deposited with an external bank, which entails intrinsic credit risk, but this risk must be considered very low.

The fund may also suffer losses in the event that an issuer is unable to fulfil its obligations to bondholders. To minimise this credit risk, there are established frameworks for exposure to any individual issuer.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE MULTI SUSTAINABILITY DISCLOSURES

Product name: Carnegie Multi
Legal entity identifier: 549300O767I2OXC14421

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by investing in funds that raise capital and create financing for companies that meet or exceed Carnegie Fonder’s sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund’s investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company’s enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - Careful analysis of every holding from an ESG perspective prior to investing

- o Excluding companies that do not meet the standards
- o Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in funds that contribute to UN SDGs through their investments, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds (indirectly via investments in funds).
3. Share of fund assets invested in companies (indirectly via investments in funds) whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in companies (indirectly via investments in funds) with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
6. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
7. Number of advocacy dialogues held with investee companies.
8. Share of fund assets invested in companies (indirectly via investments in funds) that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments. For investments in funds, Carnegie Fonder ensures that the fund manager applies an equivalent process to the fund's investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

For investments in funds, it is ascertained that the fund manager considers the individual investment's principal adverse impacts on sustainability factors and that the fund manager's exclusion policy is aligned with Carnegie Fonder's policy.

CARNEGIE FONDER

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

For other funds that are not managed by Carnegie Fonder, it is ascertained that the fund manager's exclusion policy is aligned with Carnegie Fonder's policy regarding companies in breach of norms according to the UN Guiding Principles on Business and Human Rights.

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,

Carnegie Fonder ascertains that all investments consider principle adverse impacts. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO_2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors

7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

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

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

- The investment is made in a bond whose proceeds are used for sustainable investments as they are classified in the EU Green Bond Standard or Green, Social and Sustainable Bonds in accordance with ICMA Bond Principles. The fund may also invest in bonds linked to clear sustainability objectives, such as Sustainability-linked bonds, but these must satisfy the criteria according to the two items above.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

   For other funds that are not managed by Carnegie Fonder, the strategy is to select Article 9 funds or Article 8 funds that satisfy the requirements above.

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 following binding elements of the investment strategy are used:

1. The fund places at least 10% of its investments in sustainable investments, measured as the minimum rates of sustainable investments of the investee funds.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies in funds managed by Carnegie Fonder.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management, including holdings in investee funds, shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

For funds managed by Carnegie Fonder, this entails compliance with the fund company's Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
   - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.

- "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).

Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies or credits issued by companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

Regarding investments in funds that are not managed by Carnegie Fonder, it is ascertained that the fund's exclusion policy is aligned with Carnegie Fonder's policy and that the funds' corporate governance policies uphold high standards.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

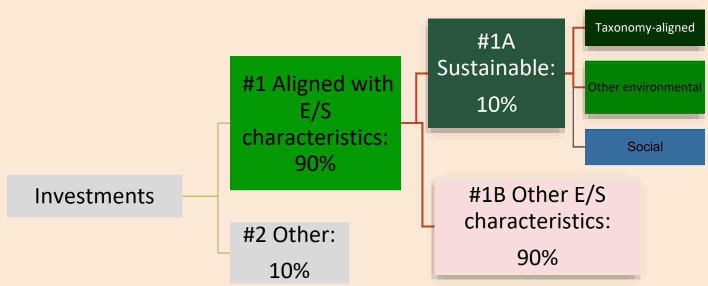
#1. All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

#1A. A minimum share of 10% of these investments have environmental or social objectives:

- Within this 10%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

#1B. The remaining maximum share of 90% covers investments that are aligned with the environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Any use of derivatives by the fund is intended solely for the purposes of increasing liquidity and/or minimising risk and derivatives are not used as part of the investment strategy. We impose the same requirements for funds managed by other Investments fund managers.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

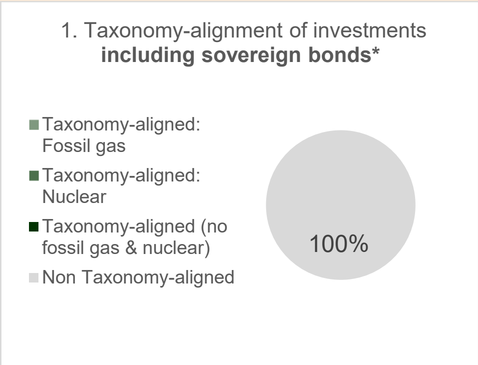
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

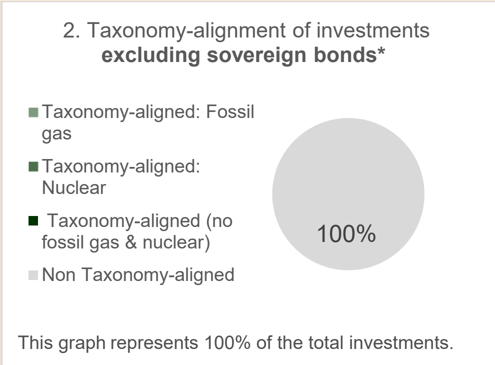
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/multi-a-2/

CARNEGIE MULTI FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Multi. The fund is a UCITS fund as defined under the Swedish UCITS Act (2004:46). The fund is operated in accordance with these fund rules, the articles of association of the fund company, the UCITS Act and other applicable regulations.

The assets of the fund are owned jointly by the fund unitholders and each unit in a unit class confers equal rights to the assets that make up the fund.

Unitholders are not liable for obligations referring to the fund. The fund cannot acquire rights or assume obligations. Nor can the fund institute legal proceedings before a court of law or other public authority. Property included in the fund is not subject to seizure. The fund company (defined in § 2) represents unitholders in all matters concerning the fund, takes decisions concerning the property included in the fund and exercises the rights derived from the property.

The fund has the following unit classes:

- A – SEK
- B – NOK
- C – SEK, Distribution
- D – NOK, Distribution

The unit classes differ with regard to currency, distribution channel and management fees.

The unit classes are accumulation (do not pay dividends), which means that fund returns are continuously reinvested.

NAV per unit is calculated in the currency in which the unit class is denominated.

Unless otherwise specifically stated, the content of the fund rules is common for all unit classes. All unit classes confer equal rights to the property included in the fund.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund’s unitholder register – transfer the investor to another unit class, whose terms and conditions the investor fulfils. If the investor is eligible for more than one unit class, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as the “fund company”.

§ 3 Depositary and its Function

The depositary for the fund’s assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund’s assets and implements the fund company’s instructions concerning the fund provided these do not contravene the UCITS Act, other statutes or the fund rules. The depositary further verifies that fund management and subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions arising from the assets of the fund are paid into the fund without delay. The depositary also monitors the fund's cash flows.

§ 4 Fund Characteristics

The fund is a fund of funds (see § 7) that through investment in equity funds, fixed income funds and alternative funds, as well as other financial instruments, aims to create a positive return over a period of approximately seven years with a lower volatility than the global stock market (comprising companies included in the MSCI World AC index or an index with corresponding composition).

The fund has a global focus but with significant Nordic elements (see § 5). The fund invests with no restrictions as to sector or specific country.

§ 5 Investment Strategy

The fund may invest its assets in fund units, transferable securities, money market instruments, derivative instruments, and accounts with credit institutions.

The underlying assets of derivative instruments may comprise or relate to such assets referred to in the UCITS Act Ch 5, § 1, second paragraph, first sentence, financial indices, interest rates, exchange rates or foreign currencies.

At least 90% of the fund's assets shall be invested in other funds at all times. The fund's units in equity funds or other equity-related instruments or fixed income funds or other interest-related financial instruments, as well as alternative funds or other financial instruments with alternative exposure, may vary over time depending on market conditions. Alternative funds refer to funds with alternative exposure (see definition below) that meets the criteria set forth in the UCITS Act Ch 5, § 15, or units in closed-end funds that satisfy the criteria for transferable securities. Over time it is estimated that 10-60% of fund's NAV will be invested in equity funds or other equity-related financial instruments, 10-80% in fixed income funds or other interest-related financial instruments, and 0-60% in mixed funds or alternative funds and other financial instruments with alternative exposure. Alternative exposure refers to exposure through funds or other permitted asset classes that directly or indirectly allow elements of commodities, real estate or exposures other than equities or fixed income that are permitted for a UCITS fund and that are intended to have diversifying properties for the fund.

"Significant Nordic elements" means that at least 25% of the fund's assets will be directly or indirectly invested in financial instruments issued by companies based in the Nordic region or their wholly owned subsidiaries, or which are admitted to trading or frequently traded on a regulated market or multilateral trading facility (MTF) in the Nordic region.

The fund may invest in both funds managed by Carnegie Fonder and funds managed by another fund company or UCITS management company. At least 50% of the fund's assets should always be invested in funds managed by Carnegie Fonder.

§ 6 Marketplaces

Subscriptions and redemptions of fund units are carried out directly with the respective fund company, management company, AIF manager or UCITS management company. The fund's trade in other financial instruments and exchange traded funds (ETFs) may take place on a regulated market within the EEA or equivalent market outside the EEA. Trading is also permitted on other markets within or outside the EEA that are regulated, open to the public and covered by the fund's investment strategy as set forth in § 5.

§ 7 Special Investment Strategy

The fund’s assets may also be invested in transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5 up to a maximum of 10% of the fund’s NAV.

The fund’s investment strategy means that it invests fund assets substantially in units of other investment funds and UCITS management companies. The fund is a fund of funds that invests at least 90% of its assets in other funds.

The fund may invest in derivative instruments as part of its investment strategy. Derivative instruments may also be used to improve management efficiency with the intention of reducing risk and costs, as well to increase returns and generate leverage.

The fund may invest in OTC derivatives as referred to in the UCITS Act Ch 5, § 12, paragraph 2.

The fund may use such techniques and instruments as referred to in Ch 25, § 21 of Finansinspektionen’s regulations regarding Swedish UCITS (FFFS 2013:9) to increase the return and generate leverage in the fund.

The fund may enter into securities lending agreements.

§ 8 Valuation

The fund’s net asset value (NAV) is calculated by deducting liabilities relating to the fund from its assets. The NAV per unit in a particular unit class is the value of the unit class divided by the number of outstanding fund units in that particular unit class. NAV per unit is calculated each bank day and forms the basis for establishing the subscription and redemption prices for trade in fund units. In the daily valuation, the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate NAV per unit if the fund is closed for subscriptions or redemptions. If there are large value changes in the financial instruments included in the fund, NAV per unit may be established several times during the day.

The fund’s assets are calculated as follows:

- Financial instruments are valued at the current market value (last price paid or, if this is not available, last bid price).
- Cash and cash equivalents and current receivables, in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold are included at the amount expected to be received.
- For transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for this special valuation includes market prices from unapproved exchanges or market makers, other financial instruments or indices adjusted for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (net present value) or share of net asset value (financial statement valuation).

For all assets, associated rights in the form of interest, dividends, issue rights and similar are considered.

The liabilities of the fund are calculated as follows:

- Accrued management fees to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

For derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2 (OTC derivatives), a market value is established as follows:

- Market prices from an active market

If such market prices cannot be obtained, the market value shall be established using one of the methods below:

- Based on the market value of the component assets/constituents
- Based on recently completed transactions between knowledgeable, willing parties in an arm's length transaction, if these are available, or
- The use of market prices from an active market for another financial instrument that is substantially identical
- If market prices cannot be established using one of the options above, or are obviously misleading, the applicable market value shall be established through the use of a valuation method generally accepted on the market, such as option valuation models such as Black & Scholes.

The valuation is conducted individually for each unit class.

§ 9 Subscriptions and Redemptions

The fund is normally open for the subscriptions and redemptions of fund units on all bank days. The fund is, however, not open for subscriptions and redemptions on bank days when the fund's assets cannot be valued in a manner that ensures the equal rights all unitholders due to the partial or full closure of one or more of the marketplaces on which the fund trades.

Requests to subscribe for fund units must be made in writing to the fund company. Subscriptions of fund units are made at the price established on the date cash become available to the fund company.

Unitholders are responsible for ensuring that the application is duly signed, that the correct bank account number has been provided and that other documents required by the fund company at any given time, and which are available on the fund company's website, have been provided to the fund company or another recipient as instructed by the fund company.

Requests to redeem fund units shall be made in writing to the fund company. Redemption shall be executed at the NAV per unit established on the redemption date. Redemptions are executed immediately only to the extent possible without requiring the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. Redemption takes place as soon as cash from sales has been received. The subscription and redemption prices correspond to the latest calculated NAV per unit at the time the order is executed. The procedures described above mean that subscription/redemption takes place at a price unknown to the unitholder at the time the subscription/redemption is requested. Information about subscription and redemption prices is available from the fund company or intermediary institution no later than the bank day following the bank day on which NAV per unit is established as above.

Unit classes C and D are reserved for investors who subscribe for units through distributors which, under an agreement with the fund company, wholly or partly, do not accept retrocession fees from the fund company and which are paid directly by their customers when the distributor provides the investment service in connection with the subscription of units. A prerequisite to be eligible to invest in unit classes C and D is that the holding is registered on one or more accounts in the distributor's name of behalf of the client (nominee registration).

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if there exist extraordinary circumstances that prevent valuation of the fund's assets in a manner that ensures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund's assets to the fund company for its management of the fund. In addition, fees shall be paid to the depositary for its activities as the depositary as well as expenses for auditing and payments to Finansinspektionen for supervision. The total charges for unit classes A and B shall not exceed 1.55% annually of the fund's NAV. The total charges for unit classes C and D may not exceed 1.15% annually of the fund's NAV.

The costs of purchase and sale of financial instruments, including but not limited to brokerage, registration costs, taxes and transaction fees to the depositary, as well as payments to suppliers of research services and comparable services, will be charged to the fund. Where required by law, value added tax will be additional on all payments.

Costs and payments are charged to the fund as they are incurred.

Unitholders are hereby made aware that the fund is charged with management fees paid to the managers of the funds in which Carnegie Multi invests. The Carnegie Multi prospectus contains information about the maximum ongoing charges and performance-based fees that may be charged for the management of the funds in whose units or shares Carnegie Multi invests its assets.

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-yearly reporting period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the depositary and shall be sent to those unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules must be submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfer

Fund units may be transferred or pledged. In conjunction with the pledge of fund units that are not nominee registered, the pledging party and/or pledge holder must notify the fund company in writing in respect thereof.

The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge
- The identity of the owner of the fund units

The fund company shall notify the unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the management company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

Transfers of fund units must be notified in writing to the fund company. Unitholders are responsible for ensuring that the notice has been duly signed. Notices of transfers must state (i) the identity of the transferor, (ii) the identity of the transferee and (iii) the purpose of the transfer. Transfers of fund units are subject to the consent of the fund company and will be approved only if the transferee assumes the transferor's acquisition cost for each fund unit.

§ 16 Limitation of Liability

The fund company or the depositary shall not be liable for damage arising as a consequence of Swedish or foreign legislation, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether the fund company or the depositary initiates or is the target of such a labour action. Nor shall the fund company or the depositary pay compensation for losses arising in other cases if the fund company or depositary has observed customary prudence. The fund company or the depositary shall not be liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If the fund company or the depositary is prevented from making or receiving payment as a consequence of such circumstance the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest will be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this section, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Neither the fund company nor the depositary is liable for loss caused by a - Swedish or foreign - stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities that provide equivalent services, nor other third parties engaged with due care by the fund company or the depositary. The same shall apply to loss caused by the insolvency of the aforementioned organisations or third parties. The depositary is not responsible for engaged parties instructed by the fund company. Nor will the fund company or the depositary be liable for loss incurred by the fund, unitholders, or other parties by reason of restrictions upon disposition that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the management company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund company and the depositary is regulated under the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of such a unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or ordinance or that the fund company has by reason of a unitholder's subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE SPAR BALANSERAD

INVESTMENT STRATEGY

The aim of the fund is to generate high long-term returns at lower risk than dedicated equity funds through investments in equities without restrictions as to company or sector and in fixed income funds.

The fund may invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions.

With regard to the equity component, the fund may invest its assets in global and Swedish equities with no restrictions as to company or sector.

With regard to the fixed income-related component, the fund may invest its assets in fixed income funds that invest in Nordic or Nordic-related financial instruments.

The proportions of equity-related financial instruments and fixed income funds in the fund may vary depending on market conditions, but the share of equity-related financial instruments is an estimated 50-70% over time.

The fund’s assets may be invested in derivative instruments whose underlying assets consist of or are related to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation

When the fund invests in another fund or UCITS management company managed by Carnegie Fonder, the fund is compensated for the fixed management fee that the fund pays for the underlying fund. This is done by Carnegie Fonder repaying amounts corresponding to the management fee paid to the fund, which means that no fixed management fee is paid for underlying funds in these cases. If any performance-based fee is deducted from an underlying fund or UCITS management company, this is also repaid to the fund.

When the fund invests in funds managed by a fund company or UCITS management company other than Carnegie Fonder, the fixed management fee in the underlying fund or UCITS management company may not exceed 3% after considering any part of the management fee reimbursed to the fund. The performance-based management fee in the underlying fund or UCITS management company may not exceed 30% of the excess return in relation to the benchmark parameter of the fund or the UCITS management company.

RISK PROFILE

The fund invests its assets in both the Swedish and the global capital markets, including emerging markets that are not as advanced in terms of legislation that protects the rights of investors.

There are no restrictions on fund investments as regards companies, sectors, or geographies, which provides opportunity to spread risks Equity investments are made in local currencies and are not hedged; fund assets are therefore affected by changes in the exchange rates of local currencies against SEK.

Certain operational risks arise because fund assets can be invested in emerging markets. For example, the protection of non-controlling interests may be limited and equal treatment of all shareholders cannot always be assumed. Insider trading regulations may be deficient. Accounting standards are still under development in certain markets and are not comparable to western standards. The supply, quality and reliability of company information and research material is sometimes of low quality, which increases the uncertainty about the value of assets.

To the extent that derivatives are used, this can be done as part of the investment strategy, with the aim of increasing returns or with the aim of reducing costs and risks in the fund. Investments in derivatives can mean that the fund's sensitivity to market changes increases.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations, such as to deliver securities or cash in accordance with the contractual conditions of a securities transaction.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

Investing in a fund is always associated with both opportunities and risks. Money invested in funds can both increase and decrease in value depending on market developments and it is not certain that the entire invested capital will be recovered. Past returns are not a guarantee of future returns.

CARNEGIE SPAR BALANSERAD SUSTAINABILITY DISCLOSURES

Product name: Carnegie SPAR Balanserad
Legal entity identifier: 549300ZH8IMI028YXY13

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by investing in equities and funds that raise capital and create financing for companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards
   - Influencing holdings in the right direction as regards E and S.
3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies that contribute to UN SDGs, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds (directly or indirectly via investments in funds).
3. Share of fund assets invested in companies (directly or indirectly via investments in funds) whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in companies (directly or indirectly via investment in funds) with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
6. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
7. Number of advocacy dialogues held with investee companies.
8. Share of fund assets invested in companies (directly or indirectly via investments in funds) that have committed to having or have already had their climate targets approved by Science Based Targets initiative.

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

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments. For investments in funds, Carnegie Fonder ensures that the fund manager applies an equivalent process to the fund's investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the company or its credits would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

For investments in funds, it is ascertained that the fund manager considers the individual investment's principal adverse impacts on sustainability factors and that the fund manager's exclusion policy is aligned with Carnegie Fonder's policy.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

For other funds that are not managed by Carnegie Fonder, it is ascertained that the fund manager's exclusion policy is aligned with Carnegie Fonder's policy regarding companies in breach of norms according to the UN Guiding Principles on Business and Human Rights.

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,

Carnegie Fonder ascertains that all investments consider principle adverse impacts. Carnegie Fonder applies three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy

6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

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

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investment is made in a bond whose proceeds are used for sustainable investments as they are classified in the EU Green Bond Standard or Green, Social and Sustainable Bonds in accordance with ICMA Bond Principles. The fund may also invest in bonds linked to clear sustainability objectives, such as Sustainability-linked bonds, but these must satisfy the criteria according to the two items above.

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

   For other funds that are not managed by Carnegie Fonder, the strategy is to select Article 9 funds or Article 8 funds that satisfy the requirements above.

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 following binding elements of the investment strategy are used:

1. The fund invests at least 30% of fund assets in sustainable investments, which are assessed as one of the following.
   - The fund's holdings in investee companies whose turnover related to the UN SDGs exceeds 25%.
   - The fund's holdings in underlying funds, measured as its minimum rate for sustainable investments.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies in funds managed by Carnegie Fonder.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management, including holdings in investee funds, shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

For funds managed by Carnegie Fonder, this entails compliance with the fund company's Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.

- "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
- "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies or credits issued by companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

   - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
   - The fund manager contacts the holding to discuss our concerns.
   - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
   - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

Regarding investments in funds that are not managed by Carnegie Fonder, it is ascertained that the fund's exclusion policy is aligned with Carnegie Fonder's policy and that the funds' corporate governance policies uphold high standards.

What is the asset allocation planned for this financial product?

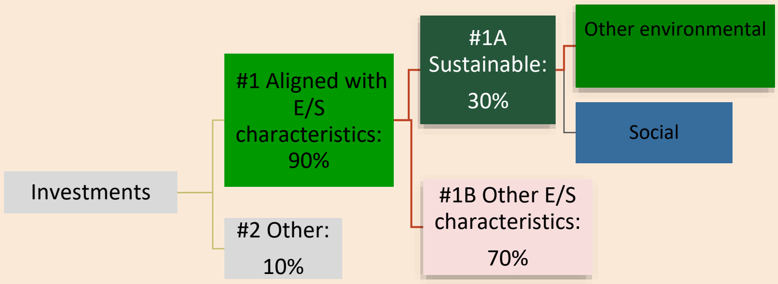
#1. All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

Asset allocation describes the share of investments in specific assets.

#1A. A minimum share of 30% of these investments have environmental or social objectives:
- Within this 30%, the minimum share of investments that Taxonomy-aligned is currently 0% (see explanation in the section below). There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them (thus 0 -100%).

1B. The remaining maximum share of 70% covers investments that are aligned with the environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Any use of derivatives by the fund is intended solely for the purposes of increasing liquidity and/or minimising risk and derivatives are not used as part of the investment strategy. We impose the same requirements for funds managed by other Investments fund managers.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

☐ Yes:

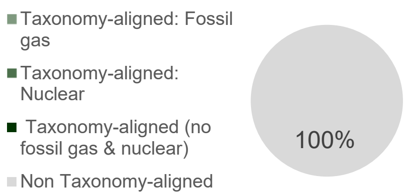
☐ In fossil gas ☐ In nuclear energy

☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

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

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



This graph represents 100% of the total investments.

* *For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures.*

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-spar-balanserad-2/

CARNEGIE SPAR BALANSERAD FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie SPAR Balanserad. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). The fund is managed in accordance with these fund rules, the articles of association of the fund company, the UCITS Act and other applicable statutes.

Fund assets are owned jointly by the fund unitholders and each fund unit confers an equal right to the assets that make up the fund. The fund company (see § 2) represents unitholders in all matters concerning the UCITS fund. The fund cannot acquire rights or assume obligations. Nor may the fund institute legal proceedings before a court of law or other public authority. The assets included in the fund are not subject to seizure and fund unitholders are not responsible for the fund's obligations.

The fund is intended for the general public.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary for the fund's assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund's assets and implements the fund company's instructions regarding the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. The depositary further verifies that fund management and subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions arising from the assets of the fund are paid into the fund without delay. The depositary also monitors the fund's cash flows.

§ 4 Fund Characteristics

The aim of the fund is to generate high long-term returns at lower risk than dedicated equity funds through investments in equities and fixed income funds with no restrictions as to company or sector.

The objective of the fund is to generate a positive and stable return relative to investment risk.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions.

With regard to the equity component, the fund may invest its assets in global and Swedish equities without restriction as to company or sector and in funds or UCITS management companies with focus on equities.

With regard to the fixed income-related component, the fund may invest its assets in fixed income funds. The majority of the funds will be focused on Nordic or Nordic-related financial instruments.

The proportions of equity-related financial instruments and fixed income funds in the fund may vary depending on market conditions, but the share of equity-related financial instruments is an estimated 50-70% over time.

Global equities will consist mainly of large and well-established global companies. The majority of the companies are expected to be listed in Europe, the USA and Japan. Equities will be selected under the assumption that the companies will be owned for the very long term and value growth in the investments will be generated by the companies' long-term profit growth and not from short-term price movements.

"Swedish equities" means equities or equity-related securities traded on a regulated market: in Sweden or on another regulated market as long as the company's domicile or principal operations are located in Sweden.

"Nordic" or "Nordic-related" financial instruments means instruments issued by companies domiciled in the Nordic countries or their wholly owned subsidiaries or instruments quoted or admitted to trading on a regulated market or multilateral trading facility (MTF) within the Nordic countries.

The fund's assets may be invested in derivative instruments whose underlying assets consist of or are attributable to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

§ 6 Exchanges and Marketplaces

The fund may trade in financial instruments on a regulated market within the EEA or equivalent market outside the EEA. Trading is also allowed on other markets within or outside the EEA that are regulated, open to the public and within the scope of the fund's investment strategy as set forth in § 5.

§ 7 Special Investment Strategy

The fund's assets may also be invested in transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5 up to a maximum of 10% of the fund's NAV.

The fund's investment strategy means that it invests fund assets substantially in units of other UCITS funds and UCITS management companies. The fund's investments in other UCITS funds and UCITS management companies shall not exceed 50%.

In order to improve management efficiency, the fund may invest in derivative instruments in accordance with the Swedish UCITS Act, Ch 5, §12, first paragraph. The fund may not use OTC derivatives in accordance with the UCITS Act, Ch 5, §12, second paragraph.

The fund may enter into securities lending agreements.

§ 8 Valuation

NAV per unit corresponds to the fund's NAV divided by the total number of outstanding fund units. The fund's NAV of the fund is calculated by deducting its liabilities, including any future tax liabilities and the fees set forth in § 11 below, from its assets.

NAV per unit is calculated each bank day and forms the basis for establishing the subscription and redemption prices for trade in fund units. In the daily valuation the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate NAV per unit if the fund is closed for subscriptions or redemptions.

The fund's assets are calculated as follows:

- Transferable securities, money market instruments, derivative instruments and fund units are measured at current market value (last price paid, or if such is not available, last bid price). If such prices are unavailable or are deemed misleading by the fund company, the assets may be measured at the value determined by the fund company on an objective basis.
- Transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 are measured at the value determined by the fund company on an objective basis. This valuation may be based on e.g. market prices from an unapproved, regulated market, independent broker or market maker, other financial instruments or indexes, adjusted for differences in e.g. credit risk and liquidity (reference method of valuation); discounted cash flows (present value method of valuation), or share of equity (reporting date method valuation) Initially, the aforementioned transferable securities and money market instruments may also be measured at cost.
- Cash and cash equivalents including bank deposits, short-term placements in the money market, funds on account with credit institutions.
- Accrued interest.
- Accrued dividends.
- Unsettled transactions.
- Other receivables relating to the fund.

For all assets, associated rights in the form of interest, dividends, issue rights and similar are considered.

The liabilities of the fund are calculated as follows:

- Accrued management fees due to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

§ 9 Subscriptions and Redemptions

The subscription and redemption price corresponds to the latest NAV per unit, calculated in accordance with § 8 upon execution of the order.

The fund is normally open for subscriptions (purchases by unitholders) and redemptions (sales by unitholders) of fund units on all bank days. However, the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of all unitholders, as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Subscription requests must be made in writing to the fund company. Purchases of fund units are made at the price established on the date cash become available to the fund company.

Redemption requests must be made in writing to the management company. Redemptions shall be executed at the NAV per unit established on the redemption date. Redemptions are executed immediately only to the extent possible without requiring the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. The redemption will be executed as soon as the proceeds of sale have been received.

The procedures described above mean that subscriptions and redemptions take place at a price unknown to the unitholder at the time the subscription or redemption is requested.

Information about subscription and redemption prices will be available from the fund company and the intermediary institution no later than the bank day after the bank day the NAV per unit is established as above.

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if there exist extraordinary circumstances that prevent valuation of the fund's assets in a manner that ensures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund’s assets to the fund company for its management of the fund. In addition, payments shall be paid to the depositary for its activities as the depositary as well for audit expenses and the costs of supervision by Finansinspektionen. The combined charges and fees shall not exceed 1.65% per year of the fund’s NAV.

The payments described above, as well as brokerage and other costs incurred for the fund's trading in financial instruments are charged to the fund on an ongoing basis. The payments will be subject to any statutory value added tax.

Unitholders are hereby made aware that the fund is charged management fees that are paid to the managers of the funds in which Carnegie SPAR Balanserad invests. The fund prospectus for Carnegie SPAR Balanserad contains information about the maximum ongoing charges and performance-based fees that may be charged for the management of the funds in whose units or shares Carnegie SPAR Balanserad invests its assets.

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-year period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

The pledging party and/or pledge holder must inform the management company in writing when fund units that are not nominee-registered are pledged.

The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge;
- Any restrictions on the scope of the pledge.

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss arising as a consequence of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether the fund company or the depositary initiates or is the target of such a labour action. Nor shall the fund company or the depositary pay compensation for losses arising in other cases if the fund company or depositary has observed customary prudence. The fund company or the depositary shall not be liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If the fund company or the depositary is prevented from making or receiving payment as a consequence of such a circumstance the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest will be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this section, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Neither the fund company nor the depositary shall be liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities that provide equivalent services, nor other third parties engaged with due care by the fund company or the depositary. The same shall apply to loss caused by the insolvency of the aforementioned organisations or third parties. The depositary shall not be liable for engaged parties instructed by the fund company. Nor shall the fund company or the depositary be liable for loss incurred by the fund, unitholders, or other parties by reason of restrictions upon disposition that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund management company and the depositary is regulated under the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from for such investors referred to above in this paragraph.

The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder's subscription for or holdings of units in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE STRATEGIFOND

INVESTMENT STRATEGY

The fund may invest its assets in transferable securities, money market instruments, fund units and accounts with credit institutions. The assets of the fund must be invested primarily in Nordic or Nordic-related financial instruments. The fund's assets may also to a limited extent be invested in fixed income financial instruments with exposure outside the Nordic region.

The fund is actively managed and does not track an index. Investments are selected based on the fund's own assessments. The objective is to maximise long-term returns with consideration of the fund's level of risk. The fund may invest a maximum of 10% of its value in fund units. The fund's assets may also be invested in transferable securities and money market instruments referred to in the Swedish UCITS Act, Ch 5, § 5, but only up to a maximum of 10% of the fund's NAV.

The fund may invest in derivatives instruments. Derivatives may be used to improve the efficiency of management and thereby enhance the return. The fund may invest in OTC derivatives. The fund may make use of foreign exchange derivatives to provide currency hedges against part or all of its holdings. The fund may enter into securities lending agreements. Strategifond G pays quarterly dividends Strategifond D is aimed at the general public and pays monthly dividends.

The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – EUR, Accumulation
- C – NOK Accumulation
- D – SEK, Income
- E – EUR, Income
- F – NOK, Income
- G – SEK, Income, Institutional (min. SEK 3,000,000)
- H – SEK, Distribution

When the fund invests in another fund or UCITS management company managed by Carnegie Fonder, the fund is compensated for the fixed management fee that the fund pays for the underlying fund. This is done by Carnegie Fonder repaying amounts corresponding to the management fee paid to the fund, which means that no fixed management fee is paid for underlying funds in these cases. If any performance-based fee is deducted from an underlying fund or UCITS management company, this is also repaid to the fund.

When the fund invests in funds managed by a fund company or UCITS management company other than Carnegie Fonder, the fixed management fee in the underlying fund or UCITS management company may not exceed 3% after considering any part of the management fee reimbursed to the fund. The performance-based management fee in the underlying fund or UCITS management company may not exceed 30% of the excess return in relation to the benchmark parameter of the fund or the UCITS management company.

RISK PROFILE

The fund invests most of its assets in the Swedish capital market, a mature and transparent market. The fund is also able to invest its assets in foreign markets, as well as emerging markets that are less developed in terms of legislation that protects the rights of investors.

The fund may invest with no restrictions as to industry and region, offering an opportunity to spread the geographical risks. Typically, equity investments abroad are unhedged in local currencies, so the fund assets are affected by changes in local currencies' exchange rate movements against SEK. Fixed income investments, however, are normally currency hedged. It is also possible to vary the fixed income portion of fund assets, which reduces the volatility of NAV per unit. To the extent that derivatives are used, the intention is primarily to reduce price risks and foreign exchange risks in the fund.

Fund assets are invested in liquid assets that can be sold in the event of redemptions. Experience in recent years, with sharp stock market movements, shows that equities and corporate bonds in the most actively traded Nordic and Swedish companies have good liquidity even in periods of extreme market conditions.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE STRATEGIFOND SUSTAINABILITY DISCLOSURES

Product name: Carnegie Strategifond
Legal entity identifier: 529900PU5SQ8AOBIHH62

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?	
☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What is the sustainable investment objective of this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
    - careful analysis of every holding from an ESG perspective prior to investing
    - excluding companies that do not meet the standards
    - Influencing holdings in the right direction as regards E and S.
3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

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

1. Share of fund assets invested in economic activities or credits issued by economic activities for which at least 25% of turnover contributes to at least one SDG, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds.
3. Share of fund assets invested in companies, or credits issued by companies, whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in companies, or credits issued by companies, with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
6. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
7. Number of advocacy dialogues held with investee companies.
8. Share of fund assets invested in companies, or credits issued by companies, that have committed to having or have already had their climate targets approved by Science Based Targets initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the company or its credits would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors

7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:
   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investment is made in a bond whose proceeds are used for sustainable investments as they are classified in the EU Green Bond Standard or Green, Social and Sustainable Bonds in accordance with ICMA Bond Principles. The fund may also invest in bonds linked to clear sustainability objectives, such as Sustainability-linked bonds, but these must satisfy the criteria according to the two items above.

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening in, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places a minimum of 30% of its investments in companies, or credits issued by companies, whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all companies in whose shares or credits the fund has invested.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
   - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
   - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).

   Read more about the analysis tool here.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

2. Negative screening. Carnegie Fonder does not invest in companies or credits issued by companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

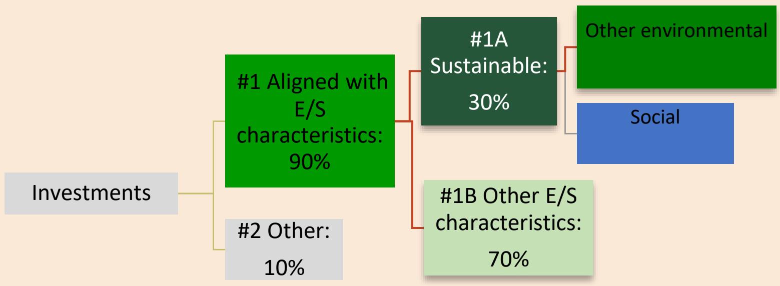
#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 30% of these investments have environmental or social objectives:

- Within this 30%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them.

#1B. The remaining maximum share of 70% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

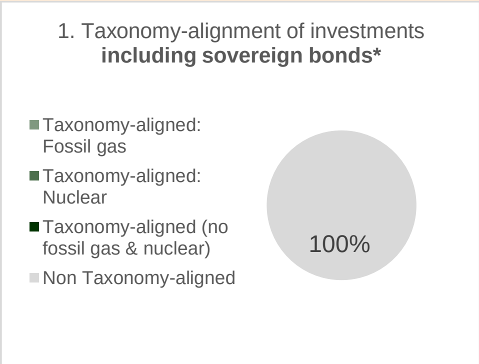
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

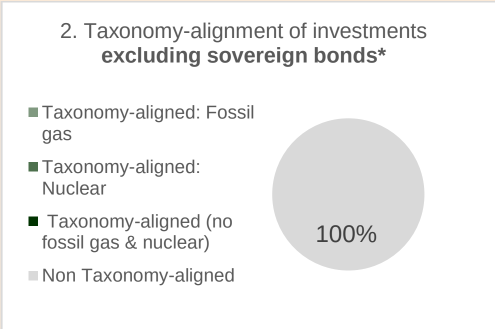
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy Regulation (EU) 2020/852.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-strategifond-a-2/

CARNEGIE
FONDER

CARNEGIE STRATEGIFOND FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Strategifond. The fund is a UCITS fund as defined under the Swedish UCITS Act (SFS 2004:46). The fund is managed in accordance with these fund rules, the articles of association of the fund company, the UCITS Act and other applicable statutes.

The assets of the fund are owned jointly by the unitholders and each unit in a unit class confers equal rights to the assets that make up the fund. The fund company (see § 2) represents unitholders in all matters concerning the UCITS fund. The fund cannot acquire rights or assume obligations.

Unit Classes

The fund has the following unit classes:

- A – Accumulation, SEK
- B – Accumulation, EUR
- C – Accumulation, NOK
- D – Income, SEK
- E – Income, EUR
- F – Income, NOK
- G – Income, Institutional, SEK
- H – Accumulation, Distribution, SEK

The accumulation classes reinvest fund returns, while the income classes pay dividends as set forth in § 12.

NAV per unit is calculated in the currency in which the unit class is denominated. The unit classes differ in terms of management fees. Unit classes H is intended for a specific distribution channel.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes. All unit classes confer equal rights to the property included in the fund.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund's unitholder register – transfer the investor to another unit class, which terms and conditions the investor fulfils. If the investor is eligible for more than one unit class, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary for the fund's assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary implements the fund company's decisions with regard to the fund and receives and retains the fund's assets. The depositary further verifies that sales and redemptions of fund units, the valuation of fund units and other use of the fund's assets do not contravene the provisions of the UCITS Act or the fund rules.

§ 4 Fund Characteristics

Through investment in equities with no restrictions as to company or sector and in bonds and treasury bills, the fund strives to create a long-term high return at a lower level of risk than dedicated equity funds. The fund has a distinct Nordic focus in its investments.

The objective of the fund is to generate a positive return over a period of approximately seven years with a lower volatility than the Nordic equity market. “Nordic equity market” refers to shares issued by companies domiciled in the Nordic region and/or companies whose shares are traded on a regulated market or multilateral trading facility (MTF) within the Nordic region.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions.

With regard to the equity-related component, the fund may invest its assets in Nordic or Nordic-related financial instruments. The fund may also to a limited extent, not exceeding 5% of the fund’s NAV, invest its equity-related component in financial instruments with exposure outside the Nordic region. With regard to the fixed income-related component, the fund’s assets may be invested in Nordic or Nordic-related financial instruments. The fund may also invest its fixed income-related component to a limited extent, not exceeding 10% of the fund’s NAV, in financial instruments with exposure outside the Nordic region. The fund may invest a maximum of 10% of its NAV in fund units.

The proportions of equity-related financial instruments and fixed income-related financial instruments held by the fund may vary over time depending on market conditions, but the share of equity-related financial instruments is an estimated 40-60 percent over time.

“Nordic or Nordic-related financial instruments” means instruments issued by companies domiciled in the Nordic countries or their wholly owned subsidiaries or instruments quoted or admitted to trading on a regulated market or multilateral trading facility (MTF) within the Nordic countries.

The fund’s assets may be invested in such derivative instruments where the underlying asset consists of transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

The fund will normally use foreign exchange forwards to hedge the fund's investments against SEK if the investments are quoted in a currency other than SEK. This applies regardless of unit class.

§ 6 Exchanges and Marketplaces

The fund’s trading in financial instruments may take place on a regulated market within the EEA or equivalent market outside the EEA and on other markets, within or outside the EEA, that are regulated and open to the public and that are covered by the fund investment strategy in § 5.

§ 7 Special Investment Strategy

The fund’s assets may also be invested in transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5 up to a maximum of 10% of the fund’s NAV.

The fund may invest in derivatives instruments. Derivatives may be used to improve management efficiency aimed at reducing risks and costs, increasing return and generating leverage.

The fund may invest in OTC derivatives as referred to in the UCITS Act Ch 5, § 12, paragraph 2.

The fund may enter into securities lending agreements.

§ 8 Valuation

§ 8.1 Fundamentals of Valuation

The NAV per unit is the fund's NAV divided by the number of outstanding fund units. The fund's NAV is calculated by deducting the liabilities related to the fund from its assets. NAV per unit is calculated each bank day and is used as the basis for determining subscription and redemption prices for trading in fund units. The outstanding liabilities of the fund are calculated and considered in the daily valuation. The fund company does not, however, calculate NAV per unit if the fund is closed for subscriptions or redemptions. In the event of large changes in the value of financial instruments included in the fund, NAV per unit may be established several times during the day.

The fund's assets are calculated as follows:

- Financial instruments are valued at the current market value (last price paid or, if this is not available, last bid price).
- Cash and cash equivalents and current receivables, in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold are included at the amount expected to be received.
- For transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for this special valuation includes market prices from unapproved exchanges or market makers, other financial instruments or indices adjusted for differences in, for example, credit risk and liquidity (reference valuation method), discounted cash flows (net present value method) or share of equity (financial statement method).
- For all assets, associated rights in the form of interest, dividends, issue rights and similar are considered.

The liabilities of the fund are calculated as follows:

- Accrued management fees to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

For derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2 (OTC derivatives), a market value is established as follows:

- Market prices from an active market

If such market prices cannot be obtained, the market value shall be established using one of the methods below:

- Based on the market value of the component assets/constituents
- Based on recently completed transactions between knowledgeable, willing parties in an arm's length transaction, if these are available, or
- The use of market prices from an active market for another financial instrument that is substantially identical.
- If market prices cannot be established using one of the options above, or are obviously misleading, the applicable market value shall be established through the use of a valuation method generally accepted on the market, for example using option valuation models such as Black & Scholes.

The valuation is conducted individually for each unit class.

§ 8.2 Adjusted Fund Unit Value

In order to ensure fair treatment of the fund's unit holders and to safeguard the common interests of the unit holders, the fund company applies a method for determining an adjusted fund unit value.

The purpose of calculating an adjusted fund unit value is to prevent a unit holder from bearing transaction costs due to the subscription and redemption of fund units in the fund carried out by other unit holders in the fund. The transaction costs referred to in this case are those that arise in situations where assets are bought or sold in the fund to handle requests for subscription or redemption of fund units in the fund, i.e., in the event of net inflows or net outflows.

The fund unit value is adjusted upwards or downwards if the fund has a net inflow or a net outflow that exceeds a threshold value predetermined by the fund company, expressed as a percentage of the fund's value, hereinafter referred to as the threshold value. On days when the net flow does not exceed the threshold value, no adjustment of the fund unit value is made. The level of the threshold value is determined based on the fund company's assessment of what is considered a significant net flow for the fund.

The size of the adjustment of the fund unit value, hereinafter referred to as the adjustment factor, is determined by the fund company and may vary over time. The adjustment factor is determined taking into account direct or indirect costs and includes, where relevant, brokerage fees, spreads, market impact, currency exchange costs, and transaction taxes.

The adjustment factor may amount to a maximum of 2 percent of the fund unit value.

The fund unit value shall, in accordance with the above, be determined as follows:

- In the event that the fund has a net inflow that exceeds the threshold value, the fund unit value calculated according to § 8.1 above shall be adjusted upwards by the adjustment factor determined by the fund company.
- In the event that the fund has a net outflow that exceeds the threshold value, the fund unit value calculated according to § 8.1 above shall be adjusted downwards by the adjustment factor determined by the fund company.
- In the event that the net flow in the fund does not exceed the threshold value, no adjustment of the fund unit value is made, and the value of a fund unit is calculated in the manner set out in § 8.1 above.

The threshold value and the adjustment factor are continuously evaluated by the fund company.

A more detailed description of the fund's application of the adjusted fund unit value can be found in the fund's prospectus.

§ 9 Subscriptions and Redemptions

The fund is normally open for the subscriptions and redemptions of fund units every bank day. However the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of fund unitholders as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Subscription requests must be made in writing to the fund company. Subscriptions for fund units are executed at the price established on the day payment is available to the fund company.

The minimum initial subscription amount in unit class G is SEK 3,000,000. There is no minimum amount for other unit classes.

Redemption requests must be made in writing to the fund company. Redemption shall be executed at the NAV per unit established on the redemption date. Redemptions are executed immediately only to the extent possible without requiring the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. The redemption will be executed as soon as the proceeds of sale have been received. The subscription and redemption price corresponds to the latest calculated NAV per unit when the order is executed.

The procedures described above mean that subscriptions and redemptions take place at a price unknown to the unitholder when subscription or redemption is requested.

Information about subscription and redemption prices is available from the fund company and intermediary institution no later than the bank day following the bank day on which NAV per unit is established as above.

Unit class H is restricted to investors who subscribe for units through distributors which, according to an agreement with the fund company, wholly or partly, do not accept retrocession fees from the fund company and which, when the distributor provides the investment service to its customer in connection with the subscription of units, is paid directly by its customer. A prerequisite to be eligible to invest in share class H is that the holding is registered on one or more accounts in the distributor’s name of behalf of client (nominee registration).

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if extraordinary circumstances occur that prevent valuation of the fund's assets in a manner that assures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund’s assets to the fund company for its management of the fund. In addition, fees shall be paid to the depositary for its activities as the depositary, for audit expenses and to Finansinspektionen for its supervisory activities. Total fees and charges for unit classes A, B, C, D, E and F shall not exceed 1.6% of the fund’s NAV per year. The corresponding maximum fees and charges are 1% for unit class G and 1.15% for unit class H.

The payments described above, as well as brokerage and other costs incurred for the fund's trading in financial instruments are charged to the fund on an ongoing basis. The payments will be subject to any statutory value added tax.

§ 12 Dividends

Classes A, B and C do not pay dividends.

Dividends on the income classes, D, E, F and G, are decided by the fund company. Dividends on classes E, F and G are paid to unitholders on the last Wednesday in January, April, July and October. The dividend on class D is paid to unitholders on the last Wednesday of each calendar month.

Dividends on fund units are paid to all unitholders in the income classes who are registered unitholders on the record date determined by the fund company.

Unless the fund company decides otherwise, return on fund assets, remaining residual amounts of previously distributable amounts and other distributable amounts can be used for dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company is required to deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-yearly reporting period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

The pledging party and/or pledge holder must inform the fund company in writing when fund units that are not nominee-registered are pledged.

The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company shall notify unitholders in writing that a pledge has been registered in the unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss arising as a consequence of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether the fund company or the depositary initiates or is the target of such a labour action. Nor shall the fund company or the depositary pay compensation for losses arising in other cases if the fund company or depositary has observed customary prudence. The fund company or the depositary shall not be liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If the fund company or the depositary is prevented from making or receiving payment as a consequence of such circumstance the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest will be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this section, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Neither the fund company nor the depositary shall be liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities that provide equivalent services, nor other third parties engaged with due care by the fund company or the depositary. The same shall apply to loss caused by the insolvency of the aforementioned organisations or third parties. The depositary shall not be liable for engaged parties instructed by the fund company. The fund company or the depositary shall not be liable for loss incurred by the fund, unitholders, or other parties by reason of restrictions upon disposition that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund management company and the depositary is regulated under the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder's subscription for or holdings of units in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE ALL CAP

INVESTMENT STRATEGY

The fund is an equity fund that mainly invests in companies admitted to trading on the Swedish stock market. The fund also has the option to invest up to 10% in companies admitted to trading in other Nordic equity markets.

The objective of the fund is to achieve long-term capital growth a good spread of risk while taking into account the fund's level of risk. The fund is actively managed and does not track an index. The fund's investments are not targeted at any particular sector. Stock selection is based on long-term fundamental analysis where the company analysis also includes sustainability. The fund invests for the long term, mainly in companies with historically good profitability and growth. Stock selection for the fund is based on a combined analysis of each company's financial position and an ESG analysis to determine its capacity to manage risks and opportunities in relation to the environment, social issues, and governance. Only companies that are interesting from a financial perspective and whose approach to sustainability is assessed as a future comparative advantage and value driver will be considered for investment. Fund management also applies other norms and guidelines for ethics and responsible business, which means that certain companies are excluded.

The asset classes that fund assets may be invested in are transferable securities, money market instruments, fund units, derivatives and accounts with credit institutions.

A maximum of 10% of fund assets may be invested in units in other funds.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Income
- C – SEK, Accumulation Institutional (min. SEK 3,000,000)
- D – SEK, Income, Institutional (min. SEK 3,000,000)
- E – SEK, Accumulation, Distribution
- F – SEK, Accumulation
- G – NOK, Accumulation, Distribution Norway
- H – SEK, Accumulation (min. SEK 50,000)

RISK PROFILE

The fund is an equity fund, which generally has a higher risk than a fixed income fund, for example, but also an opportunity for higher returns over the long term. The fund's investment strategy towards the Swedish equity market also poses a higher risk because concentration of equities in one or only a few markets increases the risk and could entail large price fluctuations.

The fund has a high risk of both increases and decreases in NAV per unit. The fund invests in companies listed on the stock market, which is generally characterised by high risk but also the potential for high returns. The indicator mainly reflects the upturns and downturns in the shares in which the fund has invested. The indicator reflects the most important risks in the fund, but not the liquidity risk, i.e., the risk that it will not be possible to enter or exit the fund at the intended time.

The fund's investment strategy may give rise to certain risks. One of these is market risk, as the fund's concentrated selection and the concentration of equities in one or a few markets increase the risk of large price fluctuations. As Carnegie Fonder acts in the market, there is always a general risk that a counterparty could suspend payments, which is a credit risk. However, Carnegie Fonder does not believe that the credit risk in this fund would exceed the credit risk of other funds in the market. The above risks are carefully controlled, monitored, and managed at Carnegie Fonder.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

Investing in a fund is always associated with both opportunities and risks. Money invested in a fund can both increase and decrease in value depending on market performance, and there is no guarantee that all invested capital will be recovered. Past returns are not a guarantee of future returns.

The commitment approach is used to measure the fund's total exposure. The commitment approach calculates the fund's exposures arising from the use of derivatives. In the calculation, derivatives are converted to exposures corresponding to their underlying assets. When calculating the total exposures, the fund company considers netting and any hedging. The total exposures, when calculated in this way, may not exceed 100% of the fund's NAV in accordance with the UCITS Act (2004:46).

CARNEGIE ALL CAP SUSTAINABILITY DISCLOSURES

Product name: Carnegie All Cap
Legal entity identifier: 549300Y5VB71HXHKC012

Environmental and/or social characteristics

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.

Does this financial product have a sustainable investment objective?

[x] Yes	[ ] No
[x] It will make a minimum of **sustainable investments with an environmental objective: 40%**	[ ] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
[ ] In economic activities that qualify as environmentally sustainable under the EU Taxonomy	[ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
[x] In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	[ ] With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	[ ] with a social objective
[x] It will make a minimum of **sustainable investments with a social objective: 10%**	[ ] It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to our categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the following sustainability indicators are used to ensure that the sustainability target is attained.

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 how the objectives are attained:

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

1. Share of fund assets invested in companies for which 25% of turnover contributes to at least one or more SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives “climate change mitigation” and “climate change adaptation” in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company’s internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company’s exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company’s voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Targets initiative.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company’s internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding investments in economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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

✖ Yes,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. GHG intensity

4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to attain the investment objective of sustainable investments is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund invests only in investee companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative (SBTi).

The following binding elements are also used in the investment strategy to meet the fund's Nordic Swan Ecolabel:

1. At least 25% of the fund assets must be invested in companies with a climate goal verified by SBTi and in line with the 1.5°C target.
2. At least 70% of the fund assets must be invested in companies with 'strong sustainability practices'. At Carnegie Fonder 'strong sustainability practices' means that a holding either has a rating of 'Strong' or 'Very Strong' in our internal sustainability analysis, and more than 25% of its turnover contributes to UN:s Sustainable Development Goals, or has a rating of 'Adequate' in our internal sustainability analysis, and more than 50% of its turnover contributes to UN:s Sustainable Development Goals.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
   - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
   - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions

and practical management of employees (such as training, employee turnover, etc.).
Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.
3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:
    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

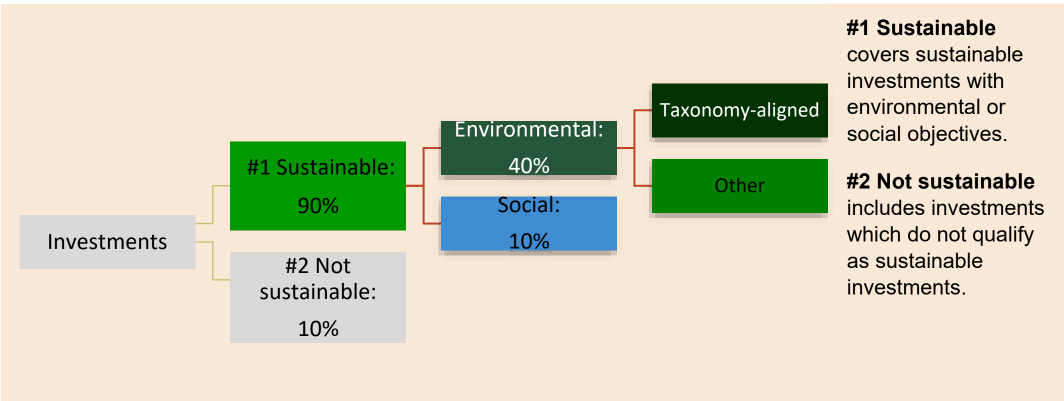
What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1 All investments including cash in the fund are sustainable investments with environmental or social objectives (minimum 90%).

- All investments are aligned with Environmental or Social, with minimum limits of 40% Environmental and 10% Social.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share does not have environmental or social objectives (maximum 10%).



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

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

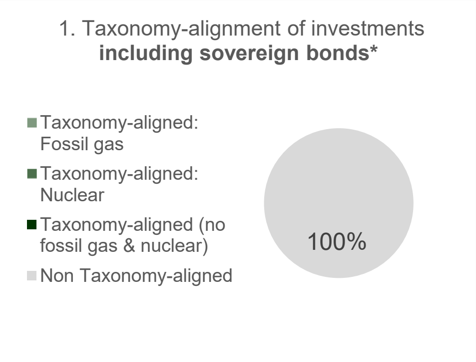
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

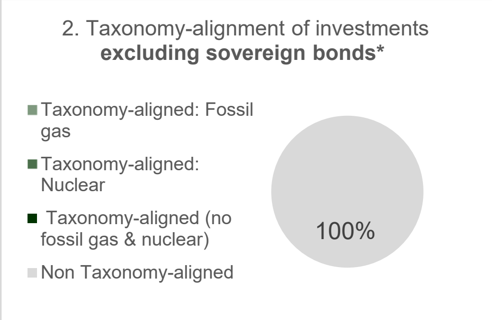
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy Regulation (EU) 2020/852.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. All of the funds' investments are sustainable with an environmental or a social objective. The minimum share of sustainable investments with an environmental objective is 40%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. All of the funds' investments are sustainable with an environmental or a social objective. The minimum share of sustainable investments with a social objective is 10%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to meet the sustainable investment objective. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/all-cap-a/

CARNEGIE ALL CAP FUND RULES

§ 1 Name and Legal position

The name of the fund is Carnegie All Cap, hereinafter referred to as “the fund”. The fund is a UCITS fund pursuant to the Swedish UCITS Act (SFS 2004:46). The fund is aimed at the public and not a limited circle of persons.

The fund’s assets are jointly owned by the unitholders and each unit in a unit class confers an equal right to the property included in the fund. The fund cannot acquire rights or assume obligations.

The fund is managed by the fund company specified § 2 below. The fund company represents the unitholders in all matters regarding the fund, makes decisions concerning property included in the fund and exercises the rights derived from the property.

Operations are conducted in accordance with these fund rules, the articles of association of the fund company, the Swedish UCITS Act and other applicable statutes.

These fund rules are complemented by and integrated with the fund prospectus. The prospectus is provided by the fund company.

Unit Classes

The fund has the following unit classes:

- A – Accumulation
- B – Income
- C – Accumulation, minimum investment amount
- D – Income, minimum investment amount
- E – Distribution, Accumulation
- F – Accumulation
- G – Distribution, Accumulation
- H – Accumulation, minimum investment amount

The content of the fund rules is common to all unit classes unless otherwise stated below. The unit classes differ in terms of minimum initial subscription amount, charges and fees, distribution channel and dividends. The differences between the unit classes are described in full below in § 9 and §§11-12.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as “the fund company”. The fund company conducts fund business in accordance with the Swedish UCITS Act.

§ 3 Depositary and its Function

The fund's assets are stored by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081) as the depositary. The depositary is required to act independently of the fund company and shall implement decisions regarding the fund taken by the fund company provided these do not contravene the UCITS Act or these fund rules.

The depositary shall receive and retain the property included in the fund and ensure that the sale and redemption of fund units, calculation of NAV per unit, and use of the fund’s assets do not contravene the UCIT Act or these fund rules.

The depositary shall also ensure that the assets of the fund are provided to the fund without delay.

§ 4 Fund Characteristics

The fund is an equity fund that mainly invests in companies admitted to trading on the Swedish equity market. The fund also has the option to invest up to 10% in companies admitted to trading in other Nordic equity markets.

The fund's investments are not targeted at any particular sector or type of company. Fund management applies standards and guidelines for ethics and sustainability. The fund's investments are made in companies whose approach to the areas of social responsibility, environment, climate, corporate governance and business ethics is judged to serve as a future comparative advantage and value driver in that profit growth is expected to have positive impact and become more sustainable.

The objective of the fund is to achieve long-term capital growth while taking into account the fund's level of risk.

§ 5 Investment Strategy

The fund’s assets may be invested in the following asset classes:

- Transferable securities
- Money market instruments
- Fund units
- Derivative instruments
- Accounts with credit institutions

The fund invests in companies whose shares or share-related transferable securities that are admitted to trading or are intended to be admitted to trading within one year of issue on a regulated market in Sweden or on another regulated market provided that the company's registered office or principal business is located in Sweden. The fund also has the option to invest up to 10% in companies admitted to trading in the other Nordic markets. “Nordic equity markets” means shares issued by companies domiciled in the Nordic region and/or companies whose shares are traded on a regulated market or multilateral trading facility (MTF) within the Nordic region.

The fund's investments shall be made in sectors and companies that the fund company has assessed as having the best prerequisites for good value growth. Equity selection is a multi-step process. In step 1, companies that produce weapons, alcohol, pornography, or tobacco or extract fossil fuels are excluded and investments are possible in companies where a maximum of 5% of turnover is generated by commercial gambling operations, production of munitions, or distribution of tobacco, alcohol or pornography. The fund prospectus provides more information about the selection criteria applied. In step 2, companies are analysed in terms of both financial quality and potential to achieve increased profit growth as a result of their strategies and positions in the areas of social responsibility, environment, climate, corporate governance, and business ethics.

Underlying assets of derivative instruments included in the fund shall consist of or relate to assets referred to in the UCITS Act, Ch 5, § 12, paragraph 1.

A maximum of 10% of fund assets may be invested in units in other funds.

§ 6 Marketplaces

The fund’s assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading is also permitted on a multilateral trading facility (MTF) or another market within or outside the EEA that is regulated and open to the public.

§ 7 Special Investment Strategy

- The fund may invest assets in such transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5.
- The fund may use derivative instruments to improve management efficiency with the aim of reducing management costs and risk.
- The fund may invest in OTC derivatives as referred to in the UCITS Act, Ch 5, § 12, paragraph 2.

§ 8 Valuation

The fund's value is calculated by deducting from the fund's liabilities from its assets.

The fund's assets are valued at the current market value. Valuation is calculated daily at the last price paid or, if such is not available, the last bid price and if such is not quoted, the last ask price.

If the fund company determines that such prices are not representative or if such prices are unavailable, which is mainly the case regarding transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5, a market value is determined on objective grounds based on a special valuation.

The special valuation is based on factors that including market prices from:

- An unregulated market
- An independent broker
- Other external, independent sources
- Another listed financial instrument
- An index or corporate event that affects the market value

For such instruments referred to in the UCITS Act, Ch 5, § 12, paragraph 2, i.e., OTC derivatives, a market price is established as follows.

- Market price quoted on an active market.
- If a market price cannot be obtained, OTC derivatives shall be valued using valuation models such as Black & Scholes and Black 76.

NAV per unit corresponds to the fund's NAV divided by the number of fund units, taking into account the conditions associated with each unit class.

§ 9 Subscriptions and Redemptions

The price of one unit sold by the fund company (unitholder's subscription/purchase) is the NAV per unit on the bank day on which the sale is executed.

The price of one unit redeemed by the fund company (unitholder's redemption/sale) is the NAV per unit on the bank day on which redemption is executed.

Subscriptions and redemptions of fund units through the fund company are possible on any bank day. The subscription and redemption prices may be obtained from the fund company.

Prices are also published in daily newspapers or similar media. Prices on any given bank day are normally published in the evening of the same bank day.

Requests to subscribe for fund units (unitholders' purchases) shall be made in writing by fax or, upon special agreement, by electronic media. Requests for redemption (unitholders' sales) of fund units shall be made in writing by fax, or by electronic media upon special agreement. Request submitted in writing by fax shall be signed by the unitholder.

The request is executed on the day it is submitted, provided that the request is received by the fund company no later than the cut-off time specified and in accordance with the conditions stated in the fund prospectus. Otherwise, the request will be executed the next bank day.

Redemption requests may be withdrawn only if the fund company consents.

Subscriptions and redemptions are transacted at a unit value that is unknown when the request is submitted.

The fund may be closed for subscriptions and redemptions if all or part of the fund's assets cannot be valued because the markets in which the fund invests are closed.

Specific Information Regarding Unit Classes C and D

The minimum initial subscription amount is SEK 3 million.

Specific Information Regarding Unit Class E.

Class E is restricted to investors who subscribe to units through distributors that, in whole or in part and in accordance with their agreement with the fund company, do not receive retrocession fees from the fund company and that, when the distributor provides the investment service to its customers in connection with subscription of units, are paid directly by the customer. A prerequisite for investing in class E is that the holding is registered in one or more accounts in the distributor's name on behalf of the customer (nominee registration).

Specific Information Regarding Unit Class G

Subscriptions and redemptions of fund units are denominated in Norwegian kroner (NOK). Unit class G is reserved for investors who subscribe for units via a distributor that, within the framework of its operations, distributes the fund units on the Norwegian market, and that in accordance with the agreement with the fund company does not receive retrocession fees from the fund company for distribution on the Norwegian market. A prerequisite for investing in unit class G is that the holding is registered in an account in the distributor's name on behalf of the customer (nominee registration).

Specific Information Regarding Unit Class H

The minimum initial subscription amount is SEK 50,000.

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary events have occurred that prevent valuation of the fund's assets in a way that ensures the equal rights of unitholders.

§ 11 Charges and Fees

Payments are made from the fund's assets to remunerate the fund company for its management, analysis, administration, accounting, and record keeping regarding the fund, and custodian fees are paid to the depositary for storage of the fund's assets, as well as for auditing costs and payments to the regulator (Finansinspektionen) for its supervisory activities.

Fees and charges are calculated daily and deducted from the fund at the end of each month. For unit classes A and B, fees and charges shall not exceed 1.5% per year. For unit classes C, D and E, fees and charges shall not exceed 1.05% per year.

For unit class G, fees and charges shall not exceed 0.80% percent per year.

For unit class H, fees and charges shall not exceed 1.15% per year.

For unit class F, fees and charges consist of an ongoing charge and a performance-based fee.

The ongoing charge for unit class F is calculated daily and shall not exceed 1.05% of fund assets per year.

The performance-based fee for unit class F shall not exceed 20% of the portion of daily return exceeding the hurdle rate. The fund's hurdle rate is defined as the Nasdaq Stockholm SIXPRX index.

The fee is calculated daily after deduction of the ongoing charge and is deducted collectively from the unit class. If the value growth of the unit class is below the fund's hurdle rate, no performance-based fee will be charged until the previous relative underperformance has been recovered.

The performance-based fee is charged even in the case of negative value growth for the fund, provided that the fund exceeds its hurdle rate.

If a unitholder redeems fund units when the unit class has an accumulated underperformance, no previously paid performance-based fee will be refunded.

The total annual ongoing charge performance-based fee shall not exceed 3.00% of the value of the unit class. Charges and fee are based on the opening value of the unit class on the dates the charge of fee is deducted.

Management fees, both the ongoing charge and performance-based fees, are paid to the fund company monthly in arrears.

Brokerage and other costs attributable to purchases and sales of securities are also paid from fund assets.

§ 12 Dividends

- Unit classes A, C, E, F, G and H – Accumulation. Unit classes A, C, E, F, G and H do not pay dividends.
- Unit classes B and D – Income. Unit classes B and D pay dividends.

The board of directors of the fund company decides annually on the dividend to be paid to unitholders in unit classes B and D. The calculation shall be based on the return in the Income unit class in the preceding financial year. However, the board of directors may set the dividend at a higher or lower amount if this is in the interests of the unitholders. The objective regarding the size of the dividend is stated in the prospectus.

Dividends accrue to unitholders in unit classes B and D that are registered as unitholders on the established record date. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends are paid in cash, after deduction of the tax that must legally be withheld on dividends, into an account that the unitholder has designated in advance to the fund company. However, upon written notification to the fund company, no later than 10 days before the established dividend date, unitholders may have the dividend, less withholding tax, reinvested in the fund.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund's annual and half-yearly reports shall be available at the fund company within four and two months respectively after the end of the reporting period.

If the fund company decides to amend these fund rules, the decision shall be submitted to Finansinspektionen for approval. After Finansinspektionen has approved the amendment, the amended fund rules shall be made available at the fund company and the depositary and be announced in the manner instructed by Finansinspektionen.

The amendments shall enter into force when they are announced or at the later date specified Finansinspektionen's decision. The amendments shall apply to all unitholders.

§ 15 Pledges and Transfers

Unitholders must notify the fund company in writing of pledges of fund units. The notification shall state the identity of the unitholder, the pledge holder, the scope of the pledge and any restrictions to the pledge. The notification shall be signed by the pledging party.

The fund company shall record the pledge in the unitholder register and inform the unitholder of the registration. Information about the pledge shall be removed from the register after notification from the pledge holder.

The fund company is entitled to charge a fee for the cost incurred due to the pledge, which shall not exceed SEK 500 per pledge.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss caused by legal enactment, government intervention, act of war, strike, blockade, boycott, lockout or any other similar circumstance, such as computer or telecommunications failures.

The reservation regarding strike, blockade, boycott and lockout shall apply not withstanding whether the fund company and/or the depositary initiates or is the target of such labour action.

Nor shall the fund company or the depositary liable to compensate for losses in other cases if the company has exercised customary care. Neither the fund company nor the depositary shall be liable in any circumstances whatsoever for indirect losses.

That said above in this paragraph does not limit the rights of shareholders to damages pursuant to the UCITS Act Ch 2, § 21 or Ch 3, §§ 14-16.

§ 17 Restriction of Sales Rights, etc

The circumstance that the fund is intended for the general public does not mean that it is intended for such investors whose purchases of units in the fund or participation in the fund otherwise contravenes the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose purchases or holdings of units in the fund would mean that the fund or the fund would be required to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse sales to such investors referred to above in this paragraph.

The fund management company may redeem a unitholder's units in the fund – notwithstanding the unitholder's objection – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of provisions of Swedish or foreign law, ordinance, regulation or decision by governmental authority, or if the fund company is required to take a registration measure or other measure for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE FASTIGHETSFOND NORDEN

INVESTMENT STRATEGY

The fund is an actively managed equity fund, which means that deviations from the benchmark index may be both large and small over time. The objective is to achieve good capital growth over the long term with good risk diversification.

The fund is an actively managed sector fund, and its assets are invested in real estate and construction companies, primarily in the Nordic markets. The fund will invest in purely real estate companies where these mainly own completed properties. The fund may also invest in contracting and construction companies, i.e., companies that build buildings and infrastructure etc. Notwithstanding the above, the fund may invest a maximum of 10 percent of its assets in companies within the real estate and construction industry outside the Nordic region.

The fund is permitted to invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions. The fund may use derivatives as part of improving the management efficiency in order to reduce costs and risks.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Institutional (min. SEK 25,000,000)
- C – NOK, Accumulation Carnegie Nordisk Eiendom
- D – EUR, Accumulation Carnegie Nordic Real Estate
- E – SEK, Income, Institutional (min. SEK 25,000,000)
- F – NOK, Accumulation, Distribution Norway
- G – SEK, Accumulation, (min. SEK 50,000)

RISK PROFILE

The fund is an equity fund, and these generally have a higher level of risk than, for example, fixed income funds, but also a potential for higher returns in the long term.

The fund has a medium risk of rises and falls in the unit value. The fund invests in companies listed on stock markets, which are generally characterised by high risk but also by the possibility of high returns. The indicator mainly reflects the rises and falls of the shares the fund has invested in. The indicator reflects the most important risks in the fund, but not the risk that, in extreme conditions in the stock markets, it may not be possible to make deposits into or withdrawals from the fund at the intended time (liquidity risk).

The primary risk from the investment strategy is liquidity risk since the fund invests within the Nordic real estate and construction industry in small, medium, and large companies. This could give rise to a risk that a position cannot be sold in a timely manner at a reasonable price. This risk increases with lower turnover of the company shares. The next risk is market risk. This is because the fund's concentrated selection and the concentration of shares in one or a few markets increase the risk of large price fluctuations. Since Carnegie Fonder acts in the market, there is always a general risk of a counterparty suspending payments, known as credit risk. However, Carnegie Fonder does not believe that the credit risk in this fund will exceed the credit risk of other funds in the market. The above risks are carefully controlled, monitored, and managed at Carnegie Fonder.

The commitment approach is used to measure the fund's total exposure. The commitment approach calculates the fund's exposures arising from the use of derivatives. In the calculation, derivatives are converted to exposures corresponding to their underlying assets. When calculating the total exposures, the fund company considers netting and any hedging. The total exposures, when calculated in this way, may not exceed 100% of the fund's NAV in accordance with the Swedish UCITS Act (2004:46).

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE FASTIGHETSFOND NORDEN SUSTAINABILITY DISCLOSURES

Product name: Carnegie Fastighetsfond Norden
Legal entity identifier: 549300Y7FJUSPWBXER85

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

[ ] **Yes**	[x] **No**
[ ] It will make a minimum of **sustainable investments with an environmental objective:** ___%	[x] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments
[ ] In economic activities that qualify as environmentally sustainable under the EU Taxonomy	[ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
[ ] In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	[x] With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	[x] with a social objective
[ ] It will make a minimum of **sustainable investments with a social objective:**___%	[ ] It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards
   - Influencing holdings in the right direction as regards E and S.
3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives “climate change mitigation” and “climate change adaptation” in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company’s internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company’s exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company’s voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund’s sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies’ products and services have direct impact on attaining the goal and that demand for the company’s products and services is affected in both the positive and negative sense depending on the company’s business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company’s categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark.

Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 50% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).

    Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

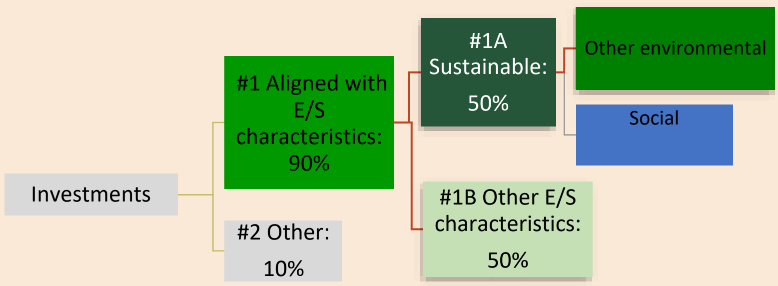
Asset allocation describes the share of investments in specific assets.

#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

#1A. A minimum share of 50% of these investments have environmental or social objectives:
- Within this 50%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

1B. The remaining maximum share of 50% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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

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 fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

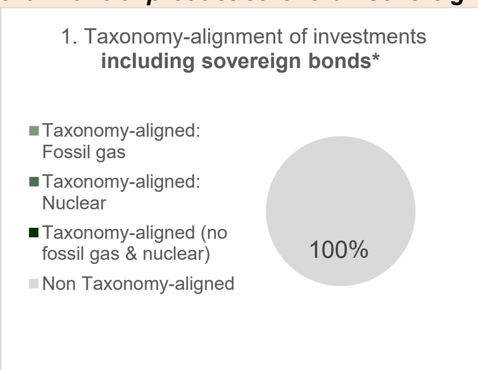
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

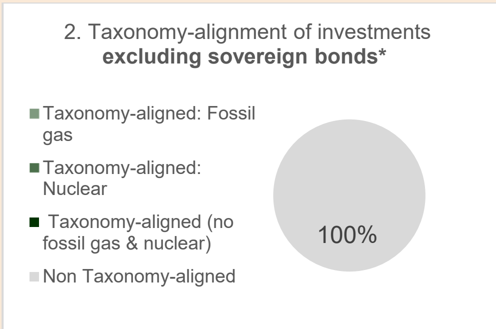
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy Regulation (EU) 2020/852.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-fastighetsfonden-norden-a/

CARNEGIE FASTIGHETSFOND NORDEN FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Fastighetsfond Norden. The fund is a UCITS fund pursuant to the Swedish UCITS Act (SFS 2004:46).

The assets of the fund are owned jointly by the unitholders and each unit in a unit class confers an equal right to the assets that make up the fund. The fund cannot acquire rights or assume obligations.

The fund is managed by the fund company specified in § 2 below. The fund company represents unitholders in all matters concerning the fund, takes decisions concerning the property included in the fund and exercises the rights derived from the property.

Operations are conducted in accordance with these fund rules, the articles of association of the fund company, the Swedish UCITS Act and other applicable statutes.

The fund rules are complemented by and integrated with the fund prospectus. The prospectus is provided by the fund company.

Unit Classes

The fund has the following seven unit classes:

- Unit class A
- Unit class B
- Unit class C – Carnegie Nordisk Eiendom
- Unit class D – Carnegie Nordic Real Estate
- Unit class E
- Unit class F
- Unit class G – non-dividend, minimum investment amount

The content of the fund rules is common to all unit classes unless otherwise stated below. The differences between the unit classes are described in full below in § 9 and §§ 11-12.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder Sverige AB, (CRN: 556266-6049), hereinafter referred to as “the fund company”. The fund company conducts fund business in compliance with the Swedish UCITS Act (2004:46).

§ 3 Depositary and its Function

The fund's assets are stored by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081) as the depositary. The depositary acts independently of the fund company and shall implement the fund company’s decisions regarding the fund unless these contravene the UCITS Act (2004:46) or these fund rules.

The depositary shall receive and retain the property included in the fund and ensure that subscriptions and redemptions of fund units, calculation of NAV per unit, and use of the fund’s assets do not contravene the UCITS Act or these fund rules.

The depositary shall also ensure that the assets of the fund are provided to the fund without delay.

§ 4 Fund Characteristics

The fund is an equity fund, a sector fund that focuses on investing in the Nordic real estate market. The goal of the fund's management is to achieve good capital growth in the long term.

§ 5 Investment Strategy

The fund has a strategy that requires the fund's assets to be invested in real estate and construction companies, mainly in the Nordic markets. The fund will invest in dedicated real estate companies where the companies mainly own completed properties. The fund may also invest in contracting and construction companies, i.e., companies that build buildings and infrastructure etc. Notwithstanding the above, the fund may invest a maximum of 10% of its assets in companies within the real estate and construction industry outside the Nordic region.

The fund may invest in the following asset classes.

- Transferable securities
- Money market instruments
- Fund units
- Derivative instruments
- Accounts with credit institutions

A maximum of 10% of fund assets may be invested in units in other funds.

A maximum of 10% of the fund's assets may be deposited in accounts with credit institutions.

The fund may engage in securities lending.

The fund's assets may be invested in such derivative instruments where the underlying asset consists of transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

§ 6 Marketplaces

The fund's assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading is also permitted on other markets within or outside the EEA that are regulated and open to the public. The fund's assets may also be invested on a multilateral trading facility (MTF) within the EEA.

§ 7 Special Investment Strategy

The fund may invest in transferable securities and money market instruments referred to in the UCITS Act (2004:46), Ch 5, § 5.

The fund may use derivative instruments to improve management efficiency and thereby reduce costs and risks in management.

Fund assets may not be invested in derivative instruments referred to in the UCITS Act Ch 5, §12, second paragraph ("OTC derivatives").

The fund may engage in securities lending.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

§ 8 Valuation

The fund's NAV is calculated by deducting the liabilities relating to the fund from its assets.

The fund’s assets are valued at the current market value. Valuation is calculated daily at the last price paid or, if such is not available, the last bid price and if this is not quoted, the last ask price.

To determine the value of unlisted transferable securities and money market instruments referred to the UCITS Act Ch 5, § 5 the price paid or the bid price is normally used.

If the above valuation methods are deemed misleading by the fund company, a market value will be determined on an objective basis following a special valuation. The special market valuation is based on, for example, market prices from:

- An unregulated market
- An independent broker
- Other external, independent sources
- Another listed financial instrument
- An index or corporate event that affects the market value

The value of a fund unit in a particular unit class is equal to the value of the unit class divided by the number of outstanding units in that unit class.

§ 9 Subscriptions and Redemptions

The price of one unit sold by the fund company (unitholder’s subscription/purchase) is the NAV per unit on the bank day on which the sale is executed.

The price of one unit redeemed by the fund company (unitholder’s redemption/sale) is the NAV per unit on the bank day on which redemption is executed.

Subscriptions and redemptions of fund units through the fund company can be made on any bank day. Subscription and redemption prices may be obtained from the fund company. These may also be published in daily newspapers or similar media. Prices on any given bank day are normally published in the evening of the same bank day.

Requests to subscribe for (unitholders’ purchases) fund units shall be made in writing by fax or by electronic media upon special agreement.

Requests for redemption (sales by unitholders) of fund units shall be made in writing by fax, or via electronic media by special agreement.

Requests made in writing by fax must be signed by the unitholder.

Requests are executed on the date submitted, provided that the request is received by the fund company no later than the cut-off time specified and in accordance with the conditions stated in the fund prospectus. Otherwise, the request will be executed the next bank day.

Redemption requests may be withdrawn only if the fund company consents.

Subscriptions and redemptions are transacted at a unit value that is unknown when the request is submitted.

Unit Class A

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK).

Unit Class B

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK). The minimum initial investment is SEK 25 million.

Unit Class C

Subscriptions and redemptions of fund units are denominated in Norwegian kroner (NOK).

Unit Class D

Subscriptions and redemptions of fund units are denominated in euros (EUR).

Unit Class E

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK). The minimum initial investment is SEK 25 million.

Unit Class F

Subscriptions and redemptions of fund units are denominated in Norwegian kroner (NOK). Unit class F is reserved for investors who subscribe for units via a distributor that, within the framework of its operations, distributes the fund units on the Norwegian market, and that in accordance with the agreement with the fund company does not receive retrocession fees from the fund company for distribution on the Norwegian market. A prerequisite for investing in unit class F is that the holding is registered in an account in the distributor's name on behalf of the customer (nominee registration).

Unit Class G

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK). The minimum initial investment is SEK 50,000.

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary events have occurred that prevent valuation of the fund’s assets in a manner that assures the equal rights of all unitholders. The same applies if all or part of the fund’s assets cannot be valued because the markets in which the fund invests are closed.

§ 11 Charges and Fees

Management Fee

The management fee shall be paid to the fund company from the fund’s assets.

For unit classes A, C and D the management fee shall not exceed 1.75% of the total value of each unit class per year.

For unit classes B and E the fixed management fee is charged at a fixed rate that shall not exceed 0.80% of the total value of Unit Class B and Unit Class E, respectively, per year.

For unit class F, the management fee is charged at a fixed rate that shall not exceed 0.90% of the total value of the unit class per year.

For unit class G, the management fee is charged at a fixed rate that shall not exceed 1.40% of the total value of the unit class, per year.

The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for storage of the financial instruments included in the fund, payments to the fund company's auditors and payments to Finansinspektionen for its supervisory activities.

Other Costs and Fees

Brokerage and other costs attributable to purchases and sales of financial instruments are also paid from fund assets.

§ 12 Dividends

Unit classes A, B, C, D, F and G – Accumulation. Unit classes A, B, C, D, F and G do not pay dividends.

Unit Class E – Income. A dividend will be paid on unit class E.

The board of directors of the fund management company decides annually on the dividend to be paid to unitholders in Unit Class E. The calculation shall be based on the return on the dividend unit class for the preceding financial year. However, the board may fix the dividend at a higher or lower amount if it is in the interests of the unitholders. The objective regarding the size of the dividend is stated in the prospectus.

A dividend accrues to holders of unit class E that are registered as unitholders by the fund management company on the established record date. Dividends shall be paid, where applicable, during the month of May following the end of the financial year.

Dividends are paid in cash, after deduction of the tax that must legally be withheld on dividends, into an account that the unitholder has designated in advance to the fund company. However, upon written notification to the fund company, no later than 10 days before the established dividend date, unitholders may have the dividend, less withholding tax, reinvested in the fund.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund's annual and half-yearly reports shall be available at the fund company within four and two months respectively after the end of the reporting period.

If the fund company decides to amend these fund rules, the decision shall be submitted to Finansinspektionen for approval. The decision shall be made available at the fund company and the depositary and shall be announced in the manner instructed by Finansinspektionen.

The amendments shall take effect in connection with the announcement or at the later date specified in Finansinspektionen's decision. The amendments shall apply to all unitholders.

§ 15 Pledges and Transfers

The fund company must be notified in writing of pledges of fund units. The notification shall state the identity of the unitholder, the pledge holder, the scope of the pledge and any restrictions to the pledge. The notification shall be signed by the pledging party.

The fund company shall record the pledge in the unitholder register and inform the unitholder of the registration. Information about the pledge shall be removed from the register after notification from the pledge holder.

The fund company is entitled to charge a fee for the cost incurred due to the pledge, which shall not exceed SEK 500 per pledge.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss arising because of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances, such as data or telecommunications failures. The reservation with respect to strikes, blockades and lockouts shall apply notwithstanding whether the fund company and/or the depositary is the object of or initiates such labour action.

Neither the fund company nor the depositary shall be liable for loss arising under other circumstances if the fund company or depositary has exercised due care. Neither the fund company nor the depositary shall be liable for indirect loss under any circumstances.

That said above in this paragraph does not limit the rights of unitholders to damages pursuant to the UCITS Act Ch 2, § 21 or Ch 3, §§ 14-16.

§ 17 Restriction of Sales Rights, etc

The circumstance that the fund is intended for the general public does not mean that it is intended for such investors whose purchases of units in the fund or participation in the fund otherwise contravenes the provisions of Swedish or foreign law or regulation. Nor is the fund intended for those investors whose purchase or holding of units in the fund means that the fund or the fund company becomes required to take registration measures or other measures that the fund or the fund company would otherwise not be required to take. The fund company has the right to refuse sales to such investors referred to above in this paragraph.

The fund company may redeem a unitholder’s units In the fund – notwithstanding the objection of the unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of provisions of Swedish or foreign law, ordinance, regulation or decision by governmental authority, or that the fund company is required to take a registration measure or other measure for the fund or the fund company by reason of a unitholder’s redemptions or holdings of units in the fund that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE GLOBAL QUALITY COMPANIES

INVESTMENT STRATEGY

The fund is an equity fund and has a global investment strategy. The fund invests most of its capital in large, established global companies with good profitability and good forecast sales growth. The majority of the companies are expected to be listed in Europe, the USA and Japan. Equities are selected under the assumptions that the companies will be owned for the very long term and that value growth in the investments will be generated by the companies' long-term profit growth and not from short-term price movements.

As part of the fund's investment policy, international standards and guidelines for the environment, social responsibility and corporate governance are considered when selecting investments. In addition to avoiding companies that stand out negatively, the fund also seeks companies stand out positively.

The objective is to offer an investment with good long-term returns. A further objective is to offer an investment with good return relative to investment risk. Risk is limited by means including consideration of corporate sensitivity to the business cycle (cyclicality) and balance sheets. The portfolio is furthermore structured to provide optimal spread of risk based on quantitative and qualitative criteria.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK Accumulation
- B – SEK Income, Institutional (min. SEK 3,000,000)
- C – SEK Accumulation, Institutional (min. SEK 3,000,000)
- D – SEK Accumulation, Distribution
- E – NOK Accumulation, Distribution

RISK PROFILE

The fund invests its assets in global equity markets, including emerging markets that are less developed in terms of legislation that protects investors' rights.

There are no restrictions on fund investments as regards companies, sectors, or geographies, which provides opportunity to spread risks Equity investments are made in local currencies and are not hedged; fund assets are therefore affected by changes in the exchange rates of local currencies against SEK.

Fund assets are invested in liquid assets that can be sold in the event of redemptions. Experience has shown that equities in the most frequently traded companies have good liquidity even under extreme market conditions. But a number of emerging markets are not as well developed, which means that liquidity in these markets may sometimes be deficient.

Certain operational risks arise because fund assets can be invested in emerging markets. For example, the protection of non-controlling interests may be limited and equal treatment of all shareholders cannot always be assumed. The regulations regarding insider trading are often deficient. Accounting standards are still under development in certain markets and are not comparable to western standards. The supply, quality and reliability of company information and research material is sometimes of low quality, which increases the uncertainty about the value of assets. This may also lead to higher price changes than for comparable shares in in western countries.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations, such as to deliver securities or cash in accordance with the contractual conditions of a securities transaction.

Cash and cash equivalents are deposited with an external bank, which entails intrinsic credit risk, but this risk must be considered very low.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE GLOBAL QUALITY COMPANIES SUSTAINABILITY DISCLOSURES

Product name: Carnegie Global Quality Companies
Legal entity identifier: 549300P0VJH45OXLIR11

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
    - careful analysis of every holding from an ESG perspective prior to investing

- excluding companies that do not meet the standards
- Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

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

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 50% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

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

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.

    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
      Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

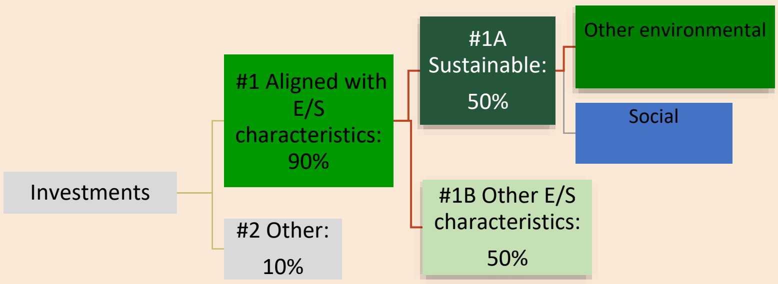
#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 50% of these investments have environmental or social objectives:
- Within this 50%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them.

1B. The remaining maximum share of 50% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

Asset allocation describes the share of investments in specific assets.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

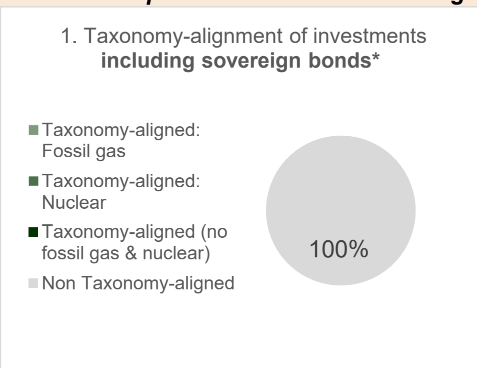
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

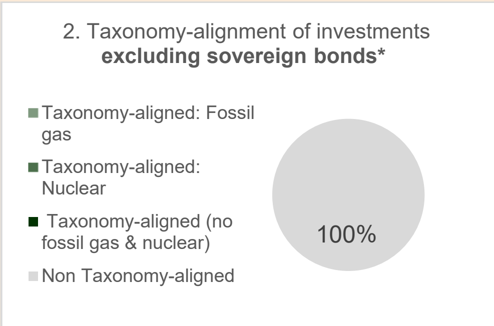
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-global-quality-companies-a-4/

CARNEGIE FONDER

CARNEGIE GLOBAL QUALITY COMPANIES FUND RULES

§ 1 Name and Legal Position

The fund’s name is Carnegie Global Quality Companies, hereinafter referred to as “the fund”. Operations are conducted in compliance with the Swedish UCITS Act (2004:46) these fund rules, Carnegie Fonder AB’s Articles of Association, and regulations issued based on laws and statutes.

The fund is a UCITS fund as defined under the UCITS Act and is intended for the general public. The fund is not a legal person and cannot institute proceedings in a court of law. Fund assets are owned jointly by the unitholders. All units within a unit class carry equal rights to the property included in the fund. The fund cannot acquire rights or assume obligations. The property included in the fund is not subject to seizure and unitholders are not liable for obligations relating to the fund.

Carnegie Fonder AB represents the fund and its unitholders in all matters concerning the fund.

The fund has the following unit classes:

- A – SEK Accumulation
- B – SEK Income, Institutional
- C – SEK Accumulation, Institutional
- D – SEK Distribution, Accumulation
- E – NOK Distribution, Ackumulerande

The accumulation classes reinvest fund returns on an ongoing basis, while the dividend unit class pays dividends. The unit classes differ otherwise regarding distribution channel, minimum initial investment and management fees. The differences between the unit classes are described in full below in §§ 9, 11 and 12.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as “the fund company”.

§ 3 Depositary and its Function

The fund has appointed Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081), hereinafter referred to as “the depositary” as the depositary institution for the fund.

The depositary implements the fund company’s decisions regarding the fund and receives and retains the fund’s property. The depositary furthermore verifies that the decisions taken by the fund company regarding the fund do not contravene the provisions of the UCITS Act or these fund rules. The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

§4 Fund Characteristics

The fund is an equity fund and has a global investment strategy.

The objective is to offer an investment with good long-term return. A further objective is to offer an investment with good returns in relation to the investment risk. Risk is limited by means including consideration of corporate sensitivity to the business cycle (cyclicality) and balance sheets. The portfolio is furthermore structured to provide optimal spread of risk based on quantitative and qualitative criteria.

The fund is intended for investors with a relatively long-term investment horizon. The recommended investment horizon for an investment in the fund is five years.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivative instruments and accounts with credit institutions. The fund will only invest in money market instruments as part of the fund's liquidity management.

The fund is not restricted in terms of geographies or sectors.

The fund will invest most of its capital in large, established global companies. The majority of the companies are expected to be listed in Europe, the USA and Japan. Equities are selected under the assumption that the companies will be owned for the very long term and value growth in investment value will be generated by the companies' long-term profit growth and not from short-term price movements.

As part of the fund's investment policy, international standards and guidelines for the environment, social responsibility and corporate governance are considered when selecting investments. In addition to avoiding companies that stand out negatively, the fund also seeks companies stand out positively.

The fund adheres to specific sustainability-related criteria for its investments. The criteria are based on international norms and guidelines for human rights, labour law, the environment and corruption, as well as criteria decided by the fund company. In addition to avoiding companies that stand out negatively, the company also seeks to identify companies that stand out positively. The fund does not invest in companies that manufacture and/or sell controversial weapons or companies that extract or refine coal, gas, and oil. Furthermore, the fund excludes investments in companies where a significant share of turnover is derived from the production and/or sale of weapons or pornographic material, production of alcoholic beverages or tobacco products or commercial gambling activities. More information is provided in the fund prospectus.

The fund's assets shall be invested in a manner that ensures a good spread of risk in order to generate a high ratio between expected return and expected risk. The fund may invest assets in derivative instruments whose underlying assets consist of or are attributable to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies. The fund may invest a maximum of 10% of its assets in units in other funds UCITS management companies.

§ 6 Specific Information: Permitted Markets for Investments of Fund Assets

Fund assets may be invested in a regulated market or equivalent market outside the EEA or another market within or outside the EEA that is regulated and open to the public.

§ 7 Special Investment Strategy

The fund may invest up to 5% in the transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5.

The fund may invest in derivatives instruments to improve management efficiency in order to reduce the costs and risks of management.

The fund may not use OTC derivatives.

§ 8 Valuation

The fund company ensures a fair and relevant market value at all times.

The fund's NAV is calculated by deducting liabilities related to the fund from its assets.

The fund's assets comprise:

- Financial instruments
- Cash and cash equivalents
- Accrued interest
- Accrued dividends
- Unsettled sales
- Other assets and receivables relating to the fund

Fund assets are valued at current market value. This refers to last price paid, or if such is not available, the last bid price. The unlisted transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5 are calculated at the value determined by the fund company on objective grounds. This valuation is based on:

- Market prices from an unapproved exchange or market maker
- Other financial instruments or indices, adjusted for differences in e.g. risk
- Discounted dividends or cash flows
- Share of equity

Financial instruments and other assets quoted in foreign currency are converted to SEK based on the current market rate for the currency.

The fund's liabilities comprise:

- Payments to the fund company (varies among unit classes)
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

NAV per unit corresponds to the fund's NAV divided by the number of outstanding units, taking into account the terms and conditions attached to each unit class.

NAV per unit is established each bank day.

For the purposes of these fund rules, "bank day" means any day on which Swedish commercial banks are generally open for customary banking business.

§ 9 Subscriptions and Redemptions

The fund is normally open for the subscriptions and redemption of fund units every bank day. As stated below, the fund may be temporarily closed for subscriptions and redemptions on one or more bank days.

The minimum initial subscription amount is SEK 3,000,000 for unit classes B and C.

Unit class D is restricted to investors that subscribe for units via distributors that, under an agreement with the fund company, in whole or in part, do not accept retrocession fees from the fund company and which are paid directly by its customers in connection with providing investment services. A prerequisite for eligibility to invest in unit class D is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration).

Unit class E is restricted to investors that subscribe for units via a distributor which, within the framework of its business, distributes fund units in the Norwegian market and which, under the terms of an agreement with the fund company, does not receive retrocession fees from the fund company for distribution in the Norwegian market. A prerequisite for eligibility to invest in unit class E is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration). Subscriptions and redemptions of fund units are denominated in Norwegian kroner (NOK).

The unit price for subscription or redemption is the latest unit price at execution. Transactions are executed after the fund company receives a subscription or redemption request. The subscription or redemption is then executed at a price unknown to the unitholder when the request was submitted. Details concerning subscription and redemption prices are available on the fund company's website, www.carnegiefonder.se

Redemption of a fund unit shall be executed on the redemption date if cash is available in the fund. If this is not the case, cash must be acquired through sale of the fund's property and the redemption will be executed as soon as possible. If an individual redemption request is of such scope that a sale would be materially detrimental to other unitholders, the fund company may defer the sale after notifying Finansinspektionen thereto. The redemption shall be executed as soon as possible, with due consideration of the interests of other unitholders.

Requests for subscriptions and redemptions of fund units may be withdrawn only if the fund company consents.

§10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of unitholders.

§11 Charges and Fees

Payments shall be made from the fund's assets to the fund company for its management of the fund. The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for the storage of securities included in the fund, including value added tax where required by law, payments to Finansinspektionen for its supervisory activities in accordance with its current regulations, and payments to the fund company's auditors.

The management fee is charged as an ongoing charge not exceeding 1.45% of the fund's NAV per year for unit class A, and 0.85% for unit classes B, C and D. The management fee for unit class E is charged as an ongoing charge not exceeding 0.85% of the fund's NAV per year. Brokerage and other costs as well as tax on the fund's purchases or sales of financial instruments and tax payable by law are charged to the fund.

§ 12 Dividends

The fund does not pay dividends for unit classes A, C, D and E.

The dividend for the income class, unit class B, is determined by the fund company. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends on fund units are paid to all unitholders in the dividend unit class who are registered unitholders on the record date determined by the fund company.

Unless the fund company decides otherwise, return on fund assets, residual distributable amounts from previous periods and other distributable amounts may be used to pay dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company is required to deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports, Amendments of Fund Rules

The fund company shall prepare annual reports and half-yearly reports for the fund. The reports shall be made available by the fund company within four (4) months of the end of the annual reporting period and within two (2) months of the end of the half-yearly reporting period and shall be available for inspection at the depositary. Annual and half-yearly reports shall be provided free of charge to unitholders that request the information.

The fund company decides on amendments to the fund rules. After Finansinspektionen has approved the amendments, the amended fund rules shall be made available at the fund company and the depositary and, as applicable, shall be announced in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

Transfers of fund units must be notified in writing to the fund company. Unitholders are responsible for ensuring that the notification has been duly signed. Notifications of transfer must include details of the transferor and the transferee. Transfers of fund units require the fund company's consent.

Notification that fund units have been pledged must be provided to the fund company in writing. The notification shall state (i) the identity of the unitholder (the pledging party), (ii) the identity of the pledge holder, (iii) the fund units covered by the pledge and (iv) any restrictions to the scope of the pledge. The notification must be signed by the unitholder. The fund company shall record the details of the pledge in the unitholder register and inform the unitholder (the pledging party) of the registration. Details concerning pledges shall be removed from the unitholder register upon written request by the pledge holder.

§ 16 Limitation of Liability

16.1 Limitation of the Fund Company's Liability

The fund company shall not be liable for loss arising from Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strike, lockout, boycott, blockade or other comparable circumstances. The reservation in respect of strike, blockade, boycott and lockout shall apply notwithstanding whether the fund manager initiates or is the target of such a labour action.

If the fund company is prevented from making payments or taking other measures due to circumstances referred to in the foregoing paragraph, the measure may be deferred until the obstacle no longer exists. If as a consequence of such a circumstance the fund company is prevented from making or receiving payments, the fund company shall not be liable to pay penalty interest.

The fund company shall not be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder or another party. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided. The fund company shall not be liable for indirect losses or other consequential losses under any circumstances.

The fund company is not liable for any loss caused by a custodian bank or other contractor engaged by the fund company with due care. Nor shall the fund company be liable for loss incurred by the fund, unitholders, or others by reason of restrictions upon rights of disposal that may be imposed on the fund company in respect of financial instruments and other assets.

The fund company will not pay compensation for losses arising in other cases if the fund company has acted with customary prudence. The fund company shall not be liable for indirect losses under any circumstances.

Notwithstanding the foregoing, the fund company’s tort liability as set forth in the UCITS Act Ch 2, § 21 shall always apply.

16.2 Limitation of the Depositary’s Liability

If the depositary or a custodian bank has lost financial instruments held in custody at the depositary or a custodian bank, the depositary must without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the fund. The depositary shall, however, not be liable if the loss of the financial instruments was caused by an external event beyond the reasonable control of the depositary and whose consequences were impossible to avoid, even though all reasonable efforts were made to do so, such as losses arising from Swedish or foreign legal enactment, intervention by a Swedish or foreign governmental authority, act of war, strike, blockade, boycott, lockout or comparable circumstance. The reservation in respect of strike, blockade, boycott and lockout shall apply notwithstanding whether the depositary initiates or is the target of such labour action.

The depositary shall not be liable for any loss other than such loss referred to in the first paragraph of this clause, provided that the depositary has not intentionally or negligently caused such other loss. Nor shall the depositary be liable for such other loss if circumstances as set forth in the first paragraph of this clause exist.

The depositary shall not be held liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, clearing organisation or other entities that provide equivalent services, nor – as regards losses other than those set forth in the first paragraph of this clause – for losses caused by a custodian bank or other contractors engaged by the depositary with due care or as instructed by the fund company. The depositary shall not be liable for loss caused by the insolvency of the aforementioned organisations or contractors. A delegation agreement for the safekeeping of assets and verification of ownership shall not, however, relieve the depositary of its liability for losses and other injury pursuant to law.

The depositary shall not be liable for any loss or injury incurred by unitholders, the fund or another party by reason of restrictions upon rights of disposal that may be imposed on the depositary in respect of securities. The depositary shall not be liable for indirect losses under any circumstances.

If the depositary is prevented partially or entirely from executing measures according to this agreement as a consequence of a circumstance set forth in the first paragraph of this clause, these measures may be deferred until the obstacle no longer exists. If payment is deferred, the Depositary shall not pay penalty interest. If interest has been previously agreed, the depositary shall pay interest at the rate prevailing on the due date.

If the depositary is prevented from accepting payments for the fund by reason of a circumstance specified in the first paragraph of this clause, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Notwithstanding the above, the depositary’s liability for losses as set forth in the UCITS Act Ch 3, §§ 14-16 shall apply at all times.

§ 17 Restrictions on Sale Rights

The fund is not open to investors whose purchase of units in the fund or participation in the fund otherwise would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to perform. The fund company has the right to refuse to sell units to such investors referred to above in this section.

The fund company may redeem a unitholder’s units in the fund - notwithstanding the objections of the unitholder - if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund Company has by reason of the unitholder’s subscriptions for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

Redemption in accordance with the foregoing paragraph will be executed at the end of the month. That stipulated concerning payment of proceeds for redeemed fund units in accordance with § 9 above shall also apply in respect of redemption in accordance with this § 17.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

CARNEGIE GLOBAL QUALITY SMALL CAP

INVESTMENT STRATEGY

The fund may invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions.

The fund will invest its assets in global small cap companies. “Global small cap companies” means companies whose total market capitalisation, as of the date of investment, is below USD 15 billion. At least 70 percent of the companies are expected to be listed in Europe, the USA and Japan. Equities will be selected under the assumption that the companies will be owned for the very long term and value growth in the investments will be generated by the companies’ long-term profit growth and not from short-term price movements.

The fund’s assets shall be invested in a manner that ensures a good spread of risk in order to generate a high ratio between expected return and expected risk. The fund’s assets may be invested in derivative instruments whose underlying assets consist of or are related to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

The fund may invest a maximum of 10% of its assets in units in other funds or UCITS management companies.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Income, (min. SEK 3,000,000)
- C – SEK, Accumulation, (min. SEK 3,000,000)
- D – SEK Accumulation, Distribution
- E – NOK, Accumulation, Distribution Norway

RISK PROFILE

The fund invests its assets in global equity markets, including emerging markets that are less developed in terms of legislation that protects investors’ rights.

There are no restrictions on fund investments as regards companies, sectors, or geographies, which provides opportunity to spread risks Equity investments are made in local currencies and are not hedged; fund assets are therefore affected by changes in the exchange rates of local currencies against SEK.

Fund assets are invested in liquid assets that can be sold in the event of redemptions. Since shares in small and medium-sized companies may be less liquid than those in larger companies, particular focus will be directed at fund liquidity. Several of the emerging markets are also not as well developed, and there may be liquidity shortfalls from time to time.

Certain operational risks arise because fund assets can be invested in emerging markets. For example, the protection of non-controlling interests may be limited and equal treatment of all shareholders cannot always be assumed. The regulations regarding insider trading are often deficient. Accounting standards are still under development in certain markets and are not comparable to western standards. The supply, quality and reliability of company information and research material is sometimes of low quality, which increases the uncertainty about the value of assets. This may also lead to higher price changes than for comparable shares in in western countries.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations, such as to deliver securities or cash in accordance with the contractual conditions of a securities transaction.

Cash and cash equivalents are deposited with an external bank, which entails intrinsic credit risk, but this risk must be considered very low.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE GLOBAL QUALITY SMALL CAP SUSTAINABILITY DISCLOSURES

Product name: Carnegie Global Quality Small Cap
Legal entity identifier: 63670085LO2MIZKD6U73

Environmental and/or social characteristics

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

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.

Does this financial product have a sustainable investment objective?

☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through

- careful analysis of every holding from an ESG perspective prior to investing
- excluding companies that do not meet the standards
- Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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

The fund uses the following Sustainability indicators to measure the environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 50% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

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

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
      Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

- The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
- The fund manager contacts the holding to discuss our concerns.
- The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
- If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

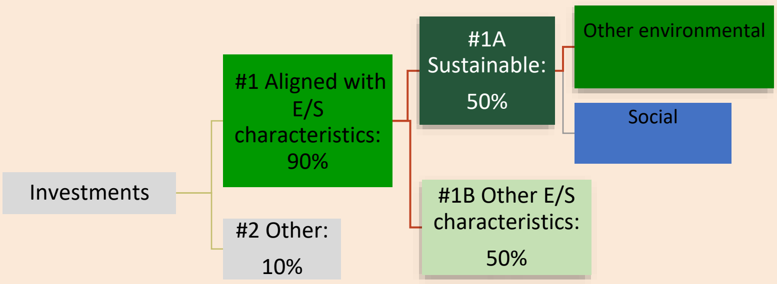
#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 50% of these investments have environmental or social objectives:

- Within this 50%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

1B. The remaining maximum share of 50% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

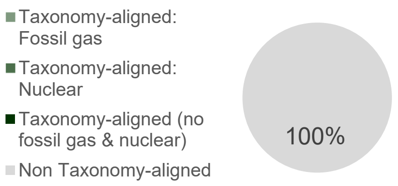
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

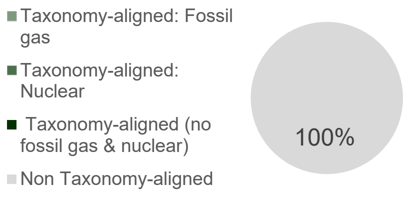
☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

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



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



This graph represents 100% of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-global-quality-small-cap-a/

CARNEGIE GLOBAL QUALITY SMALL CAP FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Global Quality Small Cap. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). The fund is managed in accordance with these fund rules, the articles of association of the fund company, IFA and other applicable statutes.

Fund assets are owned jointly by the fund unitholders and each fund unit confers an equal right to the assets that make up the fund. The fund company (see § 2) represents unitholders in all matters concerning the UCITS fund. The fund cannot acquire rights or assume obligations. Nor may the fund institute legal action before a court of law or other public authority. The assets included in the fund are not subject to seizure and fund unitholders are not responsible for the fund's obligations.

Unit classes

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Income, minimum initial investment
- C – SEK, Accumulation, minimum initial investment
- D – SEK Accumulation, Distribution
- E – NOK, Accumulation, Distribution

The accumulation unit classes differ in terms of management fee, minimum initial deposit, distribution channel and base currency.

The accumulation unit classes reinvest fund returns, while the dividend unit class pays dividends as set forth in § 12.

Unless otherwise specified, the contents of the fund rules are common to all unit classes.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary for the fund's assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund's assets and implements the fund company's instructions regarding the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. The depositary furthermore verifies that management of the fund and subscriptions, redemptions and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions relating to the fund's assets are provided the fund without delay. The depositary also monitors the fund's cash flows.

§ 4 Fund Characteristics

The fund is an equity fund with a global investment strategy. The objective is to offer an investment with good long-term return. A further objective is to offer an investment with good return relative to investment risk. Risk is limited by means including consideration of corporate sensitivity to the business cycle (cyclicality) and balance sheets. The portfolio is furthermore structured to provide optimal spread of risk based on quantitative and qualitative criteria.

The fund is intended for investors with a relatively long-term investment horizon. The recommended investment horizon for an investment in the fund is at least five years.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivatives, fund units and accounts with credit institutions.

The fund will invest its assets in global small cap companies “Global small cap companies” refers to companies with total market capitalisation, as of the date of investment, below USD 15 billion. At least 70 percent of the companies are expected to be listed in Europe, the USA and Japan. Equities are selected under the assumption that the companies will be owned for the very long term and value growth in the investment will be generated by the companies’ long-term profit growth and not from short-term price movements.

The fund’s assets shall be invested in a manner that ensures a good spread of risk in order to generate a high ratio between expected return and expected risk. The fund may invest assets in derivative instruments whose underlying assets consist of or are attributable to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

The fund may invest a maximum of 10% of its assets in units in other funds UCITS management companies.

§ 6 Exchanges and Marketplaces

The fund may trade in financial instruments on a regulated market within the EEA or equivalent market outside the EEA. Trading is also allowed on other markets within or outside the EEA that are regulated, open to the public and within the scope of the fund’s investment strategy as set forth in § 5.

Subscriptions and redemptions of fund units are carried out directly with from the respective fund company, management company, AIF manager or UCITS management company.

§ 7 Special Investment Strategy

The fund may also invest its assets in transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 IFA up to a maximum of 10% of the fund's NAV.

In order to improve management efficiency, the fund may invest in derivative instruments in accordance with the Swedish UCITS Act, Ch 5, §12, first paragraph. The fund may not use OTC derivatives in accordance with the UCITS Act, Ch 5, §12, second paragraph.

The fund may enter into securities lending agreements.

§ 8 Valuation

The fund's NAV is calculated by deducting liabilities related to the fund from its assets. NAV per unit in a particular unit class is equal to NAV for the asset class divided by the number of outstanding units, taking into account the terms and conditions attached to each unit class.

NAV per unit is calculated every bank day and is the basis for setting subscription and redemption prices for trading in fund units. In the daily valuation, the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate unit value if the fund is closed for subscriptions or redemptions.

The fund's assets are calculated as follows:

- Transferable securities, money market instruments, derivative instruments and fund units are measured at current market value (last price paid, or if such is not available, last bid price). If such prices are unavailable or are deemed misleading by the fund company, the assets may be measured at the value determined by the fund company on an objective basis.
- Transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5, are measured at the value determined by the fund company on an objective basis. This valuation may be based on e.g. market prices from an unapproved, regulated market, independent broker or market maker, other financial instruments or indexes, adjusted for differences in e.g. credit risk and liquidity (reference method of valuation); discounted cash flows (present value method of valuation), or share of equity (reporting date method valuation) Initially, the aforementioned transferable securities and money market instruments may also be measured at cost.
- Cash and cash equivalents including bank deposits, short-term placements in the money market, funds deposited in accounts with credit institutions.
- Accrued interest
- Accrued dividends
- Unsettled transactions
- Other receivables relating to the fund

For all assets, associated rights are considered in the form of interest payments, dividends, issue rights and similar.

The fund's liabilities are calculated as follows:

- Accrued management fees due to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

§ 9 Subscriptions and Redemptions

The subscription and redemption prices are the most recently calculated NAV per unit, calculated in accordance with § 8, when the order is executed.

The fund is normally open for subscriptions (purchases by unitholders) and redemptions (sales by unitholders) of fund units on every bank day. However, the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of all unitholders as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Requests to subscribe for fund units must be made in writing to the fund company. Subscriptions of fund units are made at the price established on the date cash become available to the fund company.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

Requests to redeem fund units must be made in writing to the fund company. Redemption shall be executed at the NAV per unit established on the redemption date. Redemptions are executed immediately only to the extent possible without requiring the sale of securities in the fund. If liquid funds must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. The redemption will be executed as soon as the proceeds of sale have been received.

The procedures described above mean that subscription/redemption takes place at a price unknown to the unitholder at the time the subscription/redemption is requested.

Information on subscription and redemption prices will be available from the fund company and the intermediary institution no later than the bank day after the bank day the NAV per unit is established as above.

Unit Class A

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK).

Unit Class B

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK). The minimum initial investment is SEK 3,000,000.

Unit Class C

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK). The minimum initial investment is SEK 3,000,000.

Unit Class D

Subscriptions and redemptions of fund units are denominated in Swedish kronor (SEK). Unit Class D is restricted to investors that subscribe for units via distributors that, under an agreement with the fund company, in whole or in part, do not accept retrocession fees from the fund company and which are paid directly by their customers in connection with providing investment services. A prerequisite for eligibility to invest in unit class D is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration).

Unit Class E

Subscriptions and redemptions of fund units are denominated in Norwegian kroner (NOK). Unit class E is restricted to investors that subscribe for units via a distributor which, within the framework of its business, distributes fund units in the Norwegian market and which, under the terms of an agreement with the fund company, does not receive retrocession fees from the fund company for distribution in the Norwegian market. A prerequisite for eligibility to invest in unit class E is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration).

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if there exist extraordinary circumstances that prevent valuation of the fund's assets in a manner that assures the equal rights of fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund’s assets to the fund company for its management of the fund. In addition, fees shall be paid to the depositary for its activities as the depositary as well as expenses for auditing and supervision by Finansinspektionen.

Total charges and fees for unit class A shall not exceed 1.45% of Fund assets per year.

Total charges and fees for unit classes B, C and D shall not exceed 0.85% of fund assets per year.

Total charges and fee for unit class E shall not exceed 0.80% of fund assets per year.

The charges and fees described above, as well as brokerage and other costs related to the fund's trading in financial instruments are charged to the fund on an ongoing basis. Where required by law, value added tax will be charged on all payments.

§ 12 Dividends

The fund does not pay dividends for unit classes A, C, D and E.

The dividend for the income class, unit class B, is determined by the fund company. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends on fund units are paid to all unitholders in the dividend unit class who are registered unitholders on the record date determined by the fund company.

Unless the fund company decides otherwise, return on fund assets, residual distributable amounts from previous periods and other distributable amounts may be used to pay dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company shall withhold taxes due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-yearly reporting period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to those unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

In conjunction with the pledge of fund units that are not nominee registered, the pledging party and/or pledge holder must notify the fund company in writing in respect thereof.

The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge;
- Any restrictions on the scope of the pledge.

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee. Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

Fund units that are subject to individual pension savings under the Swedish Individual Pension Savings Act (1993:931) cannot be pledged.

The fund company is entitled to charge unitholders a fee not exceeding SEK 400 for administering the registration of the pledge.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss arising as a consequence of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation in respect of strike, blockade, boycott and lockout shall apply whether the fund company or the depositary initiates or is the target of such labour action.

Neither the fund company nor the depositary will pay compensation for losses arising in other cases if the fund company/depositary has acted with due care. Neither the fund company nor depositary shall be liable for indirect loss under any circumstances, nor for loss caused by a custodian bank or other contractor that the fund company or depositary has engaged with due care, nor for loss that may arise by reason of restrictions upon disposition that may be imposed on the fund company or the depositary.

If the fund company or depositary is prevented from taking measures due to circumstances listed in the first paragraph, the measures may be deferred until the obstacle has ceased to exist.

The tort liability of the fund company and the depositary is regulated under the UCITS Act Ch 2 § 21 and Ch 3 §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, but not for investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would obligate the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions by such investors referred to in this paragraph.

The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder's subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE GLOBAL RESILIENT SMALL CAP

INVESTMENT STRATEGY

The fund is an actively managed equity fund that primarily invests in companies traded on regulated markets. It mainly invests in global companies. The goal is to achieve a long-term increase in the fund's value over a period of five years or more. The fund can invest in transferable securities, which include shares and share-related securities. At least 90% of the fund's assets must be invested in shares and share-related securities. Investments should be made in companies whose market value does not exceed the largest constituent in the fund's benchmark index at the time of investment.

Investments should be made in companies that, according to the fund company's assessment, contribute to achieving one or more of the UN's global goals for sustainable development. The selection of stocks and the distribution between different industries and regions are not predetermined, meaning the portfolio can sometimes be concentrated in a few industries and regions.

The fund will normally not use derivatives. It can only use derivatives to a limited extent and for the purpose of making management more efficient. According to the fund rules, the fund may use financial derivatives to make management more efficient. The total exposure should be calculated using the commitment method and should not exceed 100% of the fund's net value.

The fund's benchmark index is the MSCI World Small Cap Net Total Return (in SEK). This index is relevant as it reflects the fund's long-term investment strategy regarding asset classes, company size, and geographic market.

INTENDED INVESTOR

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation (min. SEK 1,000,000)
- C – SEK, Distribution (min. SEK 5,000,000 initial investment, and thereafter a minimum amount for additional investment of SEK 500,000)
- D – NOK, Accumulation, Distribution

RISK PROFILE

The fund is an equity fund, and investing in equities involves the risk of significant price fluctuations. Therefore, an investment period exceeding five years is recommended. The fund freely chooses which industries and sectors to invest in, which can result in overexposure to individual industries and regions at times. The fund normally does not use derivatives or other tools to reduce this risk.

Investing in equity funds involves market risk as the price of the fund and its underlying assets fluctuate. The fund aims to be fully invested in equities, so the value of the fund units can vary significantly in the short term. Market risk is considered the greatest risk the fund is exposed to.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

When a fund invests in financial instruments issued in currencies other than the fund’s base currency, currency risk arises. This means the fund’s value can vary due to changes in exchange rates, which can affect the value of investments both positively and negatively. The fund normally does not use derivatives or other techniques to reduce this risk.

The fund aims to achieve a long-term, positive value increase and invests actively. The responsible managers select a small number of companies to invest in and do not aim to replicate any benchmark index. Therefore, the fund will sometimes deviate from the benchmark, both positively and negatively. Concentration risk can lead to significant price fluctuations for an equity fund with few holdings in a single market or specific sector.

When a security cannot be traded at the intended time without a significant price reduction, liquidity risk arises. This risk is most pronounced in securities with low turnover. If the fund holds a relatively large portion of a company’s shares, this risk increases. Shares traded on a regulated market usually have good liquidity even during periods of significant fluctuations.

Counterparty risk is defined as the risk of loss due to a counterparty being unable to fulfill its obligations within a transaction. The fund generally only trades in shares on a regulated market, thus limiting counterparty risk. The funds should ensure independence from counterparties and always strive for the best result in all securities transactions.

Sustainability risks are managed by subjecting all investments to a sustainability analysis. Investments are selected or excluded based on this analysis. Sustainability risks are also managed through Carnegie Fonder’s engagement in dialogue and ownership influence. Investments in the fund may be subject to value decline due to sustainability risks. These risks can lead to fines, reduced demand for a company’s products or services, supply chain disruptions, increased operating costs, inability to obtain additional capital, or reputational damage.

A sustainability-related event can affect a single investment or have a broader impact on an economic sector, geographic or political region, or country, which can affect the fund’s portfolio as a whole. The use of sustainability criteria can impact the fund’s investment results, and as such, the investment may perform differently than similar funds that do not use such criteria. The fund’s sustainability policy means it cannot invest in certain sectors and companies due to the ESG screening conducted by Carnegie Fonder. This can make the fund more sensitive to certain market movements than other funds. ESG-based exclusion criteria used can lead to the fund foregoing opportunities to make certain investments when it might otherwise be advantageous to do so and/or divesting an investment due to its ESG characteristics when it might be disadvantageous.

When evaluating an investment based on ESG criteria, Carnegie Fonder relies on information and data that may sometimes be incomplete, incorrect, or unavailable. As a result, there is a risk that Carnegie Fonder may make an incorrect assessment of an investment. There is also a risk that Carnegie Fonder may not apply all relevant ESG criteria correctly or that the fund may have indirect exposure to companies that do not meet the relevant ESG criteria used by the fund.

CARNEGIE GLOBAL RESILIENT SMALL CAP SUSTAINABILITY DISCLOSURES

Product name: Carnegie Global Resilient Small Cap
Legal identifier: 636700W62WBIF2N2QJ49

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**. The Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social charateristics

Does this financial product have a sustainable investment objective?	
✖ **Yes**	☐ **No**
✖ It will make a minimum of **sustainable investments with an environmental objective: 40%** ☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy ✖ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments ☐ With an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy ☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy ☐ With a social objective
✖ It will make a minimum of **sustainable investments with a social objective:10%**	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund's sustainable goal is to contribute to sustainable environmental and social development. The fund invests in companies that, through their services or products, contribute to the UN SDG and thus to the transition to a more sustainable society. Activities within the companies in which the fund invests include renewable energy, energy efficiency, healthcare, social and financial inclusion, and contributions to the circular economy. The sustainable investments with an environmental goal also contribute to one or more of the six environmental objectives in the EU Taxonomy. The fund is actively managed, and no specific index has been chosen as a benchmark to achieve the sustainable investment goal.

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

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

A sustainable investment is defined as an investment in an economic activity that contributes to an environmental or social objective, provided that the investments do not cause significant harm to any other environmental objective and that the investment objects follow good governance practices.

The fund uses the following indicators to assess how well the fund's sustainable investment objectives have been achieved:

- At least 50% of the investee companies' turnover should contribute to one or more of the UN SDGs.
- Share of the investee companies' that contribute to one or more environmental goals according to the EU Taxonomy.
- Share of the investee companies' with communicated goals of carbon neutrality or emission targets verified according to the Science Based Targets initiative (SBTI).
- That the fund is not exposed to excluded sectors in accordance with the fund's sustainability policy.
- That the fund is not exposed to companies that violate, for example, the UN Global Compact, the OECD Guidelines for Multinational Enterprises, the UN Declarations on Human Rights, and the ILO Conventions on labour conditions.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

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.

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

The fund considers sustainability risks and adverse impacts in all investments. This is done through a thorough analysis of all companies before investment, where questions about the companies' strategy, financial and non-financial results and risks, capital structure, social and environmental impact, and corporate governance are considered. Specific ESG issues that are material to each company are documented before investment and are continuously monitored and updated. The sustainability analysis takes into account Principal Adverse Impact indicators (PAI indicators). These indicators are developed by the EU and cover areas that cause negative impacts on sustainability factors. The extent to which they cause negative impacts varies between companies depending on industry, geography, and business model.

Fundamental for all companies included in the fund is also that they comply with the requirements of recognized international norms and agreements. The fund's holdings are screened quarterly for compliance with global norms for environmental protection, human rights, labour standards, and anti-corruption.

It is important to analyse these based on the specific characteristics of the companies. Companies with PAI indicators that stand out negatively are further analysed, which may lead to additional measures such as engagement dialogue. It may also lead to an investment not being made in the company or an existing investment being divested.

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

The fund does not invest in companies that violate the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. To ensure that the companies in the fund do not breach any convention or other international agreement, or if there is suspicion of, for example, environmental crimes or human rights violations, the companies are continuously analysed for this. The managers conduct their own ongoing analysis based on information from the companies and news flow, and the fund portfolio is screened twice a year. Through the screening, the fund company

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

receives information on how the companies comply with international norms and agreements from, for example, the UN, EU, OECD, and ILO, as well as any violations of these norms. The fund company also receives ongoing reports on newly suspected violations.

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

✖ Yes, the fund considers principal adverse impacts in its management by selecting investments with positive sustainability impacts, excluding investments with significant sustainability risks and adverse impacts on sustainability factors, and through engagement activities.

The fund company has adopted a sustainable investment policy that covers the fund.

In the fund's management, principal adverse impacts on environmental characteristics (e.g., companies' impact on the environment and climate) and social characteristics (e.g., human rights, labour rights, and equal treatment) are considered).

Indicators for principal adverse impacts:

1. Greenhouse gas emissions,
2. Carbon foootprint,
3. Greenhouse gas intensity,
4. Companies active in the fossil fuel sector,
5. Proportion of non-renewable energy consumption and production,
6. Energy consumption intensity per high climate impact sector,
7. Activities negatively affecting areas with sensitive biodiversity,
8. Emissions to water,
9. Hazardous waste and radioactive waste,
10. Violations of the UN Global Compact and OECD Guidelines for Multinational Enterprises,
11. Lack of processes and compliance mechanisms to monitor adherence to the UN Global Compact and OECD Guidelines for Multinational Enterprises,
12. Unadjusted gender pay gap,
13. Unequal gender distribution in the board,
14. Exposure to controversial weapons.

The fund's annual report contains information on how the fund has considered principal adverse impacts on sustainability factors.

☐ No

What investment strategy does this financial product follow?

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

The fund is an actively managed fund that invests in stocks on a global market.

In order to make sustainable investments, the fund will only invest in companies that have over 50% of their turnover from products or services that contribute to the achievement of the UN SDG. Furthermore, the companies must demonstrate good governance and not cause significant harm.

The fund's selection process has been designed with this in mind. ESG analysis is an integral part of the company analysis process, and material sustainability aspects are documented for all the fund's holdings. The analysis is based on company reports, external analysis, as well as specific ESG analysis and screening. ESG factors are also continuously discussed with company representatives, among other things, to influence the companies to improve from a sustainability perspective.

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

The binding parts of the investment strategy include that investments should be made in companies whose turnover is at least 50% linked to one or more of the UN SDG.

Additionally, the fund does not invest in companies involved in the following products and services: controversial weapons, weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels (oil, gas, coal), uranium, and cannabis. For some of these sectors, there are turnover limits of 5%; see the fund company’s sustainability policy for more information.

Furthermore, the fund does not invest in companies that violate international norms and conventions related to human rights, the environment, labor rights, or the fight against corruption and bribery.

What is the policy for assessing good governance practices in the investment objects?

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

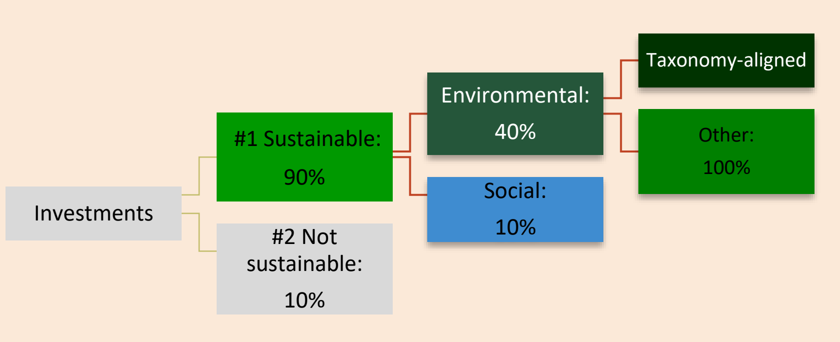
To ensure good governance, the companies’ management structure, corporate culture, compensation, and tax compliance are analysed.

The managers look for companies with good owners and a management team that governs the companies with a long-term perspective.

The analysis is conducted both by reviewing public reports and through meetings and contacts with the companies, where there is an opportunity to ask questions and form an opinion about the business model, corporate governance, and management personnel.

What asset allocation is planned for the financial product?

Asset allocation describes the share of investments in specific assets.



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

CARNEGIE FONDER

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

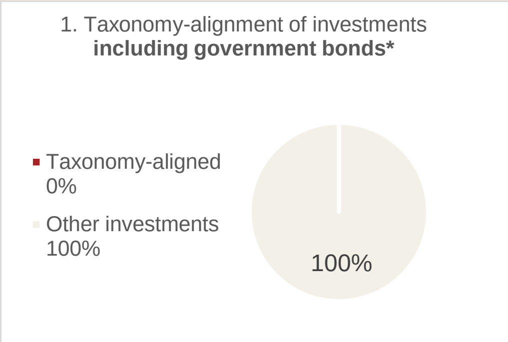
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emissions levels corresponding to the

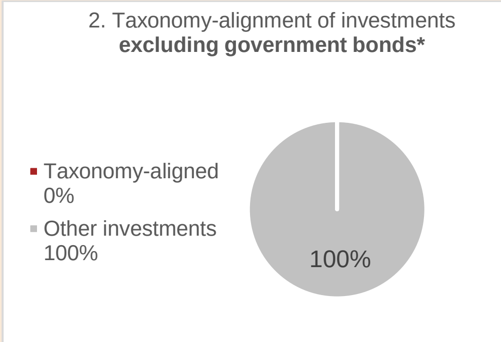
are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund does not commit to making a certain minimum share of sustainable investments according to the EU Taxonomy.

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

The fund does not commit to a minimum share of investments in transition activities and enabling activities.

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

The minimum share of sustainable investments with an environmental objective that are not compliant with the requirements of the EU Taxonomy is 40%.

What is the minimum share of socially sustainable investments?

The minimum share of sustainable investments with a social objective is 10%.

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

The fund includes investments other than shares, which consist of cash. This share may be up to 10%.

Where can I find more product-specific information online?

More product-specific information is available on the website:

https://www.carnegiefonder.se/fonder/carnegie-global-resilient-small-cap-a/

CARNEGIE GLOBAL RESILIENT SMALL CAP FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Global Resilient Small Cap, hereinafter referred to as “the fund.” The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46).

The fund company specified in § 2, hereinafter referred to as “the fund company,” represents the unit holders in all matters concerning the fund, decides on the assets included in the fund, and exercises the rights derived from the assets.

In addition to the provisions of the aforementioned law, the Fund’s operations are governed by these fund regulations, the fund company’s articles of association, and other regulations issued under the law or ordinance. The Fund’s assets are jointly owned by the unit holders, i.e., those who have made deposits in the Fund.

The fund company manages the fund and keeps a register of all unitholders. The fund is not a legal entity and therefore cannot acquire rights or assume obligations, but it is a separate taxable entity.

The fund consists of unit classes with the following conditions:

- A – Accumulation, SEK (non-distributing)
- B – Accumulation, SEK (non-distributing) with a minimum initial investment of SEK 1,000,000
- C – Income, SEK with a minimum initial investment of 5,000,000 SEK and a minimum subsequent investment of 500,000 SEK.
- D – Accumulation, NOK (non-distributing) with distribution conditions.

Each fund unit in a unit class is of equal size. Units in a unit class have equal rights to the assets included in the fund.

The unit classes are associated with fee levels according to §11 and distribution conditions according to §12.

A unit class with distribution conditions (unit class D) is only open to:

- Investors who, under an agreement on [investment service according to Ch 2, § 1] of the Swedish Securities Market Act (2007:528), or equivalent Swedish or foreign regulation, invest in the fund and where no compensation is paid by the fund company to the provider of the investment service,
- Insurance companies that, under an agreement with policyholders, invest in the fund and where no compensation is paid by the fund company to the insurance company [or insurance distributor].

If an investor no longer meets the conditions and requirements to be invested in a particular unit class, the fund company shall, after prior notice to the person listed in the fund’s unitholder register, move the investor to another unit class whose conditions and requirements the investor meets. If an investor can choose more than one unit class or holds units in more than one unit class, the investor has the right to request that the fund company move the investor to the unit class with the lowest management fee. The fund company is not responsible for any costs, fees, or losses incurred by the investor as a result of such a move, including any tax consequences.

All transfers are made without changing the distribution conditions or currency. The above applies regardless of whether the unit holder’s holdings are directly or nominee-registered (in one or more steps) with the fund company.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049).

§ 3 Depositary and its Function

The fund's assets are held by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081), hereinafter the "custodian".

The custodian shall receive and retain the fund's assets and implement the fund company's instructions regarding the UCITS fund provided these do not contravene the UCITS Act, other statutes, or the fund rules, and ensure that:

- subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules.
- the value of the fund units is calculated in accordance with the UCITS Act and the fund rules,
- payments for transactions involving the fund's assets are paid into the fund without delay, and
- the fund's income is used in accordance with the provisions of the UCITS Act and the fund rules.

The custodian shall act independently of the fund company and exclusively in the interest of the unitholders.

§ 4 Fund Characteristics

The fund is an equity fund whose assets are largely invested globally in small companies across various industries. Investments may be made in shares and share-related transferable securities traded on regulated markets within or outside the EEA, as well as other markets according to §6. The selection of shares and the distribution between different industries and regions are not predetermined. Investments may be concentrated in a few industries and regions.

Investments should be made in companies whose operations, according to the fund company's assessment, contribute to achieving one or more of the UN SDG. In addition to investing in such operations as exemplified in §5, specific sustainability criteria have also been established for the fund. These specific sustainability criteria mean that the fund will not invest in certain types of operations. Further information on the fund's sustainability disclosure can be found in the prospectus.

The aim is to achieve a long-term increase in the fund's unit value through the investments described above over a period of five (5) years or more.

§ 5 Investment Strategy

The fund's assets may be invested in transferable securities, derivative instruments, fund units, Swedish treasury bills, and accounts with credit institutions. "Transferable securities" refers to shares and share-related transferable securities. At least 90% of the fund's assets must be invested in shares and share-related transferable securities. Investments should be made in companies whose market value at the time of investment does not exceed the market value of the largest constituent in the fund's benchmark index. The fund's benchmark index is specified in the fund's prospectus. No more than ten percent (10%) of the fund's value may be placed in accounts with credit institutions. No more than 10% of the Fund's value may be invested in Swedish treasury bills. The fund may invest up to ten percent (10%) of its value in fund units.

The fund shall invest its assets in various industries and markets. The fund's investments shall be made on the regulated markets specified in §6.

The fund's investments shall be made in companies whose operations, according to the fund company's assessment, contribute to achieving one or more of the UN SDGs.

In accordance with the sustainability criteria established for the fund, the fund will not invest in certain types of operations. Such operations may be those that could cause significant harm to any of the sustainable development goals. Examples of operations the Fund will not invest in are those conducted in violation of international norms and conventions. Further information on the operations excluded can be found in the fund's prospectus.

§ 6 Marketplaces

The fund's assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading may also take place on other markets within or outside the EEA that are regulated and open to the public.

§ 7 Special Investment Strategy

The fund may invest in such transferable securities as referred to in the UCITS Act, Ch 5, § 5.

The fund may not invest in such money market instruments as referred to in UCITS Act, Ch 5, § 5

The fund may only use derivative instruments to a very limited extent. The fund may use derivative instruments to streamline management in order to reduce costs and risks in management, provided that the underlying assets consist of such transferable securities or financial indices as referred to in the UCITS Act, CH 5, § 12. However, the fund may not use OTC derivatives.

§ 8 Valuation

The fund's net asset value (NAV) is normally calculated each bank day. The NAV per fund unit is the NAV divided by the number of outstanding fund units. The NAV is calculated by deducting the liabilities relating to the fund from its assets.

The fund's assets are calculated as follows:

- Financial instruments are valued based on the current market value (normally the latest price paid). If such a price is missing or is deemed misleading by the fund company, the fund company may determine the value on another objective basis. When valuing on objective grounds, a market value is determined based on, for example, information on the latest paid price or indicative bid price, or with the help of information from counterparties or other independent external sources.
- For transferable securities as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for the special valuation is market prices from unregulated exchanges or independent market makers if such are 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 another listed financial instrument or index with adjustments for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (present value calculation), or capital share of equity.
- Cash and cash equivalents and current receivables in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold, are recorded at the amount they are expected to be received. All assets take into account associated rights in the form of interest, dividends, subscription rights, and the like.

The liabilities of the fund consist of:

- Compensation to the fund company
- Unpaid proceeds for purchased financial instruments
- Any tax liabilities and other liabilities

§ 9 Subscriptions and Redemptions

The fund is open for subscription and redemption of fund units every banking day. The fund company has the right to delay subscriptions and redemptions if the fund company deems that the valuation of the fund's assets cannot be made in a way that ensures the equal rights of the unit holders, for example, due to one or more of the regulated markets or other trading venues or markets where the fund's trading takes place being entirely or partially closed. The value of the fund units is normally calculated each bank day.

The principles used to determine the value of the fund units are stated in §8.

Subscriptions and redemptions of fund units are made at a price that is not yet determined (i.e., unknown) at the time of the request for subscription and redemption.

Requests for redemption can be made to the fund company. The request must be signed and made in writing to the fund company, or alternatively, made in such an equivalent manner as the fund company has previously approved. Redemption cannot take place until a redemption request that meets one of these requirements has been received by the fund company.

Immediate redemption shall only take place to the extent possible without the sale of securities in the fund.

If immediate redemption cannot take place, redemption shall take place as soon as liquid assets have been obtained. Liquid assets are obtained in such cases by selling securities in the fund as soon as possible, and redemption takes place as soon as the subscription proceeds have been received. If a subscription could significantly disadvantage the interests of other unitholders, the fund company may, after notifying the Financial Supervisory Authority, delay the subscription.

The request is executed on the same day it is submitted, provided that the request has reached the fund company no later than the time and in accordance with the conditions specified on the company's website. Otherwise, the request will be executed on the following bank day.

Requests for redemption may only be withdrawn if the fund company permits it.

Applications for the subscription of fund units must be made in writing to the fund company. Subscription of fund units are carried out at the price determined on the day the proceeds are available to the fund company.

The minimum monthly savings amount is 100 SEK.

The information the fund company provides to the media about the price of fund units is always preliminary and may be adjusted by the fund company if necessary. Therefore, the price information provided by the media is not binding for the fund company. Information about the most recently calculated NAV can be obtained from the fund company.

§ 10 Extraordinary Circumstances

The fund may be closed for the subscription and redemption of units if such extraordinary circumstances have occurred that make it impossible to value the fund's assets in a way that ensures the equal rights of unitholders.

§ 11 Charges and Fees

From the fund's assets, compensation shall be paid to the fund company for its management of the fund. The compensation includes costs for the custody of the fund's assets as well as for supervision and auditors with an amount corresponding to a maximum of the percentage share of the value of the fund units in each unit class calculated daily with 1/365th and separated from the fund monthly

- Unit Class A: 1.60%
- Unit Class B: 1.12%
- Unit Class C: 0.96%
- Unit Class D: 0.80%

Brokerage fees related to the purchase and sale of transferable securities as well as taxes and statutory fees are charged to the fund.

§ 12 Dividends

If distribution of dividends is to be made for a unit class according to §1, the basis for the dividend shall be the return of the unit class or other distributable amount. The dividend may exceed or fall below the return of the unit class. Dividends takes place during the period from March to May. The fund company may also decide, if it is in the interest of the unitholders, that an extra dividend shall be made during the year. Dividend accrues to unitholders who are registered for fund units on the determined dividend ex-day.

For dividends, the fund company shall, after any deduction for preliminary tax, acquire new fund units for the unit holders. At the request of the unit holder, the dividend – after any tax deduction – shall instead be paid to the unit holder.

The dividend affects the relationship between the value of accumulated (non-distributing) fund units and the value of distributing fund units by reducing the value of the distributing fund units in relation to the size of the dividend. Further information on dividends can be found in the Fund's prospectus.

§ 13 Financial Year

The financial year of the Fund is the calendar year.

§ 14 Semi-annual and Annual Reports and Amendments of Fund Rules

For each financial year, the fund company shall submit an annual report for the fund no later than four months after the end of the financial year. The fund company shall submit a semi-annual report for the fund no later than two months after the end of each calendar half-year. The annual report and semi-annual report shall be available at the fund company. The semi-annual report and annual report for the fund shall be sent to unitholders registered with the fund company.

If the board of the fund company decides to amend these fund regulations, the decision shall be submitted to the Financial Supervisory Authority for approval. Once the decision has been approved, it shall be made available at the fund company and, where applicable, announced in the manner prescribed by the Financial Supervisory Authority.

§ 15 Pledges and Transfers

Pledging is done by the pledgee or pledgor notifying the fund company in writing of the pledge. The notification shall include the name and address of the pledgee, the owner of the fund units, the number of units covered by the pledge, and information on any restrictions on the scope of the pledge. Registration of the pledge is made in the unitholder register. The fund company shall notify the unitholder in writing of such registration. The note of the pledge applies until the fund company has received notification from the pledgee that the pledge has ceased and has deregistered it in the unitholder register. The fund company may charge a fee of up to 500 SEK for handling the pledge. Unitholders can transfer their fund units. In such cases, the fund company may charge a fee of up to 500 SEK.

§ 16 Limitation of liability

If the custodian or a depositary bank has lost financial instruments held in custody by the custodian under the agreement between the fund company and the custodian, the custodian shall, without undue delay, return financial instruments of the same kind or pay an amount corresponding to the value of such financial instruments to the fund company for the fund's account. However, the custodian is not liable if the loss of the financial instruments is caused by an external event beyond the custodian's reasonable control and whose consequences were impossible to avoid despite all reasonable efforts.

Furthermore, the custodian is not liable for damage caused by Swedish or foreign legislation, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances.

The reservation regarding strike, blockade, boycott, and lockout applies even if the Custodian is subject to or itself undertakes such conflict measures.

The Custodian is not liable for any damages other than those specified in the first paragraph, unless the Custodian has intentionally or negligently caused such damages.

The Custodian is also not liable for such damages if the circumstances specified in the first paragraph exist. The Custodian is not liable for damages caused by a Swedish or foreign stock exchange or other Execution Venue, Registrar, Clearing Organization, or others providing equivalent services, and – with regard to damages other than the loss of financial instruments held in custody – not for damages caused by a Depository Bank or other contractor that the Custodian has engaged with due skill, care, and diligence and regularly monitors, or that has been designated by the Fund Company.

The Custodian is not liable for damages caused by the insolvency of the aforementioned organizations or contractors. However, a custody agreement regarding the safekeeping of assets and control of ownership does not relieve the Custodian of its liability for losses and other damages according to the Fund Legislation. The Custodian is not liable for damages incurred by the Fund Company, unitholders in the Fund, the Fund, or others due to restrictions on disposal that may be applied against the Custodian regarding financial instruments.

The Custodian is not liable for indirect costs, damages, or losses in any case. If there is an obstacle for the Custodian to fully or partially execute an action due to circumstances specified in the first paragraph, the action may be postponed until the obstacle has ceased.

In the event of deferred payment, the Custodian shall not pay default interest. If interest is promised, the Custodian shall pay interest at the rate applicable on the due date.

If the Custodian is prevented from receiving payment for the Funds due to circumstances specified in the first paragraph, the Custodian is entitled to interest only according to the terms applicable on the due date for the period during which the obstacle existed.

The above limitations of liability do not restrict the unitholder’s right to compensation regulated under the UCITS Act Ch 3, §§ 14-16. The fund company has tort liability for damages regulated under the UCITS Act Ch 2, § 21.

§ 17 Permitted investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take.

The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph. The fund company has the right to redeem a unitholder’s units in the fund – notwithstanding the objections of such a unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or ordinance or that the fund company has by reason of a unitholder’s subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE INDIENFOND

INVESTMENT STRATEGY

The fund may invest its assets in transferable securities, money market instruments, fund units, derivatives, but not OTC derivatives, and accounts with credit institutions. Deposits to accounts with credit institutions may not exceed 10% of the fund's value. The fund may invest up to 10% of the fund's NAV in fund units.

The fund invests in companies whose shares or equity-related securities are traded on a regulated market or equivalent market outside the EEA or any other market that is regulated and open to the public and where Indian securities and money market instruments can be traded. The fund is thus not restricted to marketplaces in a particular country.

The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the

entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Distribution

RISK PROFILE

India's development from socialist planned economy to market economy with elements of a planned economy is dependent on continued economic reform. This means that structural risks still exist in the system. India is the world's largest functioning democracy. The political progress of the reform programme, however, is dependent on many different forces. Coalition governments and political horse-trading are common elements. Democratic decision-making can also be very time consuming. Elements of corruption exist in the allocation of assets. The country is therefore still vulnerable to external and internal influences of various kinds. There are also risks of military, social, ethnic or religious conflicts that may affect the economic and political development process.

There are many risks associated with the stock market and how it functions and the approach to share ownership. Accounting rules may not yet be comparable with Western accounting standards. The availability, quality and reliability of corporate information and analytical materials are often of lower quality than that of most Western markets, which increases uncertainty about valuations of companies and their assets. It is common, for example, for extraordinary revenues to be reported as recurring revenue. Reallocation of earnings between public and private companies, via transfer pricing, also takes place. This often results in the volatility of Indian shares being higher than comparable companies' shares in Western countries. Many large companies, however, comply with international accounting standards.

Carnegie Indienfond’s returns are also affected by currency fluctuations. Since shares on the Indian stock markets are denominated in INR, the fund’s returns are affected by changes in the value of SEK against INR, which further increases the fund’s level of risk.

India’s stock markets, the NSE and the BSE, can be considered to have a good standard, with electronic trading and paperless systems for settlement. The regulator, the SEBI, applies a strict set of rules for trade. A special license is required for foreign investors, which means that all transactions are controlled by the SEBI. Trading volumes for most Indian companies are generally good. For smaller companies and on some occasions, however, liquidity in the market may be inadequate. The market is dominated from time to time by trading in derivatives with high turnover, which may affect pricing in the short term and cause large variations in prices.

The Indian market economy still shows many shortcomings compared to a more mature market economy. Business sector conditions and the regulatory framework for the various industries can change without notice through government intervention. Monopolies, oligopolies and cartels are commonly occurring imperfections in the functioning of business. Individual companies may naturally be adversely affected by this, and lack of experience and limited financial resources may make it difficult to obtain protection contractually or through insurance.

The legal risks must be considered significant. The judiciary does not function fully transparently and elements of arbitrariness and corruption can occur. The Indian judicial system was founded by the British and has since independence been developed and refined with an extensive and time-consuming bureaucracy, which often leads to corrupt elements in the process.

Existing protection of non-controlling interests is limited, and it is difficult to seek legal protection for things that we in the West often consider to be violations of the law. Shareholders’ right to information as well as their ability to exert influence over a company’s governance are still limited. Equal treatment of all shareholders cannot always be assumed. Rules against fraud and insider trading exist, but the application of the law may be flawed.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations, such as to deliver securities or cash in accordance with the contractual conditions of a securities transaction.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company’s products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund’s entire portfolio. The use of ESG criteria can affect the fund’s investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE INDIENFOND SUSTAINABILITY DISCLOSURES

Product name: Carnegie Indienfond
Legal entity identifier: 549300R11YUGUCGQUW26

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

[ ] **Yes**	[x] **No**
[ ] It will make a minimum of **sustainable investments with an environmental objective:** ___%	[x] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5% of sustainable investments
[ ] In economic activities that qualify as environmentally sustainable under the EU Taxonomy	[ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
[ ] In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	[x] With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	[x] with a social objective
[ ] It will make a minimum of **sustainable investments with a social objective:**___%	[ ] It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through

VISITING ADDRESS Regeringsgatan 56 Stockholm, Sweden
POSTAL ADDRESS Box 7828 SE-103 97 Stockholm
WEBSITE carnegiefonder.se
E-MAIL spara@carnegiefonder.se
TELEPHONE +46 8 12 15 50 00

- careful analysis of every holding from an ESG perspective prior to investing
- excluding companies that do not meet the standards
- Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

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

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 5% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
    Read more about the analysis tool here.
2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.
3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:
    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

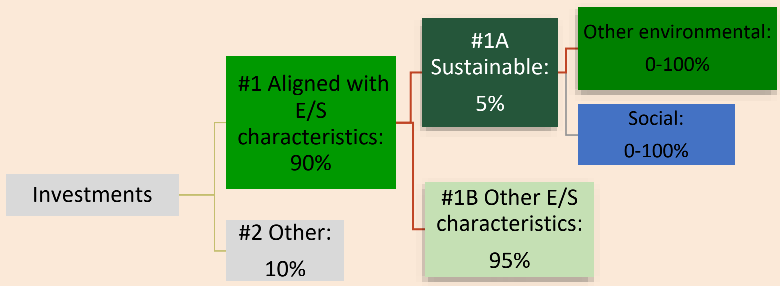
Asset allocation describes the share of investments in specific assets.

#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 5% of these investments have environmental or social objectives:
- Within this 5%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

1B. The remaining maximum share of 95% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

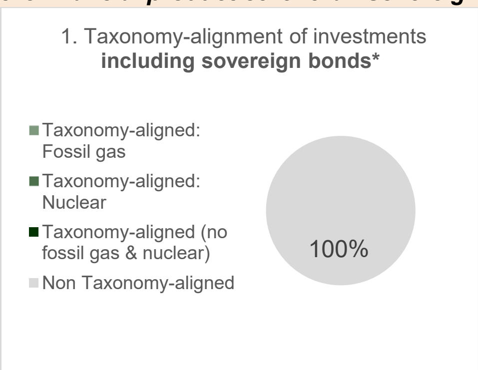
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

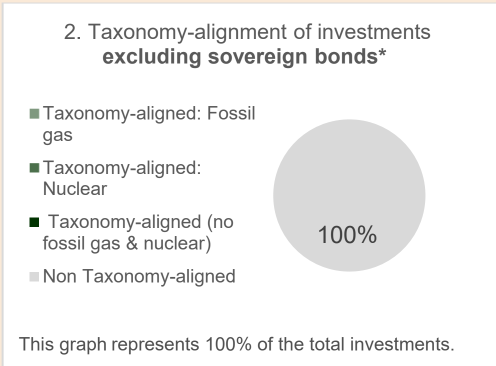
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-indienfond-a-2/

CARNEGIE INDIENFOND FUND RULES

§ 1 Name and Legal Position

The name of the fund is the Carnegie Indienfond. The fund is an equity fund pursuant to the Swedish UCITS Act (2004:46). Fund assets are owned jointly by the fund unitholders and each unit in a unit class confers an equal right to the property that makes up the fund. The fund company (see § 2) represents unitholders in the fund in all matters regarding the UCITS fund, decides over property included in the fund and exercises the rights derived from such property.

The fund is not a legal entity and therefore cannot acquire rights or assume obligations. Fund unitholders are not liable for the fund's obligations.

The fund has the following unit classes:

- A - SEK
- B – SEK, Distribution

The unit classes differ with regard to distribution channel and management charges.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes.

The fund is intended for the general public.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund's unitholder register – transfer the investor to another unit class whose terms and conditions the investor fulfils. If the investor is eligible for more than one unit class, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder Sverige AB, (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary institution for the assets of the fund is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary implements the fund company's decisions with regard to the fund and receives and retains the fund's assets. The depositary furthermore verifies that subscriptions and redemptions of fund units, the valuation of fund units and other use of the fund's assets do not contravene the provisions of the UCITS Act or the fund rules.

§ 4 Fund Characteristics

The fund is an equity fund that focuses on Indian companies.

§ 5 Investment Strategy

The fund focuses on Indian companies. The objective of management is to achieve good long-term returns at least on par with the average performance of the stock markets in the region, while observing customary prudence. The fund strives to maintain a well-diversified securities portfolio. Under normal conditions, the cash component should be low. The investment strategy shall be broad, which means that investments will be made in different companies and different sectors.

The fund may invest its assets in securities, fund units, money-market instruments and accounts with credit institutions. “Securities” means shares and share-related securities. The fund may deposit a maximum of 10% of its asset value to accounts with credit institutions. The fund may invest a maximum of 10% of its asset value in units in equity units.

The fund is estimated to have a high level of risk since it invests in shares issued by companies in emerging markets. The concentration of shares in a particular market entails a limitation to the spread of risk and can also lead to large price fluctuations. Fund return may also be affected by currency movements and political risk.

§ 6 Marketplaces etc

Purchases and sales of securities and money market instruments shall take place on a regulated market or an equivalent market outside the EEA or another market that is regulated and open to the public and where Indian securities and money-market instruments can be traded. The fund is thus not restricted to marketplaces in a particular country.

§ 7 Special Investment Strategy

The fund’s assets may also be invested in such securities and money market instruments as referred to in the UCITS Act Ch 5, § 5, but to a maximum of 10% of the fund’s value.

The management focuses on spot trade. Trading in derivative instruments is used solely to improve management efficiency.

The fund may not make use of OTC derivatives.

§ 8 Valuation

NAV per unit corresponds to the fund's NAV divided by the total number of outstanding fund units. The fund's NAV is calculated by deducting the liabilities related to the fund from its assets.

The value of fund units is calculated each bank day and forms the basis for establishing the subscription and redemption prices for trade in fund units. In the daily valuation, the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate the unit value if the fund is closed for subscriptions or redemptions. If there are large value changes in the securities and other financial instruments included in the fund, the unit value may be established several times during the day.

The fund’s assets are calculated as follows:

- Securities, fund units and money market instruments are valued at the current market value (last price paid or, if this is not available, last bid price). If such prices are not available or are deemed misleading by the fund company, they may be included at a value determined by the fund company on an objective basis.
- Cash and cash equivalents, including deposits in bank accounts, short-term investments on the money market and special deposits with banks, as well as settlement for securities sold, are included at the amount expected to be received.

- Accrued interest
- Accrued dividends
- Unsettled transactions
- Other receivables relating to the fund

For all assets, associated rights in the form of interest payments, dividends, issue rights and similar are considered.

The fund’s liabilities are calculated as follows:

- Accrued management fees to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

For securities and money market instruments as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for this special valuation includes:

- Market prices from unapproved exchanges or market makers
- Other financial instruments or indexes, adjusted for differences in, for example, credit risk and liquidity (reference valuation)
- Discounted cash flows (net present value)
- Share of net asset value (financial statement valuation)
- Initially the above securities and money-market instruments may also be valued at cost.

§ 9 Subscriptions and Redemptions

Fund units are issued by the fund company. The fund is normally open for subscriptions and redemptions of fund units on every bank day, and this takes place through the fund company or its intermediary. However, the fund is not open for subscriptions and redemptions on bank days when the valuation of the fund’s assets cannot be conducted in a manner that assures the equal rights of fund unitholders as a consequence of one or more marketplaces on which the fund is traded being partly or entirely closed.

Requests to buy fund units are made through payment into the fund’s account and are executed at the price established on the bank day following the bank day on which payment is made to the fund. Requests to redeem fund units shall be made in writing or, following special agreement, via electronic media. Redemption requests are executed at the price established on the bank day following the bank day on which the request to sell has been received. Requests for subscription or redemption of fund units may be withdrawn only if the fund company consents.

If requests for subscription or redemption are received by the fund company when the fund is closed for subscriptions and redemptions, NAV per unit is normally established on the following bank day. Subscriptions and redemptions of fund units take place at a price unknown to the unitholder at the time the subscription or redemption is requested.

Information on prices for subscriptions and redemptions is made available at the fund company no later than the bank day after the bank day during which NAV per unit is established in accordance with the foregoing paragraph.

Unit class B is reserved for investors who subscribe for units through distributors that, under an agreement with the fund company, wholly or partly, do not accept retrocession fees from the fund company and are paid directly by their customers in connection with provision of the investment services. A prerequisite to be eligible to invest in unit class B is that the holding is registered on one or more accounts in the distributor’s name of behalf of the client (nominee registration).

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of unitholders.

§ 11 Charges and Fees

The fund company charges a fee for subscriptions and redemptions of fund units of 1% of the invested amount up to SEK 499,999. For amounts between SEK 500,000 and SEK 999,999 the fund company charges a fee of 0.50%. No fee is charged on amounts of SEK 1,000,000 or more. When redeeming fund units, the fund company is entitled to charge a redemption fee not exceeding 1% of NAV per unit if the units have been held for less than one year.

The management fee shall be paid to the fund company from the fund's assets. The management fee is charged at a fixed rate that shall not exceed 2.20% of the fund's value per year for unit class A, and 1.55% for unit classes B. The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for storage of the securities included in the fund, including any statutory value added tax, payments to Finansinspektionen for its supervisory activities in accordance with Finansinspektionen's current regulations, and payments to the fund company's auditors.

Brokerage and other expenses as well as tax consequent upon the fund's purchases and sales of financial instruments and statutory tax are charged to the fund.

§ 12 Dividends

Dividends on fund units will be paid during the month of March following the end of the financial year to all unitholders that are registered as unitholders on the record date determined by the fund company. Unless otherwise decided by the fund company, the fund's taxable profit for the most recently ended financial year shall be used for dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company is required to deduct the tax due on the dividend. The fund company shall use the remaining amount to acquire new fund units on behalf of unitholders. All unitholders will thus receive the additional number of units to which they are entitled. Dividends can also be paid in cash – less deductions for tax – if requested in advance by the unitholder.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

Half-yearly reports shall be made available at the fund company within two months of the end of the half-yearly reporting period and annual reports shall be made available at the fund company within four months of the end of the annual reporting period. Such reports shall also be provided to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall be subject to the approval of Finansinspektionen. After the decision to amend the fund rules has been approved, the fund rules shall be made available at the fund company and the depositary and be announced in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

In conjunction with the pledge of fund units that are not nominee registered, the pledging party and/or pledge holder must notify the fund company in writing in respect thereof. The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the management company in writing that the pledge has expired and the management company has removed the pledge from the unitholder register.

The fund company is entitled to charge unitholders a fee not exceeding SEK 400 for the administration of the registration of pledges.

§ 16 Limitation of Liability

The fund company is not liable for loss arising from Swedish or foreign legal enactments, intervention by a Swedish or foreign governmental agency, acts of war, strikes, blockades, boycotts, lockouts or other similar circumstances. The reservation with respect to strikes, blockades, boycotts, and lockouts shall apply notwithstanding whether the fund company initiates or is the target of such labour actions. Nor shall the fund company be liable in other cases to compensate for loss if the fund Company has observed customary prudence. The fund company shall not be liable for indirect losses under any circumstances.

If the fund company is prevented from making payments or taking other measures due to the circumstances noted in the first paragraph above, the measures may be deferred until the obstacle no longer exists. If as a consequence of such a circumstance the fund company is prevented from making or receiving payments, the fund company shall not be liable to pay penalty interest.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund company and the depositary is regulated under the UCITS Act Ch 2 § 21 and Ch 3 §§ 14-16.

CARNEGIE LISTED INFRASTRUCTURE

INVESTMENT STRATEGY

The fund is an equity fund and has a global investment strategy. The fund will invest in equities linked to infrastructure. Infrastructure means facilities and structures that ensure basic functions in society. Above all, it refers to systems for the transport of goods, persons, and services as well as for energy and information. Infrastructure also includes buildings and property structures.

The fund may invest its assets in transferable securities, money market instruments, derivative instruments and accounts with credit institutions. The fund will only invest in money market instruments as part of the fund's liquidity management.

The fund has no geographical restrictions. The fund will invest in industries and companies connected to infrastructure.

The fund's assets may be invested in derivative instruments whose underlying assets consist of or are related to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

The fund may invest a maximum of 10% of its assets in units in other funds or UCITS management companies.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK Accumulation
- B – SEK Income, Institutional (min. SEK 3,000,000)
- C – SEK Accumulation, Institutional (min. SEK 3,000,000)
- D – SEK Accumulation, Distribution
- E – NOK, Accumulation, Distribution Norway
- F – SEK Accumulation, (min. SEK 50,000)

RISK PROFILE

The fund invests its assets in global equity markets, including emerging markets that are not as advanced in terms of legislation that protects the rights of investors. The fund invests in companies connected to infrastructure. Infrastructure means facilities and structures that ensure basic functions in society. Above all, it refers to systems for the transport of goods, persons, and services as well as for energy and information. Infrastructure also includes buildings and property structures. There are no geographical restrictions to fund investments, which provides an opportunity to spread the risks. Equity investments are made in local currencies and are not hedged. Fund assets are therefore affected by movements in exchange rates of local currencies against SEK.

Fund assets are invested in liquid assets that can be sold in the event of redemptions. Experience has shown that equities in the most frequently traded companies have good liquidity even under extreme market conditions. But a number of emerging markets are not as well developed, which means that liquidity in these markets may sometimes be deficient. Fund investments are not restricted in terms of company size, which allows investments in small and medium sized companies, which by nature may have poorer liquidity than large companies.

Certain operational risks arise because fund assets can be invested in emerging markets. For example, the protection of non-controlling interests may be limited and equal treatment of all shareholders cannot always be assumed. Insider trading regulations are often deficient. Accounting standards are still under development in certain markets and are not comparable to western standards. The supply, quality and reliability of company information and research material is sometimes of low quality, which increases the uncertainty about the value of assets. This may also lead to higher price changes than for comparable shares in in western countries.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations, such as to deliver securities or cash in accordance with the contractual conditions of a securities transaction.

Cash and cash equivalents are deposited with an external bank, which entails intrinsic credit risk, but this risk must be considered very low.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company’s products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund’s entire portfolio. The use of ESG criteria can affect the fund’s investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE LISTED INFRASTRUCTURE SUSTAINABILITY DISCLOSURES

Product name: Carnegie Listed Infrastructure
Legal entity identifier: 549300WVGHUMB5FDVK75

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

[x] Yes	[ ] No
[x] It will make a minimum of **sustainable investments with an environmental objective: 25%**	[ ] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
[ ] In economic activities that qualify as environmentally sustainable under the EU Taxonomy	[ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
[x] In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	[ ] With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	[ ] with a social objective
[x] It will make a minimum of **sustainable investments with a social objective: 15%**	[ ] It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to our categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the following sustainability indicators are used to ensure that the sustainability target is attained.

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

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

The fund uses the following sustainability indicators to measure how the objectives are attained:

1. Share of fund assets invested in companies for which 25% of turnover contributes to at least one or more SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives “climate change mitigation” and “climate change adaptation” in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company’s internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company’s exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company’s voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company’s internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include

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.

consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding investments in economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO_2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

The fund's strategy to attain the investment objective of sustainable investments is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:
   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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

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 following binding elements of the investment strategy are used:

1. The fund invests only in investee companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.

4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
    Read more about the analysis tool here.
2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.
3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:
    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read the Carnegie Fonder Policy for Responsible Investment and Shareholder Engagement here.

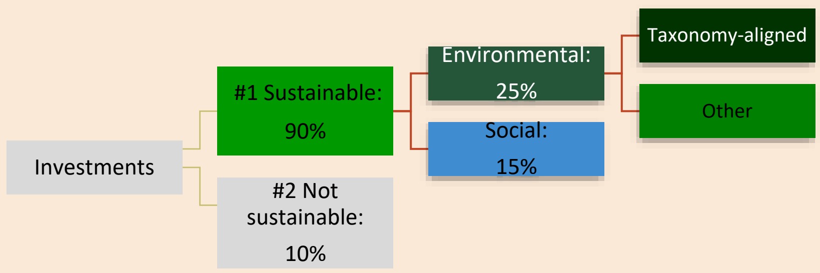
What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1. All investments including cash in the fund are sustainable investments with environmental or social objectives (minimum 90%).

- All investments are aligned with Environmental or Social, with minimum limits of 25% Environmental and 15% Social.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share does not have environmental or social objectives (maximum 10%).



#1 Sustainable covers sustainable investments with environmental or social objectives.

#2 Not sustainable includes investments which do not qualify as sustainable investments.

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

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

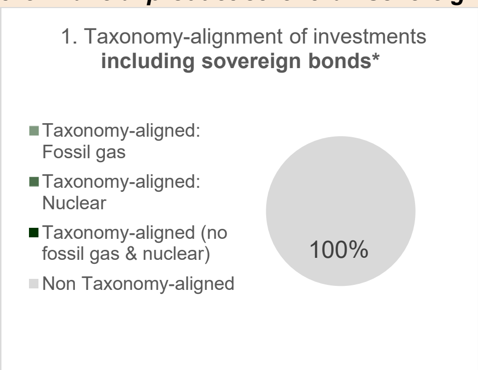
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

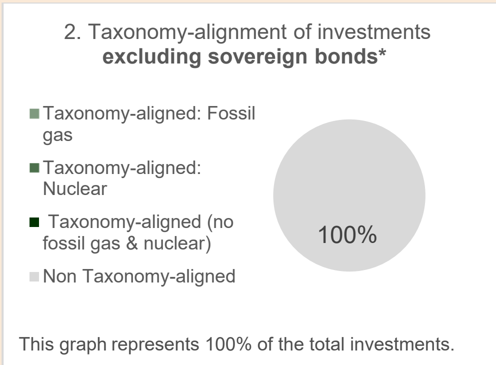
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

VISITING ADDRESS Regeringsgatan 56 Stockholm, Sweden
POSTAL ADDRESS Box 7828 SE-103 97 Stockholm
WEBSITE carnegiefonder.se
E-MAIL spara@carnegiefonder.se
TELEPHONE +46 8 12 15 50 00

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. All of the funds' investments are sustainable with an environmental or a social objective. The minimum share of sustainable investments with an environmental objective is 25%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. All of the funds' investments are sustainable with an environmental or a social objective. The minimum share of sustainable investments with a social objective is 15%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to meet the sustainable investment objective. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-listed-infrastructure-a-2/

CARNEGIE LISTED INFRASTRUCTURE FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Listed Infrastructure, hereinafter referred to as “the fund”. Operations are conducted in compliance with the Swedish UCITS Act (2004:46) these fund rules, Carnegie Fonder AB’s Articles of Association, and other regulations issued based on laws and statutes.

The fund is a UCITS fund as defined under the UCITS Act and is intended for the general public. The fund is not a legal entity and cannot institute proceedings in a court of law. Fund assets are owned jointly by unitholders. All units within a unit class confer equal rights to the property included in the fund. The fund cannot acquire rights or assume obligations. The property included in the fund is not subject to seizure and unitholders are not liable for obligations relating to the fund.

Carnegie Fonder AB represents the fund and its unitholders in all matters concerning the fund.

Unit Classes

The fund has the following unit classes:

- A – SEK Accumulation
- B – SEK Income, Institutional
- C – SEK Accumulation, institutional
- D – SEK Accumulation, Distribution
- E – NOK, Accumulation, distribution
- F – SEK Accumulation, minimum investment amount

The accumulation classes reinvest fund returns on an ongoing basis, while the income class pays dividends. The unit classes differ otherwise regarding distribution channel, minimum initial investment and management fees. The differences between the unit classes are described in full below in §§ 9, 11 and 12.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as “the fund company”.

§ 3 Depositary and its Function

The fund has appointed Skandinaviska Enskilda Banken AB (publ), company registration number 502032-9081, hereinafter referred to as “the depositary”, as the depositary institution for the fund.

The depositary shall implement the fund company’s instructions relating to the investment fund provided they do not contravene the provisions of the UCITS Act, other statutes or the fund rules and shall verify that:

Subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules.

The value of fund units is calculated in accordance with the UCITS Act and the fund rules payments for transactions involving a fund’s assets are paid into the fund without delay.

The fund’s income is used in accordance with the provisions of the UCITS Act and the fund rules.

§ 4 Fund Characteristics

The fund is an equity fund and has a global investment strategy. The fund will invest in equities linked to infrastructure. Infrastructure means facilities and structures that ensure basic functions in society. Above all, it refers to systems for the transport of goods, persons and services, as well as for energy and information. Infrastructure also includes buildings and property structures.

The fund's objective is to provide its unitholders with a long-term risk-adjusted return that exceeds a broad global equity index over a business cycle. The objective is intended to be achieved mainly through a lower risk. Risk is limited by means including consideration of corporate sensitivity to the business cycle (cyclicality) and balance sheets. The portfolio is furthermore structured to provide optimal spread of risk based on quantitative and qualitative criteria.

The fund is intended for investors with a relatively long-term investment horizon. The recommended investment horizon for an investment in the fund is at least five years.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivative instruments and accounts with credit institutions. The fund will only invest in money market instruments as part of the fund's liquidity management.

The fund has no geographical restrictions. The fund will invest in industries and companies connected to infrastructure.

The designation of the fund as an equity fund means that at least 90% of fund assets will be invested in equities at any given time.

The fund may invest its assets in derivative instruments whose underlying assets consist of or are attributable to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

The fund is permitted to invest a maximum of 10% of its assets in units in other funds or UCITS management companies.

§ 6 Specific Information: Permitted Markets for Investment of Fund Assets

The fund's assets may be invested in a regulated market or equivalent market outside the EEA or another market within or outside the EEA that is regulated and open to the public.

§ 7 Special investment Strategy

The fund may invest its assets in transferable securities and, money market instruments referred to in the UCITS Act Ch 5, § 5.

The fund may invest in derivative instruments (including OTC derivatives) in order to improve management efficiency so as to reduce costs and risks in the management.

The fund may, to a certain extent, use currency derivatives to hedge holdings denominated in foreign currency.

§ 8 Valuation

The fund company ensures a fair and relevant market value at all times. The fund’s NAV is calculated by deducting liabilities related to the fund from its assets.

The fund’s assets comprise:

Financial instruments

- Cash and cash equivalents
- Accrued interest
- Accrued dividends
- Unsettled sales
- Other assets and receivables relating to the fund

Fund assets are measured at current market value. This refers to last price paid, or if such is not available, last bid price. Unlisted transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 are included at the value determined by the fund company on an objective basis. This valuation is based on:

- Market prices from unapproved exchanges or market makers
- Other financial instruments or indices, adjusted for differentials in e.g. risk
- Discounted dividends or cash flows
- Share of equity.

Financial instruments and other assets quoted in foreign currency are converted to SEK based on the current market rate for the currency.

The fund’s liabilities comprise:

- Payments to the fund company (varies among unit classes)
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

For derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2 (OTC derivatives), a market value is established as follows: (OTC derivatives), a market value is established as follows:

- Quoted price in an active market

If such a market price is not available, market value should be determined using one of the following methods:

- Based on the market value of the included assets/constituents
- Based on recent transactions between knowledgeable, willing parties in an arm’s-length transaction, if such is available
- Use of a quoted price in an active market for a substantially identical financial instrument

If the market price cannot be determined using one of the options above, or becomes obviously misleading, the market value shall be determined by using a valuation method accepted in the market, such as an option valuation model such as Black & Scholes.

Valuations are conducted individually for each unit class.

NAV per unit corresponds to the fund's NAV divided by the number of outstanding units, taking into account the terms and conditions attached to each unit class.

P.189

§ 9 Subscriptions and Redemptions

The fund is normally open for subscriptions and redemptions of fund units every bank day. As described below, the fund may be temporarily closed for subscriptions and redemptions on one or more bank days.

The minimum initial subscription amount is SEK 3,000,000 for unit classes B and C.

Unit Class D is restricted to investors that subscribe for units via distributors that, under an agreement with the fund company, in whole or in part, do not accept retrocession fees from the fund company and which are paid directly by their customers in connection with providing investment services. A prerequisite for eligibility to invest in unit class D is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration).

Unit class E is restricted to investors that subscribe for units via a distributor which, within the framework of its business, distributes fund units in the Norwegian market and which, under the terms of an agreement with the fund company, does not receive retrocession fees from the fund company for distribution in the Norwegian market. A prerequisite for eligibility to invest in unit class E is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration).

The minimum initial subscription amount is SEK 50,000 for unit class F.

The unit price for subscription or redemption is the latest unit price at execution. Transactions are executed after the fund company receives a purchase or redemption request. The subscription or redemption is thus executed at a price unknown to the unitholder when the request was submitted. Information about subscription and redemption prices is available on the fund company's website, https://www.carnegiefonder.se/en/.

Redemption of a fund unit shall be executed on the redemption date if cash is available in the fund. If this is not the case, cash must be acquired through sale of the fund's property and the redemption will be executed as soon as possible. If an individual redemption request is of such scope that a sale would be materially detrimental to other unitholders, the fund company may defer the sale after notifying Finansinspektionen. The redemption shall be executed as soon as possible, with due consideration of the interests of other unitholders.

Requests for purchases and redemptions of fund units may be withdrawn only if the fund company consents.

NAV per unit is established every bank day, normally with a delay of one bank day.

For the purposes of these fund rules, “bank day” means any day on which Swedish commercial banks are generally open for customary banking business.

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of all unitholders.

§ 11 Charges and Fees

Payments shall be paid to the fund company for its management of the fund. The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for the safekeeping of securities included in the fund, including statutory value added tax, payments to Finansinspektionen for its supervisory activities in accordance with its current regulations, and payments to the fund company's auditors.

The management fee is an ongoing charge not exceeding 1.50% of the fund's NAV per year for Unit Class A, 0.85% percent of NAV per year for unit classes B, C and D, and 80% of NAV per year for unit class E. The

P.190

management fee for unit class F is an ongoing charge not exceeding 1.20% of the fund's NAV per year. Brokerage and other costs as well as tax on the fund's purchases or sales of financial instruments and tax payable by law are charged to the fund.

§ 12 Dividends

The fund does not pay dividends for Unit Classes A, C, D, E and F.

The dividend for the income class, unit class B, is determined by the fund company. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends on fund units are paid to all unitholders in the income class who are registered unitholders on the record date determined by the fund company.

Unless the fund company decides otherwise, return on fund assets, residual distributable amounts from previous periods and other distributable amounts may be used to pay dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company is required to deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund company shall prepare annual reports and half-yearly reports for the fund. The reports shall be made available by the fund company within four (4) months of the end of the annual reporting period and within two (2) months of the end of the half-yearly reporting period and shall be available for inspection at the depositary. Annual and half-yearly reports shall be provided free of charge to unitholders that have requested this information.

Decisions to amend fund rules are made by the fund company. After Finansinspektionen has approved the amendments, the amended fund rules shall be available for inspection at the fund company and the depositary and, as applicable, shall be announced in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

Transfers of fund units must be notified in writing to the fund company. Unitholders are responsible for ensuring that the notification has been duly signed. Notifications of transfer must include details of the transferor and the transferee. Transfers of fund units require the fund company's consent.

Notification that fund units have been pledged must be provided to the fund company in writing. The notification shall state (i) the identity of the unitholder (the pledging party), (ii) the identity of the pledge holder, (iii) the fund units covered by the pledge and (iv) any limitations to the scope of the pledge. The notification must be signed by the unitholder. The fund company shall record the details of the pledge in the unitholder register and inform the unitholder (the pledging party) of this registration. Information concerning pledges shall be removed from the unitholder register upon written request of the pledge holder.

P.191

§ 16 Limitation of Liability

16.1 Limitation of the Fund Company's Liability

The fund company shall not be liable for loss arising from Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strike, lockout, boycott, blockade, or other comparable circumstances. The reservation in respect of strike, lockout, boycott and blockade will apply notwithstanding whether the fund company initiates or is the target of such labour action.

If the fund company is prevented from executing payments or taking other measures due to circumstances referred to in the foregoing paragraph, the measure may be deferred until the obstacle no longer exists. If as a consequence of such a circumstance the fund company is prevented from executing or receiving payment, the fund company shall not be liable to pay penalty interest.

The fund company shall not be liable for loss caused by breach of law, ordinance, regulation or these fund rules by a unitholder or another party. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes t information provided. The fund company shall not be liable for indirect losses or other consequential losses under any circumstances.

The fund company shall not be liable for loss caused by a custodian bank or other third party engaged by the fund company with due care. Nor shall the fund company be held liable for loss incurred by the fund, unitholders, or others by reason of restrictions upon rights of disposal that may be imposed on the fund company in respect of financial instruments and other assets.

The fund company will not pay compensation for losses arising in other cases if the fund company has acted with customary prudence. The fund company shall not be liable for indirect losses under any circumstances.

Notwithstanding the foregoing, the fund company's tort liability as set forth in the UCITS Act Ch 2, § 21 shall always apply.

16.2 Limitation of the Depositary's Liability

If the depositary or a custodian bank has lost financial instruments held in custody at the depositary or a custodian bank, the depositary must without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the fund. The depositary shall, however, not be liable if the loss of the financial instruments was caused by an external event beyond the reasonable control of the depositary and whose consequences were impossible to avoid, even though all reasonable efforts were made to do so, such as losses arising from Swedish or foreign legal enactment, intervention by a Swedish or foreign governmental authority, act of war, strike, blockade, boycott, lockout or comparable circumstance. The reservation in respect of strike, blockade, boycott and lockout will apply notwithstanding whether the depositary initiates or is the target of such labour action.

The depositary shall not be liable for any loss other than such loss referred to in the first paragraph of this clause, provided that the depositary has not intentionally or negligently caused such other loss. Nor shall the depositary be liable for such other loss if circumstances as set forth in the first paragraph of this clause exist.

The depositary shall not be held liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, clearing organisation or other entities that provide equivalent services, nor – as regards losses other than those set forth in the first paragraph of this clause – for losses caused by a custodian bank or other third parties engaged by the depositary with due care or as instructed by the fund company. The depositary shall not be liable for loss caused by the insolvency of the aforementioned organisations or third parties. A delegation agreement for the safekeeping of assets and verification of ownership shall not, however, relieve the depositary of its liability for losses and other injury in accordance with law.

The depositary shall not be liable for any loss or damage incurred by unitholders, the fund or another party by reason of restrictions upon rights of disposal that may be imposed on the depositary in respect of securities. The depositary shall not be held liable for indirect losses under any circumstances.

If the depositary is prevented partially or entirely from executing measures according to this agreement as a consequence of a circumstance set forth in the first paragraph of this clause, these measures may be deferred until the obstacle no longer exists. If payment is deferred, the depositary shall not pay penalty interest. If interest has been previously agreed, the depositary shall pay interest at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this clause, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Notwithstanding the foregoing, the depositary's liability for losses as set forth in the UCITS Act Ch 3, §§ 14-16 shall apply at all times.

§ 17 Restrictions on Sale Rights

The fund is not open to investors whose purchase of units in the fund or participation in the fund otherwise would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose purchases or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions by such investors referred to above in this section.

The fund company may redeem a unitholder's units in the fund - notwithstanding the objections of the unitholder - if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of the unitholder's subscriptions for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

Redemption in accordance with the foregoing paragraph will be executed at the end of the month. That stipulated concerning payment of proceeds for redeemed fund units in accordance with § 9 above shall also apply in respect of redemption in accordance with this § 17.

CARNEGIE LISTED PRIVATE EQUITY

INVESTMENT STRATEGY

The fund is a global equity fund that invests in listed private equity firms, whose business is to invest in, influence and develop privately held companies in their capacity as an active owner. This type of activity is known internationally as private equity. The fund also invests in companies that invest in private equity funds whose business is to invest in, influence and develop privately held companies in their capacity as an active owner. The legal structure of private equity funds is typically a limited partnership. The objective is to generate good long-term adjusted returns for unitholders, and the management target is for risk to correspond to the level of risk in the equity market.

The fund is quoted in SEK and is permitted to utilise currency forward contracts to protect the fund's NAV against currency losses.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK Accumulation
- B – SEK Income, Institutional (min. SEK 3,000,000)
- C – EUR Accumulation, Institutional (min. EUR 300,000)
- D – SEK Accumulation, Distribution
- E – NOK Accumulation, Distribution Norway
- F – SEK Accumulation (min. SEK 50,000)

RISK PROFILE

The fund invests its assets in global equity markets, including emerging markets that are not as advanced in terms of legislation that protects the rights of investors. The fund also invests in listed venture capital firms/funds whose business is to invest in, influence and develop privately held companies in their capacity as an active owner. There are no geographical restrictions to fund investments, which provides an opportunity to spread the risks. Equity investments are made in local currencies and are not hedged. Fund assets are therefore affected by movements in exchange rates of local currencies against SEK.

Fund assets are invested in liquid assets that can be sold in the event of redemptions. Experience has shown that equities in the most frequently traded companies have good liquidity even under extreme market conditions. But a number of emerging markets are not as well developed, which means that liquidity in these markets may sometimes be deficient. Fund investments are not restricted in terms of company size, which allows investments in small and medium sized companies, which by nature may have poorer liquidity than large companies.

Certain operational risks arise because fund assets can be invested in emerging markets. For example, the protection of non-controlling interests may be limited and equal treatment of all shareholders cannot always be assumed. Insider trading regulations are often deficient. Accounting standards are still under development in certain markets and are not comparable to western standards. The supply, quality and reliability of company information and research material is sometimes of low quality, which increases the uncertainty about the value of assets. This may also lead to greater price changes than for shares in comparable companies in western countries.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations, such as to deliver securities or cash in accordance with the contractual conditions of a securities transaction. Cash and cash equivalents are deposited with an external bank, which entails intrinsic credit risk, but this risk must be considered very low.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE LISTED PRIVATE EQUITY SUSTAINABILITY DISCLOSURES

Product name: Carnegie Listed Private Equity
Legal entity identifier: 549300C21O1H12S3S235

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards

- Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

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

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 10% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.

    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).

    Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

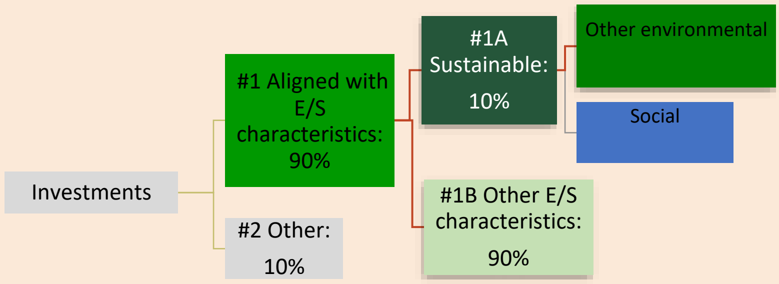
Asset allocation describes the share of investments in specific assets.

#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 10% of these investments have environmental or social objectives:
- Within this 10%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

1B. The remaining maximum share of 90% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

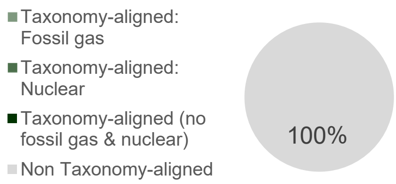
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

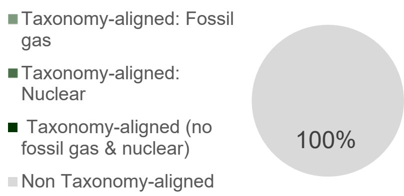
☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

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



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



This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-listed-private-equity-a-2/

CARNEGIE LISTED PRIVATE EQUITY FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Listed Private Equity, hereinafter referred to as “the fund”. Operations are conducted in accordance with the Swedish UCITS Act (2004:46), these fund rules, the articles of association of Carnegie Fonder AB and other regulations issued based on the law and statutes.

The fund is a UCITS fund as defined under the UCITS Act. The fund is not a legal entity and cannot institute legal proceedings before a court of law. Fund assets are owned jointly by the unitholders. All units within a unit class carry equal rights to the property included in the fund. The fund cannot acquire rights or assume obligations. The property included in the fund is not subject to seizure and unitholders are not liable for obligations relating to the fund.

Carnegie Fonder AB represents the fund and its unitholders in all matters concerning the fund.

The fund has the following unit classes:

- A – SEK Accumulation
- B – SEK Income, Institutional
- C – EUR Accumulation, Institutional
- D – SEK Accumulation, Distribution
- E – NOK Accumulation, Distribution
- F – SEK, Accumulation, minimum investment amount)

The accumulation classes reinvest fund returns on an ongoing basis, while the income class pays dividends. The unit classes differ otherwise with regard to distribution channel, minimum initial investment, currency and management fees. The differences between the unit classes are described in full below in §§ 9, 11 and 12.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as “the fund company”.

§ 3 Depositary and its Function

The fund has appointed Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081) as the depositary institution for the fund, hereinafter referred to as “the depositary”.

The depositary implements the fund company’s decisions regarding the fund and receives and retains the fund’s property. The depositary further verifies that the decisions taken by the fund company regarding the fund do not contravene the provisions of the UCITS Act or these fund rules. The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

§ 4 Fund Characteristics

The fund is an equity fund that invests in private equity firms, whose business is to invest in, influence and develop privately held companies in their capacity as an active owner. The fund also invests in companies that invest in private equity funds whose business is to invest in, influence and develop privately held companies in their capacity as an active owner. The legal structure of private equity funds is typically a limited partnership.

The fund’s objective is to generate good long-term risk-adjusted returns for its unitholders.

The recommended minimum investment horizon for an investment in the fund is five years.

§ 5 Investment Strategy

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

The fund shall primarily place its assets in listed equities (transferable securities). These equities shall be involved in private equity firms whose business involves influencing and developing companies in the capacity of active owner.

The designation as an equity fund means that at least 90% of fund assets is invested in listed equities at any given time.

The fund’s assets may be invested in derivative instruments whose underlying assets consist of or are attributable to transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

The fund may invest a maximum of 10% of its assets in units in other funds or UCITS management companies.

§ 6 Specific Information: Permitted Markets for Investment of Fund Assets

Fund assets may be invested in a regulated market or equivalent market outside the EEA or another market within or outside the EEA that is regulated and open to the public.

§ 7 Special Investment Strategy

The fund’s assets may be invested in the transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5.

The fund may invest in derivative instruments (including OTC derivatives) as part of its investment strategy.

The fund may use currency derivatives to a certain extent to hedge its holdings against currency movements.

The fund may invest in derivative instruments without having the capacity to deliver underlying assets.

The fund may also lend transferable securities (securities loans) up to a maximum value corresponding to 20% of fund assets.

§ 8 Valuation

The fund company ensures a fair and relevant market value at all times. The fund’s NAV is calculated by deducting liabilities related to the fund from its assets.

The fund’s assets comprise:

- Financial instruments
- Cash and cash equivalents
- Accrued interest
- Accrued dividends
- Unsettled sales
- Other assets and receivables relating to the fund

Fund assets are measured at current market value. This refers to last price paid, or if such is not available, last bid price. Unlisted transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 are included at the value determined by the fund company on an objective basis. This valuation is based on:

- Market prices from unapproved exchanges or market makers
- Other financial instruments or indices, adjusted for differentials in e.g. risk
- Discounted dividends or cash flows
- Share of equity.

Financial instruments and other assets quoted in foreign currency are converted to SEK based on the current market rate for the currency.

The fund's liabilities comprise:

- Payments to the fund company (varies among unit classes)
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

For derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2 (OTC derivatives), a market value is established as follows:

- Quoted price in an active market

If such a market price is not available, market value should be determined using one of the following methods:

- Based on the market value of the included assets/constituents
- Based on recent transactions between knowledgeable, willing parties in an arm's-length transaction, if such is available
- Use of a quoted price in an active market for a substantially identical financial instrument

If the market price cannot be determined using one of the alternatives above, or becomes obviously misleading, the market value shall be determined by using a valuation method accepted in the market, such as an options valuation model such as Black & Scholes.

Valuations are conducted individually for each unit class.

Net asset value per fund unit (NAV per unit) is equal to the fund's NAV divided by the number of outstanding units, taking into account the terms and conditions attached to each unit class.

NAV per unit in unit classes with a base currency other than SEK is converted from SEK to the respective base currency based on the current market rate for the currency. NAV per unit is established each bank day.

For the purposes of these fund rules, "bank day" means any day on which branches of Swedish commercial banks are generally open for customary banking business.

§ 9 Subscriptions and Redemptions

The fund is normally open for subscriptions and redemptions of fund units every bank day. As described below, the fund may be temporarily closed for subscriptions and redemptions on one or more bank days.

The minimum initial subscription amounts are SEK 3,000,000 for unit class B and EUR 300,000 for unit class C.

Unit Class D is restricted to investors that subscribe for units via distributors that, under an agreement with the fund company, in whole or in part, do not accept retrocession fees from the fund company and which are paid directly by their customers when the distributor provides the investment service in connection with subscription

P.207

for fund units. A prerequisite for eligibility to invest in Unit Class D is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration).

Unit class E is restricted to investors that subscribe for units via a distributor which, within the framework of its business, distributes fund units in the Norwegian market and which, under the terms of an agreement with the fund company, does not receive retrocession fees from the fund company for distribution in the Norwegian market. A prerequisite for eligibility to invest in unit class E is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration). Subscriptions and redemptions of fund units are denominated in Norwegian kroner (NOK).

The minimum initial subscription amount is SEK 50,000 for unit class F.

The unit price for subscription or redemption is the latest unit price at execution. Transactions are executed after the fund company receives a purchase or redemption request. The subscription or redemption is then executed at a price unknown to the unitholder when the request was submitted. Information about subscription and redemption prices is available on the fund company's website, https://www.carnegiefonder.se/en/.

Redemption of a fund unit shall be executed on the redemption date if cash is available in the fund. If this is not the case, cash must be acquired through sale of the fund's property and the redemption will be executed as soon as possible. If an individual redemption request is of such scope that a sale would be materially detrimental to other unitholders, the fund company may defer the sale after notifying Finansinspektionen thereto. The redemption shall be executed as soon as possible, with due consideration of the interests of other unitholders.

Requests for subscriptions or redemptions of fund units may be withdrawn only if the fund company consents.

§ 10 Extraordinary Circumstances

The fund may be closed for sales and redemptions if such extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that ensures the equal rights of all unitholders.

§ 11 Charges and Fees

Payments shall be paid to the fund company for its management of the fund. The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for the safekeeping of securities included in the fund, including statutory value added tax, payments to Finansinspektionen for its supervisory activities in accordance with its current regulations, and payments to the fund company's auditors.

The management fee is an ongoing charge not exceeding 1.50% of the fund's NAV per year for unit class A, 0.85% for unit classes B, C and D, and 0.90% for unit class E. The management fee is an ongoing charge not exceeding 1.20% of the fund's NAV per year for unit class F. Brokerage and other costs as well as tax on the fund's purchases or sales of financial instruments and tax payable by law are charged to the fund.

§ 12 Dividends

The fund does not pay dividends for unit classes A, C, D, E and F.

The dividend for the income class, unit class B, is determined by the fund company. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends on fund units are paid to all unitholders in the income class who are registered unitholders on the record date determined by the fund company.

P.208

Unless the fund company decides otherwise, return on fund assets, residual distributable amounts from previous periods and other distributable amounts may be used to pay dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company is required to deduct the tax due on the dividend

§ 13 Financial Year

The financial year for the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund company shall prepare annual reports and half-yearly reports for the fund. The reports shall be made available by the fund company within four (4) months of the end of the annual reporting period and within two (2) months of the end of the half-yearly reporting period and shall be available for inspection at the depositary. Annual and half-yearly reports shall be provided free of charge to unitholders that have requested this information.

Decisions to amend fund rules are made by the fund company. After Finansinspektionen has approved the amendments, the amended fund rules shall be available for inspection at the fund company and the depositary and, as applicable, shall be announced in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

Transfers of fund units must be notified in writing to the fund company. Unitholders are responsible for ensuring that the notification has been duly signed. Notifications of transfer must include details of the transferor and the transferee. Transfers of fund units require the fund company's consent.

Notification that fund units have been pledged must be provided to the fund company in writing. The notification shall specify (i) the identity of the unitholder (the pledging party), (ii) the identity of the pledge holder, (iii) the fund units covered by the pledge and (iv) any limitations to the scope of the pledge. The notification must be signed by the unitholder. The fund company shall record the details of the pledge in the unitholder register and inform the unitholder (the pledging party) of this registration. Information concerning pledges shall be removed from the unitholder register upon written request of the pledge holder.

§16 Limitation of Liability

16.1 Limitation of the Fund Company's Liability

The fund company shall not be liable for loss arising from Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strike, lockout, boycott, blockade, or other comparable circumstances. The reservation in respect of strike, lockout, boycott, and blockade will apply notwithstanding whether the fund company initiates or is the target of such labour action.

If the fund company is prevented from executing payments or taking other measures due to circumstances referred to in the foregoing paragraph, the measure may be deferred until the obstacle no longer exists. If as a consequence of such a circumstance the fund Company is prevented from executing or receiving payment, the fund company shall not be liable to pay penalty interest.

The fund company shall not be liable for loss caused by breach of law, ordinance, regulation or these fund rules by a unitholder or another party. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed, and for

P.209

ensuring that the fund company is notified of any changes to information provided. The fund company shall not be liable for indirect losses or other consequential losses under any circumstances.

The fund company shall not be liable for loss caused by a custodian bank or other third party engaged by the fund company with due care. Nor shall the fund company be liable for loss incurred by the fund, unitholders, or others by reason of restrictions upon rights of disposal that may be imposed on the fund company in respect of financial instruments and other assets.

The fund company will not pay compensation for losses arising in other cases if the fund company has acted with customary prudence. The fund company shall not be liable for indirect losses under any circumstances.

Notwithstanding the foregoing, the fund company's tort liability as set forth in the UCITS Act Ch 2, § 21 shall apply at all times.

16.2 Limitation of the Depositary's Liability

If the depositary or a custodian bank has lost financial instruments held in custody at the depositary or a custodian bank, the depositary must without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the fund. The depositary shall, however, not be liable if the loss of the financial instruments was caused by an external event beyond the reasonable control of the depositary and whose consequences were impossible to avoid, even though all reasonable efforts were made to do so, such as losses arising from Swedish or foreign legal enactment, intervention by a Swedish or foreign governmental authority, act of war, strike, blockade, boycott, lockout or comparable circumstance. The reservation in respect of strike, blockade, boycott and lockout will apply notwithstanding whether the depositary initiates or is the target of such labour action.

The depositary shall not be liable for any loss other than such loss referred to in the first paragraph of this clause, provided that the depositary has not intentionally or negligently caused such other loss. Nor shall the depositary be liable for such other loss if circumstances as set forth in the first paragraph of this clause exist.

The depositary shall not be held liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, clearing organisation or other entities that provide equivalent services, nor – as regards losses other than those set forth in the first paragraph of this clause – for losses caused by a custodian bank or other third parties engaged by the depositary with due care or as instructed by the fund company. The depositary shall not be liable for loss caused by the insolvency of the aforementioned organisations or third parties. A delegation agreement for the safekeeping of assets and verification of ownership shall not, however, relieve the depositary of its liability for losses and other injury pursuant to law.

The depositary shall not be liable for any loss or damage incurred by unitholders, the fund or another party by reason of restrictions upon rights of disposal that may be imposed on the depositary in respect of securities. The depositary shall not be liable for indirect losses under any circumstances.

If the depositary is prevented partially or entirely from executing measures according to this agreement as a consequence of a circumstance set forth in the first paragraph of this clause, these measures may be deferred until the obstacle no longer exists. If payment is deferred, the depositary shall not pay penalty interest. If interest has been previously agreed, the depositary shall pay interest at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this clause, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Notwithstanding the foregoing, the depositary's tort liability as set forth in the UCITS Act Ch 3, §§ 14-16 shall apply at all times.

§ 17 Restrictions on Sale Rights

The fund is not open to investors whose purchase of units in the fund or participation in the fund otherwise would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this section.

The fund company may redeem a unitholder's units in the fund – notwithstanding the objections of the unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of the unitholder's subscriptions for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

Redemption in accordance with the foregoing paragraph will be executed at the end of the month. That stipulated concerning payment of proceeds for redeemed fund units in accordance with § 9 above shall also apply in respect of redemption in accordance with this § 17.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

CARNEGIE MICRO CAP

INVESTMENT STRATEGY

The fund is an actively managed equity fund that invests in small companies, mainly in Sweden. The fund is a special fund (non-UCITS) in accordance with the Swedish Alternative Investment Fund Managers Act (SFS 2013:561) ("AIFM").

The investments focus on companies that, at the time of investment, have a market value not exceeding 0.1 percent of the total market capitalisation of the companies listed on NASDAQ OMX Stockholm. A small proportion of the fund's investments, equivalent to a maximum of 10 percent of the fund's value, can be invested in companies in other Nordic countries. The fund's investment strategy is otherwise diversified and therefore not limited to particular industries. Investments may be made in derivatives in order to improve management efficiency.

The fund may invest its assets in transferable securities, money market instruments, derivatives, fund units and accounts with credit institutions. The fund's total exposure to any individual company, i.e., the net of the fund's holdings of transferable securities and money market instruments issued by or related to an individual company, may amount to a maximum of 30 percent of the fund's NAV if the total holding of such assets amounts to a maximum of 50 percent of the fund's NAV.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation (min. SEK 50,000)

RISK PROFILE

The fund can invest with no restrictions as to sector, which means the risk is essentially linked to specific holdings. The Swedish equity market has historically fluctuated more than some other markets, both upward and downward. Fund assets are invested in liquid assets that can be sold in the event of redemptions. Since shares in small companies may be less liquid than those in large companies, a particular focus will be placed on the fund's liquidity.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CLOSURE OF THE FUND FOR SUBSCRIPTIONS

The board of directors of the fund company may decide to close the fund to new subscriptions of fund units at the end of the next subsequent quarter if the officially established value of the fund's assets at the end of any quarter exceeds SEK 2,000 million. The board of directors of the fund company believes that this option is necessary to maintain an optimal management volume in the fund at all times and thereby protect the interests of the unitholders.

Notice of closure of the fund will be published on the fund company's website not later than 20 calendar days before closure and notification will be sent to Finansinspektionen. The fund company retains the right to refuse requests for new subscriptions of fund units when subscription forms are received by the fund company after such notice has been published. Once the fund has been closed the board of directors of the fund company may decide that the fund should be opened for new subscriptions of fund units on a particular bank day. Any such decision will be published on the fund company's website not later than one month before the subscription date and notice will be sent to Finansinspektionen. The fund company may at the time of sale determine a maximum total subscription amount in order to limit the additional capital that must be managed and in so doing prevent material detriment to the interests of other unitholders. If a maximum subscription amount is decided, the fund company will provide information about this on its website, as well as the principles to be applied in the event of oversubscription.

The fund company's decisions regarding fund closure or reopening will be published on the company's website, https://www.carnegiefonder.se/en/, in conjunction with the decisions.

CARNEGIE MICRO CAP SUSTAINABILITY DISCLOSURES

Product name: Carnegie Micro Cap
Legal entity identifier: 549300WHNAXC3I3QBG04

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

[ ] **Yes**	[X] **No**
[ ] It will make a minimum of **sustainable investments with an environmental objective:** ___%	[X] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
[ ] In economic activities that qualify as environmentally sustainable under the EU Taxonomy	[ ] with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
[ ] In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	[X] With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	[X] with a social objective
[ ] It will make a minimum of **sustainable investments with a social objective:**___%	[ ] It promotes E/S characteristics, but **will not make any sustainable investments**

What is the sustainable investment objective of this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards
   - Influencing holdings in the right direction as regards E and S.
3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives “climate change mitigation” and “climate change adaptation” in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company’s internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company’s exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company’s voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

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

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund’s sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies’ products and services have direct impact on attaining the goal and that demand for the company’s products and services is affected in both the positive and negative sense depending on the company’s business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company’s categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark.

Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO_2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

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

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 10% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.

    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).

    Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

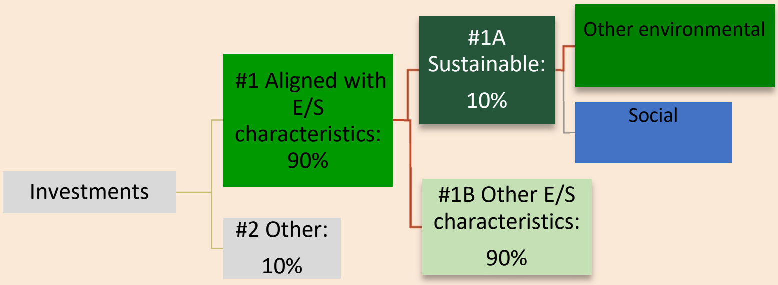
Asset allocation describes the share of investments in specific assets.

#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 10% of these investments have environmental or social objectives:
- Within this 10%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

1B. The remaining maximum share of 90% covers investments that promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

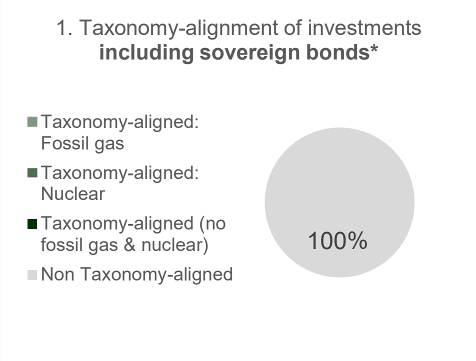
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

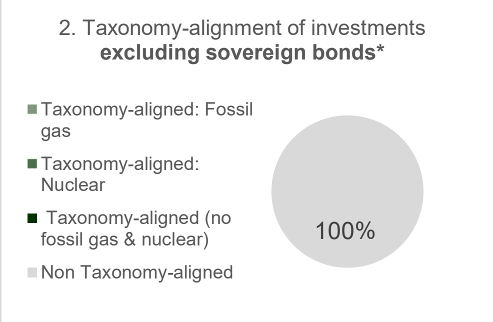
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

* *For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures.*

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change (“climate change mitigation”) and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-micro-cap-a/

CARNEGIE MICRO CAP FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Micro Cap. The fund is a special fund (non-UCITS) in accordance with the Swedish Alternative Investment Fund Managers Act (SFS 2013:10) ("AIFM").

The assets of the fund are owned jointly by the fund unitholders and each fund unit confers equal right to the assets that make up the fund. The fund company (see § 2) represents the unitholders in all matters concerning the fund, decides over property included in the fund and exercises the rights derived from such property. The fund cannot acquire rights or assume obligations. Nor can the fund institute legal proceedings before a court of law or other public authority. The assets included in the fund are not subject to seizure and fund unitholders are not responsible for the fund's obligations.

The fund is intended for the general public.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), licensed in accordance with AIFM Ch 3, § 1, hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary for the fund's assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary shall, among else, monitor the fund's cash flows, store the fund's assets and implement the fund company's decisions concerning the fund, as well as verify that subscriptions and redemptions of fund units, valuation of fund units and use of the fund's assets comply the law and these fund rules.

§ 4 Fund Characteristics

The fund is an actively managed equity fund that invests mainly in equities and other financial instruments issued by a concentrated selection of Swedish microcap companies. A small proportion of the fund's assets may be invested in equities and other financial instruments issued by companies domiciled in other Nordic countries. The equities and other financial instruments in which the fund may invest shall, as a main rule, be admitted to trading on a regulated market or an MTF within the EEA.

The fund is a special fund and has more liberal investment rules than those that apply to UCITS funds which means, among else, that the fund may concentrate its holdings to a smaller number of companies than that which applies to an ordinary equity fund. The fund is not restricted with respect to sector, which means that the selection of equities may relate to one or more sectors.

The objective of the fund is to achieve a good risk-adjusted return for the unit holders over the long term, i.e. over a period of 5 years or more, based on the level of risk the fund strives to maintain and as set forth in § 5 below.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivatives, fund units and accounts with credit institutions.

The fund's equity investments are focused on small companies that, at the time of the investment, have a market value not exceeding one-tenth (0.1) percent of the total market capitalisation of the companies listed on Nasdaq OMX Stockholm.

The fund’s investments are primarily made in equities or other financial instruments issued by Swedish companies. “Swedish companies” refers to companies that are domiciled in Sweden or companies listed on a Swedish marketplace. A small portion of the fund’s investments, corresponding to a maximum of 10% of the fund’s value, may be invested in equities or other financial instruments issued by companies domiciled in other Nordic countries or companies that are listed on other Nordic marketplaces. The fund is also entitled to invest in transferable securities that meet the requirement that they are intended to be admitted to trading on such a market within one year from issue. Further examples of investments within the scope of the fund’s geographical focus may be provided in the fund prospectus.

The fund’s investment strategy is otherwise diversified and therefore not restricted with respect to sector.

Investments in derivatives may be used to improve management efficiency and may be made in derivatives with such underlying assets that constitute or relate to those assets referred to in the UCITS Act Ch 5, § 12, first paragraph.

The fund may deposit up to 10% of its value in accounts with credit institutions. No more than 10% of the asset value may be invested in fund units in other funds or UCITS management companies.

As a special fund, the departures from the rules that apply to UCITS funds are permitted:

Investments in such transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5 shall not exceed 25% of the fund’s value. The investment strategy deviates in this respect from the provisions of the UCITS Act Ch 5, § 5, first paragraph.

The fund’s total exposure to any individual company, i.e. the net of the fund’s holdings of transferable securities and money market instruments issued by or related to an individual company, shall not exceed 30% of the fund's NAV if the total holding of such assets does not exceed 50% of the fund's NAV, provided that such transferable securities or money market instruments 1) meet the requirements set forth in the UCITS Act Ch 5, § 3, or 2) are traded on an MTF within the EEA that meets the requirements of Article 50(1)(b) of the UCITS Directive, and that the instrument meets the requirements of Commission Directive 2007/16/EC on permitted assets and in particular Article 2(1) of this directive. Furthermore, the acquisition may not mean that the exposure limit of 25% of the fund’s value in financial instruments referred to in the UCITS Act Ch 5, § 5 IFA is exceeded. The investment strategy deviates in this respect from the provisions of the UCITS Act Ch 5, § 6, first paragraph, second paragraph, point 3, third paragraph, and Ch 5 § 21.

The fund may acquire shares with such voting rights that enable the fund to exercise a controlling influence over the management of a company, but shall not exceed 30% of voting rights in the individual company, provided that such shares 1) meet the requirements set forth in the UCITS Act Ch 5, § 3, or 2) are traded on an MTF within the EEA that meets the requirements of Article 50(1)(b) of the UCITS Directive and that the shares meet the requirements of Commission Directive 2007/16/EC on permitted assets and in particular Article 2(1) of this directive. Furthermore, the acquisition may not mean that the exposure limit of 25% of the fund’s value to financial instruments referred to in the UCITS Act Ch 5, § 5 is exceeded. The investment strategy deviates in this respect from the provisions of the UCITS Act Ch 5, § 20, first paragraph.

Risk Level and Measures of Risk

- Given that the fund’s investments will consist of investments in small companies, it is estimated that the fund will have a total risk (volatility) over time that exceeds the level that applies to the Swedish equity market as a whole. Total risk shows how much the fund’s returns have varied, and can be assumed to vary, from its expected average return over time.
- The fund’s risk, calculated using the risk measure applied by the fund (the standard deviation of monthly returns for the fund over a rolling 24-month period, multiplied by the square root of the number of months during the year), should under normal market conditions amount to 15-25%. The targeted average level of risk may be exceeded under abnormal market conditions.

§ 6 Exchanges and Marketplaces

The fund’s assets may be invested on a regulated market within the EEA or equivalent market outside the EEA and on other markets, within or outside the EEA, that are regulated and open to the public. In addition, the fund’s assets may be invested on a multilateral trading facility (MTF) within the EEA.

Trade in fund units and UCITS management companies may take place directly through the respective management companies.

§ 7 Special Investment Strategy

The fund’s assets may be invested in such transferable securities and unlisted money market instruments referred to in the UCITS Act Ch 5, § 5.

The fund may make use of derivatives to improve management efficiency so as to reduce management costs and risk.

The fund may not invest in OTC derivatives.

§ 8 Valuation

NAV per unit corresponds to the fund’s NAV divided by the total number of outstanding fund units. The fund's NAV is calculated by deducting liabilities related to the fund, including any future tax liabilities not debited from its assets, as well as the charges and costs specified in § 11 below.

The fund’s assets are calculated as follows:

- Transferable securities, money market instruments, derivatives and fund units are valued at current market value (last price paid or, if not available, last bid price). If such prices are unavailable or are deemed misleading by the fund company, the assets may be measured at the value determined by the fund company on an objective basis.
- For transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation determined on an objective basis by the fund company. This valuation may be based on, for example, market prices from unapproved regulated markets, independent brokers or market makers, other financial instruments or indices adjusted for differences in, for example, credit risk and liquidity (reference valuation), discounted dividends or cash flows (net present value) and share of equity (financial statement valuation). The above transferable securities and money market instruments may also be initially valued at cost.
- Cash and cash equivalents, including deposits in bank accounts, short-term investments on the money market, funds on deposit with credit institutions.
- Accrued interest
- Accrued dividends
- Unsettled transactions
- Other receivables relating to the fund

For all assets, associated rights in the form of interest, dividends, issue rights and similar are considered.

The liabilities of the fund are calculated as follows:

- Accrued management fees to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

In deviation from the UCITS Act Ch 4, § 10, fifth paragraph, NAV per unit is established on the last bank day of each month and published no later than the second bank day thereafter on the fund company's website at https://www.carnegiefonder.se/en/.

§ 9 Subscriptions and Redemptions

The fund is normally open for subscriptions (purchases by unitholders) and redemptions (sales by unitholders) of fund units on every bank day. However, the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of fund unitholders, as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Requests to subscribe for fund units must be made in writing to the fund company. Subscriptions of fund units are executed at the price established on the day payment is available to the fund company.

The minimum initial subscription amount is SEK 50,000.

Redemption requests shall be made in writing to the fund company and are executed at the price established on the seventh bank day following the bank day on which the redemption request is received.

Requests for subscriptions or redemptions shall be made in the manner and at the time specified on the fund company's website.

Requests for subscriptions and redemptions may only be withdrawn with the permission of the fund company.

If cash must be acquired for the redemption through the sale of fund holdings, such sales will take place and redemption will be executed as soon as possible. Should such a redemption be to the material detriment to the interests of other unitholders, the fund company may delay the sale after notification to Finansinspektionen.

The subscription and redemption price per fund unit corresponds to NAV per unit on the bank day on which subscription or redemption takes place. Subscriptions and redemptions thus take place at a price unknown to the unitholder when the subscription or redemption request is submitted.

Information about subscription and redemption prices is published on the fund company's website not later than the second bank day following the bank day on which NAV per unit is established as above.

NAV per unit is rounded to two decimal places.

The board of directors of the fund company may decide to close the fund to new subscriptions of fund units at the end of the next subsequent quarter if the officially established value of the fund's assets at the end of any quarter exceeds SEK 2,000 million. The board of directors of the fund company believes that this option is necessary to maintain an optimal management volume in the fund at all times and thereby protect the interests of the unitholders. Notice of closure of the fund will be published on the fund company's website not later than 20 calendar days before closure and notification will be sent to Finansinspektionen. The fund company retains the right to refuse requests for new subscriptions of fund units when subscription forms are received by the fund company after such notice has been published. Once the fund has been closed the board of directors of the fund company may decide that the fund should be opened for new subscriptions of fund units on a particular bank day. Any such decision will be published on the fund company's website not later than one month before the subscription date and notice will be sent to Finansinspektionen. The fund company may at the time of sale determine a maximum total subscription amount in order to limit the additional capital that must be managed and in so doing prevent material detriment to the interests of other unitholders. If a maximum subscription amount is decided, the fund company will provide information about this on its website, as well as the principles to be applied in the event of oversubscription.

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund's assets to the fund company for its management of the fund at a fixed rate not exceeding 2.0% of the fund's value per year. The management fee includes costs for storage, supervision and auditors. The management fee is calculated daily and is paid to the fund company monthly in arrears.

Brokerage, other costs and tax consequent upon the fund's purchases and sales of financial instruments, statutory tax and payments to suppliers of research services and equivalent services are charged to the fund.

Payment amounts are rounded to the nearest whole krona (SEK).

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments to Fund Rules

The fund company shall prepare half-yearly and annual reports for the fund. The half-yearly report and the annual report shall be made available at the fund company and the depositary within two months and four months, respectively, after the end of the reporting period and shall be provided free of charge to unitholders that have requested these documents.

Any decision by the board of directors of the fund company to amend these fund rules shall be subject to the approval of Finansinspektionen. Once the decision on amendment has been approved, the fund rules shall be made available at the fund company and the depositary and be announced in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

In conjunction with the pledge of fund units that are not nominee registered, the pledging party and/or pledge holder must notify the fund company in writing in respect thereof.

- The notification shall state:
- The identity of the unit holder
- The identity of the pledge holder
- Which fund units are covered by the pledge
- Any restrictions on the scope of the pledge.

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired, and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

Unitholders are permitted to transfer fund units only with the written consent of the fund company.

§ 16 Limitation of Liability

If the depositary has lost financial instruments held in custody at the depositary or its custodian bank, the depositary shall return financial instruments of identical type or an amount corresponding to the value to the fund without undue delay.

Neither the fund company nor depositary shall be liable for loss arising as a consequence of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether that the fund company or the depositary initiates or is the target of such a labour action. Nor shall the fund company or depositary be liable to pay compensation for losses arising in other cases if the fund company or depositary has acted with customary prudence. The fund company or the depositary shall not be held liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If as a result of such circumstance the fund company or depositary is prevented from effecting or receiving payment, the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest shall be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance set forth in the first paragraph above, the depositary shall have the right to interest for the time during which the obstacle has existed only according to the terms prevailing on the due date.

The fund company or depositary shall not be liable for damage caused by a – Swedish or foreign – exchange or other market place, custodian bank, central securities depositary, clearing organisation, or others that provide equivalent services, or other parties engaged by the fund company or depositary with due care. The same shall apply to loss caused by the insolvency of the aforementioned organisations or engaged parties. The depositary is not responsible for engaged parties instructed by the fund company. The fund company and the depositary shall not be liable for any loss incurred by the fund, unitholders or others as a result of restriction of rights of disposal that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. The unit holder is hereby made aware that the unitholder is responsible for ensuring that documents provided to the management company are accurate and duly signed and that the fund company is notified of any changes to information provided.

The tort liability of the fund company is regulated under AIFM Ch 8, §§ 28-31. The liability of the depositary is regulated under AIFM Ch 9, § 22.

§ 17 Permitted Investors

The fund is not intended for investors whose subscription to units in the fund would contravene the provisions of Swedish or foreign law or regulations. Nor is the fund intended for investors whose subscription or holding of units in the fund would result in the fund or the fund company being required to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph. Unitholders are furthermore required to notify the fund company of any changes in their country of domicile.

The fund company may redeem the holder’s units in the fund – notwithstanding the unitholder’s objection – if it becomes apparent that the unit holder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulations or if the fund company, as a consequence of the unitholder’s subscription or holdings in the fund, would be required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unit holder did not hold units in the fund.

CARNEGIE RYSSLANDSFOND

INVESTMENT STRATEGY

The fund may invest its assets in transferable securities, money market instruments, fund units and accounts with credit institutions. To improve management efficiency, the fund may also invest in derivatives. The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

The fund invests in companies whose shares or equity-related transferable securities are traded on a regulated market in the countries of the CIS (former Soviet Union excluding the Baltic states) as well as Estonia, Latvia and Lithuania, or on another regulated market as long as the company’s headquarters or principal place of business are located in the above-defined region.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Distribution
- C – SEK, Accumulation, Institutional (min. SEK 100,000,000)

CLOSURE OF THE FUND FOR SUBSCRIPTIONS

In order to avoid a situation in which the fund cannot be managed in a way that is optimal for the fund and existing unitholders, the fund company has the right to decide to close the fund for subscription of new units. Such a decision means that the subscription of new fund units cannot take place and presupposes that the fund's assets under management exceed a capital limit set by the fund company. The capital limit set by the fund company currently amounts to one (1) million SEK.

Subscriptions received by the fund company after the decision to close has entered into force and until the fund company has again decided to open the fund for subscription of units, will be returned together with information about the decision and other practical information. Any amount paid for subscription will be refunded to the designated bank account.

The fund company's decision will be communicated via the company's website.

RISK PROFILE

Russia’s transformation from a communist planned economy to a market economy with democratic elements is not yet fully completed. Accordingly, the system is still susceptible to external and internal influences of various types. There is also still a risk of military, social, ethnic, or religious conflicts that may affect economic and political development. The return on the Rysslandsfond fund is also affected by currency fluctuations. Since some shares on the Russian stock market are only quoted in US dollars, the fund’s return is also affected by changes in the SEK against USD, which further increases the fund’s level of risk.

For Russia, as for many other countries whose stock markets are at an early stage of development, liquidity of shares is often limited. It may therefore take longer to execute purchases as well as sales compared to what we in the West are accustomed to.

Just like the economy, the legal system is undergoing major reform. Development often does not keep pace with the development of the market economy, which creates imbalances that ultimately mean increased business risks in Russia. The protection of private property rights and intellectual property rights are new developments in Russian society and the laws governing these are not yet fully in place. Often the courts lack experience in areas such as business and corporate law. Precedent is often lacking, which allows for inconsistent and arbitrary interpretation of the law.

The Russian market economy still shows many shortcomings compared to a more mature market economy. The infrastructure, financial systems and general business practices can often be regarded as inadequate. Corruption and organised crime are also factors to consider when doing business in Russia. Individual companies are naturally affected adversely by this, and lack of experience and limited financial resources may make it difficult to obtain protection contractually or through insurance.

Existing protection of non-controlling interests is limited, and it is difficult to seek legal protection for things that we in the West often consider to be violations of the law. Shareholders' right to information as well as their ability to exert influence over a company's governance are still limited. Equal treatment of all shareholders cannot always be assumed. Rules against fraud and insider trading are at best flawed.

The accounting rules are still under development and are not yet comparable to Western accounting principles. The availability, quality and reliability of corporate information and analytical materials are often of lower quality than that of most Western markets, which considerably increases uncertainty about valuations of companies and their assets. This can often result in the volatility of Russian shares being higher than for comparable companies' shares in Western countries.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations in accordance with the contractual conditions of a securities transaction, such as not delivering securities or cash and cash equivalents.

CARNEGIE RYSSLANDSFOND SUSTAINABILITY DISCLOSURES

The fund does not have sustainable investments as its objective and does not promote environmental and social characteristics. Due to the investment strategy of the fund, sustainability risks are not integrated into investment decisions. This fund's underlying investments do not consider EU criteria for environmentally sustainable economic activities.

CARNEGIE RYSSLANDSFOND FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Rysslandsfond. The fund is an investment fund pursuant to the Swedish UCITS Act (SFS 2004:46).

Fund assets are owned jointly by the fund unitholders and each unit in a unit class confers an equal right to the assets that make up the fund. The fund (see § 2) represents unitholders in the fund in all matters regarding the investment fund. The fund cannot acquire rights or assume obligations.

The fund has the following unit classes:

- A – SEK
- B – SEK, Distribution
- C – SEK, Insurance

The unit classes differ with regard to distribution channel, minimum subscription amount and management charges.

Unless otherwise specifically stated, the content of the fund rules is common for all unit classes.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund's unitholder register – transfer the investor to another unit class with terms and conditions the investor fulfils. If more than one unit class is available to the investor, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary for the fund's assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund's assets and executes the fund company's instructions with regard to the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. The depositary furthermore verifies that management of the fund and the subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions relating to the fund's assets are paid into the fund without delay. The depositary also monitors the fund's cash flows.

§ 4 Fund Characteristics

The fund is an equity fund that invests in Russia without limitation with regard to company or sector.

The objective of the fund is firstly to create a stable and positive return and secondly to exceed the benchmark index.

§ 5 Investment Strategy

The fund may invest its assets in securities, money market instruments, derivatives, fund units and accounts with credit institutions.

The fund invests in companies whose shares or equity related securities are traded on a regulated market in countries within the CIS (former Soviet Union excluding the Baltic States) and Estonia, Latvia, and Lithuania, or on another regulated market as long as the company's registered office or main business is located in the region defined above.

The fund may invest a maximum of 10% of its net asset value in fund units.

Investments in the countries specified in these fund rules are associated with high risk. This is due in part to deficiencies in the legal structures, in case law, and in the handling of securities transactions. Added to this are significant political and economic risks. These circumstances may result in the value of an investment varying considerably.

§ 6 Exchanges and Marketplaces

The fund’s assets may be invested in stock exchanges or authorised marketplaces or other regulated markets in EU or EFTA countries as well as in Australia, Hong Kong, Japan, Canada, Singapore, and the United States. In addition, the fund may trade on exchanges and marketplaces in Russia (Moscow), Estonia (Tallinn), Latvia (Riga), Lithuania (Vilnius) and Bermuda.

§ 7 Special Investment Strategy

The fund’s assets may also be invested in securities and money market instruments that are not listed in accordance with § 5, up to a maximum of 10% of the fund's NAV.

The fund may invest in derivatives to improve management efficiency. The fund may not make use of OTC derivatives.

The fund may enter into securities lending agreements.

§ 8 Valuation

NAV per unit corresponds to the fund's NAV divided by the total number of outstanding fund units. The fund’s NAV is calculated by deducting liabilities related to the fund, including any future tax liabilities, from its assets.

The fund’s assets comprise:

- Financial instruments, which are measured based on current market value. If no such market value is available, or is deemed misleading by the fund company, financial instruments may be included at the value determined by the fund company on an objective basis
- Cash and cash equivalents
- Accrued interest
- Accrued dividends
- Unsettled sales
- Other receivables relating to the fund

The fund’s liabilities comprise:

- Payments to the fund company
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

Unlisted securities and money market instruments are included at a value determined by the fund company on an objective basis. This valuation is based on:

- Market prices from an unapproved exchange or market maker
- Other financial instruments or indices, adjusted for differences such as risk
- Discounted dividends or cash flows
- Share of equity

NAV per unit is calculated by the fund company every bank day, if possible.

§ 9 Subscriptions and Redemptions

§ 9.1 General Information

The fund is normally open for subscriptions (purchases by unitholders) and redemptions (sales by unitholders) of fund units on all bank days. However, the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of fund unitholders as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Requests to subscribe for fund units must be made in writing to the fund company. Purchases of fund units are made at the price established on the date cash become available to the fund company.

Redemption requests shall be made in writing to the fund company. Redemption shall be executed at the NAV per unit established on the redemption date. Immediate redemptions take place only to the extent that this is possible without the divestment of securities in the fund. If it is necessary to acquire cash through the divestment of securities in the fund, this will take place as soon as possible. Redemption will take place as soon as cash from sales has been received.

The subscription and redemption prices are the latest calculated net asset value per unit at the time the order is completed, plus issuing fees or less redemption fees.

The procedures described above mean that subscription/redemption takes place at a price unknown to the unitholder at the time the subscription/redemption is requested.

Information about subscription and redemption prices is available from the fund company and intermediary institution no later than the bank day following the bank day on which NAV per unit is established as above.

Unit class B is reserved for investors who subscribe for units through distributors which, pursuant to agreement with the fund company, wholly or partly, do not accept retrocession fees from the fund company and which, when the distributor provides the investment service to its clients in connection with the subscription of units, is paid directly by the client. A prerequisite to be eligible to invest in unit class B is that the holding is registered on one or more accounts in the distributor's name of behalf of the client (nominee registration).

Unit class C is reserved for insurance companies that pursuant to agreement with the fund management company invest in fund units when these are included in insurance products that the insurance company sells to other investors. Upon initial deposit, subscription for units takes place at a minimum amount of SEK 100,000,000. Subscriptions are subsequently made for any amount.

§ 9.2 Closure of the Fund for Subscription Based on the Joint Interests of Unitholders

In order to avoid a situation in which the fund cannot be managed in a way that is optimal for the fund and existing unitholders, the fund company has the right to decide to close the fund for subscription of new units. Such a decision means that the subscription of new fund units cannot take place and presupposes that the fund's assets under management exceed a capital limit set by the fund company. The capital limit set by the fund company is stated in the fund prospectus.

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if there exist extraordinary circumstances whereby a valuation of the fund's assets cannot be made in a manner that assures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund’s assets to the fund company for its management of the fund.

The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for storage of the securities included in the fund, including any statutory value added tax, payments to Finansinspektionen for its supervisory activities in accordance with its current regulations, and payments to the fund company’s auditors.

The total remuneration may amount to a maximum of 2.5% of fund assets for unit class A and a maximum of 1.75% of fund assets for unit class B, per year. The corresponding highest remuneration for unit class C is 2%. The remuneration described above, as well as brokerage and other costs related to the fund's trading in financial instruments are charged to the fund on an ongoing basis. The payments will be subject to any statutory value added tax.

§ 12 Dividends

No dividend will be paid in unit classes A, B and C, unless there are extraordinary circumstances which justify payment of a dividend, taking into account the best interests of the unitholders.

In such a case, a dividend per fund unit will be paid to all unitholders who are included in the unitholder register on the record date determined by the fund company. Unless the fund company decides otherwise, return on the fund assets, remaining residual amounts of previously distributable amounts and other distributable amounts can be used for dividends. The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed. The fund company must deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-year period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner determined by Finansinspektionen.

§ 15 Pledges and Transfers

In conjunction with the pledge of fund units that are not nominee registered, the pledging party and/or pledge holder must notify the fund company in writing in respect thereof.

The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

Fund units that are subject to individual pension savings under the Swedish Individual Pension Savings Act (1993:931) cannot be pledged.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for administering the registration of a pledge.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for damage arising as a consequence of Swedish or foreign legislation, acts of Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts, and lockouts shall apply notwithstanding that the fund company or the depositary is the subject of, or executes, such labour action.

The fund company shall not be held liable for loss arising from Swedish or foreign legal enactment, measures taken by a Swedish or foreign governmental authority, act of war, strike, lockout, boycott, blockade or comparable circumstance. Neither the fund company nor depositary shall be liable for indirect loss under any circumstances, nor for loss caused by a custodian bank or other delegate that the fund company or depositary has engaged with due care, nor for loss that may arise by reason of restrictions upon disposition that may be imposed on the fund company or the depositary.

If the fund company or depositary is prevented from taking measures due to circumstances listed in the first paragraph, the measures may be deferred until the obstacle has ceased to exist.

The tort liability of the fund company and the depositary is regulated under Ch 2 § 21 and Ch 3 §§ 14-16 of the Swedish UCITS Act.

§ 17 Permitted Investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would obligate the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions by such investors referred to in this paragraph.

The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder's subscription for or holdings in the fund become obligated to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE SMALL & MICRO CAP

INVESTMENT STRATEGY

The fund is an actively managed equity fund that primarily invests in companies traded on regulated markets. The fund mainly invests in companies in Europe. The aim for the fund’s investments is to achieve a long-term increase in the fund’s value over a period of five years or more. The fund is an equity fund that can invest in equities and equity-related transferable securities. A larger portion of these investments should be in small companies. At least 80% of the fund’s assets must be invested in equities and equity-related transferable securities. Of these investments, at least 80% must be in companies that, at the time of investment, have a market capitalization that does not exceed the market capitalization of the largest constituent in the fund’s benchmark index. At least two-thirds of the fund’s investments must be in shares and share-related transferable securities issued by companies based in Europe. The selection of shares and the distribution between different industries and regions is not predetermined, which means that the portfolio may be concentrated in a few industries and regions from time to time.

The fund will normally not use derivatives. The fund may only use derivatives to a limited extent and with the aim of making management more efficient. According to the fund rules, the funds have the possibility to use financial derivatives to make management more efficient. The total exposure should then be calculated using the commitment method. The total exposure must not exceed 100% of the fund’s net value.

The fund’s benchmark index is MSCI Europe Small + Microcap TR Net (in SEK). This index is relevant for the fund as it reflects the fund’s long-term investment focus in terms of asset class, company size, and geographical market.

INTENDED INVESTOR

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has no unit classes. The fund’s currency is SEK and the fund does not distribute dividends.

RISK PROFILE

The fund is an equity fund, and investing in equities involves the risk of significant price fluctuations. Therefore, a savings period exceeding five years is recommended. The fund freely chooses which industries and sectors it invests in. As a result, the fund may at times be overexposed to individual industries and regions. The fund normally does not use derivatives or other tools to reduce this risk.

Investing in equity funds involves market risk as the price of the fund and its underlying assets show fluctuations. The fund strives to be fully invested in equities, and therefore the value of the fund units can vary significantly in the short term. Market risk is considered the greatest risk the fund is exposed to.

When a fund invests in financial instruments issued in currencies other than the fund’s base currency, currency risk arises. This means that the fund’s value can vary due to changes in exchange rates. These changes can affect the value of the investments both positively and negatively. The fund normally does not use derivatives or other techniques to reduce this risk. The fund invests the majority of its assets in SEK, thus having a somewhat lower currency risk than funds that invest a larger share in other currencies.

The fund aims to achieve a long-term, positive increase in value and invests actively. The responsible managers select a smaller number of companies to invest in and do not strive to replicate any benchmark index. Therefore, the fund will occasionally deviate from it, both positively and negatively. Concentration risk can lead to significant price fluctuations for an equity fund with few holdings in a single market or specific sector.

When a security cannot be traded at the intended time without a significant price reduction, liquidity risk arises. This risk is most pronounced in securities with low turnover. If the fund holds a relatively large portion of a company's shares, this risk increases. Shares traded on a regulated market usually have good liquidity even during periods of significant fluctuations. Normally, more than half of the fund portfolio's weight consists of slightly larger companies, which reduces liquidity risk.

Counterparty risk is defined as the risk of loss due to a counterparty not being able to fulfil its obligations within a transaction. The fund generally only trades in shares on a regulated market, and counterparty risk is therefore limited. However, the funds must ensure independence from counterparties and always strive for the best result in all securities transactions.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

CARNEGIE SMALL & MICRO CAP SUSTIANABILITY DISCLOSURES

Product name: Carnegie Small & Micro cap
Legal identifier: 5493001I619IECXWVP28

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.** The Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or sociala characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ With a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

Sustainability-related characteristics are promoted in the fund by the managers looking for responsible companies with long-term sustainable business models. The fund takes into account environmental and climate factors by excluding companies involved in the production or distribution of fossil fuels and by selecting companies that actively work with, among other things, climate solutions. The fund excludes companies that violate international norms and conventions regarding human rights, labour rights, and corruption. The fund selects companies with a strong corporate culture regarding corporate governance and social aspects.

The fund invests in companies that, through their products or services, contribute to achieving one or more of the UN SDGs or otherwise promote environmental and/or social characteristics. The fund strives for the companies to have also signed the UN Global Compact. Additionally, the fund promotes environmental characteristics by investing in companies that have established scientifically based climate targets to reduce their greenhouse gas emissions and that are in line with the goals of a maximum 1.5 degree warming.

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

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

The fund's holdings are continuously analyzed by the managers regarding relevant sustainability factors and sustainability risks. Several sustainability indicators are considered, and the priorities may vary depending on the company being analysed. Examples include energy efficiency, renewable energy, use of raw materials, and management of greenhouse gas emissions. It can also involve indicators that show the promotion of equality and labour rights issues..

The fund's engagement work mainly takes place through direct dialogue with the management of the holdings. The managers continuously engage in dialogue with the fund's holdings about sustainability and want to see them develop in the right direction on these issues. Influence is also exerted through voting at general meetings and participation in nomination committees. The fund company also measures the fund's carbon footprint.

What are the objectives of the sustainable investments that the financial product partially intends to make, and how does the sustainable investment contribute to such objectives?

The fund invests in small and micro cap companies that often have less administrative capacity than large companies. This results in sustainability reporting still being significantly less detailed than for other companies. However, this does not mean that their ambitions regarding sustainability and environmental work are less ambitious in practice. The absence of formal reporting in some cases means that the fund may periodically find it difficult to formally prove that the holdings meet the fund company's established criteria for sustainable investments. Therefore, the fund has found it difficult to set a formal target for the proportion of sustainable investments in advance.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

The fund company considers sustainability risks and adverse imoact in all investments. This is done through a thorough analysis of all companies before investment, where questions about the companies' strategy, financial and non-financial results and risks, capital structure, social and environmental impact, and corporate governance are considered. Specific ESG issues that are material to each company are documented before investment and are continuously followed up and updated. Fundamental for all companies included in the fund is also that they comply with the requirements of recognized international norms and agreements. The fund's holdings are screened quarterly for compliance with global norms for environmental protection, human rights, labour standards, and anti-corruption.

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.

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

Specific adverse impacts that are material to each company are analysed and documented before investment, and are continuously followed up and updated.

Examples of indicators covered in the environmental area can include greenhouse gas emissions, how the company uses non-renewable resources, or failure to prevent serious environmental degradation. By excluding fossil fuels, for example, we automatically avoid investing in companies that produce fossil fuels and are generally considered to have a significant direct negative climate impact. The fund company also identifies and measures the carbon footprint of the funds annually.

Examples of indicators covered in the area of human rights can include insufficient consumer protection, violations of health and safety standards, or violations of indigenous peoples' rights Examples of issues covered in the area of labour rights can include violations of the right to freedom of association, discrimination, or child labour. Regarding anti-corruption, issues such as bribery are included.

The fund completely excludes investments in certain sectors and activities such as controversial weapons, nuclear weapons, and cannabis. When investing in companies involved in products and services such as weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels, and uranium, no more than five percent of the turnover may relate to the specified product or service. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria.

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

The fund does not invest in companies that violate the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. To ensure that the companies in the fund do not breach any convention or other international agreement, or if there is suspicion of, for example, environmental crimes or human rights violations, the fund portfolio is screened twice a year. Through the screening, the fund company receives information on how the companies comply with international norms and agreements from, for example, the UN, EU, OECD, and ILO, as well as any violations of these norms.

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 in its management by selecting investments, excluding investments with excessive sustainability risks and negative impacts on sustainability factors, and through engagement activities. The fund company has adopted a policy for sustainable investments that covers the fund.

In the fund's management, principal adverse impacts on environmental characteristics (e.g., companies' impact on the environment and climate) and social characteristics (e.g., human rights, labor rights, and equal treatment) are considered.

The fund's annual report contains information on how the fund has considered principal adverse impacts on sustainability factors.

☐ No

What investment strategy does this financial product follow?

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

Sustainability analysis in terms of environmental, social responsibility, and corporate governance issues is an integral part of the analysis of all potential investments. A strong sustainability profile in all aspects is a fundamental requirement for the fund to invest in a company. The fund selects companies with a strong corporate culture (corporate governance, social aspects) and preferably where the business model benefits from the necessary development towards a more environmentally friendly society.

The fund’s selection process has been designed with this in mind. ESG analysis is an integral part of the company analysis process, and significant sustainability aspects are documented for all the fund’s holdings. The analysis is based on company reports, external analysis, as well as specific ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

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

The fund uses methods of inclusion, exclusion, and engagement to achieve the environmental and social characteristics promoted by the fund.

The managers look for well-managed companies to invest in, which includes assessments of ESG issues.

The fund does not invest in companies involved in the following products and services: cluster bombs, landmines, chemical and biological weapons, nuclear weapons, arms and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels (oil, gas, coal), uranium, and cannabis. The fund is screened semi-annually to ensure that the holdings meet the fund’s exclusion criteria. Additionally, the fund does not invest in companies that violate international norms. The assessment is made either by the fund company itself or by a subcontractor.

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

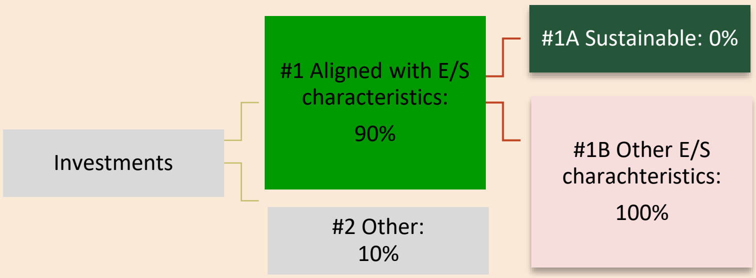
What is the policy for assessing good governance practices of the investee companies?

ESG analysis is an integral part of the company analysis process, and significant environmental, social, or corporate governance aspects are analysed and documented for all the fund’s holdings. The analysis is based on company reports, external analysis, as well as specific ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

The fund company’s board has also established Principles for Shareholder Engagement. Through shareholder engagement, the fund company can contribute to the long-term healthy development of both the companies and the financial market as a whole. As a representative of the unit holders, the fund company ensures that the companies in which the fund’s assets are invested act in accordance with relevant rules and guidelines and otherwise follow good market practices. The fund company’s Principles for Shareholder Engagement also describe shareholder engagement in terms of how relevant issues are monitored, dialogues with company representatives, exercising voting rights, and collaboration with other shareholders.

What asset allocation is planned for the financial product?

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product**.**

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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.

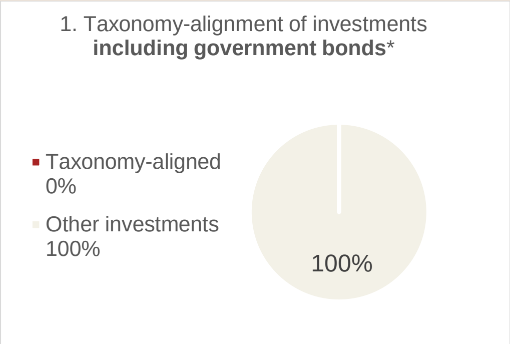
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

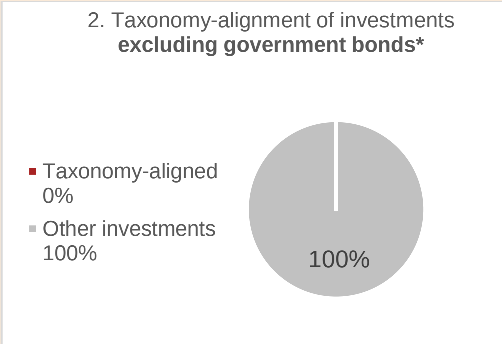
This fund’s underlying investments do not consider the EU criteria for environmentally sustainable economic activities. The EU taxonomy is a classification system aimed at establishing common criteria for environmentally sustainable economic activities. The taxonomy is still under development, and criteria for all environmental objectives are not yet finalized. There is also no established calculation model for determining the proportion of the fund’s investments that are compliant with the taxonomy.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emissions levels corresponding to the best performance.

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.*

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund contains investments in economic activities that the fund considers to be environmentally sustainable. The fund does not have a minimum proportion for environmentally sustainable investments.

What is the minimum share of socially sustainable investments?

The fund contains investments that promote both environmental and social characteristics. However, the fund does not have a minimum proportion of socially sustainable investments.

What investments are included in "No. 2 Other," what is their purpose, and are there any minimum environmental or social safeguards?

The fund includes investments other than equities, which consist of cash. This proportion may be up to 10%.

Where can I find more product-specific information online?

More product-specific information is available on the website:

https://www.carnegiefonder.se/fonder/carnegie-small-and-micro-cap/

CARNEGIE FONDER

CARNEGIE SMALL & MICRO CAP FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Small & Micro Cap, hereinafter referred to as the “fund”. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). In addition to the provisions of the aforementioned law, the fund’s operations are also governed by these fund regulations, the company’s articles of association, and other regulations issued under the law or statute.

Fund assets are owned jointly by the fund unitholders, i.e., those who have made deposits in the fund. Each unit in the fund carries equal rights to the fund’s assets. The fund company manages the fund and keeps a register of all unitholders. The fund is not a legal entity and therefore cannot acquire rights or assume obligations; however, the fund is a separate tax subject. The fund company specified in § 2 represents the unitholders in all matters concerning the UCITS fund, decides on the funds’ assets, and exercises the rights derived from the assets.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as the “fund company”.

§ 3 Depositary and its Function

The fund’s assets are held by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081), hereinafter the “custodian”. The custodian shall receive and retain the fund’s assets and implement the fund company’s instructions regarding the UCITS fund provided these do not contravene the UCITS Act, other statutes, or the fund rules, and ensure that:

- subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules.
- the value of the fund units is calculated in accordance with the UCITS Act and the fund rules,
- payments for transactions involving the fund’s assets are paid into the fund without delay, and
- the fund’s income is used in accordance with the provisions of the UCITS Act and the fund rules.

The custodian shall act independently of the fund company and exclusively in the interest of the unitholders.

§ 4 Fund characteristics

The fund is an equity fund that primarily invests in small companies whose shares and share-related transferable securities are traded on regulated markets within or outside the EEA, as well as other markets according to §6. The selection of shares and the distribution between different industries and regions is not predetermined. Investments may be concentrated in a few industries and regions.

The aim of the fund’s investments is to achieve a long-term increase in the fund’s value over a period of five years or more.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, fund units, and accounts with credit institutions. Transferable securities refer to shares and share-related transferable securities. The fund may invest in money market instruments such as Swedish treasury bills. The fund shall invest in various industries and markets. At least 80% of the fund’s assets must be invested in shares and equity-related transferable securities. Of these investments, at least 4/5 must be in companies that, at the time of investment, have a market capitalization that does not exceed the market capitalization of the largest constituent in the fund's benchmark index.

The fund's benchmark index is specified in the fund's information brochure. At least 2/3 of the fund's investments must be in shares and equity-related transferable securities issued by companies based in Europe. The fund may invest up to 10% of the fund's value in accounts. The fund may invest up to 20% of the fund's value in Swedish treasury bills.

The fund's investments shall be made in companies on the regulated markets specified in §§ 4 and 6. The fund may invest up to 10% of the fund's value in fund units.

The fund may only use derivative instruments to a very limited extent. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management, provided that the underlying assets consist of transferable securities and financial indices.

§ 6 Marketplaces

The fund's assets may be invested in a regulated market within the EEA or in an equivalent market outside the EEA. Trading may also take place on other markets within or outside the EEA that are regulated and open to the public, as well as other marketplaces or markets within the EEA.

§ 7 Special Investment Strategy

The fund may invest in such transferable securities as referred to in the UCITS Act, Ch 5, § 5.

The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks. The fund may not use OTC derivatives.

The fund may not invest in such money market instruments as referred to in the UCITS Act, Ch 5, § 5.

§ 8 Valuation

The fund's net asset value (NAV) is normally calculated each bank day. The NAV per fund unit is the NAV divided by the number of outstanding fund units. The NAV is calculated by deducting the liabilities relating to the fund from its assets.

The fund's assets are calculated as follows:

- Financial instruments are valued based on the current market value (normally the latest price paid). If such a price is missing or is deemed misleading by the fund company, the fund company may determine the value on another objective basis. When valuing on objective grounds, a market value is determined based on, for example, information on the latest paid price or indicative bid price, or with the help of information from counterparties or other independent external sources.
- For transferable securities as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for the special valuation is market prices from unregulated exchanges or independent market makers if such are 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 another listed financial instrument or index with adjustments for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (present value calculation), or capital share of equity.
- Cash and cash equivalents and current receivables in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold, are recorded at the amount they are expected to be received. All assets take into account associated rights in the form of interest, dividends, subscription rights, and the like.

All assets take into account associated rights in the form of interest, dividends, subscription rights, and the like.

The liabilities of the fund consist of:

- Compensation to the fund company
- Unpaid proceeds for purchased financial instruments
- Any tax liabilities and other liabilities

§ 9 Subscriptions and Redemptions

The fund is open for the subscription and redemption of fund units all bank days. The fund is not open for subscription and redemption on days when the valuation of the fund's assets cannot be made in a way that ensures the equal rights of the unitholders, for example, due to one or more of the regulated markets or other marketplaces or markets where the fund's trading takes place being wholly or partially closed. The fund unit value is normally calculated each bank day. The principles used to determine the fund unit value are stated in §8.

The subscription and redemption of fund units are carried out at a price not yet determined at the time of the request for sale and redemption.

Requests for redemption can be made to the fund company. The redemption request must be submitted to the fund company in writing and signed by post, fax, or email containing such a written signature. Redemption cannot take place until the written signed redemption request has been received by the fund company.

Immediate redemption shall only take place to the extent possible without the sale of securities in the fund. If immediate redemption cannot take place, redemption shall occur as soon as liquid assets have been obtained. Liquid assets are obtained in such cases by selling securities in the fund as soon as possible, and redemption takes place as soon as the sale proceeds have been received. If a subscription could significantly disadvantage the interests of other unit holders, the fund company may, after notifying the Financial Supervisory Authority, delay the subscription.

Requests are executed on the same day they are submitted, provided that the request has been received by the fund company no later than the time and in accordance with the conditions stated on the company's website. Otherwise, the request is executed on the next banking day.

Requests for redemption may only be withdrawn if the fund company permits it.

Applications for the sale of fund units must be made in writing to the fund company. The sale of fund units is carried out at the price determined on the day the proceeds are available to the fund company.

The minimum monthly savings amount is 100 SEK.

The information the fund company provides to the media about the price of fund units is always preliminary and may be adjusted by the fund company if necessary. Therefore, the price information provided by the media is not binding on the fund company. Information on the most recently calculated fund unit value can be obtained from the fund company.

§ 10 Extraordinary Circumstances

The fund may be closed for the subscription and redemption of units if such extraordinary conditions occur that make it impossible to value the fund's assets in a way that ensures the equal rights of the unit holders.

§ 11 Charges and Fees

From the fund's assets, compensation shall be paid to the fund company for its management of the fund. The compensation includes costs for the custody of the fund's assets as well as for supervision and auditors, with an amount corresponding to a maximum of 1.6% annually of the fund's NAV, calculated daily at 1/365 and deducted from the fund monthly.

Brokerage fees related to the purchase and sale of transferable securities are charged to the fund, as well as taxes and statutory fees.

§ 12 Dividends

The fund generally does not distribute dividends. However, the fund company may decide to distribute dividends if, in the fund company's assessment, it is in the interest of the unit holders. If the fund company decides on a dividend, the basis for the dividend shall be the return on the fund's assets or other distributable amounts. If the fund company decides on a dividend, it will be distributed in April of the year following the financial year and will be allocated to unit holders who are registered for fund units on the dividend date determined by the fund company.

If the fund company decides on a dividend, the fund company shall, for the dividend attributable to the fund unit after deduction of any preliminary tax, acquire new fund units for the unit holder's account, who is registered for the fund unit on the date determined by the fund company. Upon prior request, the dividend, if decided by the fund company, may also be paid to the unit holder's account after deduction of any preliminary tax.

§ 13 Financial Year

The fund's financial year is the calendar year.

§ 14 Semi-annual and Annual Reports and Amendments of Fund Rules

For each financial year, the fund company shall submit an annual report for the fund no later than four months after the end of the financial year. The fund company shall submit a semi-annual report for the fund no later than two months after the end of each calendar half-year. The annual report and semi-annual report shall be available at the fund company. The semi-annual report and annual report for the fund shall be sent to unitholders registered with the fund company.

If the board of the fund company decides to amend these fund regulations, the decision shall be submitted to the Financial Supervisory Authority for approval. Once the decision has been approved, it shall be made available at the fund company and, where applicable, announced in the manner prescribed by the Financial Supervisory Authority.

§ 15 Pledges and Transfers

Pledging is done by the pledgee or pledgor notifying the fund company in writing of the pledge. The notification shall include the name and address of the pledgee, the owner of the fund units, the number of units covered by the pledge, and any limitations on the scope of the pledge.

Registration of the pledge is made in the unit holder register. The fund company shall notify the unitholder in writing of such registration.

The note of the pledge applies until the fund company has received notification from the pledgee that the pledge has ceased and has deregistered it in the unit holder register. The fund company may charge a fee of up to 500 SEK for handling the pledge.

Unitholders may transfer their fund units. In such a transfer, the fund company may charge a fee of up to 500 SEK.

§16 Limitation of Liability

If the custodian or a depositary bank has lost financial instruments held in custody by the custodian under the agreement between the fund company and the custodian, the custodian shall, without undue delay, return financial instruments of the same kind or pay an amount corresponding to the value of such financial instruments to the fund company for the fund's account. However, the custodian is not liable if the loss of the financial instruments is caused by an external event beyond the custodian's reasonable control and whose consequences were impossible to avoid despite all reasonable efforts. Furthermore, the custodian is not liable for damage caused by Swedish or foreign legislation, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation regarding strike, blockade, boycott, and lockout applies even if the Custodian is subject to or itself undertakes such conflict measures.

The Custodian is not liable for any damages other than those specified in the first paragraph, unless the Custodian has intentionally or negligently caused such damages. The Custodian is also not liable for such damages if the circumstances specified in the first paragraph exist.

The Custodian is not liable for damage caused by Swedish or foreign exchanges or other Execution Venues, Registrars, Clearing Organizations, or others providing equivalent services, and – as far as other damages than the loss of custodied Financial Instruments are concerned – not for damage caused by a Depository Bank or other contractor that the Custodian has engaged with due skill, care, and diligence and regularly monitors, or that has been designated by the fund company. The Custodian is not liable for damage caused by the insolvency of the aforementioned organizations or contractors. However, a custody agreement regarding the custody of assets and control of ownership does not relieve the Custodian of its liability for losses and other damages under the Fund Legislation.

The Custodian is not liable for damage incurred by the fund company, unit holders in the Fund, the Fund, or others due to restrictions on disposal that may be applied to the Custodian regarding Financial Instruments.

The Custodian is not liable in any case for indirect costs, damages, or losses.

If there is an obstacle for the Custodian to fully or partially execute an action due to circumstances specified in the first paragraph, the action may be postponed until the obstacle has ceased. In the event of deferred payment, the Custodian shall not pay default interest. If interest is promised, the Custodian shall pay interest at the rate applicable on the due date. If the Custodian is prevented from receiving payment for the Funds due to circumstances specified in the first paragraph, the Custodian is entitled to interest only according to the terms applicable on the due date for the period during which the obstacle existed.

The above limitations of liability do not restrict the unitholder's right to compensation regulated under the UCITS Act Ch 3, §§ 14-16.

The fund company has tort liability for damages regulated under the UCITS Act Ch 2, § 21.

§ 17 Permitted Investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of such a unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or ordinance or that the fund company has by reason of a unitholder's subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE SMÅBOLAGSFOND

INVESTMENT STRATEGY

The fund is an equity fund that invests in Swedish and Nordic securities. The fund is actively managed and does not track an index. Stocks are selected based on the fund's own assessments. The objective is to maximise long-term returns with consideration of the fund's level of risk. The fund invests mainly in small and medium-sized companies admitted to trading on the Swedish stock market. The fund also has the option to invest up to 20% of its assets in small and mid-cap companies admitted to trading on other Nordic stock markets. The fund may invest its assets in securities, money market instruments, derivatives, fund units and accounts with credit institutions.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Distribution,
- C – SEK, Income (min. SEK 3,000,000)

RISK PROFILE

The fund may invest without restriction as to sector, and the risk is therefore related to specific holdings. The Swedish market has historically fluctuated more than some other markets in both upturns and downturns, and therefore the market is quite volatile with a high dependence on the country's export industry.

Fund assets are invested in liquid assets that can be sold in the event of redemptions. Since shares of small and medium-sized companies may have less liquidity than those in larger companies, particular focus will be directed at fund liquidity. Cash and cash equivalents deposited with banks entail a credit risk, but this risk is judged to be low.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE SMÅBOLAGSFOND SUSTAINABILITY DISCLOSURES

Product name: Carnegie Småbolagsfond
Legal entity identifier: 549300KFCS9PJO7BZL90

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but will **not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through

- careful analysis of every holding from an ESG perspective prior to investing
- excluding companies that do not meet the standards
- Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

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

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 10% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
      Read more about the analysis tool here.
2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.
3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:
    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

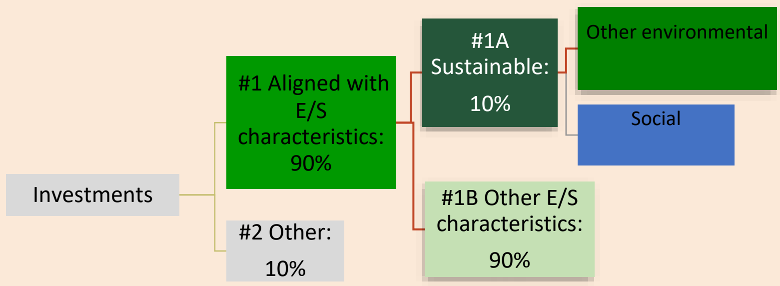
Asset allocation describes the share of investments in specific assets.

#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 10% of these investments have environmental or social objectives:
- Within this 10%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

1B. The remaining maximum share of 90% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

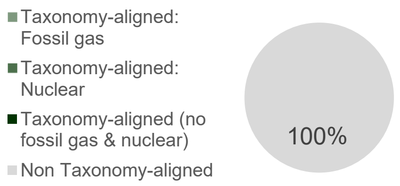
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

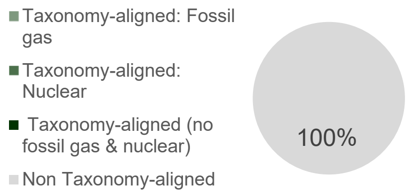
☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

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



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



This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-smabolagsfond-a/

CARNEGIE SMÅBOLAGSFOND FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Småbolagsfond, hereinafter referred to as “the fund”.

The fund is a UCITS fund as defined under the Swedish UCITS Act (2004:46). Fund assets are owned jointly by the fund unitholders and each unit in a unit class confers an equal right to the property that makes up the fund. The fund company (see § 2) represents unitholders in the fund in all matters regarding the UCITS fund, decides over property included in the fund and exercises the rights derived from such property.

The fund is not a legal entity and therefore cannot acquire rights or assume obligations. Fund unitholders are not liable for the fund’s obligations.

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Distribution, Accumulation
- C – SEK, Income

The accumulation classes reinvest fund returns, while the income class pays dividends as set forth in § 12.

The accumulation classes differ in terms of distribution channel and management fees.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund’s unitholder register – transfer the investor to another unit class, whose terms and conditions the investor fulfils. If the investor is eligible for more than one unit class, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder Sverige AB, (CRN: 556266-6049), hereinafter referred to as “the fund company”.

§ 3 Depositary and its Function

The depositary for the fund’s assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund’s assets and implements the fund company’s instructions with regard to the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. The depositary further verifies that management of the fund and subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions arising from the assets of the fund are paid into the fund without delay. The depositary also monitors the fund’s cash flows.

§ 4 Fund Characteristics

The fund is an equity fund that invests primarily in small and mid-cap companies admitted to trading on the Swedish stock market. The fund also has the option to invest up to 20% of its assets in small and mid-cap companies admitted to trading on other Nordic stock markets.

The objective of fund management is to achieve attractive long-term value growth by means of favourable risk diversification.

§ 5 Investment Strategy

The fund may invest its resources in transferable securities, money market instruments, derivative instruments, fund units and deposit accounts with credit institutions.

The fund is an equity fund focused on Sweden and small and mid-cap companies. At least 90% of the fund's assets are invested in companies whose market value on the investment date is a maximum of 1% of the stock market's total capitalisation.

The fund may also invest a maximum of 20% of its assets in small and mid-cap companies admitted to trading on other Nordic stock markets.

A maximum of 10% of the fund's assets may be invested in fund units or UCITS management companies.

§ 6 Marketplaces etc

The fund's assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading is also permitted on other markets within or outside the EEA that are regulated and open to the public. The fund is thus not restricted to marketplaces in a particular country.

§ 7 Special Investment Strategy

The fund's assets may be invested in transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5. The fund may use derivative instruments as part of its investment strategy provided that the underlying assets consist of equity-related transferable securities, financial indices, exchange rates or foreign currencies. The fund may not make use of OTC derivatives.

§ 8 Valuation

NAV per unit corresponds to the fund's NAV divided by the number of outstanding fund units. The fund's NAV is calculated by deducting the liabilities related to the fund from its assets. NAV per unit is calculated each bank day and is used as the basis for determining subscription (selling) and redemption prices for trade in fund units. The outstanding liabilities of the fund are calculated and considered in the daily valuation. The fund company does not, however, calculate NAV per unit if the fund is closed for subscriptions or redemptions. In the event of large changes in the value of financial instruments included in the fund, NAV per unit may be established several times during the day.

Fund assets are calculated as follows:

- Financial instruments are valued at the current market value (last price paid or, if this is not available, last bid price).
- Cash and cash equivalents and current receivables, in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold, are included at the amount expected to be received.

VISITING ADDRESS Regeringsgatan 56 Stockholm, Sweden
POSTAL ADDRESS Box 7828 SE-103 97 Stockholm
WEBSITE carnegiefonder.se
E-MAIL spara@carnegiefonder.se
TELEPHONE +46 8 12 15 50 00

- A market value for transferable securities referred to in the UCITS Act Ch 5, § 5 is determined using a special valuation. The basis for this special valuation includes market prices from unapproved exchanges or market makers, other financial instruments or indices adjusted for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (net present value) or share of net asset value (financial statement valuation).

For all assets, associated rights in the form of interest, dividends, issue rights and similar are considered.

The liabilities of the fund are calculated as follows:

- Accrued management fees to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

Initially, the aforementioned instruments and money market instruments may be valued at cost.

§ 9 Subscriptions and Redemptions

Fund units are issued by the fund company. The fund is normally open for subscriptions and redemptions of fund units every bank day, which are arranged through the fund company or its agent. However, the fund is not open for subscriptions and redemptions on bank days when the valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of fund unitholders as a consequence of one or more marketplaces on which the fund is traded being partly or entirely closed.

The minimum initial investment in unit class C is SEK 3,000,000. There is no minimum amount for other unit classes.

Requests for subscriptions for fund units are made through payment to the fund's account and are executed at the price established on the day payment is received by the fund. Requests to redeem fund units shall be made in writing or, upon special agreement, via electronic media. Redemption requests are executed at the price established on the bank day the redemption request is received. The cut-off time for the receipt of subscription and redemption requests by the fund company for execution on the same day is stated in the fund prospectus. If requests are after the cut-off time, the fund company will execute the requests on the following bank day.

Requests for subscription or redemption of fund units may be withdrawn only if the fund company consents.

If requests for subscription or redemption are received by the fund company when the fund is closed for subscriptions and redemptions, NAV per unit is normally established on the following bank day.

Subscriptions and redemptions of fund units are executed at a price unknown to the fund unitholder when the subscription or redemption request is submitted.

Information about subscription and redemption prices is made available at the fund company no later than the bank day after the bank day during which NAV per unit is established in accordance with the above.

Unit class B is reserved investors who subscribe for units through distributors which, according to an agreement with the fund company, wholly or partly, do not accept retrocession fees from the fund company and which, when the distributor provides the investment service to its customer in connection with the subscription of units, is paid directly by its customer. A prerequisite to be eligible to invest in unit class B is that the holding is registered on one or more accounts in the distributor's name of behalf of the client (nominee registration).

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of unitholders.

§ 11 Charges and Fees

In conjunction with subscriptions, the fund company may charge an entry charge not exceeding 3% of NAV per unit. In conjunction with redemptions, the fund company may charge an exit charge not exceeding 1% of NAV per unit. These charges accrue to the fund.

The fund's management fee shall not exceed 1.6% of the fund's NAV per year for unit class A. The corresponding maximum fee for unit classes B and C is 1.15%. This fee includes payments for fund management and the costs of storage, supervision and auditing. The management fee is calculated daily and is paid to the fund company monthly in arrears. Brokerage in connection with the fund's purchases and sales of financial instruments and tax are charged to the fund.

§ 12 Dividends

Unit classes A and B do not pay dividends.

The dividend on the income class, unit class C, is determined by the fund company. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends on fund units are paid to all unitholders in the income class who are registered unitholders on the record date determined by the fund company.

Unless the fund company decides otherwise, return on fund assets, remaining residual amounts of previously distributable amounts and other distributable amounts can be used for dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company is required to deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

Half-yearly reports shall be made available at the fund company within two months of the end of the half-yearly reporting period and annual reports shall be made available at the fund company within four months of the end of the annual reporting period. Such reports shall also be provided to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall be subject to the approval of Finansinspektionen. After the decision to amend the fund rules has been approved, the fund rules shall be made available at the fund company and the depositary and be announced in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

In conjunction with the pledging of fund units that are not nominee-registered, the pledging party and/or the pledge holder shall inform the fund company in writing thereto. The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company must inform unitholders in writing that a pledge has been recorded in the unitholder register. In conjunction with the pledging of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

§ 16 Limitation of Liability

The fund company is not liable for loss arising from Swedish or foreign legal enactments, intervention by a Swedish or foreign governmental agency, acts of war, strikes, blockades, boycotts, lockouts or other similar circumstances. The reservation with respect to strikes, blockades, boycotts, and lockouts shall apply notwithstanding whether the fund company initiates or is the target of such labour actions. Nor shall the fund company be liable in other cases to compensate for loss if the fund company has observed customary prudence. The fund company shall not be liable for indirect losses under any circumstances.

If the fund company is prevented from making payments or taking other measures due to the circumstances noted in the first paragraph above, the measures may be deferred until the obstacle no longer exists. If as a consequence of such a circumstance the fund company is prevented from making or receiving payments, the fund company shall not be liable to pay penalty interest.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund company and the depositary is regulated under the UCITS Act Ch 2 § 21 and Ch 3 §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, but not for investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company has the right to redeem a unitholder’s units In the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder’s subscription for or holdings of units in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE SPAR GLOBAL

INVESTMENT STRATEGY

The fund is an equity fund with a combined global and Swedish focus. The fund invests without restrictions regarding companies or industry.

The fund may invest its assets in securities, money market instruments, derivatives, fund units and accounts with credit institutions.

The fund may invest a maximum of 10% of the fund's NAV in units in other funds.

In order to improve management efficiency, the fund may invest in derivative instruments in accordance with the Swedish UCITS Act, Ch 5, §12, first paragraph. The fund may not use OTC derivatives in accordance with the UCITS Act, Ch 5, §12, second paragraph.

INTENDED INVESTOR

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation

When the fund invests in another fund or UCITS management company managed by Carnegie Fonder, the fund is compensated for the fixed management fee that the fund pays for the underlying fund. This is done by Carnegie Fonder repaying amounts corresponding to the management fee paid to the fund, which means that no fixed management fee is paid for underlying funds in these cases. If any performance-based fee is deducted from an underlying fund or UCITS management company, this is also repaid to the fund.

When the fund invests in funds managed by a fund company or UCITS management company other than Carnegie Fonder, the fixed management fee in the underlying fund or UCITS management company may not exceed 3% after considering any part of the management fee reimbursed to the fund. The performance-based management fee in the underlying fund or UCITS management company may not exceed 30% of the excess return in relation to the benchmark parameter of the fund or the UCITS management company.

RISK PROFILE

The fund invests its assets in both the Swedish and the global equity markets, including emerging markets that are not as advanced in terms of legislation that protects the rights of investors.

There are no restrictions on fund investments as regards companies, sectors, or geographies, which provides opportunity to spread risks Equity investments are made in local currencies and are not hedged; fund assets are therefore affected by changes in the exchange rates of local currencies against SEK.

Certain operational risks arise because fund assets can be invested in emerging markets. For example, protection of non-controlling interests may be limited, equal treatment of all shareholders cannot always be assumed and insider trading regulations may be deficient. Accounting standards are still under development in certain markets and are not comparable to western standards. The supply, quality and reliability of company information and research material is sometimes of low quality, which increases the uncertainty about the value of assets.

To the extent that derivatives are used, this can be done as part of the investment strategy, with the aim of increasing returns or with the aim of reducing costs and risks in the fund. Investments in derivatives can mean that the fund's sensitivity to market changes increases.

The fund may experience losses due to counterparty risk, which is the risk of a counterparty being unable to meet its obligations, such as to deliver securities or cash in accordance with the contractual conditions of a securities transaction.

Investing in a fund is always associated with both opportunities and risks. Money invested in funds can both increase and decrease in value depending on market developments and it is not certain that the entire invested capital will be recovered. Past returns are not a guarantee of future returns.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company’s products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund’s entire portfolio. The use of ESG criteria can affect the fund’s investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE SPAR GLOBAL SUSTAINABILITY DISCLOSURES

Product name: Carnegie SPAR Global
Legal entity identifier: 549300CWTBHXYHFJG086

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by investing in equities and funds that raise capital and create financing for companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
    - careful analysis of every holding from an ESG perspective prior to investing
    - excluding companies that do not meet the standards
    - Influencing holdings in the right direction as regards E and S.
3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies that contribute to UN SDGs.
2. Share of fund assets invested in companies (directly or indirectly via investments in funds) whose turnover is aligned with the environmental objectives “climate change mitigation” and “climate change adaptation” in the EU Taxonomy.
3. Share of fund assets invested in companies (directly or indirectly via investment in funds) with Adequate, Strong or Very Strong ratings in the fund company’s internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company’s exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company’s voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies (directly or indirectly via investments in funds) that have committed to having or have already had their climate targets approved by Science Based Targets initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund’s sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies’ products and services have direct impact on attaining the goal and that demand for the company’s products and services is affected in both the positive and negative sense depending on the company’s business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company’s categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments. For investments in funds, Carnegie Fonder ensures that the fund manager applies an equivalent process to the fund's investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

For investments in funds, it is ascertained that the fund manager considers the individual investment's principal adverse impacts on sustainability factors and that the fund manager's exclusion policy is aligned with Carnegie Fonder's policy.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.For other funds that are not managed by Carnegie Fonder, it is ascertained that the fund manager's exclusion policy is aligned with Carnegie Fonder's policy regarding companies in breach of norms according to the UN Guiding Principles on Business and Human Rights.

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,

Carnegie Fonder ascertains that all investments consider principle adverse impacts. Carnegie Fonder applies three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

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

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

   For other funds that are not managed by Carnegie Fonder, the strategy is to select Article 9 funds or Article 8 funds that satisfy the requirements above.

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 following binding elements of the investment strategy are used:

1. The fund invests at least 30% of fund assets in sustainable investments, which are assessed as one of the following.
   - The fund's holdings in investee companies whose turnover related to the UN SDGs exceeds 25%.
   - The fund's holdings in underlying funds, measured as its minimum rate for sustainable investments.

2. An ESG analysis has been performed in our internal analysis tool for all investee companies in funds managed by Carnegie Fonder.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management, including holdings in investee funds, shall have a climate target approved by Science Based Targets initiative.

- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

For funds managed by Carnegie Fonder, this entails compliance with the fund company's Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.

    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).

    Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
  - If the holding's response is unsatisfactory, the holding is sold.

[Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.]

Regarding investments in funds that are not managed by Carnegie Fonder, it is ascertained that the fund's exclusion policy is aligned with Carnegie Fonder's policy and that the funds' corporate governance policies uphold high standards.

What is the asset allocation planned for this financial product?

#1 All investments including cash in the fund promote environmental or social characteristics (minimum 90 %).

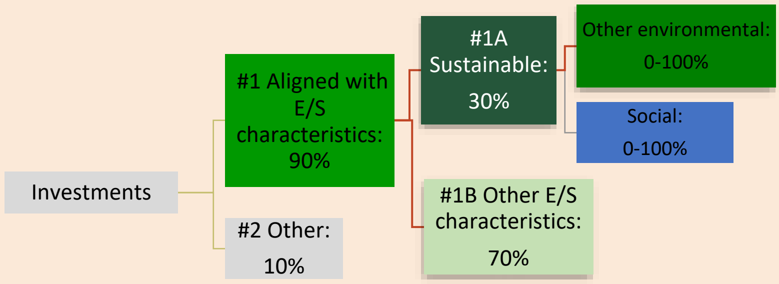
Asset allocation describes the share of investments in specific assets.

1A. A minimum share of 30% of these investments have environmental or social objectives:

- Within this 30%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them.

1B. The remaining maximum share of 70% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Any use of derivatives by the fund is intended solely for the purposes of increasing liquidity and/or minimising risk and derivatives are not used as part of the investment strategy. We impose the same requirements for funds managed by other Investments fund managers.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

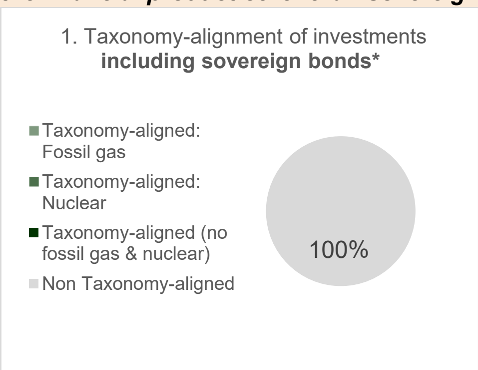
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

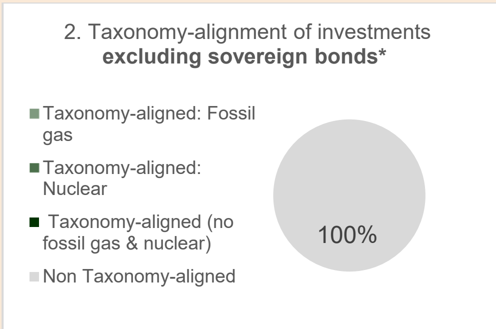
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund’s sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund’s sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund’s custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-spar-global-2/

CARNEGIE SPAR GLOBAL FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie SPAR Global. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). The fund is managed in accordance with these fund rules, the articles of association of the fund company, the UCITS Act and other applicable statutes.

Fund assets are owned jointly by the fund unitholders and each fund unit confers an equal right to the assets that make up the fund. The fund company (see § 2) represents unitholders in all matters concerning the UCITS fund. The fund cannot acquire rights or assume obligations. Nor may the fund institute legal proceedings before a court of law or other public authority. The assets included in the fund are not subject to seizure and fund unitholders are not responsible for the fund's obligations.

The fund is intended for the general public.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary for the fund's assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund's assets and implements the fund company's instructions regarding the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. The depositary further verifies that fund management and subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions arising from the assets of the fund are paid into the fund without delay. The depositary also monitors the fund's cash flows.

§ 4 Fund Characteristics

The fund is an equity fund with a combined global and Swedish strategy. The fund invests with no restrictions as to company or sector. The objective of the fund is to generate a positive and stable return relative to investment risk.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivatives, fund units and accounts with credit institutions.

"Equity fund" means that the fund at all times has an equity exposure of at least 90% of the fund's assets.

The proportions of global and Swedish equities held by the fund may vary depending on market conditions, but the share of global equities is an estimated 70-90% over time.

Global equities will consist mainly of large and well-established global companies. The majority of the companies are expected to be listed in Europe, the USA and Japan. Equities will be selected under the assumption that the companies will be owned for the very long term and value growth in the investments will be generated by the companies' long-term profit growth and not from short-term price movements.

“Swedish equities” means equities or equity-related securities traded on a regulated market in Sweden or on another regulated market as long as the company’s domicile or principal operations are located in Sweden.

The fund may invest a maximum of 10% of its net asset value (NAV) in units in other funds or UCITS management companies.

§ 6 Exchanges and Marketplaces

The fund may trade in financial instruments on a regulated market within the EEA or equivalent market outside the EEA. Trading is also allowed on other markets within or outside the EEA that are regulated, open to the public and within the scope of the fund’s investment strategy as set forth in § 5.

Subscriptions and redemptions of fund units are carried out directly with the respective fund company, management company, AIF manager or UCITS management company.

§ 7 Special Investment Strategy

The fund may also invest its assets in transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 IFA up to a maximum of 10% of the fund’s NAV.

In order to improve management efficiency, the fund may invest in derivative instruments in accordance with the Swedish UCITS Act, Ch 5, §12, first paragraph. The fund may not use OTC derivatives in accordance with the UCITS Act, Ch 5, §12, second paragraph.

The fund may enter into securities lending agreements.

§ 8 Valuation

NAV per unit corresponds to the fund’s NAV divided by the total number of outstanding fund units. The fund’s NAV is calculated its liabilities, including any future tax liabilities and the fees set forth in § 11 below, from its assets.

NAV per unit is calculated each bank day and forms the basis for establishing the subscription and redemption prices for trade in fund units. In the daily valuation the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate NAV per unit if the fund is closed for subscription or redemption.

The fund’s assets are calculated as follows:

- Transferable securities, money market instruments, derivative instruments and fund units are measured at current market value (last price paid, or if such is not available, last bid price). If such prices are unavailable or are deemed misleading by the fund company, the assets may be measured at the value determined by the fund company on an objective basis.
- Transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 are measured at the value determined by the fund company on an objective basis. This valuation may be based on e.g. market prices from an unapproved, regulated market, independent broker or market maker, other financial instruments or indexes, adjusted for differences in e.g. credit risk and liquidity (reference method of valuation); discounted cash flows (present value method of valuation), or share of equity (reporting date method valuation) Initially, the aforementioned transferable securities and money market instruments may also be measured at cost.
- Cash and cash equivalents including bank deposits, short-term placements in the money market, funds on account with credit institutions.
- Accrued interest.
- Accrued dividends.
- Unsettled transactions.

- Other receivables relating to the fund.

For all assets, associated rights in the form of interest, dividends, issue rights and similar are considered.

The liabilities of the fund are calculated as follows:

- Accrued management fees due to the fund company.
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

§ 9 Subscriptions and Redemptions

The subscription and redemption price corresponds to the most recently calculated NAV per unit, calculated in accordance with § 8, when the order is executed.

The fund is normally open for subscriptions (purchases by unitholders) and redemptions (sales by unitholders) of fund units on every bank day. However, the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of all unitholders as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Requests to subscribe for fund units must be made in writing to the fund company. Subscriptions of fund units are made at the price established on the date payment becomes available to the fund company.

Requests to redeem fund units must be made in writing to the management company. Redemption shall be executed at the NAV per unit established on the redemption date. Redemptions are executed immediately only to the extent possible without requiring the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. The redemption will be executed as soon as the proceeds of sale have been received.

The procedures described above mean that subscriptions and redemptions take place at a price unknown to the unitholder at the time the subscription or redemption is requested.

Information about subscription and redemption prices will be available from the fund company and the intermediary institution no later than the bank day after the bank day NAV per unit is determined as above.

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if extraordinary circumstances occur that prevent valuation of the fund's assets in a manner that assures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund's assets to the management company for its management of the fund. In addition, payments shall be made: to the depositary for its activities as the depositary, for audit expenses and to Finansinspektionen for its supervisory activities. The combined charges and fees shall not exceed 1.65% per year of the fund's NAV. The payments described above, as well as brokerage and other costs incurred for the fund's trading in financial instruments are charged to the fund on an ongoing basis. Where required by law, value added tax will be charged on all payments.

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-yearly reporting period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

In conjunction with the pledge of fund units that are not nominee registered, the pledging party and/or pledge holder must notify the fund company in writing in respect thereof.

The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge;
- Any restrictions on the scope of the pledge.

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee. Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

Fund units that are subject to individual pension savings under the Swedish Individual Pension Savings Act (1993:931) cannot be pledged.

The fund company is entitled to charge unitholders a fee not exceeding SEK 400 for administering the registration of the pledge.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss arising as a consequence of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation in respect of strike, blockade, boycott and lockout shall apply notwithstanding whether the fund company or the depositary initiates or is the target of such labour action.

Neither the fund company nor the depositary will pay compensation for losses arising in other cases if the fund company/depositary has acted with customary prudence. Neither the fund company nor depositary shall be liable for indirect loss under any circumstances, nor for loss caused by a custodian bank or other contractor that the fund company or depositary has engaged with due care, nor for loss that may arise by reason of restrictions upon disposition that may be imposed on the fund company or the depositary.

If the fund company or depositary is prevented from taking measures due to circumstances listed in the first paragraph, the measures may be deferred until the obstacle has ceased to exist.

The tort liability of the fund company and the depositary is regulated under the UCITS Act Ch 2 § 21 and Ch 3 §§ 14-16.

§ 17 Permitted investors

The fund is intended for the general public, but not for investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to in this paragraph.

The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder's subscription for or holdings of units in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE FONDER

CARNEGIE SPIN-OFF

INVESTMENT STRATEGY

The fund may invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions. The fund mainly invests in companies listed for trading on the Swedish stock market.

Investments in the Swedish stock market means that the fund invests capital in companies that are domiciled in Sweden or companies listed on a Swedish marketplace or companies whose shares are traded on another market if the company’s main business is in Sweden. The fund is focused on investments in companies that have been, will be, or are expected to be subject to a spin-off, either as a spin-off company or a company conducting a spin-off.

Investments in derivative instruments may be made to improve management efficiency and may be made in derivatives with underlying assets referred to in the UCITS Act Ch 5, § 12.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation (min. SEK 50,000)
- B – SEK, Accumulation (min. SEK 50,000)
- C – SEK, Income (min. SEK 50,000)

ABOUT THE INDEX ADMINISTRATOR

Under new EU regulation, an index administrator must be approved and registered with ESMA (The European Securities and Markets Authority). The Stockholm SIXPRX index is provided by SIX Financial Information Nordic AB. SIX Financial Information Nordic AB is approved by and registered with ESMA.

RISK PROFILE

The fund invests in securities in the Swedish capital market. This market is mature and highly transparent.

The fund can invest with no restrictions as to sector and the risks are therefore associated with the specific holdings. The Swedish market has historically fluctuated more than some other markets in both upturns and downturns and must therefore be considered quite volatile and highly dependent on the country’s export industry. The fund is permitted to use derivatives, but only with the intention of improving management efficiency, and this is an additional risk.

Fund assets are invested in liquid assets that can be divested in the event of redemption. Experience in recent years with sharp stock market movements shows that shares in the most actively traded Swedish listed companies have good liquidity even in periods of extreme market conditions. Cash and cash equivalents are deposited in a bank, which entails intrinsic credit risk, but this risk must be considered low.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CLOSURE OF THE FUND FOR SUBSCRIPTIONS

The board of directors of the fund company may decide to close the fund to new subscriptions of fund units at the subsequent end of quarter if the officially established value of the fund's assets at the end of any quarter exceeds SEK 4,000 million. The board of directors of the fund company believes that this option is necessary to maintain an optimal management volume in the fund at all times and thereby protect the interests of the unitholders.

Notice of closure of the fund will be published on the fund company's website not later than 20 calendar days before closure and notification will be sent to Finansinspektionen. The fund company retains the right to refuse requests for new subscriptions of fund units when subscription forms are received by the fund company after such notice has been published. Once the fund has been closed the board of directors of the fund company may decide that the fund should be opened for new subscriptions of fund units on a particular bank day. Such decision will be published on the fund company's website not later than one month before the subscription date and notice will be sent to Finansinspektionen. The fund company may at the time of sale determine a maximum total subscription amount in order to limit the additional capital that must be managed and in so doing prevent material detriment to the interests of other unitholders. If a maximum amount for subscription is determined, the fund company will provide information about this on its website, as well as the principles to be applied in the event of oversubscription.

The fund company's decisions regarding fund closure or reopening will be published on the company's website, https://www.carnegiefonder.se/en/, in conjunction with the decisions.

CARNEGIE SPIN-OFF SUSTAINABILITY DISCLOSURES

Product name: Carnegie Spin-Off
Legal entity identifier: 549300DBH5OBMKGD4C98

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but will **not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards
   - Influencing holdings in the right direction as regards E and S.
3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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 environmental and social characteristics that are promoted:

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

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 10% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
    Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. We advocate. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

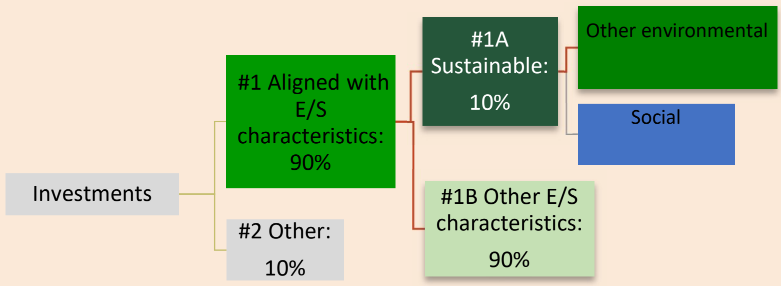
Asset allocation describes the share of investments in specific assets.

#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 10% of these investments have environmental or social objectives:
- Within this 10%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them.

1B. The remaining maximum share of 90% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

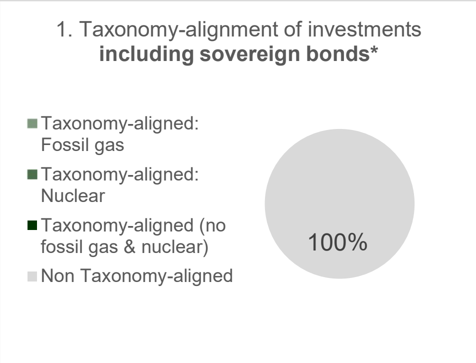
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

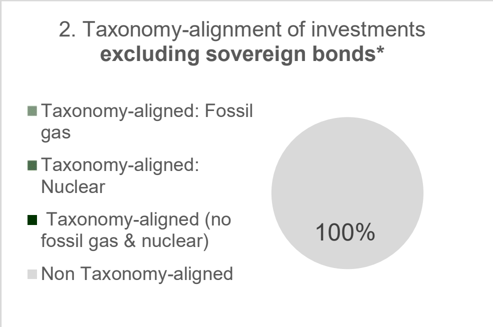
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0-100%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0-100%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristic that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-spin-off-a/

CARNEGIE SPIN-OFF FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Spin-Off. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46).

Fund assets are owned jointly by the fund unitholders and each unit in a unit class confers an equal right to the property that makes up the fund. The fund company (see § 2) represents the unitholders in all matters concerning the fund. The fund cannot acquire rights or assume obligations.

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation
- C – SEK, Income

The accumulation unit classes differ with regard to management fees.

The accumulation classes reinvest fund returns, while the income class pays dividends as set forth in § 12. Unless otherwise specifically stated, the content of the fund rules is common to all unit classes.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as “the fund company”.

§ 3 Depositary and its Function

The depositary institution for the assets of the fund is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081). The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund’s assets and implements the fund company’s instructions with regard to the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. The depositary further verifies that management of the fund and subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions arising from the assets of the fund are paid into the fund without delay. The depositary also monitors the fund’s cash flows.

§ 4 Fund Characteristics

The fund is an actively managed equity fund that mainly invests in companies admitted to trading on the Swedish stock market. In addition to investments in the Swedish stock market, the fund also invests in companies admitted to trading outside Sweden.

The objective of the fund is to generate an excess return in relation to the value growth of the Swedish stock market over a period of 5 years.

The fund is estimated to have a total risk (volatility) over time level with the Swedish stock market as a whole.

VISITING ADDRESS Regeringsgatan 56 Stockholm, Sweden

POSTAL ADDRESS Box 7828 SE-103 97 Stockholm

WEBSITE carnegiefonder.se

E-MAIL spara@carnegiefonder.se

TELEPHONE +46 8 12 15 50 00

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, money market instruments, derivatives, fund units and accounts with credit institutions. Investments in derivative instruments may be made to improve management efficiency and may be made in derivatives with underlying assets referred to in the UCITS Act Ch 5, § 12.

“Investments in the Swedish stock market” means that the fund invests capital in companies that are domiciled in Sweden or companies listed on a Swedish marketplace or companies whose shares are traded on another market if the company’s principal business is in Sweden. The fund is focused on investments in companies that have been, will be, or are expected to be subject to a spin-off, either as a spun-off company or as a company conducting a spin-off. The fund may invest up to 20% in companies admitted to trading outside Sweden.

A maximum of 10% of the fund’s NAV may be invested in units in other funds or UCITS management companies.

§ 6 Exchanges and Marketplaces

The fund’s trade in financial instruments may take place on a regulated market within the EEA or equivalent market outside the EEA as well as other markets, within or outside the EEA, that are regulated, open to the public and covered by the fund’s investment strategy as set forth in § 5.

§ 7 Special Investment Strategy

The fund’s assets may also be invested in transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5 up to a maximum of 10% of the fund’s NAV. The fund may use derivatives to improve management efficiency and reduce management-related expenses and risks.

The fund may not invest in OTC derivatives as referred to in the UCITS Act Ch 5, § 12, paragraph 2.

§ 8 Valuation

The fund’s NAV is calculated by deducting liabilities related to the fund from its assets. The NAV per unit in a particular unit class corresponds to the NAV of the unit class divided by the number of fund units in that class with consideration given to the terms and conditions associated with each unit class.

NAV per unit is calculated each bank day and forms the basis for establishing the subscription and redemption prices for trade in fund units. In the daily valuation the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate NAV per unit if the fund is closed for subscriptions or redemptions.

The fund’s assets comprise:

- Financial instruments, which are valued based on current market value. If no such market value is available, or is deemed misleading by the fund company, financial instruments may be included at the value determined by the fund company on an objective basis
- Cash and cash equivalents,
- Accrued interest
- Accrued dividends
- Unsettled sales
- Other receivables relating to the fund.

The fund's liabilities comprise:

- Payments to the fund company
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund.

Unlisted transferable securities and money market instruments are included at a value determined by the fund company on an objective basis. This valuation is based on:

- Market prices from unapproved exchanges or market makers
- Other financial instruments or indices, adjusted for differences such as risk
- Discounted dividends or cash flows
- Share of equity

§ 9 Subscriptions and Redemptions

The fund is normally open for the subscriptions and redemptions of fund units on all bank days. The fund is, however, not open for subscriptions and redemptions on bank days when the fund's assets cannot be valued in a manner that assures the equal rights all unitholders due to the partial or full closure of one or more of the marketplaces on which the fund trades.

Requests to subscribe for fund units must be made in writing to the fund company. Subscriptions of fund units are executed at the price established on the day payment is available to the fund company.

The minimum initial subscription amount is SEK 50,000. Unitholders are responsible for ensuring that the application is duly signed, that the correct bank account number has been provided and that other documents required by the fund company at any time, and which are available on the fund company's website, have been provided to the fund company or another recipient as instructed by the fund company.

Redemption requests shall be made in writing to the fund company. Redemption will be executed at the NAV per unit established on the redemption date. Immediate redemptions take place only to the extent that this is possible without the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. The redemption will be executed as soon as the proceeds of sale have been received. The subscription and redemption price corresponds to the last calculated NAV per unit when the order is executed.

Under the procedures set forth above, subscription and redemptions are executed at a price unknown to the unitholder when the subscription or redemption request is submitted.

Information about subscription and redemption prices will be available from the fund company not later than the bank day after the bank day NAV per unit is established as above.

The board of directors of the fund company may decide to close the fund to new subscriptions of fund units at the subsequent end of quarter if the officially established value of the fund's assets at the end of any quarter exceeds SEK 4,000 million. The board of directors of the fund company believes that this option is necessary to maintain an optimal management volume in the fund at all times and thereby protect the interests of the unitholders. Notice of closure of the fund will be published on the fund company's website not later than 20 calendar days before closure and notification will be sent to Finansinspektionen. The fund company retains the right to refuse requests for new subscriptions of fund units when subscription forms are received by the fund company after such notice has been published. Once the fund has been closed the board of directors of the fund company may decide that the fund should be opened for new subscriptions of fund units on a particular bank day. Such decision will be published on the fund company's website not later than one month before the subscription date and notice will be sent to Finansinspektionen. The fund company may at the time of sale determine a maximum total subscription amount in order to limit the additional capital that must be managed and in so doing prevent material detriment to the interests of other unitholders. If a maximum amount for subscription is determined, the fund company will provide information about this on its website, as well as the principles to be applied in the event of oversubscription.

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if extraordinary circumstances occur that would prevent valuation of the fund's assets in a manner that assures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund’s assets to the fund company for its management of the fund. For unit class A, payment is made partly in the form of an ongoing charge and partly in the form of a performance-based fee.

The ongoing charge for unit class A is calculated daily at a maximum of 1.05% per year of the NAV.

The corresponding charge for classes B and C shall not exceed 1.55% per year.

The ongoing charge includes payment to the depositary for its activities as a depositary, payment to Finansinspektionen for its supervisory activities and payment to the fund’s auditors.

The performance-based fee for unit class A amounts to a maximum of 20% of the portion the daily return that exceeds the hurdle rate.

No performance-based fees are charged for unit classes B and C.

The fund’s hurdle rate is defined as the Nasdaq Stockholm SIXPRX index. The fee is calculated daily after deduction of the ongoing charge and is deducted collectively from the unit class. If the value growth of the unit class is below the fund’s hurdle rate, no performance-based fee will be charged until the previous relative underperformance has been recovered.

If a unitholder redeems fund units at a time when the unit class has a cumulative underperformance, any previously paid performance-based fees will not be refunded.

The total ongoing charge and performance-based fee shall not exceed 3.00% of the value of the unit class. Charges and fees are based on the opening NAV of the unit class on the days charges and fees are deducted.

The management fee, both the ongoing charge and performance-based fee, are paid monthly to the fund company in arrears.

Brokerage and other expenses associated with the fund’s trade in financial instruments are charged to the fund on an ongoing basis. Any statutory value-added tax will be charged on the payments. Payment amounts are rounded to the nearest whole krona (SEK).

§ 12 Dividends

Unit classes A and B do not pay dividends.

The dividend on the income class, unit class C, is determined by the fund company. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends on fund units are paid to all unitholders in the income class who are registered unitholders on the record date determined by the fund company.

Unless the fund company decides otherwise, return on fund assets, remaining residual amounts of previously distributable amounts and other distributable amounts can be used for dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed. The fund company is required to deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-yearly reporting period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§15 Pledges and Transfers

The pledging party and/or pledge holder must inform the fund company in writing when fund units that are not nominee-registered are pledged. The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the management company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

If the depositary has lost financial instruments held in custody at the depositary or its custodian bank, the depositary shall return financial instruments of identical type or an amount corresponding to the value to the fund without undue delay.

Neither the fund company nor depositary shall be liable for loss arising as a consequence of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether the fund company or the depositary initiates or is the target of such a labour action. Nor shall the fund company or the depositary pay compensation for losses arising in other cases if the fund company or depositary has observed customary prudence. The fund company or the depositary shall not be liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If the fund company or the depositary is prevented from making or receiving payment as a consequence of such circumstance the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest will be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this section, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Neither the fund company nor the depositary is liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities that provide equivalent services, nor other third parties engaged with due care by the fund company or the depositary. The same shall apply to loss caused by the insolvency of the aforementioned organisations or third parties. The depositary shall not be liable for engaged parties instructed by the fund company. Nor will the fund company or the depositary be liable for loss incurred by the fund, unitholders, or other parties by reason of restrictions upon disposition that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund company and the depositary is regulated under the UCITS Act, Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, but not for investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to in this paragraph.

The fund company has the right to redeem a unitholder’s units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder’s subscription for or holdings of units in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE SVERIGEFOND

INVESTMENT STRATEGY

The fund is an equity fund that invests with no restrictions as to company or sector in Sweden. The fund's main objective is to create a positive and stable return.

The fund may invest its assets in securities, money market instruments, derivatives, fund units and accounts with credit institutions. The fund invests in companies whose shares or equity-related securities are traded on a regulated market, as long as its head office or principal business is located in Sweden. The fund may invest up to 10% of its NAV in fund units. The fund may deposit up to 10% of its NAV in accounts with credit institutions.

The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested may be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Distribution
- C – SEK, Income (min. SEK 3,000,000)
- D – NOK, Accumulation, Distribution

RISK PROFILE

The fund invests in securities in the Swedish capital market. The fund may invest without restriction as to sector, and the risk is therefore related to specific holdings. The Swedish market has historically fluctuated more than some other markets in both upturns and downturns and must therefore be considered quite volatile and highly dependent on the country's export industry. The fund is permitted to use derivatives, but only with the intention of improving management efficiency, and this is an additional risk.

Fund assets are invested in liquid assets that can be divested in the event of redemption. Experience in recent years with sharp stock market movements shows that shares in the most actively traded Swedish listed companies have good liquidity even in periods of extreme market conditions. Cash and cash equivalents are deposited with external banks and this represents a credit risk, but this risk must be regarded as very low.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE SVERIGEFOND SUSTAINABILITY DISCLOSURES

Product name: Carnegie Sverigefond
Legal entity identifier: 549300P4XGIJ8567OR33

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?	
☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards
   - Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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

The fund uses the following sustainability indicators to measure the environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Excluded companies in accordance with the fund company's exclusion policy, calculated as a number, where this is made possible by an available index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint ($CO2$/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 50% of the investments in companies whose turnover related to the UN SDGs exceeds 25%.
2. An ESG analysis has been performed in our internal analysis tool for all investee companies.
3. The fund excludes companies in accordance with the fund company's policy.

4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
   - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
   - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
   [Read more about the analysis tool here.]

2. Negative screening. Carnegie Fonder does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

   - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
   - The fund manager contacts the holding to discuss our concerns.
   - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
   - If the holding's response is unsatisfactory, the holding is sold.

Read more in the Carnegie Fonder Responsible Investment and Shareholder Engagement Policy here.

What is the asset allocation planned for this financial product?

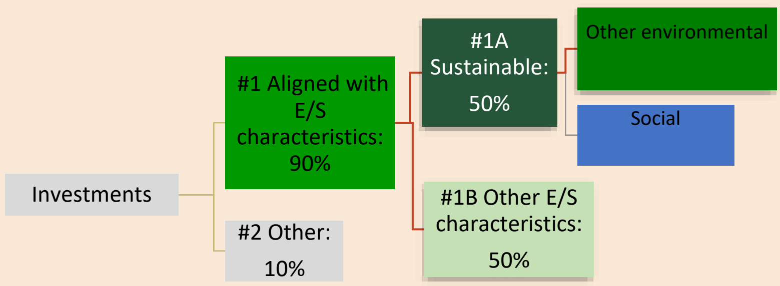
Asset allocation describes the share of investments in specific assets.

#1 All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 50% of these investments have environmental or social objectives:
- Within this 50%, the minimum share of investments that Taxonomy-aligned is currently 0% . There is no planned allocation between “Other environmental” and “Social” but all investments are aligned with at least one of them.

1B. The remaining maximum share of 50% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

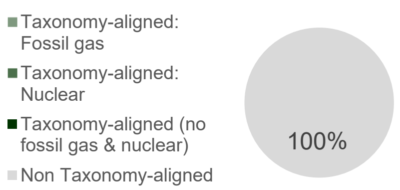
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

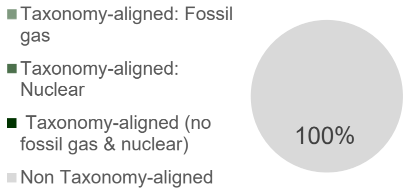
☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

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



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



This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are **sustainable investments** with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-sverigefond-a/

CARNEGIE SVERIGEFOND FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Sverigefond. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). The fund is also available for individual pension savings in accordance with the Individual Pension Savings Act (1993: 931). Special rules apply to this type of investment.

Fund assets are owned jointly by the fund unitholders and each unit in a unit class confers an equal right to the property that makes up the fund. The fund company (see § 2) represents unitholders in all matters concerning the UCITS fund. The fund cannot acquire rights or assume obligations.

Unit classes

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Distribution
- C – SEK, Income
- D – NOK, Accumulation, Distribution

The accumulation classes reinvest fund returns, while the income class pays dividends as set forth in § 12. The accumulation classes differ in terms of distribution channel and management fees.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes. All unit classes confer equal rights to the property included in the fund.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund's unitholder register – transfer the investor to another unit class, whose terms and conditions the investor fulfils. If the investor is eligible for more than one unit class, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary for the fund's assets is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund's assets and implements the fund company's instructions with regard to the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. The depositary further verifies that management of the fund and subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions arising from the assets of the fund are paid into the fund without delay. The depositary also monitors the fund's cash flows.

§ 4 Fund Characteristics

The fund is an equity fund that invests with no restrictions as to company or sector in Sweden.

The primary objective of the fund is to create a stable and positive return and the secondary objective is to outperform the benchmark index.

§ 5 Investment Strategy

The fund may invest its assets in securities, money market instruments, derivatives, fund units and accounts with credit institutions.

The fund invests in companies whose shares or equity-related securities are traded on a regulated market in Sweden or on another regulated market provided that the company's registered office or principal business is located in Sweden.

The fund may invest a maximum of 10% of its NAV in fund units.

The fund may deposit a maximum of 10% of its NAV to accounts with credit institutions.

§ 6 Exchanges and Marketplaces

The fund's assets may be invested on exchanges or authorised marketplaces or other regulated markets in EU and EFTA countries as well as in Australia, Hong Kong, Japan, Canada, Singapore and the USA.

§ 7 Special Investment Strategy

The fund's assets may also be invested in securities and money market instruments that are not listed in accordance with the UCITS Act Ch 5, §5 up to a maximum of 10% of the fund's NAV.

In order to improve management efficiency, the fund may invest in derivative instruments in accordance with the Swedish UCITS Act, Ch 5, §12, first paragraph. The fund may not use OTC derivatives in accordance with the UCITS Act, Ch 5, §12, second paragraph.

The fund may enter into securities lending agreements.

§ 8 Valuation

The fund's NAV is calculated by deducting liabilities related to the fund from its assets. The NAV per unit in a particular unit class corresponds to the NAV of the unit class divided by the number of fund units in that class with consideration given to the terms and conditions associated with each unit class.

NAV per unit is calculated each bank day and forms the basis for establishing the subscription and redemption prices for trade in fund units. In the daily valuation, the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate unit value if the fund is closed for subscriptions or redemptions.

The fund's assets comprise:

- Financial instruments, which are measured based on current market value. If no such market value is available, or is deemed misleading by the fund company, financial instruments may be included at the value determined by the fund company on an objective basis
- Cash and cash equivalents
- Accrued interest
- Accrued dividends

- Unsettled sales
- Other receivables relating to the fund

The fund’s liabilities comprise:

- Payments to the fund company
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

Unlisted securities and money market instruments are included at a value determined by the fund company on an objective basis. This valuation is based on:

- Market prices from unapproved exchanges or market makers
- Other financial instruments or indices adjusted for differences in,
- for example, risk,
- discounted dividends or cash flows, or
- share of equity.

§ 9 Subscriptions and Redemptions

The fund is normally open for subscriptions (purchases by unitholders) and redemptions (sales by unitholders) of fund units on all bank days. However, the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund’s assets cannot be conducted in a manner that assures the equal rights of all unitholders, as a consequence of several of the marketplaces on which the fund’s trade takes place being partly or entirely closed.

The minimum amount for initial subscriptions in unit class C is SEK 3,000,000. There is no minimum amount for other unit classes.

Subscription requests must be made in writing to the fund company. Subscriptions of fund units are executed at the price established on the date payment is available to the fund company.

Redemption requests must be made in writing to the fund company. Redemption shall be executed at the NAV per unit established on the redemption date. Immediate redemptions take place only to the extent that this is possible without the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. Redemption will take place as soon as cash from sales has been received.

The subscription and redemption prices are the latest calculated NAV per unit when the order is executed, plus issuance fees or minus redemption fees.

The procedures described above mean that subscriptions and redemptions take place at a price unknown to the unitholder when the subscription or redemption is requested.

Information on subscription and redemption prices will be available from the fund company and the intermediary institution no later than the bank day after the bank day the NAV per unit is established as above.

Unit class B is reserved for investors who subscribe for units through distributors which, according to an agreement with the fund company, wholly or partly, do not accept retrocession fees from the fund company and which, when the distributor provides the investment service to its customers in connection with the subscription of units, is paid directly by its customer. A prerequisite to be eligible to invest in unit class B is that the holding is registered on one or more accounts in the distributor’s name of behalf of the client (nominee registration).

Unit class D is reserved for investors who subscribe for units via a distributor who, within the framework of its operations, distributes the fund units on the Norwegian market, and who in accordance with an agreement with the fund company does not receive retrocession fees from the fund company for distribution on the Norwegian market. A prerequisite for eligibility to invest in unit class D is that the holding is registered in one or more accounts in the distributor's name on behalf of the client (nominee registration). Subscriptions and redemptions of fund units are denominated in Norwegian kroner (NOK).

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund’s assets to the management company for its management of the fund. In addition, payments shall be made to the depositary for its activities as the depositary, for audit expenses and to Finansinspektionen for its supervisory activities. Total charges and fees shall not exceed 1.5% per year of the fund’s NAV for unit class A and shall not exceed 1.05% of the fund’s NAV for unit classes B and C. Total charges and fees shall not exceed 1.05% of the fund’s NAV for unit class D per year. The payments described above, as well as brokerage and other costs incurred for the fund's trading in financial instruments are charged to the fund on an ongoing basis. Where required by law, value added tax will be additional on all payments.

§ 12 Dividends

Classes A, B and D will not pay dividends.
The dividend on the income class, unit class C, is determined by the fund company. Dividends are paid to unitholders on the last Wednesday of January, April, July and October.

Dividends on fund units are paid to all unitholders in the income class who are registered unitholders on the record date determined by the fund company.
Unless otherwise decided by the fund management company, returns on the fund’s assets, residual distributable amounts remaining from previously, and other distributable amounts may be used for dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.
The fund company is required to deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

Half-yearly reports shall be made available at the fund company within two months of the end of the half-yearly reporting period and annual reports shall be made available at the fund company within four months of the end of the annual reporting period. Such reports shall also be provided to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall be subject to the approval of Finansinspektionen. After the decision to amend the fund rules has been approved, the fund rules shall be made available at the fund company and the depositary and be announced in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

In conjunction with the pledge of fund units that are not nominee registered, the pledging party and/or pledge holder must notify the fund company in writing in respect thereof. The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired, and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss arising as a consequence of Swedish or foreign legislation, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether the fund company or the depositary initiates or is the target of such a labour action. Nor shall the fund company or the depositary pay compensation for losses arising in other cases if the fund company or depositary has observed customary prudence. The fund company or the depositary shall not be liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If the fund company or the depositary is prevented from making or receiving payment as a consequence of such a circumstance the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest will be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this section, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Neither the fund company nor the depositary is liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities that provide equivalent services, nor other third parties engaged with due care by the fund company or the depositary. The same shall apply to loss caused by the insolvency of the aforementioned organisations or third parties. The depositary shall not be liable for engaged parties instructed by the fund company. The fund company or the depositary shall not be liable for loss incurred by the fund, unitholders, or other parties by reason of restrictions upon disposition that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation of these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

If the depositary or a custodian bank has lost financial instruments held in custody at the depositary or a custodian bank, the depositary shall without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the fund company on the fund's behalf. The depositary shall, however, not be liable if the loss of the financial instruments was caused by an external event beyond the reasonable control of the depositary and whose consequences were impossible to avoid, even though all reasonable efforts were made to do so, such as losses arising from Swedish or foreign legal enactment, intervention by a Swedish or foreign governmental authority, act of war, strike, blockade, boycott, lockout or comparable circumstance. The reservation in respect of strike, blockade, boycott and lockout will apply notwithstanding whether the depositary initiates or is the target of such labour action.

The tort liability of the fund management company and the depositary is regulated under the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, but not for investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to in this paragraph.

The fund company has the right to redeem a unitholder’s units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder’s subscription for or holdings of units in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE US SMALL AND MICRO CAP

INVESTMENT STRATEGY

The fund is an actively managed equity fund that primarily invests in companies traded on regulated markets. The fund invests mainly in companies in the USA. The aim of the fund's investments is to achieve a long-term increase in the fund's unit value over a period of five years or more. The fund is an equity fund that can invest in shares and share-related transferable securities. A larger portion of these investments will be in small companies. At least 80 percent of the fund's assets will be invested in shares and share-related transferable securities. Of these investments, at least 4/5 will be in companies that, at the time of investment, have a market value not exceeding the market value of the largest constituent in the fund's benchmark index. The fund's benchmark index is MSCI USA Small Cap TR NET in SEK. At least two-thirds of the fund's investments will be in shares and share-related transferable securities issued by companies based in the USA. The selection of shares and the distribution between different industries and regions is not predetermined, which means that the portfolio may be concentrated in a few industries and regions from time to time.

The fund will normally not use derivatives. The fund can only use derivatives to a limited extent and with the aim of making management more efficient. According to the fund's regulations, the fund may use financial derivatives to make management more efficient. The total exposure will then be calculated using the commitment method. The total exposure must not exceed 100% of the fund's net value.

The fund's benchmark index is MSCI USA Small Cap TR Net in SEK. This index is relevant to the fund as it reflects the fund's long-term investment strategy in terms of asset class, company size, and geographic market.

INTENDED INVESTORS

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has no unit classes. The fund's currency is SEK and the fund does not distribute dividends.

RISK PROFILE

The fund is an equity fund, and investing in equities involves the risk of significant price fluctuations. Therefore, an investment period exceeding five years is recommended. The fund freely chooses which industries and sectors to invest in. As a result, the fund may occasionally be overexposed to individual industries and regions. The fund normally does not use derivatives or other tools to reduce this risk.

Investing in equity funds involves market risk as the price of the fund and its underlying assets exhibit fluctuations. The fund aims to be fully invested in equities, and therefore, the value of the fund units can vary significantly in the short term. Market risk is considered the largest risk the fund is exposed to.

When a fund invests in financial instruments issued in currencies other than the fund's base currency, currency risk arises. This means that the fund's value can vary due to changes in exchange rates. These changes can affect the value of the investments both positively and negatively. The fund normally does not use derivatives or other techniques to mitigate this risk.

The fund aims to achieve a long-term, positive value increase and invests actively. The responsible managers select a smaller number of companies to invest in and do not strive to replicate any benchmark index. Therefore, the fund will occasionally deviate from it, both positively and negatively. The concentration risk can lead to significant price fluctuations for an equity fund with few holdings in a single market or specific sector.

When a security cannot be traded at the intended time without a significant price reduction, liquidity risk arises. This risk is most pronounced in securities with low turnover. In cases where the fund holds a relatively large portion of a company's shares, this risk increases. Shares traded on a regulated market usually have good liquidity even during periods of significant fluctuations. Normally, more than half of the fund portfolio's weight consists of slightly larger companies, which reduces liquidity risk.

Counterparty risk is defined as the risk of loss due to a counterparty being unable to fulfil its obligations within a transaction. The fund generally only trades in shares on a regulated market, thus limiting counterparty risk. However, the funds must ensure independence from counterparties and always strive for the best result in all securities transactions.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE US SMALL AND MICRO CAP SUSTAINABILITY DISCLOSURES

Product name: Carnegie US Small and Microcap
Legal entity identifier: 549300CRNQGUORX4VZ03

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**. The Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective :** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 25% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ With a social objective
☐ It will make a minimum of **sustainable investments with a social objective :**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

Sustainability-related characteristics are promoted in the fund by the fund managers seeking responsible companies with long-term sustainable business models. The fund takes into account environmental and climate factors by excluding companies involved in the production or distribution of fossil fuels and by selecting companies that actively work on climate solutions, among other things. The fund excludes companies that violate international norms and conventions regarding human rights, labour rights, and corruption. The fund selects companies with a strong corporate culture regarding corporate governance and social aspects.

The fund invests in companies whose products or services contribute to achieving one or more of the UN SDGs or otherwise promote environmental and/or social characteristics. The fund strives for the companies to have also signed the UN Global Compact. Additionally, the fund promotes environmental characteristics by investing in companies that have established scientifically based climate targets to reduce their greenhouse gas emissions and that are in line with the goals of a maximum 1.5 degree temperature increase.

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

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

The fund's holdings are continuously analysed by the fund managers regarding relevant sustainability factors and sustainability risks. Several sustainability indicators are considered, and the priorities may differ depending on the company being analysed. Examples include energy efficiency, renewable energy, use of raw materials, and management of greenhouse gas emissions. It can also involve indicators that show the promotion of equality and labour rights issues.

The fund's engagement work mainly takes place through direct dialogue with the management of the companies in which it invests. The managers continuously engage in dialogue with the fund's holdings about sustainability and want to see them develop in the right direction on these issues. Engagement also occurs through voting at general meetings and participation in nomination committees. The fund company also measures the fund's carbon footprint.

What are the objectives of the sustainable investments that the financial product partially intends to make, and how does the sustainable investment contribute to such objectives?

The objectives of the sustainable investments that the fund partially intends to make are to contribute to one or more of the UN SDG for sustainable development.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

The fund company considers sustainability risks and adverse impacts in all investments. This is done through a thorough analysis of all companies before investing, where questions about the companies' strategy, financial and non-financial results and risks, capital structure, social and environmental impact, and corporate governance are considered. Specific ESG issues that are material to each company are documented before investment and are continuously monitored and updated. Fundamental for all companies included in the fund is also that they comply with the requirements of recognized international standards and agreements. The fund's holdings are screened quarterly for compliance with global standards for environmental protection, human rights, labour standards, and anti-corruption.

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.

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

Specific principal adverse impacts that are material to each company are analysed and documented before investment and are continuously monitored and updated.

Examples of indicators covered in the environmental area can include greenhouse gas emissions, how the company uses non-renewable resources, or failure to prevent serious environmental degradation. By excluding fossil fuels, for example, we automatically avoid investing in companies that produce fossil fuels and are generally considered to have a significant direct negative climate impact. The fund company also identifies and measures the carbon footprint of the funds annually.

Examples of indicators covered in the area of human rights can include insufficient consumer protection, violations of health and safety standards, or violations of indigenous people's rights. Examples of issues covered in the area of labour rights can include

violations of the right to freedom of association, discrimination, or child labour. Regarding anti-corruption, issues such as bribery are included.

The fund completely excludes investments in certain sectors and activities such as controversial weapons, nuclear weapons, and cannabis. When investing in companies involved in products and services such as weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels, and uranium, no more than five percent of the turnover may relate to the specified product or service. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria.

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

The fund does not invest in companies that violate the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. To ensure that the companies in the fund do not breach any convention or other international agreement, or if there is suspicion of, for example, environmental crimes or human rights violations, the fund portfolio is screened twice a year. Through the screening, the fund company receives information on how the companies comply with international norms and agreements from, for example, the UN, EU, OECD, and ILO, as well as any violations of these norms.

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 in its management by selecting investments, excluding investments with excessive sustainability risks and negative impacts on sustainability factors, and through engagement activities. The fund company has adopted a sustainable investment policy that covers the fund.

In the fund's management, principal adverse impacts on environmental characteristics (e.g., companies' impact on the environment and climate) and social characteristics (e.g., human rights, labour rights, and equal treatment) are considered.

The fund's annual report contains information on how the fund has considered principal adverse impacts on sustainability factors.

☐ No

What investment strategy does this financial product follow?

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

Sustainability analysis within environmental, social responsibility, and corporate governance issues is an intergrated part of the analysis of all potential investments. A strong sustainability profile in all aspects is a fundamental requirement for the fund to invest in a company. The fund selects companies with a strong corporate culture (corporate governance, social aspects) and preferably where the business model benefits from the necessary development towards a more environmentally friendly society.

The fund's selection process has been designed with this in mind. ESG analysis is an integral part of the company analysis process, and material sustainability aspects are documented for all the fund's holdings. The analysis is based on company reports, external analysis, as well as specified ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

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

The fund uses methods of inclusion, exclusion, and engagement to achieve the environmental and social characteristics promoted by the fund.

The fund managers look for well-managed companies to invest in, which includes assessments of ESG issues.

The fund does not invest in companies involved in the following products and services: cluster bombs, landmines, chemical and biological weapons, nuclear weapons, weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels (oil, gas, coal), uranium, and cannabis. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria. Additionally, the fund does not invest in companies that violate international norms. The assessment is made either by the fund company itself or by a subcontractor.

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

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

ESG analysis is an integral part of the company analysis process, and material environmental, social, or governance aspects are analysed and documented for all the fund's holdings. The analysis is based on company reports, external analysis, as well as specified ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

The fund company's board has also established Principles for Shareholder Engagement. Through shareholder engagement, the fund company can contribute to the long-term healthy development of both the companies and the financial market as a whole. As a representative of the unitholders, the fund company ensures that the companies in which the fund's assets are invested act in accordance with relevant rules and guidelines and otherwise follow good market practices. The fund company's Principles for Shareholder Engagement also describe shareholder engagement based on how relevant issues are monitored, dialogues with company representatives, exercising voting rights, and collaboration with other shareholders.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

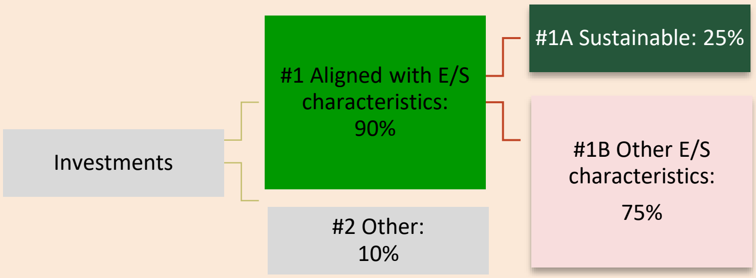
WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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.

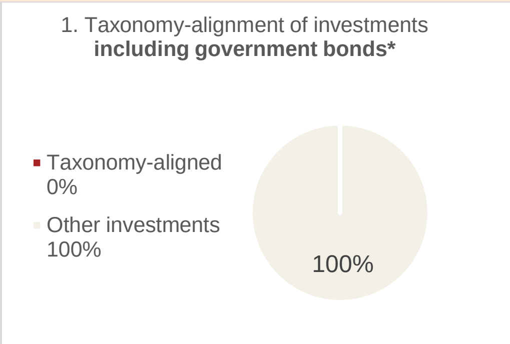
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

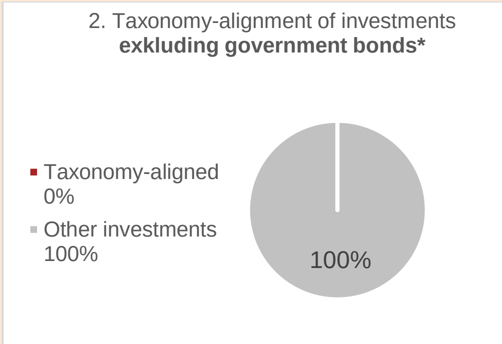
This fund’s underlying investments do not consider the EU criteria for environmentally sustainable economic activities. The EU Taxonomy is a classification system aimed at establishing common criteria for environmentally sustainable economic activities. The Taxonomy is still under development, and criteria for all environmental objectives are not yet finalised. There is also no established calculation model for determining the proportion of the fund’s investments that are aligned with the Taxonomy.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective**.**

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emissions levels corresponding to the

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.*

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund includes investments in economic activities that the fund considers to be environmentally sustainable. The fund has no minimum share for environmentally sustainable investments.

What is the minimum share of socially sustainable investments?

The fund includes investments that promote both environmental and social characteristics. However, the fund has no minimum share of socially sustainable investments.

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

The fund includes other investments than shares, which consist of cash. This share may be up to 10%.

Where can I find more product-specific information online?

More product-specific information is available on the website:

https://www.carnegiefonder.se/fonder/carnegie-us-small-and-micro-cap/

CARNEGIE US SMALL AND MICRO CAP FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie US Small and Micro Cap, hereinafter referred to as the “fund”. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). In addition to the provisions of the aforementioned law, these fund rules, the articles of association of the fund company, and other regulations issued under the law or ordinance apply to the fund’s operations.

Fund assets are owned jointly by the fund unitholders, i.e., those who have made deposits in the fund. Each unit in the fund carries equal rights to the fund’s assets. The fund company manages the fund and keeps a register of all unitholders. The fund is not a legal entity and therefore cannot acquire rights or assume obligations; however, the fund is a separate tax subject. The fund company specified in § 2 represents the unitholders in all matters concerning the UCITS fund, decides on the funds’ assets, and exercises the rights derived from the assets.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as the “fund company”.

§ 3 Depositary and its Function

The fund’s assets are held by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081), hereinafter the “custodian”. The custodian shall receive and retain the fund’s assets and implement the fund company’s instructions regarding the UCITS fund provided these do not contravene the UCITS Act, other statutes, or the fund rules, and ensure that:

- subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules.
- the value of the fund units is calculated in accordance with the UCITS Act and the fund rules,
- payments for transactions involving the fund’s assets are paid into the fund without delay, and
- the fund’s income is used in accordance with the provisions of the UCITS Act and the fund rules.

The custodian shall act independently of the fund company and exclusively in the interest of the unitholders.

§ 4 Fund characteristics

The fund is an equity fund that primarily invests in small companies in the USA. Investments may be made in shares and share-related transferable securities traded on regulated markets within or outside the EEA, as well as other markets according to §6. The selection of shares and the distribution between different industries and regions is not predetermined. Investments may be concentrated in a few industries and regions.

The aim of the fund’s investments is to achieve a long-term increase in the fund’s unit value over a period of 5 years or more.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, fund units, Swedish treasury bills, and in accounts with credit institutions. Transferable securities refer to shares and share-related transferable securities. The fund shall invest in various industries and markets. At least 80% of the fund’s assets shall be invested in shares and share-related transferable securities. Of these investments, at least 4/5 shall be in companies that, at the time of investment, have a market value not exceeding the market value of the largest constituent in the fund's benchmark index.

The fund's benchmark index is specified in the fund's prospectus. At least 2/3 of the fund's investments shall be in shares and share-related transferable securities issued by companies based in the USA. The fund may invest up to 10% of the fund's value in accounts. The fund may invest up to 20% of the fund's value in Swedish treasury bills.

The fund's investments shall be made in companies on the regulated markets specified in §6. The fund may invest up to 10% of the fund's value in fund units.

The fund shall only use derivative instruments to a very limited extent. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management, provided that the underlying assets consist of transferable securities and financial indices.

§ 6 Marketplaces

The fund's assets may be invested in a regulated market within the EEA or in an equivalent market outside the EEA. Trading may also take place on another market within or outside the EEA that is regulated and open to the public.

§ 7 Special investment strategy

The fund may invest in such transferable securities as referred to in the UCITS Act, Ch 5, § 5.

The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks.

The fund may not use OTC derivatives. The fund may not invest in such money market instruments as referred to in the UCITS Act, Ch 5, § 5.

§ 8 Valuation

The fund's net asset value (NAV) is normally calculated each bank day. The NAV per fund unit is the NAV divided by the number of outstanding fund units. The NAV is calculated by deducting the liabilities relating to the fund from its assets.

- Financial instruments are valued based on the current market value (normally the latest price paid). If such a price is missing or is deemed misleading by the fund company, the fund company may determine the value on another objective basis. When valuing on objective grounds, a market value is determined based on, for example, information on the latest paid price or indicative bid price, or with the help of information from counterparties or other independent external sources.
- For transferable securities as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for the special valuation is market prices from unregulated exchanges or independent market makers if such are 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 another listed financial instrument or index with adjustments for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (present value calculation), or capital share of equity.
- Cash and cash equivalents and current receivables in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold, are recorded at the amount they are expected to be received. All assets take into account associated rights in the form of interest, dividends, subscription rights, and the like.

For all assets, associated receivables in the form of i.e. interest, dividends, emission rights are taken into account.

The fund’s liabilities consist of:

- Compensation to the fund company
- Unpaid cash for purchased financial instruments
- Any tax liabilities and other liabilities

§ 9 Subscriptions and Redemptions

The fund is open for the subscription and redemption of fund units each bank day. The fund company has the right to delay subscriptions and redemptions if it deems that the valuation of the fund’s assets cannot be done in a way that ensures equal rights for the unit holders, for example, due to one or more of the regulated markets or other marketplaces or markets where the fund’s trading takes place being entirely or partially closed. The unit value is normally calculated each bank day. The principles used for determining the unit value are stated in § 8.

Subscriptions and redemptions of fund units are carried out at a price not yet determined at the time of the request for sale and redemption.

Redemption requests can be made to the fund company. The redemption application must be submitted in writing and signed by post, fax, or email containing such a written signature. Redemption cannot take place until the written signed redemption application has been received by the fund company.

Immediate redemption shall only take place to the extent possible without the sale of securities in the fund. If immediate redemption cannot take place, redemption shall occur as soon as liquid assets have been acquired. Liquid assets are acquired in such cases through the sale of securities in the fund as soon as possible, and redemption takes place as soon as the sales proceeds have been received. If a subscription could significantly disadvantage the interests of other unit holders, the fund company may, after notifying the Financial Supervisory Authority, delay the subscription.

Requests are executed on the same day they are submitted, provided that the request has been received by the fund company no later than the time and in accordance with the conditions stated on the company’s website. Otherwise, the request is executed on the next business day.

Redemption requests can only be withdrawn if the fund company permits it. Applications for the sale of fund units must be made in writing to the fund company. Subscription of fund units are carried out at the price determined on the day the funds are available to the fund company.

The minimum monthly savings amount is 100 SEK.

The information the fund company provides to the media about the price of fund units is always preliminary and can be adjusted by the fund company if necessary. Therefore, the price information provided by the media is not binding for the fund company. Information about the most recently calculated unit value can be obtained from the fund company.

§ 10 Closure of the Fund in Extraordinary Circumstances

The fund may be closed for the subscription and redemption of units if such extraordinary circumstances have occurred that make it impossible to value the fund’s assets in a way that ensures the equal rights of unitholders.

§ 11 Charges and Fees

From the fund’s assets, compensation shall be paid to the fund company for its management of the fund. The compensation includes costs for the custody of the fund’s assets as well as for supervision and auditors, with an amount corresponding to a maximum of 1.6% annually of the fund’s NAV, calculated daily at 1/365 and deducted from the fund monthly.

Brokerage fees related to the purchase and sale of transferable securities are charged to the fund, as well as taxes and statutory fees.

§ 12 Dividends

As a general rule, the fund does not pay dividends. However, the fund company may decide to distribute dividends if it deems it to be in the interest of the unit holders. If the fund company decides to distribute dividends, the basis for the dividend shall be the return on the fund's assets or other dividend amounts. If the fund company decides to distribute dividends, it will be done in April of the year following the financial year and will be allocated to unit holders who are registered for fund units on the dividend ex-date determined by the fund company.

If the fund company decides to distribute dividends, the fund company shall, for the dividend attributable to the fund unit after deduction of any preliminary tax, acquire new fund units for the unit holder's account, who is registered for the fund unit on the date determined by the fund company. Upon prior request, the dividend, if decided by the fund company, may also be paid to the unit holder's account after deduction of any preliminary tax.

§ 13 Financial Year

The fund's financial year is the calendar year.

§ 14 Semi-annual and Annual Reports and Amendments of Fund Rules

For each financial year, the fund company shall submit an annual report for the fund no later than four months after the end of the financial year. The fund company shall submit a semi-annual report for the fund no later than two months after the end of each calendar half-year. The annual report and semi-annual report shall be available at the fund company. The semi-annual report and annual report for the fund shall be sent to unitholders registered with the fund company.

If the board of the fund company decides to amend these fund regulations, the decision shall be submitted to the Financial Supervisory Authority for approval. Once the decision has been approved, it shall be made available at the fund company and, where applicable, announced in the manner prescribed by the Financial Supervisory Authority.

§ 15 Pledges and Transfers

Pledging is done by the pledgee or pledgor notifying the fund company in writing about the pledge. The notification must include the name and address of the pledgee, the owner of the fund units, the number of units covered by the pledge, and any limitations on the scope of the pledge.

Registration of the pledge is done in the unit holder register. The fund company shall notify the unitholder in writing about such registration.

The note of the pledge is valid until the fund company receives notification from the pledgee that the pledge has ceased and has deregistered it in the unitholder register. The fund company may charge a fee of up to 500 SEK for handling the pledge.

Unitholders can transfer their fund units. For such a transfer, the fund company may charge a fee of up to 500 SEK.

§ 16 Limitation of liability

If the Custodian or a Depository Bank has lost Financial Instruments that are held in custody by the Custodian under the agreement between the Fund Company and the Custodian, the Custodian shall, without undue delay, return Financial Instruments of the same kind or pay an amount equivalent to the value of such Financial Instruments to the Fund Company on behalf of the Fund. However, the Custodian is not liable if the loss of the Financial Instruments is caused by an external event beyond the Custodian's reasonable control and whose consequences were impossible to avoid despite all reasonable efforts.

Furthermore, the Custodian is not liable for damage caused by Swedish or foreign legislation, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation regarding strikes, blockades, boycotts, and lockouts applies even if the Custodian is the subject of or itself takes such conflict action.

The Custodian is not liable for other damages than those specified in the first paragraph, unless the Custodian has intentionally or negligently caused such damages. The Custodian is also not liable for such damages if the circumstances specified in the first paragraph exist.

The Custodian is not liable for damage caused by Swedish or foreign exchanges or other Execution Venues, Registrars, Clearing Organizations, or others providing equivalent services, and – with regard to other damages than the loss of Financial Instruments held in custody – not for damage caused by a Depository Bank or other contractor that the Custodian has engaged with due skill, care, and diligence and regularly monitors, or that has been designated by the Fund Company. The Custodian is not liable for damage caused by the insolvency of the aforementioned organizations or contractors. However, a custody agreement regarding the custody of assets and control of ownership does not relieve the Custodian of its liability for losses and other damages according to the Fund Legislation.

The Custodian is not liable for damage incurred by the Fund Company, unit holders in the Fund, the Fund, or others due to restrictions on disposal that may be applied against the Custodian regarding Financial Instruments.

The Custodian is not liable in any case for indirect costs, damages, or losses.

If there is an obstacle for the Custodian to fully or partially execute an action due to circumstances specified in the first paragraph, the action may be postponed until the obstacle has ceased. In the event of deferred payment, the Custodian shall not pay default interest. If interest is promised, the Custodian shall pay interest at the rate applicable on the due date. If the Custodian is prevented from receiving payment for the Funds due to circumstances specified in the first paragraph, the Custodian is entitled to interest only according to the terms applicable on the due date for the period during which the obstacle existed.

The above limitations of liability do not restrict the unitholder's right to compensation regulated under the UCITS Act Ch 3, §§ 14-16. The fund company has tort liability for damages regulated under the UCITS Act Ch 2, § 21.

§ 17 Permitted investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take.

The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph. The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of such a unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or ordinance or that the fund company has by reason of a unitholder's subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

D&G AKTIEFOND

INVESTMENT STRATEGY

The fund is an actively managed equity fund that primarily invests in companies traded on regulated markets in Sweden. The objective of the fund's investments is to achieve a value increase in the fund's unit value over the long term, i.e., a period of five years or more. The fund is an equity fund where at least 90 percent of the assets are invested in shares and share-related transferable securities. Of these investments, at least 80 percent must be in shares and transferable securities in Sweden.

The fund may invest in transferable securities, fund units, Swedish treasury bills, and in accounts at credit institutions. Transferable securities refer to shares and share-related transferable securities. The fund is actively managed and invests entirely based on its own choices without regard to the share's index weight. The fund's return is determined by how the shares in which the fund invests increase or decrease in value during the holding period. The fund will normally not use derivatives. The fund may only use derivatives to a limited extent and with the aim of making management more efficient. According to the fund's regulations, the fund has the option to use financial derivatives to make management more efficient. The total exposure should then be calculated using the commitment method. The total exposure must not exceed 100% of the fund's net value.

The fund's benchmark index is the SIX Portfolio Return Index. This index is relevant to the fund as it reflects the fund's long-term investment focus regarding asset classes and geographic market.

INTENDED INVESTORS

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has no unit classes. The fund's currency is SEK and the fund does not distribute dividends.

RISK PROFILE

The fund is an equity fund, and investing in shares involves the risk of significant price fluctuations. Therefore, a savings period exceeding five years is recommended. The fund freely chooses which industries and sectors it invests in. As a result, the fund may at times be overexposed to individual industries and regions. The fund normally does not use derivatives or other tools to reduce this risk.

Investing in equity funds involves market risk as the price of the fund and its underlying assets show fluctuations. The fund strives to be fully invested in shares, and the value of the fund unit can therefore vary significantly in the short term. Market risk is considered the greatest risk the fund is exposed to.

When a fund invests in financial instruments issued in currencies other than the fund's base currency, currency risk arises. This means that the fund's value can vary due to changes in exchange rates. These changes can affect the value of the investments both positively and negatively. The fund normally does not use derivatives or other techniques to reduce this risk. The fund invests the majority of its assets in SEK and therefore has a slightly lower currency risk than funds that invest a larger proportion in other currencies.

The fund aims to provide a long-term, positive value increase and invests actively. The responsible managers select a smaller number of companies to invest in and do not strive to replicate any benchmark index. The fund will therefore at times deviate from it, both positively and negatively. Concentration risk can lead to significant price fluctuations for an equity fund with few holdings in a single market or a specific sector.

When a security cannot be traded at the intended time without a significant price reduction, liquidity risk arises. This risk is most pronounced in securities with low turnover. In cases where the fund holds a relatively large proportion of a company's shares, this risk increases. Shares traded on a regulated market usually have good liquidity even during periods of significant fluctuations. Normally, more than half of the fund portfolio's weight consists of slightly larger companies, which reduces liquidity risk.

Counterparty risk is defined as the risk of loss due to a counterparty being unable to fulfil its obligations within a transaction. The fund generally only trades in shares on a regulated market, and counterparty risk is therefore limited. However, the funds must ensure independence from counterparties and always strive for the best result in all security transactions.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

D&G AKTIEFOND SUSTAINABILITY DISCLOSURES

Product name: D&G Aktiefond
Legal entity identifier: 549300OFGPKKF0RV0Z55

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**. The Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 25% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ With a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

Sustainability-related characteristics are promoted in the fund by the fund managers seeking responsible companies with long-term sustainable business models. The fund takes into account environmental and climate factors by excluding companies involved in the production or distribution of fossil fuels and by selecting companies that actively work on climate solutions, among other things. The fund excludes companies that violate international norms and conventions regarding human rights, labour rights, and corruption. The fund selects companies with a strong corporate culture regarding corporate governance and social aspects.

The fund invests in companies whose products or services contribute to achieving one or more of the UN SDGs or otherwise promote environmental and/or social characteristics. The fund strives for the companies to have also signed the UN Global Compact. Additionally, the fund promotes environmental characteristics by investing in companies that have established scientifically based climate targets to reduce their greenhouse gas emissions and that are in line with the goals of a maximum 1.5-degree temperature increase.

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

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

The fund's holdings are continuously analysed by the fund managers regarding relevant sustainability factors and sustainability risks. Several sustainability indicators are considered, and the priorities may differ depending on the company being analysed. Examples include energy efficiency, renewable energy, use of raw materials, and management of greenhouse gas emissions. It can also involve indicators that show the promotion of equality and labour rights issues.

The fund's engagement work mainly takes place through direct dialogue with the management of the companies in which it invests. The managers continuously engage in dialogue with the fund's holdings about sustainability and want to see them develop in the right direction on these issues. Engagement also occurs through voting at general meetings and participation in nomination committees. The fund company also measures the fund's carbon footprint.

What are the objectives of the sustainable investments that the financial product partially intends to make, and how does the sustainable investment contribute to such objectives?

The objectives of the sustainable investments that the fund partially intends to make are to contribute to one or more of the UN SDG for sustainable development.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

The fund company considers sustainability risks and adverse impacts in all investments. This is done through a thorough analysis of all companies before investing, where questions about the companies' strategy, financial and non-financial results and risks, capital structure, social and environmental impact, and corporate governance are considered. Specific ESG issues that are material to each company are documented before investment and are continuously monitored and updated. Fundamental for all companies included in the fund is also that they comply with the requirements of recognized international standards and agreements. The fund's holdings are screened quarterly for compliance with global standards for environmental protection, human rights, labour standards, and anti-corruption.

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

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.

Specific principal adverse impacts that are material to each company are analysed and documented before investment and are continuously monitored and updated.

Examples of indicators covered in the environmental area can include greenhouse gas emissions, how the company uses non-renewable resources, or failure to prevent serious environmental degradation. By excluding fossil fuels, for example, we automatically avoid investing in companies that produce fossil fuels and are generally considered to have a significant direct negative climate impact. The fund company also identifies and measures the carbon footprint of the funds annually.

Examples of indicators covered in the area of human rights can include insufficient consumer protection, violations of health and safety standards, or violations of indigenous people's rights. Examples of issues covered in the area of labour rights can include

violations of the right to freedom of association, discrimination, or child labour. Regarding anti-corruption, issues such as bribery are included.

The fund completely excludes investments in certain sectors and activities such as controversial weapons, nuclear weapons, and cannabis. When investing in companies involved in products and services such as weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels, and uranium, no more than five percent of the turnover may relate to the specified product or service. The fund is screened semi-annually to ensure that the holdings meet the fund’s exclusion criteria.

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

The fund does not invest in companies that violate the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. To ensure that the companies in the fund do not breach any convention or other international agreement, or if there is suspicion of, for example, environmental crimes or human rights violations, the fund portfolio is screened twice a year. Through the screening, the fund company receives information on how the companies comply with international norms and agreements from, for example, the UN, EU, OECD, and ILO, as well as any violations of these norms.

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 in its management by selecting investments, excluding investments with excessive sustainability risks and negative impacts on sustainability factors, and through engagement activities. The fund company has adopted a sustainable investment policy that covers the fund.

In the fund’s management, principal adverse impacts on environmental characteristics (e.g., companies’ impact on the environment and climate) and social characteristics (e.g., human rights, labour rights, and equal treatment) are considered.

The fund’s annual report contains information on how the fund has considered principal adverse impacts on sustainability factors.

☐ No

What investment strategy does this financial product follow?

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

Sustainability analysis within environmental, social responsibility, and corporate governance issues is an intergrated part of the analysis of all potential investments. A strong sustainability profile in all aspects is a fundamental requirement for the fund to invest in a company. The fund selects companies with a strong corporate culture (corporate governance, social aspects) and preferably where the business model benefits from the necessary development towards a more environmentally friendly society.

The fund's selection process has been designed with this in mind. ESG analysis is an integral part of the company analysis process, and material sustainability aspects are documented for all the fund's holdings. The analysis is based on company reports, external analysis, as well as specified ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

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

The fund uses methods of inclusion, exclusion, and engagement to achieve the environmental and social characteristics promoted by the fund.

The fund managers look for well-managed companies to invest in, which includes assessments of ESG issues.

The fund does not invest in companies involved in the following products and services: cluster bombs, landmines, chemical and biological weapons, nuclear weapons, weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels (oil, gas, coal), uranium, and cannabis. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria. Additionally, the fund does not invest in companies that violate international norms. The assessment is made either by the fund company itself or by a subcontractor.

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

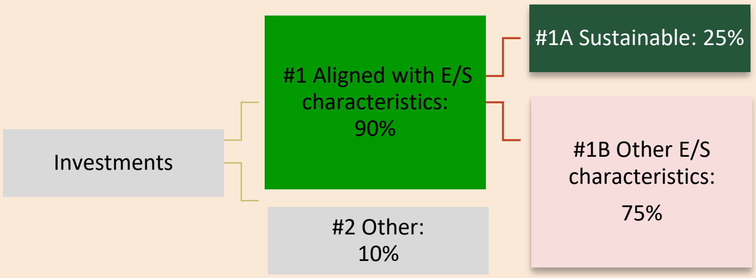
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

ESG analysis is an integral part of the company analysis process, and material environmental, social, or governance aspects are analysed and documented for all the fund's holdings. The analysis is based on company reports, external analysis, as well as specified ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

The fund company's board has also established Principles for Shareholder Engagement. Through shareholder engagement, the fund company can contribute to the long-term healthy development of both the companies and the financial market as a whole. As a representative of the unitholders, the fund company ensures that the companies in which the fund's assets are invested act in accordance with relevant rules and guidelines and otherwise follow good market practices. The fund company's Principles for Shareholder Engagement also describe shareholder engagement based on how relevant issues are monitored, dialogues with company representatives, exercising voting rights, and collaboration with other shareholders.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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.

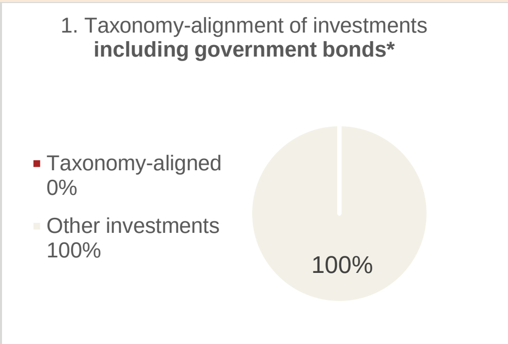
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

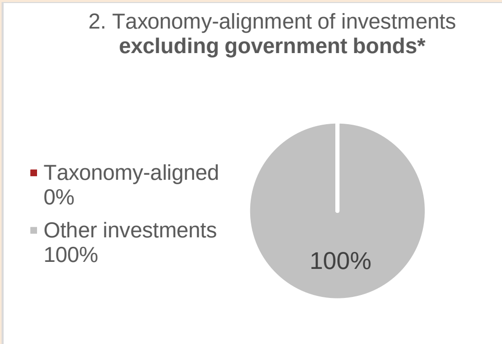
This fund's underlying investments do not consider the EU criteria for environmentally sustainable economic activities. The EU Taxonomy is a classification system aimed at establishing common criteria for environmentally sustainable economic activities. The Taxonomy is still under development, and criteria for all environmental objectives are not yet finalised. There is also no established calculation model for determining the proportion of the fund's investments that are aligned with the Taxonomy.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emissions levels corresponding to the best performance.

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.*

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund includes investments in economic activities that the fund considers to be environmentally sustainable. The fund has no minimum share for environmentally sustainable investments.

What is the minimum share of socially sustainable investments?

The fund includes investments that promote both environmental and social characteristics. However, the fund has no minimum share of socially sustainable investments.

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

The fund includes other investments than shares, which consist of cash. This share may be up to 10%.

Where can I find more product-specific information online?

More product-specific information is available on the website:

https://www.carnegiefonder.se/fonder/dg-aktiefond/

D&G AKTIEFOND FUND RULES

§ 1 Name and legal position

The name of the fund is D&G Equity Fund, hereinafter referred to as the “fund”. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). In addition to the provisions of the aforementioned law, these fund rules, the company’s articles of association, and other regulations issued under the law or regulation apply to the fund’s operations. Fund assets are owned jointly by the fund unitholders, i.e., those who have made deposits in the fund. Each unit in the fund carries equal rights to the assets included in the fund.

The fund company manages the fund and keeps a register of all unitholders. The fund is not a legal entity and therefore cannot acquire rights or assume obligations; however, the fund is a separate tax subject. The fund company specified in § 2 represents the unitholders in all matters concerning the UCITS fund, decides on the funds’ assets, and exercises the rights derived from the assets.

§ 2 Fund manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as the “fund company”.

§ 3 Depositary and its function

The fund’s assets are held by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081), hereinafter the “custodian”. The custodian shall receive and retain the fund’s assets and implement the fund company’s instructions regarding the UCITS fund provided these do not contravene the UCITS Act, other statutes, or the fund rules, and ensure that:

- subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules.
- the value of the fund units is calculated in accordance with the UCITS Act and the fund rules,
- payments for transactions involving the fund’s assets are paid into the fund without delay, and
- the fund’s income is used in accordance with the provisions of the UCITS Act and the fund rules.

The custodian shall act independently of the fund company and exclusively in the interest of the unitholders.

§ 4 Fund characteristics

The fund is an equity fund that primarily invests in companies whose shares and share-related transferable securities are traded on regulated markets within or outside the EEA, as well as other marketplaces according to §6. The selection of shares and the distribution between different industries and regions are not predetermined. Investments may be concentrated in a few industries and regions. The objective of the fund’s investments is to achieve a value increase in the fund’s unit value over the long term, i.e., a period of 5 years or more.

§ 5 Investment strategy

The fund may invest its assets in transferable securities, fund units, and in accounts with credit institutions. Transferable securities refer to shares and share-related transferable securities. The fund may invest in money market instruments such as Swedish treasury bills.

At least 90% of the fund’s assets shall be invested in shares and share-related transferable securities. Of these investments in shares and share-related transferable securities, at least 80% shall be in shares and share-related transferable securities traded on regulated markets in Sweden. Up to 20% of investments in shares and share-related transferable securities may be on regulated markets outside Sweden in accordance with §6.

The fund may place up to 10% of the fund's value in accounts. The fund may place up to 10% of the fund's value in Swedish treasury bills. The fund may place up to 10% of the fund's value in fund units.

The fund shall only use derivative instruments to a very limited extent. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management, provided that the underlying assets consist of transferable securities and financial indices.

§ 6 Marketplaces

The fund's assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading may also take place on other markets within or outside the EEA that are regulated and open to the public, as well as other marketplaces or markets within the EEA.

§ 7 Special Investment strategy

The fund may invest in such transferable securities as referred to in the UCITS Act, Ch 5, § 5. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management. The fund may not use OTC derivatives. The fund may not invest in such money market instruments as referred to in the UCITS Act, Ch 5, § 5.

§ 8 Valuation

The fund's net asset value (NAV) is normally calculated each bank day. The NAV per fund unit is the NAV divided by the number of outstanding fund units. The NAV is calculated by deducting the liabilities relating to the fund from its assets.

The fund's assets are calculated as follows:

- Financial instruments are valued based on the current market value (normally the latest price paid). If such a price is missing or is deemed misleading by the fund company, the fund company may determine the value on another objective basis. When valuing on objective grounds, a market value is determined based on, for example, information on the latest paid price or indicative bid price, or with the help of information from counterparties or other independent external sources.
- For transferable securities as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for the special valuation is market prices from unregulated exchanges or independent market makers if such are 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 another listed financial instrument or index with adjustments for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (present value calculation), or capital share of equity.
- Cash and cash equivalents and current receivables in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold, are recorded at the amount they are expected to be received. All assets take into account associated rights in the form of interest, dividends, subscription rights, and the like.

The liabilities of the fund consist of:

- Compensation to the fund company
- Unpaid proceeds for purchased financial instruments
- Any tax liabilities and other liabilities

§ 9 Subscription and redemption of shares

The fund is open for the subscription and redemption of fund units all bank days. The fund is, however, not open for subscriptions and redemptions on bank days when the fund's assets cannot be valued in a manner that ensures the equal rights all unitholders due to the partial or full closure of one or more of the marketplaces on which the fund trades. The NAV is normally calculated each bank day. The principles used to determine the NAV are stated in §8.

The subscription and redemption of fund units are carried out at a price not yet determined at the time of the request for subscription and redemption. Requests for redemption can be made to the fund company. Redemption requests must be submitted to the fund company in writing and signed by post, fax, or email containing such a written signature. Redemption cannot take place until the written signed redemption order has been received by the fund company. Immediate redemption shall only take place to the extent possible without the subscription of securities in the fund. If immediate redemption cannot take place, redemption shall take place as soon as liquid assets have been obtained. Liquid assets are obtained in such cases by selling securities in the fund as soon as possible, and redemption takes place as soon as the subscription proceeds have been received. If a subscription could significantly disadvantage the interests of other unitholders, the fund company may, after notifying the Financial Supervisory Authority, delay the subscription.

The request is executed on the same day it is submitted, provided that the request has reached the fund company no later than the time and in accordance with the conditions specified on the company's website. Otherwise, the request will be executed on the following bank day.

A redemption request may only be withdrawn if the fund company permits it. Applications for the subscription of fund units must be made in writing to the fund company. The subscription of fund units is carried out at the price determined on the day the funds are available to the fund company.

The minimum monthly savings amount is 100 SEK.

The information the fund company provides to the media about the price of fund units is always preliminary and may be adjusted by the fund company if necessary. Therefore, the price information provided by the media is not binding for the fund company. Information about the most recently calculated NAV can be obtained from the fund company.

§ 10 Closure of the fund in extraordinary circumstances

The fund may be closed for subscription and redemption of units if such extraordinary circumstances have occurred that prevent valuation of the fund's assets in a manner that ensures the equal rights of the fund unitholders.

§ 11 Charges and fees

From the fund's assets, compensation shall be paid to the fund company for its management of the fund. The compensation includes costs for the custody of the fund's assets as well as for supervision and auditors, with an amount corresponding to a maximum of 1.5% annually of the fund's NAV, calculated daily at 1/365th and deducted from the fund monthly. Brokerage fees related to the purchase and sale of transferable securities and other financial instruments are charged to the fund.

§ 12 Dividends

As a general rule, the fund does not pay dividends. However, the fund company may decide that dividends shall be distributed if, in the fund company's assessment, it is in the interest of the unitholders to pay dividends. If the fund company decides on a dividend, the basis for the dividend shall be the return on the fund's assets or other distributable amount. If the fund company decides on a dividend, it will be distributed in April of the year following the financial year and will be allocated to unitholders who are registered for fund units on the dividend date determined by the fund company. If the fund company has decided on a dividend, the fund company shall, for the dividend attributable to the fund unit after deduction of preliminary tax, acquire new fund units for the unitholder's account, who is registered for the fund unit on the date determined by the fund company. Upon prior request, the dividend, if decided by the fund company, may also be paid to the unitholder's bank account after deduction of any preliminary tax.

§ 13 Financial year

The financial year of the fund is the calendar year.

§ 14 Semi-annual and annual reports, and amendments of fund rules

For each financial year, the fund company shall submit an annual report for the fund no later than four months after the end of the financial year. The fund company shall submit a semi-annual report for the fund for each calendar half-year no later than two months after the end of the half-year. The annual report and semi-annual report shall be available at the fund company. The semi-annual report and annual report for the fund shall be provided free of charge to unitholders registered with the fund company. If the board of the fund company decides to amend these fund regulations, the decision shall be submitted to the Financial Supervisory Authority for approval. Once the decision has been approved, it shall be made available at the fund company and, where applicable, announced in the manner prescribed by the Financial Supervisory Authority.

§ 15 Pledges and transfer

Pledging is done by the pledgee or pledgor notifying the fund company in writing of the pledge. The notification shall include the name and address of the pledgee, the owner of the fund units, the number of units covered by the pledge, and information on any restrictions on the scope of the pledge. Registration of the pledge is made in the unitholder register. The fund company shall notify the unitholder in writing of such registration. The note on the pledge applies until the fund company has received notification from the pledgee that the pledge has ceased and has deregistered it in the unitholder register. The fund company may charge a fee of up to 500 SEK for handling the pledge. Unitholders may transfer their fund units. In such a transfer, the fund company may charge a fee of up to 500 SEK.

§16 Limitation of liability

If the custodian or a depository bank has lost financial instruments held in custody by the custodian under the agreement between the fund company and the custodian, the custodian shall, without undue delay, return financial instruments of the same kind or pay an amount corresponding to the value of such financial instruments to the fund company for the fund's account. However, the custodian is not liable if the loss of the financial instruments is caused by an external event beyond the custodian's reasonable control and the consequences of which were impossible to avoid despite all reasonable efforts.

Furthermore, the custodian is not liable for damage caused by Swedish or foreign law, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation regarding strikes, blockades, boycotts, and lockouts applies even if the custodian is the subject of or itself takes such conflict action.

The custodian is not liable for other damages than those specified in the first paragraph unless the custodian has intentionally or negligently caused such damages. The custodian is also not liable for such damages if the circumstances specified in the first paragraph exist.

The custodian is not liable for damages caused by Swedish or foreign exchanges or other execution venues, registrars, clearing organizations, or others providing equivalent services, and – as far as other damages than the loss of financial instruments held in custody are concerned – not for damages caused by a depository bank or other contractor that the custodian has engaged with due skill, care, and diligence and regularly monitors, or that has been designated by the fund company. The custodian is not liable for damages caused by the insolvency of the aforementioned organizations or contractors. However, a custody agreement regarding the custody of assets and control of ownership rights does not relieve the custodian of its liability for losses and other damages according to the fund legislation.

The custodian is not liable for damages incurred by the fund company, unitholders in the fund, the fund, or others due to restrictions on disposal that may be applied to the custodian regarding financial instruments.

The custodian is not liable in any case for indirect costs, damages, or losses.

If there is an obstacle for the custodian to fully or partially execute an action due to circumstances specified in the first paragraph, the action may be postponed until the obstacle has ceased. In the event of deferred payment, the custodian shall not pay default interest. If interest is promised, the custodian shall pay interest at the rate applicable on the due date. If the custodian is prevented from receiving payment for the funds due to circumstances specified in the first paragraph, the custodian is entitled to interest only according to the terms applicable on the due date for the period during which the obstacle existed.

The above limitations of liability do not restrict the unitholder's right to compensation regulated under the UCITS Act Ch 3, §§ 14-16.

The fund company has tort liability for damages regulated under the UCITS Act Ch 2, § 21.

§ 17 Permitted investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph. The fund company has the right to redeem a unitholder's units in the fund – notwithstanding the objections of such a unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or ordinance or that the fund company has by reason of a unitholder's subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

D&G GLOBAL ALL CAP

INVESTMENT STRATEGY

The fund is an actively managed equity fund that primarily invests in companies traded on regulated markets. The fund invests in companies worldwide. The objective of the fund's investments is to achieve a value increase in the fund's unit value over the long term, i.e., a period of five years or more. The fund is an equity fund that can invest in shares and share-related transferable securities. At least 80 percent of the fund's assets must be invested in shares and share-related transferable securities. The selection of shares and the distribution between different industries and regions is not predetermined, which means that the portfolio may be concentrated in a few industries and regions from time to time.

The fund will normally not use derivatives. The fund can only use derivatives to a limited extent and with the aim of making management more efficient. According to the fund rules, the funds have the possibility to use financial derivatives to make management more efficient. The total exposure should then be calculated using the commitment method. The total exposure must not exceed 100% of the fund's net value.

The fund's benchmark index is MSCI ACWI TR Net in SEK. This index is relevant for the fund as it reflects the fund's long-term investment strategy regarding asset classes and geographic market.

INTENDED INVESTORS

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has no unit classes. The fund's currency is SEK and the fund does not distribute dividends.

RISK PROFILE

The fund is an equity fund, and investing in shares involves the risk of significant price fluctuations. Therefore, a savings period of more than five years is recommended. The fund freely chooses which industries and sectors it invests in. As a result, the fund may be overexposed to individual industries and regions from time to time. The fund normally does not use derivatives or other tools to reduce this risk.

Investing in equity funds involves market risk as the price of the fund and its underlying assets show fluctuations. The fund strives to be fully invested in shares, and the value of the fund unit can therefore vary significantly in the short term. Market risk is considered the greatest risk the fund is exposed to.

When a fund invests in financial instruments issued in currencies other than the fund's base currency, currency risk arises. This means that the fund's value can vary due to changes in exchange rates. These changes can affect the value of the investments both positively and negatively. The fund normally does not use derivatives or other techniques to reduce this risk.

The fund aims to provide a long-term, positive value increase and invests actively. The responsible managers select a smaller number of companies to invest in and do not strive to replicate any benchmark index. Therefore, the fund will deviate from it from time to time, both positively and negatively. Concentration risk can lead to significant price fluctuations for an equity fund with few holdings in a single market or a specific sector.

When a security cannot be traded at the intended time without a significant price reduction, liquidity risk arises. Such risk is most pronounced in securities with low turnover. In cases where the fund holds a relatively large portion of a company's shares, this risk increases. Shares traded on a regulated market usually have good liquidity even during periods of significant fluctuations. Normally, more than half of the fund portfolio's weight consists of slightly larger companies, which reduces liquidity risk.

Counterparty risk is defined as the risk of loss due to a counterparty not being able to fulfil its obligations within a transaction. The fund generally only trades in shares on a regulated market, and counterparty risk is therefore limited. However, the funds must ensure independence from counterparties and always strive for the best result in all securities transactions.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

D&G GLOBAL ALL CAP SUSTAINABILITY DISCLOSURES

Product name: D&G Global All Cap
Legal entity identifier: 549300GW2E8Q2CRH5L04

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**. The Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
☐ **Yes**	[x] **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	[x] It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ With a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

Sustainability-related characteristics are promoted in the fund by the managers seeking responsible companies with long-term sustainable business models. The fund takes into account environmental and climate factors by excluding companies involved in the production or distribution of fossil fuels and by selecting companies that actively work on climate solutions, among other things. The fund excludes companies that violate international norms and conventions regarding human rights, labour rights, and corruption. The fund selects companies with a strong corporate culture regarding corporate governance and social aspects.

The fund invests in companies whose products or services contribute to achieving one or more of the UN SDGs or otherwise promote environmental and/or social characteristics. The fund strives for the companies to have also signed the UN Global Compact. Additionally, the fund promotes environmental characteristics by investing in companies that have established scientifically based climate targets to reduce their greenhouse gas emissions and that are in line with the goals of a maximum 1.5 degree temperature increase.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

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

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

The fund's holdings are continuously analysed by the managers regarding relevant sustainability factors and sustainability risks. Several sustainability indicators are considered, and the priorities may differ depending on the company being analysed. Examples include energy efficiency, renewable energy, use of raw materials, and management of greenhouse gas emissions. It can also involve indicators that show the promotion of equality and labour rights issues.

The fund's engagement work mainly takes place through direct dialogue with the management of the companies in which it invests. The managers continuously engage in dialogue with the fund's holdings about sustainability and want to see them develop in the right direction on these issues. Engagement also occurs through voting at general meetings and participation in nomination committees. The fund company also measures the fund's carbon footprint.

What are the objectives of the sustainable investments that the financial product partially intends to make, and how does the sustainable investment contribute to such objectives?

The objectives of the sustainable investments that the fund partially intends to make are to contribute to one or more of the UN SDG for sustainable development.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

The fund company considers sustainability risks and adverse impacts in all investments. This is done through a thorough analysis of all companies before investing, where questions about the companies' strategy, financial and non-financial results and risks, capital structure, social and environmental impact, and corporate governance are considered. Specific ESG issues that are material to each company are documented before investment and are continuously monitored and updated. Fundamental for all companies included in the fund is also that they comply with the requirements of recognized international standards and agreements. The fund's holdings are screened quarterly for compliance with global standards for environmental protection, human rights, labour standards, and anti-corruption.

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

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.

Specific principal adverse impacts that are material to each company are analysed and documented before investment and are continuously monitored and updated.

Examples of indicators covered in the environmental area can include greenhouse gas emissions, how the company uses non-renewable resources, or failure to prevent serious environmental degradation. By excluding fossil fuels, for example, we automatically avoid investing in companies that produce fossil fuels and are generally considered to have a significant direct negative climate impact. The fund company also identifies and measures the carbon footprint of the funds annually.

Examples of indicators covered in the area of human rights can include insufficient consumer protection, violations of health and safety standards, or violations of indigenous peoples' rights. Examples of issues covered in the area of labour rights can include

violations of the right to freedom of association, discrimination, or child labour. Regarding anti-corruption, issues such as bribery are included.

The fund completely excludes investments in certain sectors and activities such as controversial weapons, nuclear weapons, and cannabis. When investing in companies involved in products and services such as weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels, and uranium, no more than five percent of the turnover may relate to the specified product or service. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria.

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

The fund does not invest in companies that violate the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. To ensure that the companies in the fund do not breach any convention or other international agreement, or if there is suspicion of, for example, environmental crimes or human rights violations, the fund portfolio is screened rwice a year. Through the screening, the fund company receives information on how the companies comply with international norms and agreements from, for example, the UN, EU, OECD, and ILO, as well as any violations of these norms.

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 in its management by selecting investments, excluding investments with excessive sustainability risks and negative impacts on sustainability factors, and through engagement activities. The fund company has adopted a sustainable investment policy that covers the fund.

In the fund's management, principal adverse impacts on environmental characteristics (e.g., companies' impact on the environment and climate) and social characteristics (e.g., human rights, labour rights, and equal treatment) are considered.

The fund's annual report contains information on how the fund has considered principal adverse impacts on sustainability factors.

☐ No

What investment strategy does this financial product follow?

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

Sustainability analysis within environmental, social responsibility, and corporate governance issues is an integral part of the analysis of all potential investments. A strong sustainability profile in all aspects is a fundamental requirement for the fund to invest in a company. The fund selects companies with a strong corporate culture (corporate governance, social aspects) and preferably where the business model benefits from the necessary development towards a more environmentally friendly society.

The fund's selection process has been designed with this in mind. ESG analysis is an integral part of the company analysis process, and material sustainability aspects are documented for all the fund's holdings. The analysis is based on company reports, external analysis, as well as specified ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

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

The fund uses methods of inclusion, exclusion, and engagement to achieve the environmental and social characteristics promoted by the fund.

The managers look for well-managed companies to invest in, which includes assessments of ESG issues.

The fund does not invest in companies involved in the following products and services: cluster bombs, landmines, chemical and biological weapons, nuclear weapons, weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels (oil, gas, coal), uranium, and cannabis. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria. Additionally, the fund does not invest in companies that violate international norms. The assessment is made either by the fund company itself or by a subcontractor.

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

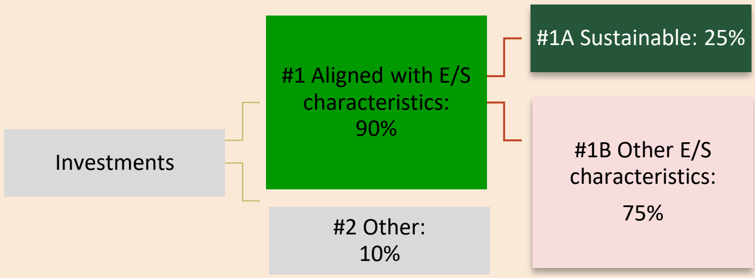
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

ESG analysis is an integral part of the company analysis process, and environmental, social, or governance aspects are analysed and documented for all the fund's holdings. The analysis is based on company reports, external analysis, as well as specified ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

The fund company's board has also established Principles for Shareholder Engagement. Through shareholder engagement, the fund company can contribute to the long-term healthy development of both the companies and the financial market as a whole. As a representative of the unitholders, the fund company ensures that the companies in which the fund's assets are invested act in accordance with relevant rules and guidelines and otherwise follow good market practices. The fund company's Principles for Shareholder Engagement also describe shareholder engagement based on how relevant issues are monitored, dialogues with company representatives, exercising voting rights, and collaboration with other shareholders.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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.

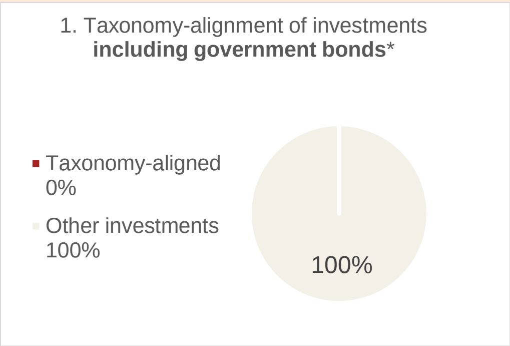
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

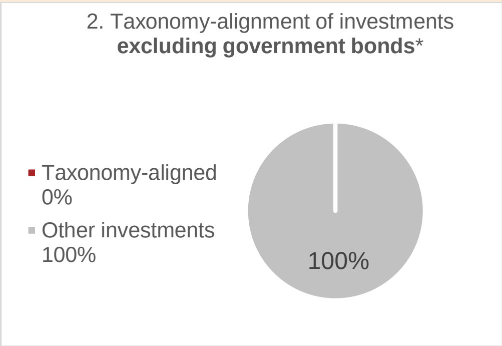
This fund's underlying investments do not consider the EU criteria for environmentally sustainable economic activities. The EU Taxonomy is a classification system aimed at establishing common criteria for environmentally sustainable economic activities. The Taxonomy is still under development, and criteria for all environmental objectives are not yet finalized. There is also no established calculation model for determining the proportion of the fund's investments that are aligned with the Taxonomy.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emissions levels corresponding to the best performance.

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.*

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund includes investments in economic activities that the fund considers to be environmentally sustainable. The fund has no minimum share for environmentally sustainable investments.

What is the minimum share of socially sustainable investments?

The fund includes investments that promote both environmental and social characteristics. However, the fund has no minimum share of socially sustainable investments.

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

The fund includes other investments than shares, which consist of cash. This share may be up to 10%.

Where can I find more product-specific information online?

More product-specific information is available on the website:

https://www.carnegiefonder.se/fonder/dg-global-all-cap/

D&G GLOBAL ALL CAP FUND RULES

§ 1 Name and Legal Position

The name of the fund is D&G Global All Cap, hereinafter referred to as the “fund”. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). In addition to the provisions of the aforementioned law, these fund rules, the articles of association of the fund company, and other regulations issued under the law or ordinance apply to the fund’s operations.

Fund assets are owned jointly by the fund unitholders, i.e., those who have made deposits in the fund. Each unit in the fund carries equal rights to the fund’s assets. The fund company manages the fund and keeps a register of all unitholders. The fund is not a legal entity and therefore cannot acquire rights or assume obligations; however, the fund is a separate tax subject. The fund company specified in § 2 represents the unitholders in all matters concerning the UCITS fund, decides on the funds’ assets, and exercises the rights derived from the assets.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as the “fund company”.

§ 3 Depositary and its Function

The fund’s assets are held by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081), hereinafter the “custodian”. The custodian shall receive and retain the fund’s assets and implement the fund company’s instructions regarding the UCITS fund provided these do not contravene the UCITS Act, other statutes, or the fund rules, and ensure that:

- subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules.
- the value of the fund units is calculated in accordance with the UCITS Act and the fund rules,
- payments for transactions involving the fund’s assets are paid into the fund without delay, and
- the fund’s income is used in accordance with the provisions of the UCITS Act and the fund rules.

The custodian shall act independently of the fund company and exclusively in the interest of the unitholders.

§ 4 Fund Characteristics

The fund is an equity fund that invests globally in companies across various industries. The fund primarily invests in shares and share-related transferable securities traded on regulated markets within or outside the EEA, as well as other markets according to § 6. The selection of shares and the distribution between different industries and regions is not predetermined. Investments may be concentrated in a few industries and regions.

The objective of the fund’s investments is to achieve a value increase in the fund’s unit value over the long term, i.e., a period of 5 years or more.

§ 5 Investment Strategy

The fund may invest its assets in transferable securities, fund units, and accounts with credit institutions. Transferable securities refer to shares and share-related transferable securities. The fund may invest in Swedish treasury bills. The fund shall invest in various industries and markets globally. At least 80% of the fund’s assets must be invested in shares and share-related transferable securities. The fund may invest up to 20% of the fund’s value in accounts. The fund may invest up to 20% of the fund’s value in Swedish treasury bills. The fund's investments shall be made in companies on the regulated markets specified in § 4 and § 6. The fund may invest up to 10% of the fund's value in fund units. The fund shall only use derivative instruments to a limited extent. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management, provided that the underlying assets consist of transferable securities, financial indices, exchange rates, or foreign currencies.

§ 6 Marketplaces

The fund's assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading may also take place on other markets within or outside the EEA that are regulated and open to the public, as well as other marketplaces or markets within the EEA.

§ 7 Special Investment Strategy

The fund may invest in such transferable securities as referred to in the UCITS Act, Ch 5, § 5. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management. The fund may not use OTC derivatives. The fund may not invest in such money market instruments as referred to in the UCITS Act, Ch 5, § 5.

§ 8 Valuation

The fund's net asset value (NAV) is normally calculated each bank day. The NAV per fund unit is the NAV divided by the number of outstanding fund units. The NAV is calculated by deducting the liabilities relating to the fund from its assets.

The fund's assets are calculated as follows:

- Financial instruments are valued based on the current market value (normally the latest price paid). If such a price is missing or is deemed misleading by the fund company, the fund company may determine the value on another objective basis. When valuing on objective grounds, a market value is determined based on, for example, information on the latest paid price or indicative bid price, or with the help of information from counterparties or other independent external sources.
- For transferable securities as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for the special valuation is market prices from unregulated exchanges or independent market makers if such are 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 another listed financial instrument or index with adjustments for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (present value calculation), or capital share of equity.
- Cash and cash equivalents and current receivables in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold, are recorded at the amount they are expected to be received. All assets take into account associated rights in the form of interest, dividends, subscription rights, and the like.

The liabilities of the fund consist of:

- Compensation to the fund company
- Unpaid proceeds for purchased financial instruments
- Any tax liabilities and other liabilities

§ 9 Subscriptions and Redemptions

The fund is open for the subscription and redemption of fund units all bank days. The fund is, however, not open for subscriptions and redemptions on bank days when the fund's assets cannot be valued in a manner that ensures the equal rights all unitholders due to the partial or full closure of one or more of the marketplaces on which the fund trades. The NAV is normally calculated each bank day.

The principles used to determine the NAV are stated in §8. The subscription and redemption of fund units are carried out at a price not yet determined at the time of the request for subscription and redemption. Requests for redemption can be made to the fund company.

Redemption requests must be submitted to the fund company in writing and signed by post, fax, or email containing such a written signature. Redemption cannot take place until the written signed redemption order has been received by the fund company. Immediate redemption shall only take place to the extent possible without the subscription of securities in the fund.

If immediate redemption cannot take place, redemption shall take place as soon as liquid assets have been obtained. Liquid assets are obtained in such cases by selling securities in the fund as soon as possible, and redemption takes place as soon as the subscription proceeds have been received. If a subscription could significantly disadvantage the interests of other unitholders, the fund company may, after notifying the Financial Supervisory Authority, delay the subscription.

The request is executed on the same day it is submitted, provided that the request has reached the fund company no later than the time and in accordance with the conditions specified on the company's website. Otherwise, the request will be executed on the following bank day.

A redemption request may only be withdrawn if the fund company permits it. Applications for the subscription of fund units must be made in writing to the fund company. The subscription of fund units is carried out at the price determined on the day the funds are available to the fund company.

The minimum monthly savings amount is 100 SEK.

The information the fund company provides to the media about the price of fund units is always preliminary and may be adjusted by the fund company if necessary. Therefore, the price information provided by the media is not binding for the fund company. Information about the most recently calculated NAV can be obtained from the fund company.

§ 10 Closure of the Fund in Extraordinary Circumstances

The fund may be closed for the subscription and redemption of units if such extraordinary circumstances have occurred that make it impossible to value the fund's assets in a way that ensures the equal rights of unitholders.

§ 11 Charges and Fees

From the fund's assets, compensation shall be paid to the fund company for its management of the fund. The compensation includes costs for the custody of the fund's assets as well as for supervision and auditors, with an amount corresponding to a maximum of 1.6% annually of the fund's NAV, calculated daily at 1/365 and deducted from the fund monthly. Brokerage fees related to the purchase and sale of transferable securities are charged to the fund, as well as taxes and statutory fees.

§ 12 Dividends

The fund generally does not pay dividends.

However, the fund company may decide to distribute dividends if, in the fund company's opinion, it is in the interest of the unitholders to do so. If the fund company decides to distribute dividends, the basis for the distribution shall be the return on the fund's assets or other distributable amounts.

If the fund company decides to distribute dividends, it will be done in April of the year following the financial year and will be allocated to unitholders who are registered for fund units on the distribution date determined by the fund company. If the fund company decides to distribute dividends, the fund company shall, for the unitholder's account, acquire new fund units for the dividend amount after deducting preliminary tax, for the unitholder who is registered for the fund unit on the date determined by the fund company. Upon prior request, dividends, if decided by the fund company, can also be paid to the unitholder's bank account after deducting any preliminary tax.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Semi-annual and Annual Reports and Amendments of Fund Rules

For each financial year, the fund company shall submit an annual report for the fund no later than four months after the end of the financial year. The fund company shall submit a semi-annual report for the fund no later than two months after the end of each calendar half-year. The annual report and semi-annual report shall be available at the fund company. The semi-annual report and annual report for the fund shall be sent to unitholders registered with the fund company.

If the board of the fund company decides to amend these fund regulations, the decision shall be submitted to the Financial Supervisory Authority for approval. Once the decision has been approved, it shall be made available at the fund company and, where applicable, announced in the manner prescribed by the Financial Supervisory Authority.

§ 15 Pledges and Transfers

Pledging is done by the pledgee or pledgor notifying the fund company in writing of the pledge. The notification shall include the name and address of the pledgee, the owner of the fund units, the number of units covered by the pledge, and information on any restrictions on the scope of the pledge. Registration of the pledge is made in the unitholder register. The fund company shall notify the unitholder in writing of such registration. The note of the pledge applies until the fund company has received notification from the pledgee that the pledge has ceased and has deregistered it in the unitholder register. The fund company may charge a fee of up to 500 SEK for handling the pledge. Unitholders can transfer their fund units. In such cases, the fund company may charge a fee of up to 500 SEK.

§16 Limitation of Liability

If the custodian or a depositary bank has lost financial instruments held in custody by the custodian under the agreement between the fund company and the custodian, the custodian shall, without undue delay, return financial instruments of the same kind or pay an amount corresponding to the value of such financial instruments to the fund company for the fund's account. However, the custodian is not liable if the loss of the financial instruments is caused by an external event beyond the custodian's reasonable control and whose consequences were impossible to avoid despite all reasonable efforts. Furthermore, the custodian is not liable for damage caused by Swedish or foreign legislation, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances.

The reservation regarding strike, blockade, boycott, and lockout applies even if the Custodian is subject to or itself undertakes such conflict measures. The Custodian is not liable for any damages other than those specified in the first paragraph, unless the Custodian has intentionally or negligently caused such damages. The Custodian is also not liable for such damages if the circumstances specified in the first paragraph exist. The Custodian is not liable for damages caused by a Swedish or foreign stock exchange or other Execution Venue, Registrar, Clearing Organization, or others providing equivalent services, and – with regard to damages other than the loss of financial instruments held in custody – not for damages caused by a Depository Bank or other contractor that the Custodian has engaged with due skill, care, and diligence and regularly monitors, or that has been designated by the Fund Company. The Custodian is not liable for damages caused by the insolvency of the aforementioned organizations or contractors. However, a custody agreement regarding the safekeeping of assets and control of ownership does not relieve the Custodian of its liability for losses and other damages according to the Fund Legislation. The Custodian is not liable for damages incurred by the Fund Company, unitholders in the Fund, the Fund, or others due to restrictions on disposal that may be applied against the Custodian regarding financial instruments.

The Custodian is not liable for indirect costs, damages, or losses in any case. If there is an obstacle for the Custodian to fully or partially execute an action due to circumstances specified in the first paragraph, the action may be postponed until the obstacle has ceased. In the event of deferred payment, the Custodian shall not pay default interest. If interest is promised, the Custodian shall pay interest at the rate applicable on the due date. If the Custodian is prevented from receiving payment for the Funds due to circumstances specified in the first paragraph, the Custodian is entitled to interest only according to the terms applicable on the due date for the period during which the obstacle existed. The above limitations of liability do not restrict the unitholder’s right to compensation regulated under the UCITS Act Ch 3, §§ 14-16. The fund company has tort liability for damages regulated under the UCITS Act Ch 2, § 21.

§ 17 Permitted Investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph. The fund company has the right to redeem a unitholder’s units in the fund – notwithstanding the objections of such a unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or ordinance or that the fund company has by reason of a unitholder’s subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

D&G SMÅBOLAG

INVESTMENT STRATEGY

The fund is an actively managed equity fund that primarily invests in companies traded on regulated markets in Sweden and the Nordic region. The goal of the fund's investments is to achieve a long-term increase in the value of the fund's units over a period of five years or more. The fund is an equity fund that can invest in shares and share-related transferable securities in small and medium-sized companies. The criterion for a company's size is its market value, which at the time of investment must not exceed the market value of the largest constituent in the fund's benchmark index.
At least 80% of the fund's assets must be invested in shares and share-related transferable securities. At least three-quarters of these investments must be in shares and share-related transferable securities issued by companies based in the Nordic region. The selection of shares and the distribution between different industries and regions is not predetermined, which means that the portfolio may be concentrated in a few industries and regions from time to time.

The fund is actively managed. The fund will normally not trade in derivatives. The fund can only use derivatives to a very limited extent and with the aim of making management more efficient. The total exposure should then be calculated using the commitment method. The total exposure must not exceed 100% of the fund's net asset value (NAV).

The fund's benchmark index is the Carnegie Small Cap Return. This index is relevant to the fund as it reflects the fund's long-term investment strategy in terms of asset class, company size, and geographic market.

INTENDED INVESTORS

This fund may be suitable for savers who plan to hold their investment for at least 5 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has no unit classes. The fund's currency is SEK and the fund does not distribute dividends.

RISK PROFILE

The fund is an equity fund and investing in shares involves the risk of significant price fluctuations. Therefore, a savings period of more than five years is recommended. The fund freely chooses which industries and sectors it invests in. As a result, the fund may be overexposed to individual industries and regions from time to time. The fund normally does not use derivatives or other tools to reduce this risk.

Investing in equity funds involves market risk as the price of the fund and its underlying assets show fluctuations. The fund strives to be fully invested in shares, and the value of the fund units can therefore vary significantly in the short term. Market risk is considered the greatest risk the fund is exposed to.

When a fund invests in financial instruments issued in currencies other than the fund's base currency, currency risk arises. This means that the value of the fund can vary due to changes in exchange rates. These changes can affect the value of the investments both positively and negatively. The fund normally does not use derivatives or other techniques to reduce this risk. The fund invests the majority of its assets in SEK and therefore has a somewhat lower currency risk than funds that invest a larger proportion in other currencies.

The fund aims to provide a long-term, positive value increase and invests actively. The responsible managers select a smaller number of companies to invest in and do not strive to replicate any benchmark index. The fund will therefore deviate from it from time to time, both positively and negatively. Concentration risk can lead to significant price fluctuations for an equity fund with few holdings in a single market or a specific sector.

When a security cannot be traded at the intended time without a significant price reduction, liquidity risk arises. This risk is most pronounced in securities with low turnover. In cases where the fund holds a relatively large proportion of a company's shares, this risk increases. Shares traded on a regulated market usually have good liquidity even during periods of significant fluctuations.

Counterparty risk is defined as the risk of loss due to a counterparty being unable to fulfil its obligations within a transaction. The fund generally only trades in shares on a regulated market, and counterparty risk is therefore limited. The funds must, however, ensure independence from counterparties and always strive for the best result in all securities transactions.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

D&G SMÅBOLAG SUSTAINABILITY DISCLOSURES

Product name: D&G Småbolag
Legal identifier: 549300DSDVKEAAE45T81

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**. The Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
☐ Yes	☒ No
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 25% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ With a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

Sustainability-related characteristics are promoted in the fund by the managers looking for responsible companies with long-term sustainable business models. The fund takes into account environmental and climate factors by excluding companies involved in the production or distribution of fossil fuels and by selecting companies that actively work on climate solutions. The fund excludes companies that violate international norms and conventions regarding human rights, labour rights, and corruption. The fund selects companies with a strong corporate culture regarding corporate governance and social aspects.

The fund invests in companies whose products or services contribute to achieving one or more of the UN SDGs or otherwise promote environmental and/or social characteristics. The fund strives for the companies to have also signed the UN Global Compact. Additionally, the fund promotes environmental characteristics by investing in companies that have established scientifically based climate targets to reduce their greenhouse gas emissions and are in line with the goals of a maximum 1.5 degree warming.

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

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

The fund's holdings are continuously analysed by the managers regarding relevant sustainability factors and sustainability risks. Several sustainability indicators are considered, and the priorities may vary depending on the company being analyzed. Examples include energy efficiency, renewable energy, use of raw materials, and management of greenhouse gas emissions. It can also involve indicators that show the promotion of equality and labor rights issues.

The fund's engagement work mainly takes place through direct dialogue with the management of the holdings. The managers continuously engage in dialogue with the fund's holdings on sustainability and want to see them develop in the right direction on these issues. Engagement also occurs through voting at general meetings and participation in nomination committees. The fund company also measures the fund's carbon footprint.

What are the objectives of the sustainable investments that the financial product partially intends to make, and how does the sustainable investment contribute to such objectives?

The goals of the sustainable investments that the fund intends to make are to contribute to one or more of the UN SDG for sustainable development.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

The fund company considers sustainability risks and adverse impacts in all investments. This is done through a thorough analysis of all companies before investment, where questions about the companies' strategy, financial and non-financial results and risks, capital structure, social and environmental impact, and corporate governance are considered. Specific ESG issues that are material for each company are documented before investment and followed up and updated continuously. Fundamental for all companies included in the fund is that they comply with the requirements of recognized international norms and agreements. The fund's holdings are screened quarterly for compliance with global norms for environmental protection, human rights, labor standards, and anti-corruption.

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.

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

Specific principal adverse impacts that are material for each company are analyzed and documented before investment and followed up and updated continuously.

Examples of indicators covered in the environmental area can be greenhouse gas emissions, how the company uses non-renewable resources, or failure to prevent serious environmental degradation. By excluding fossil fuels, we automatically avoid investing in companies that produce fossil fuels and are generally considered to have a significant direct negative climate impact. The fund company also identifies and measures the carbon footprint of the funds annually.

Examples of indicators covered in the area of human rights can be insufficient consumer protection, violations of health and safety standards, or violations of indigenous peoples' rights. Examples of issues covered in the area of labor rights can be violations of the right to freedom of association, discrimination, or child labor. Regarding anti-corruption, issues such as bribery are covered.

The fund completely excludes investments in certain sectors and activities such as controversial weapons, nuclear weapons, and cannabis. When investing in companies involved in products and services such as weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels, and uranium, no more than five percent of the turnover may relate to the specified product or service. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria.

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

The fund does not invest in companies that violate the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. To ensure that the companies in the fund do not violate any convention or other international agreement, or if there is suspicion of, for example, environmental crimes or human rights violations, the fund portfolio is screened twice a year. Through the screening, the fund company receives information on how the companies comply with international norms and agreements from, for example, the UN, EU, OECD, and ILO, as well as any violations of these norms.

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 the principal adverse impacts in its management by selecting investments, excluding investments with too high sustainability risks and negative impacts on sustainability factors, and through engagement work. The fund company has adopted a policy for sustainable investments that covers the fund.

In the fund's management, the principal adverse impacts on environmental characteristics (e.g., the companies' impact on the environment and climate) and social characteristics (e.g., human rights, labour rights, and equality) are considered.

The fund's annual report contains information on how the fund has considered the principal adverse impacts on sustainability factors.

☐ No

What investment strategy does this financial product follow?

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

A description of the fund's investment strategy can be found on page 6 of the information brochure. Sustainability analysis within environmental, social responsibility, and corporate governance issues is an integral part of the analysis of all potential investments. A strong sustainability profile in all aspects is a fundamental requirement for the fund to invest in a company. The fund selects companies with a strong corporate culture (corporate governance, social aspects) and preferably where the business model benefits from the necessary development towards a more environmentally friendly society.

The fund's selection process has been designed with this in mind. ESG analysis is an integral part of the company analysis process, and material sustainability aspects are documented for all the fund's holdings. The analysis is based on, among other things, company reports, external analysis, and specific ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

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

The fund uses methods of selecting, excluding, and engaging to achieve the environmental and social characteristics promoted by the fund.

The managers look for well-managed companies to invest in, which includes assessments of ESG issues.

The fund does not invest in companies involved in the following products and services: cluster bombs, landmines, chemical and biological weapons, nuclear weapons, weapons and/or military equipment, alcohol, tobacco, commercial gambling, pornography, fossil fuels (oil, gas, coal), uranium, and cannabis. The fund is screened semi-annually to ensure that the holdings meet the fund's exclusion criteria. Additionally, the fund does not invest in companies that violate international norms. The assessment is made either by the fund company itself or by a subcontractor.

What is the policy for assessing good governance practices of the investee companies?

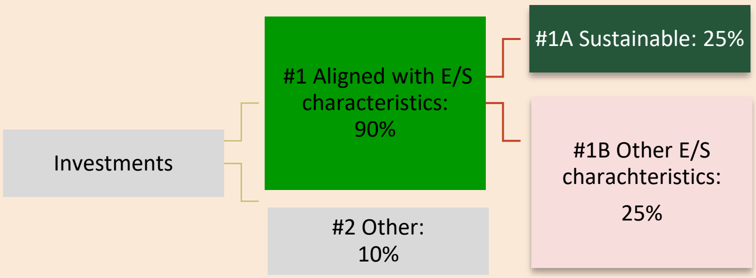
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.

ESG analysis is an integral part of the company analysis process, and material environmental, social, or governance aspects are analysed and documented for all the fund's holdings. The analysis is based on company reports, external analysis, and specific ESG analysis and screening. ESG factors are also continuously discussed with company representatives.

The fund company's board has also established Principles for Shareholder Engagement. Through shareholder engagement, the fund company can contribute to the long-term healthy development of both the companies and the financial market as a whole. As a representative of the unit holders, the fund company ensures that the companies in which the fund's assets are invested act according to relevant rules and guidelines and otherwise according to good market practices. The fund company's Principles for Shareholder Engagement also describe engagement based on how relevant issues are monitored, dialogues with company representatives, exercising voting rights, and collaboration with other shareholders.

What asset allocation is planned for the financial product?

Asset allocation describes the share of investments in specific assets.



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product**.**

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

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.

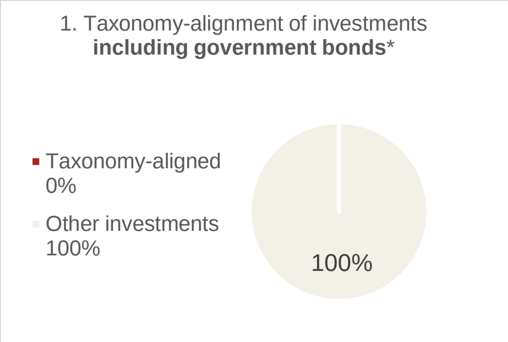
To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

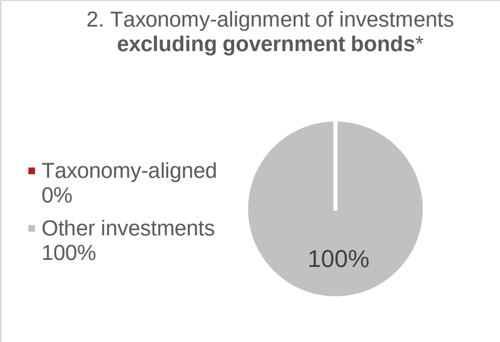
This fund’s underlying investments do not consider the EU criteria for environmentally sustainable economic activities. The EU taxonomy is a classification system aimed at establishing common criteria for environmentally sustainable economic activities. The Taxonomy is under development, and criteria for all environmental objectives are not yet finalized. There is also no established calculation model for the proportion of the fund’s investments that are aligned with the Taxonomy.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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.*

are sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund includes investments in economic activities that the fund considers environmentally sustainable. The fund has no minimum share for environmentally sustainable investments.

What is the minimum share of socially sustainable investments?

The fund includes investments that promote both environmental and social characteristics. However, the fund has no minimum share of socially sustainable investments.

What investments are included in "No. 2 Other," what is their purpose, and are there any minimum environmental or social safeguards?

The fund includes other investments than shares, which consist of cash. This share may be up to 10%.

Where can I find more product-specific information online?

More product-specific information is available on the website:

https://www.carnegiefonder.se/fonder/dg-smabolag/

D&G SMÅBOLAG FUND RULES

§ 1 Name and legal position

The name of the fund is D&G Small Cap, hereinafter referred to as the “fund”. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). In addition to the provisions of the aforementioned law, these fund regulations, the articles of association of the fund company, and other regulations issued under the law or ordinance apply to the fund’s operations.

Fund assets are owned jointly by the fund unitholders, i.e., those who have made deposits in the fund. Each unit in the fund carries equal rights to the fund’s assets. The fund company manages the fund and keeps a register of all unitholders. The fund is not a legal entity and therefore cannot acquire rights or assume obligations; however, the fund is a separate tax subject. The fund company specified in § 2 represents the unitholders in all matters concerning the UCITS fund, decides on the funds’ assets, and exercises the rights derived from the assets.

§ 2 Fund manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as the fund company.

§ 3 Depositary and its function

The fund’s assets are held by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081), hereinafter the “custodian”.

The custodian shall receive and retain the fund’s assets and implement the fund company’s instructions regarding the UCITS fund provided these do not contravene the UCITS Act, other statutes, or the fund rules, and ensure that:

- subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules.
- the value of the fund units is calculated in accordance with the UCITS Act and the fund rules,
- payments for transactions involving the fund’s assets are paid into the fund without delay, and
- the fund’s income is used in accordance with the provisions of the UCITS Act and the fund rules.

The custodian shall act independently of the fund company and exclusively in the interest of the unitholders.

§ 4 Fund characteristics

The fund is an equity fund that primarily invests in small and medium-sized companies whose shares and share-related transferable securities are traded on regulated markets within or outside the EEA, as well as other markets according to § 6. The selection of shares and the distribution between different industries and regions is not predetermined. The investments may be concentrated in a few industries and regions.

The goal of the fund’s investments is to achieve a long-term increase in the value of the fund’s units over a period of 5 years or more.

§ 5 Investment strategy

The fund may invest its assets in transferable securities, fund units, and accounts with credit institutions. Transferable securities refer to shares and share-related transferable securities. The fund may invest in money market instruments such as Swedish treasury bills. The fund shall invest in various industries and markets. At least 80% of the fund’s assets shall be invested in shares and share-related transferable securities. At least three-quarters of these investments shall be in shares and share-related transferable securities issued by companies based in the Nordic region. The fund may invest up to 10% of the fund's value in accounts. The fund may invest up to 20% of the fund's value in Swedish treasury bills.

The fund's investments shall be made in small and medium-sized companies on the regulated markets specified in § 4 and § 6. The criterion for a company's size is its market value, which at the time of investment must not exceed the market value of the largest constituent in the fund's benchmark index. The fund's benchmark index is specified in the fund's prospectus.

The fund may invest up to 10% of the fund's value in fund units. The fund shall only use derivative instruments to a very limited extent. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management, provided that the underlying assets consist of transferable securities and financial indices.

§ 6 Marketplaces

The fund's assets may be placed on a regulated market within the EEA or on an equivalent market outside the EEA. Trading may also take place on other markets within or outside the EEA that are regulated and open to the public, as well as other marketplaces or markets within the EEA.

§ 7 Special investment strategy

The fund may invest in such transferable securities as referred to in the UCITS Act, Ch 5, § 5. The fund may use derivative instruments to make management more efficient, aiming to reduce costs and risks in management. The fund may not use OTC derivatives. The fund may not invest in such money market instruments as referred to in the UCITS Act, Ch 5, § 5.

§ 8 Valuation

The fund's net asset value (NAV) is normally calculated each bank day. The NAV per fund unit is the NAV divided by the number of outstanding fund units. The NAV is calculated by deducting the liabilities relating to the fund from its assets.

The fund's assets are calculated as follows:

- Financial instruments are valued based on the current market value (normally the latest price paid). If such a price is missing or is deemed misleading by the fund company, the fund company may determine the value on another objective basis. When valuing on objective grounds, a market value is determined based on, for example, information on the latest paid price or indicative bid price, or with the help of information from counterparties or other independent external sources.
- For transferable securities as referred to in the UCITS Act Ch 5, § 5, a market value is established using a special valuation. The basis for the special valuation is market prices from unregulated exchanges or independent market makers if such are 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 another listed financial instrument or index with adjustments for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (present value calculation), or capital share of equity.
- Cash and cash equivalents and current receivables in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold, are recorded at the amount they are expected to be received. All assets take into account associated rights in the form of interest, dividends, subscription rights, and the like.

The liabilities of the fund consist of:

- Compensation to the fund company
- Unpaid proceeds for purchased financial instruments
- Any tax liabilities and other liabilities

§ 9 Subscription and redemption of shares

The fund is open for the subscription and redemption of fund units all bank days. The fund is, however, not open for subscriptions and redemptions on bank days when the fund’s assets cannot be valued in a manner that ensures the equal rights all unitholders due to the partial or full closure of one or more of the marketplaces on which the fund trades. The NAV is normally calculated each bank day. The principles used to determine the NAV are stated in §8.

The subscription and redemption of fund units are carried out at a price not yet determined at the time of the request for subscription and redemption

Requests for redemption can be made to the fund company. The redemption request must be submitted to the fund company in writing and signed by post, fax, or email containing such a written signature. Redemption cannot take place until the written signed redemption request has been received by the fund company.

Immediate redemption shall only take place to the extent possible without the sale of securities in the fund. If immediate redemption cannot take place, redemption shall take place as soon as liquid assets have been obtained. Liquid assets are obtained in such cases by selling securities in the fund as soon as possible, and redemption takes place as soon as the sale proceeds have been received.

If a subscription could significantly disadvantage the interests of other unitholders, the fund company may, after notifying the Financial Supervisory Authority, delay the subscription.

The request is executed on the same day it is submitted, provided that the request has reached the fund company no later than the time and in accordance with the conditions specified on the company’s website. Otherwise, the request will be executed on the following bank day.

Requests for redemption may only be withdrawn if the fund company permits it.

Applications for the subscription of fund units must be made in writing to the fund company. The subscription of fund units is carried out at the price determined on the day the funds are available to the fund company. The minimum monthly savings amount is 100 SEK.

The information the fund company provides to the media about the price of fund units is always preliminary and may be adjusted by the fund company if necessary. The price information provided by the media is therefore not binding on the fund company. Information on the most recently calculated NAV can be obtained from the fund company.

§ 10 Extraordinary circumstances

The fund may be closed for the subscription and redemption of units if such extraordinary circumstances have occurred that make it impossible to value the fund’s assets in a way that ensures the equal rights of the unit holders.

§ 11 Charges and fees

From the fund’s assets, compensation shall be paid to the fund company for its management of the fund.

The compensation includes costs for the custody of the fund’s assets and for supervision and auditors, with an amount corresponding to a maximum of 1.6% annually of the fund’s NAV, calculated daily with 1/365th and deducted from the fund monthly.

Brokerage fees related to the purchase and sale of transferable securities are charged to the fund, as well as taxes and statutory fees.

§ 12 Dividends

The fund generally does not distribute dividends. However, the fund company may decide to distribute dividends if, in the fund company's opinion, it is in the interest of the unitholders to distribute dividends.

If the fund company decides to distribute dividends, the basis for the distribution shall be the return on the fund's assets or other distributable amounts.

If the fund company decides to distribute dividends, it shall be done in April of the year following the financial year and shall accrue to unitholders who are registered for the fund unit on the distribution date determined by the fund company. If the fund company decides to distribute dividends, the fund company shall, for the unit holder's account, acquire new fund units for the dividend attributable to the fund unit after deduction of any preliminary tax. Upon prior request, the dividend, if decided by the fund company, may also be paid to the unitholder's account after deduction of any preliminary tax.

§ 13 Financial year of the fund

The financial year of the fund is the calendar year.

§ 14 Semi-annual and annual reports, and amendments of fund rules

For each financial year, the fund company shall submit an annual report for the fund no later than four months after the end of the financial year. The fund company shall submit a semi-annual report for the fund no later than two months after the end of the calendar half-year. The annual report and semi-annual report shall be available at the fund company. The semi-annual report and annual report for the fund shall be sent to unit holders registered with the fund company.

If the board of the fund company decides to amend these fund regulations, the decision shall be submitted to the Financial Supervisory Authority for approval. Once the decision has been approved, it shall be made available at the fund company and, if applicable, announced in the manner prescribed by the Financial Supervisory Authority.

§ 15 Pledges and transfers

Pledging is done by the pledgee or pledgor notifying the fund company in writing of the pledge. The notification shall include the name and address of the pledgee, the owner of the fund units, the number of units covered by the pledge, and information on any restrictions on the scope of the pledge. Registration of the pledge is made in the unit holder register. The fund company shall notify the unit holder in writing of such registration. A note on pledging applies until the fund company has received notification from the pledgee that the pledge has ceased and has deregistered it in the unit holder register.

When handling pledging, the fund company may charge a fee of up to 500 SEK.

Unitholders can transfer their fund units. In such a transfer, the fund company may charge a fee of up to 500 SEK.

§ 16 Limitation of liability

If the custodian or a depositary bank has lost financial instruments held in custody by the custodian under the agreement between the fund company and the custodian, the custodian shall, without undue delay, return financial instruments of the same kind or pay an amount corresponding to the value of such financial instruments to the fund company for the fund's account. However, the custodian is not liable if the loss of the financial instruments is caused by an external event beyond the custodian's reasonable control and whose consequences were impossible to avoid despite all reasonable efforts. Furthermore, the custodian is not liable for damage caused by Swedish or foreign legislation, Swedish or foreign government action, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances.

The reservation regarding strikes, blockades, boycotts, and lockouts applies even if the Custodian is the subject of or takes such conflict measures itself.

The Custodian is not liable for other damages than those specified in the first paragraph, unless the Custodian has intentionally or negligently caused such damages. The Custodian is also not liable for such damages if the circumstances specified in the first paragraph exist.

The Custodian is not liable for damage caused by Swedish or foreign exchanges or other Execution Venues, Registrars, Clearing Organizations, or others providing equivalent services, and – as far as other damages than the loss of custodied Financial Instruments are concerned – not for damage caused by a Depository Bank or other contractor that the Custodian has engaged with due skill, care, and diligence and regularly monitors, or that has been designated by the Fund Company. The Custodian is not liable for damage caused by the insolvency of the aforementioned organizations or contractors. However, a custody agreement regarding the custody of assets and control of ownership does not relieve the Custodian of its liability for losses and other damages according to the Fund Legislation.

The Custodian is not liable for damage arising for the Fund Company, unit holders in the Fund, the Fund, or others due to restrictions on disposal that may be applied to the Custodian regarding Financial Instruments.

The Custodian is not liable in any case for indirect costs, damages, or losses.

If there is an obstacle for the Custodian to fully or partially execute an action due to circumstances specified in the first paragraph, the action may be postponed until the obstacle has ceased. In the event of postponed payment, the Custodian shall not pay default interest. If interest has been promised, the Custodian shall pay interest at the rate applicable on the due date.

If the Custodian is prevented from receiving payment for the Funds due to circumstances specified in the first paragraph, the Custodian is entitled to interest only according to the terms applicable on the due date for the period during which the obstacle existed. The above limitations of liability do not restrict the unitholder’s right to compensation regulated under the UCITS Act Ch 3, §§ 14-16.

The fund company has tort liability for damages regulated under the UCITS Act Ch 2, § 21

§ 17 Permitted investors

The fund is intended for the general public, excluding such investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company has the right to redeem a unitholder’s units in the fund – notwithstanding the objections of such a unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or ordinance or that the fund company has by reason of a unitholder’s subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE INVESTMENT GRADE

INVESTMENT STRATEGY

The fund invests in fixed income securities and money market instruments issued by issuers that, in the assessment of Carnegie Fonder, have high creditworthiness. The fund has a Nordic focus, which means that at least 75% of the fund's assets will be directly or indirectly invested in financial instruments issued by companies based in the Nordic region or their wholly owned subsidiaries or that are admitted to trading or are frequently traded on a regulated market or multilateral trading facility (MTF) in the Nordic region. The fund may invest up to 10% of fund assets in fixed income securities and money market instruments with a credit rating lower than BBB- with S&P Global Rating (Investment Grade) or the equivalent thereof, but no lower than an S&P Global Rating of BB or the equivalent.

The fund has an average portfolio maturity not exceeding 5 years and an average interest duration not exceeding 3 years. The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 2 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the
entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – NOK, Accumulation
- C – EUR, Accumulation
- D – SEK, Income
- E – SEK, Accumulation, Institutional (min. SEK 100,000,000)
- F – SEK, Accumulation, Distribution
- G – NOK, Accumulation, Distribution
- H – SEK, Accumulation, Institutional (min. SEK 3,000,000)

RISK PROFILE

The fund, whose objective is to create a positive and stable return over a period of 3 years, has a risk level on par with or below the Swedish credit market, defined as the bond market.

Investing in a fixed-income fund is subject to a risk that is determined by the duration of the fund's holdings and the current situation in the money market. Longer terms to maturity in the fund's fixed income securities entails higher risk. While falling interest rates increase the value of the fund's holdings of fixed income securities, the value of the fund's holdings falls when interest rates increase. Thus, the value of the individual investor's units is affected by changes in market interest rates. The fund may make use of derivatives, and these may hold risks that have a greater influence on the fund than if the fund had bought the underlying investment instrument directly. The fund is exposed to both the general interest-rate environment and to the slope of the yield curve. A sharp rise in interest rates usually affects the fund's returns negatively.

Liquidity risk refers to the risk that a financial instrument cannot be sold without substantial additional costs and the risk that liquidity will not be available to meet payment obligations. The fund has a policy towards unit holders to ensure they have access to daily liquidity of the fund units. A focus of the fund is to invest in instruments that have good liquidity even during turbulent times in the financial market. The fund also maintains a permanent cash element. Liquidity risk refers to the risk that a financial instrument cannot be sold without substantial additional costs and the risk that liquidity is not available to meet payment obligations. A main focus of the fund is to invest in instruments that have good liquidity even during turbulent times in the financial market. The fund also maintains a permanent cash element.

Credit risk is the risk that a counterparty or issuer cannot meet its obligations to the fund and other bondholders. To minimize credit risk, there are given limits for exposure to a single issuer, and or credit institution. This framework also includes maturity. Credit risk is monitored daily by both the fund managers and internal control functions at the fund company.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

CARNEGIE INVESTMENT GRADE SUSTAINABILITY DISCLOSURES

Product name: Carnegie Investment Grade
Legal entity identifier: 549300KYLVYENW1WAG30

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards

- Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

- ***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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in credits issued by companies for which at least 25% of turnover contributes to at least one SDG, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds.
3. Share of fund assets invested in credits issued by companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in credits issued by companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Number of advocacy dialogues held with investee companies.
6. Share of fund assets invested in credits issued by companies that have committed to having or have already had their climate targets approved by Science Based Targets initiative.

- ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark. Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in its credits would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome, strategies are applied for company selection and advocacy dialogues in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

[Read more about how we manage principle adverse impacts here.]

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).

- The investment is made in a bond whose proceeds are used for sustainable investments as they are classified in the EU Green Bond Standard or Green, Social and Sustainable Bonds in accordance with ICMA Bond Principles. The fund may also invest in bonds linked to clear sustainability objectives, such as Sustainability-linked bonds, but these must satisfy the criteria according to the two items above.

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 30% of investments in credits issued by companies whose turnover related to the UN SDGs exceeds 25% and in green, social, sustainable and sustainability-linked bonds.
2. An ESG analysis has been performed in our internal analysis tool for all companies in whose credits the fund has invested.

3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

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

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
   - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
   - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
     Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in credits issued by companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

   - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
   - The fund manager contacts the holding to discuss our concerns.
   - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
   - If the holding's response is unsatisfactory, the holding is sold.

Read the Carnegie Fonder Policy for Responsible Investment and Shareholder Engagement here.

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

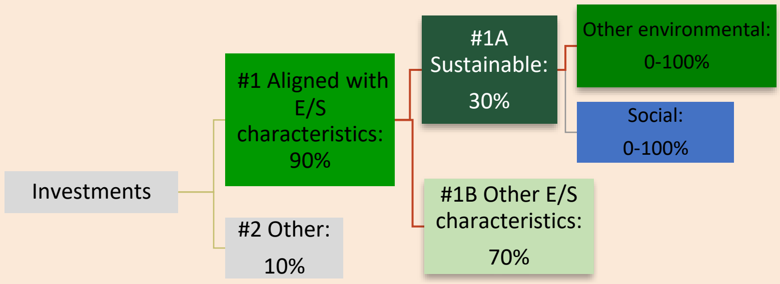
#1. All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

#1A. A minimum share of 30% of these investments have environmental or social objectives:

- Within this 30%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them.

1B. The remaining maximum share of 70% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

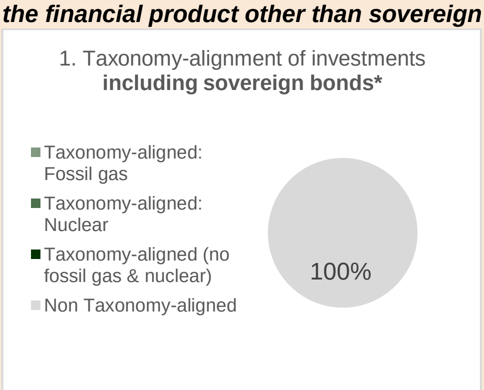
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

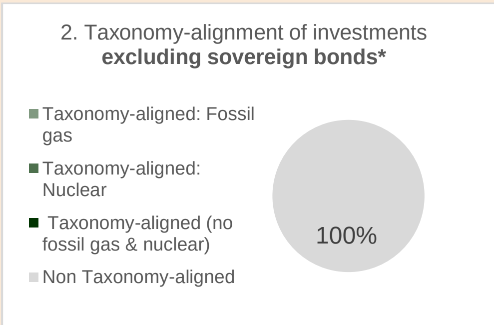
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0-100%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0-100%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-investment-grade-a-2/

CARNEGIE INVESTMENT GRADE FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Investment Grade. The fund is a UCITS fund as defined in the Swedish UCITS Act (2004:46). Fund assets are owned jointly by the fund unitholders and each unit in a unit class confers an equal right to the property that makes up the fund. The fund company (see § 2) represents unitholders in the fund in all matters regarding the UCITS fund decides over property included in the fund and exercises the rights derived from such property.

The fund is not a legal entity and cannot acquire rights or assume obligations. Fund unitholders are not liable for the fund's obligations.

The fund has the following unit classes:

- A – Accumulation, SEK
- B – Accumulation, NOK
- C – Accumulation, EUR
- D – Income, SEK
- E – Accumulation, Institutional, SEK
- F – Accumulation, Distribution, SEK
- G – Accumulation, Distribution, NOK
- H – Accumulation, SEK

The accumulation unit classes reinvest fund returns, while the dividend unit class pays dividends as set forth in § 12.

Unit value is calculated in the currency in which the unit class is denominated. The unit classes differ in terms of management charges. Unit classes F and G are intended for specific distribution channels. Unit classes E and H are conditional upon minimum subscription amounts.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes. All unit classes carry equal rights to the property included in the fund.

The fund is intended for the general public.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund's unitholder register – transfer the investor to another unit class whose terms and conditions the investor fulfils. If the investor is eligible for more than one unit class, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary institution for the assets of the fund is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary is required to act independently of the fund company and exclusively in the joint interests of unitholders.

The depositary receives and retains the fund’s assets and implements the management company’s instructions with regard to the fund provided these do not contravene the provisions of the UCITS Act, other statutes or the fund rules. In addition, the depositary verifies that management of the fund and subscription, redemption and valuation of fund units comply with the UCITS Act and the fund rules and that payments for transactions arising from the assets of the fund are provided to the fund without delay. The depositary also monitors the fund’s cash flows.

§ 4 Fund Characteristics

The fund is a fixed-income fund that invests in fixed income securities and money market instruments with a Nordic focus. The fund has an average portfolio maturity not exceeding 5 years and an average interest duration not exceeding 3 years.

The objective of the fund is to create a stable and positive return over a period of 3 years with a risk level on par with or lower than the Swedish credit market as defined in the fund’s prospectus.

§ 5 Investment Strategy

The fund may invest its assets in fixed income securities, money market instruments, derivatives, fund units and accounts with credit institutions.

The fund invests in fixed income securities and money market instruments issued by issuers that have been assessed by Carnegie Fonder as having high creditworthiness. High creditworthiness means that the issuer has a rating corresponding to a minimum of BBB- (Investment Grade) with S&P Global Rating or the equivalent.

The fund may invest up to 10% of its assets in fixed income securities and money market instruments with an S&P Global Rating below BBB- (Investment Grade) or the equivalent, but not lower than an S&P Global Rating of BB or the equivalent.

“Nordic focus” means that at least 75% of the fund’s assets will be directly or indirectly invested in financial instruments issued by companies based in the Nordic region or their wholly owned subsidiaries, or which are admitted to trading or frequently traded on a regulated market or multilateral trading facility (MTF) in the Nordic region.

The fund may invest a maximum of 10% of the fund's NAV in units in other funds.

The fund may deposit a maximum of 10% of its value in accounts with credit institutions.

Assets underlying derivatives may comprise or relate to:

- Fixed income securities
- Money market instruments
- Financial indices
- Interest rates
- Exchange rates
- Currencies

§ 6 Marketplaces etc

The fund’s assets may be invested on money markets and bond markets or on exchanges or authorised marketplaces in the EU or EFTA.

§ 7 Special Investment Strategy

The fund may also invest its assets in unlisted transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 up to a maximum of 10% of the fund's NAV.

The fund may make use of derivatives to improve management efficiency aimed at reducing risk and costs. The fund may make use of OTC derivatives as referred to in the UCITS Act Ch 5, § 12.
The fund may use currency derivatives and will hedge all entire holdings on an ongoing basis against the unit class currency.

The fund may enter into securities lending agreements.

§ 8 Valuation

§ 8.1 Fundamentals of Valuation

NAV per unit corresponds to the fund's NAV divided by the total number of outstanding fund units. The fund's NAV is calculated by deducting liabilities related to the fund, including any future tax liabilities, from its assets.

The fund's assets comprise:

- Cash and cash equivalents
- Accrued interest
- Accrued dividends
- Unsettled sales
- Other receivables relating to the fund

The fund's liabilities comprise:

- Payments to the fund company
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

Unlisted securities and money market instruments are included at a value determined by the fund company based on objective grounds. This valuation is based on:

- Market prices from unapproved exchanges or market makers
- Other financial instruments or indices, adjusted for differences such as risk
- Discounted dividends or cash flows
- Share of equity

NAV per unit is calculated by the fund company every bank day, if possible.

For derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2, i.e., OTC derivatives, a market value is established as follows:

- Market prices from an active market
- If such market prices cannot be obtained, the market value shall be established using one of the methods below:
- Based on the market value of the component assets/constituents
- Based on recently completed transactions between knowledgeable, willing parties in an arm's length transaction, if these are available, or
- The use of market prices from an active market for another financial instrument that is materially similar.

If market prices cannot be established using one of the options above, or are obviously misleading, the applicable market value shall be established through the use of a valuation method generally accepted on the market, for example option valuation models such as Black & Scholes.

The valuation is conducted individually for each unit class.

§ 8.2 Adjusted Fund Unit Value

In order to ensure fair treatment of the fund's unit holders and to safeguard the common interests of the unit holders, the fund company applies a method for determining an adjusted fund unit value.

The purpose of calculating an adjusted fund unit value is to prevent a unit holder from bearing transaction costs due to the subscription and redemption of fund units in the fund carried out by other unit holders in the fund. The transaction costs referred to in this case are those that arise in situations where assets are bought or sold in the fund to handle requests for subscription or redemption of fund units in the fund, i.e., in the event of net inflows or net outflows.

The fund unit value is adjusted upwards or downwards if the fund has a net inflow or a net outflow that exceeds a threshold value predetermined by the fund company, expressed as a percentage of the fund's value, hereinafter referred to as the threshold value. On days when the net flow does not exceed the threshold value, no adjustment of the fund unit value is made. The level of the threshold value is determined based on the fund company's assessment of what is considered a significant net flow for the fund.

The size of the adjustment of the fund unit value, hereinafter referred to as the adjustment factor, is determined by the fund company and may vary over time. The adjustment factor is determined taking into account direct or indirect costs and includes, where relevant, brokerage fees, spreads, market impact, currency exchange costs, and transaction taxes.

The adjustment factor may amount to a maximum of 2 percent of the fund unit value.

The fund unit value shall, in accordance with the above, be determined as follows:

- In the event that the fund has a net inflow that exceeds the threshold value, the fund unit value calculated according to § 8 above shall be adjusted upwards by the adjustment factor determined by the fund company.
- In the event that the fund has a net outflow that exceeds the threshold value, the fund unit value calculated according to § 8 above shall be adjusted downwards by the adjustment factor determined by the fund company.
- In the event that the net flow in the fund does not exceed the threshold value, no adjustment of the fund unit value is made, and the value of a fund unit is calculated in the manner set out in § 8 above.

The threshold value and the adjustment factor are continuously evaluated by the fund company.

A more detailed description of the fund's application of the adjusted fund unit value can be found in the fund's prospectus.

§ 9 Subscriptions and Redemptions

The fund is normally open for subscriptions (purchases by unitholders) and redemptions (sales by unitholders) of fund units on all bank days. However, the fund is not open for subscriptions and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of all unitholders as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Requests to subscribe for fund units must be made in writing to the fund company. Subscriptions of fund units are executed at the price established on the day payment is available to the fund company.

The minimum initial subscription amount in unit class E is SEK 100,000,000.

The minimum initial subscription amount for purchases of unit class H is SEK 3,000,000.

There are no minimum subscription amounts for the other unit classes.

Redemption requests shall be made in writing to the fund management company. Redemption shall be executed at the NAV per unit established on the redemption date. Redemptions are executed immediately only to the extent possible without requiring the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. The redemption will be executed as soon as the proceeds of sale have been received.

The subscription and redemption prices are the latest calculated NAV per unit at the time the order is completed, plus issuing fees or less redemption fees.

The procedures described above mean that subscription/redemption takes place at a price unknown to the unitholder at the time the subscription/redemption is requested.

Information about subscription and redemption prices will be available from the fund company and the intermediary institution no later than the bank day after the bank day the NAV per unit is determined as above.

Unit classes F and G are reserved for investors who subscribe for units through distributors which, according to agreement with the fund management company, in whole or in part, do not accept retrocession fees from the fund company and which, when the distributor provides the investment service to its clients in connection with the subscription of units, is paid directly by the customer. A prerequisite to be eligible to invest in unit classes F and G is that the holding is registered on one or more accounts in the distributor's name of behalf of the client (nominee registration).

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if there exist extraordinary circumstances whereby a valuation of the fund's assets cannot be made in a manner that assures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payment shall be made from the fund's assets to the fund company for its management of the fund.
The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for storage of the securities included in the fund, including any statutory value-added tax, payment to Finansinspektionen for its supervisory activities in accordance with its current regulations, as well as payment to the fund company's auditors.

The management fee is an ongoing charge not exceeding 0.55% of the fund's NAV per year for unit classes A, B, C and D, and not exceeding 0.30% for unit class E. The corresponding maximum management fee for unit classes F, G and H is 0.35%. Brokerage and other expenses as well as tax consequent upon the fund's purchases and sales of financial instruments and statutory tax are charged to the fund.

§ 12 Dividends

No dividends will be paid on classes A, B, C, E, F, G and H.
The dividend on the income class, unit class D, is decided by the fund company. The dividend on class D is paid to unitholders on the last Wednesday in January, April, July and October.

Dividends on fund units are paid to all unitholders in the income class that are registered as unitholders on the record date determined by the fund company.

Unless the fund company decides otherwise, return on the fund assets, remaining residual amounts of previously distributable amounts and other distributable amounts can be used for dividends.

The basis for dividends may be increased by accrued dividends that were paid in when units were sold and reduced by accrued dividends that were paid out when units were redeemed.

The fund company is required to deduct the tax due on the dividend.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-yearly reporting period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

The pledging party and/or pledge holder must inform the fund company in writing when fund units that are not nominee-registered are pledged. The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledge.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

The fund company is not liable for loss arising from Swedish or foreign legal enactments, intervention by a Swedish or foreign governmental agency, acts of war, strikes, blockades, boycotts, lockouts or other similar circumstances. The reservation with respect to strikes, blockades, boycotts, and lockouts shall apply notwithstanding whether the fund company initiates or is the target of such labour actions. Nor shall the fund company be liable in other cases to compensate for loss if the fund company has observed customary prudence. The fund company shall not be liable for indirect losses under any circumstances.

If the fund company is prevented from making payments or taking other measures due to the circumstances noted in the first paragraph above, the measures may be deferred until the obstacle no longer exists. If as a consequence of such a circumstance the fund company is prevented from making or receiving payments, the fund company shall not be liable to pay penalty interest.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund company and the depositary is regulated under the UCITS Act Ch 2 § 21 and Ch 3 §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, but not for investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company has the right to redeem a unitholder’s units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder’s subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE LIKVIDITETSFOND

INVESTMENT STRATEGY

The objective of Carnegie Likviditetsfond fund is to generate a stable and positive return. The fund may invest its assets in fixed income transferable securities, money-market instruments, fund units and accounts with credit institutions. The fund may invest in derivatives to improve management efficiency. Derivatives may be used to improve management efficiency in order to reduce costs and risks, increase returns and generate leverage.

The fund's assets should be invested in fixed income securities and money market instruments issued by Nordic governments, municipalities, counties, credit institutions and companies with a Nordic association. The creditworthiness of the issuer should be high. Investments in securities and money market instruments denominated in foreign currency are hedged against SEK.

The average duration of fixed interest may be a maximum of 12 months. The maximum average maturity may be 24 months in the portfolio. The fund may make use of derivatives to reduce foreign exchange risks and thereby reduce the effects of currency fluctuations.

The Fund is permitted in accordance with Chapter 5. Section 8 of the Swedish Investment Funds Act, to invest more than 35% of the fund's assets in bonds and other debt instruments issued or guaranteed by a state, by a municipality or a state or municipal authority in a country within the EEA or by an intergovernmental body of which one or more states within the EEA are members.

The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

INTENDED INVESTOR

This fund is suitable for investors seeking a short-term investment with low risk. The fund is also suitable for investors who believe they may need to make use of their savings in the near future. This fund may be suitable for investors who plan to hold their investment for at least 1 year and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Institutional (min. SEK 1,000,000)
- C – SEK, Accumulation, Distribution

RISK PROFILE

Investing in a fixed-income fund is subject to a risk that is determined by the duration of the fund's holdings and the current situation in the money market. A longer term to maturity in the fund's fixed income securities entails higher risk. While falling interest rates increase the value of the fund's holdings of fixed income securities, the value of the fund's holdings falls when interest rates increase. Thus, the value of the individual investor's units is affected by changes in market interest rates.

The fund may make use of derivatives and these may hold risks that have a greater influence on the fund than if the fund had bought the underlying investment instrument directly. The fund is exposed to both the general interest-rate environment and to the slope of the yield curve. A sharp rise in interest rates usually affects the fund's returns negatively. The primary objective of the fund is to invest in fixed income securities in the manner that gives the best returns with minimal volatility, which then provides a risk-adjusted return that is better than the index and comparable funds.

Interest rate risk is managed by keeping the fixed-interest duration shorter, thus limiting interest rate risk.

Liquidity risk refers to the risk that a financial instrument cannot be sold without substantial additional costs and also the risk that liquidity is not available to meet payment obligations. The fund has a policy towards unit holders to ensure they have access to daily liquidity of the fund units. A focus of the fund is to invest in instruments that have good liquidity even during turbulent times in the financial market. The fund also maintains a permanent cash element. Liquidity risk refers to the risk that a financial instrument cannot be sold without substantial additional costs and the risk that liquidity is not available to meet payment obligations. A main focus of the fund is to invest in instruments that have good liquidity even during turbulent times in the financial market. The fund also maintains a permanent cash element.

Credit risk is the risk that a counterparty or issuer cannot meet its obligations to the fund and other bondholders. To minimize credit risk, there are given limits for exposure to a single issuer, and or credit institution. This framework also includes maturity. Credit risk is tracked daily by fund managers and support functions within the fund company.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE FONDER

CARNEGIE LIKVIDITETSFOND SUSTAINABILITY DISCLOSURES

Product name: Carnegie Likviditetsfond
Legal entity identifier: 529900ALQS8ALPPBBU78

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☐ It promotes E/S characteristics, but will **not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of global commitments and targets such as the Paris Agreement and the UN Agenda 2030 through the investee company's enabling activities and/or transitional activities.
2. The fund also promotes higher standards and good practices of general performance in E and S by investee companies through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding companies that do not meet the standards
   - Influencing holdings in the right direction as regards E and S.

3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in credits issued by companies for which at least 25% of turnover contributes to at least one SDG, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds.
3. Share of fund assets invested in credits issued by companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in credits issued by companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Number of advocacy dialogues held with investee companies.
6. Share of fund assets invested in credits issued by companies that have committed to having or have already had their climate targets approved by Science Based Targets initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the SDG in the UN Agenda 2030. The UN agenda is part of a political framework, and although all the goals are relevant to the companies we invest in, not all of them are applicable in a financial analysis. We therefore divide the goals into two groups. Universal operational goals that all companies should work towards. These include Goals 5, 8, 10, 16 and 17. We consider other goals as investable in the sense that the companies' products and services have direct impact on attaining the goal and that demand for the company's products and services is affected in both the positive and negative sense depending on the company's business. These goals include Goals 1, 2, 3, 4, 6, 7, 9, 11, 12, 13, 14 and 15. Examples of this might include companies that design and plan, build, operate or own renewable energy-production, climate-proof infrastructure, or the like. Further examples are investments in economic activities related to novel sustainable materials or materials produced in a more sustainable manner. Examples of contributions to social objectives include investments in R&D-intensive companies focused on global endemic diseases.

Through these sustainable investments, the fund also contributes to the environmental objectives as they are worded in the EU Taxonomy. This is accomplished as follows. The turnover of all investee companies is mapped to one or more specific SDG Targets - while avoiding duplicates. At Carnegie Fonder, we currently use 27 SDG Targets against our investable goals. This list of targets may be expanded in pace with our investments. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

Investments are made in economic activities whose products or services enable solutions (enabling activities) and in economic activities that are transitioning existing products to become more sustainable (transitional activities). No index is used as a reference benchmark.

Instead, the above sustainability indicators are used to measure the environmental and social characteristics that are promoted.

How do the sustainable investments that the financial product partially intends to make not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in its credits would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome, strategies are applied for company selection and advocacy dialogues in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement. For an investment to be classified as sustainable, all of the following criteria must be met.

1. Contributes to one or more UN SDGs.

   Implemented in the investment process via an internally developed tool to identify companies whose turnover contributes to one or more UN SDGs and thus contribute to the environmental objectives as they are worded in the EU Taxonomy according to previous tables. All existing investments and new investments are analysed in the tool and the analyses are updated at least once a year. An investment is assessed as contributing to one or more UN SDGs if any of the following criteria are satisfied:

   - Of the company's turnover, 25% or more is currently classified as contributing to UN Agenda 2030 and thus to EU Taxonomy objectives. These categories are categorised as enabling activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investee company has set a concrete target to have 25% or more of its turnover classified as contributing to the UN Agenda 2030 and thus to the objectives found in the EU Taxonomy. These categories are categorised as transitional activities. The size of the contribution measured as turnover divides the investee companies' contributions as medium (over 25%) or high (over 50%).
   - The investment is made in a bond whose proceeds are used for sustainable investments as they are classified in the EU Green Bond Standard or Green, Social and Sustainable Bonds in accordance with ICMA Bond Principles. The fund may also invest in bonds linked to clear sustainability objectives, such as Sustainability-linked bonds, but these must satisfy the criteria according to the two items above.

2. No significant harm done to other social or environmental objectives.

   Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Compliance with good governance practices.

   Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee companies aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of investee companies and thus the value of the funds' investments. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles: Positive screening, negative screening and engagement/advocacy.

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 following binding elements of the investment strategy are used:

1. The fund places at least 30% of investments in credits issued by companies whose turnover related to the UN SDGs exceeds 25% and in green, social, sustainable and sustainability-linked bonds.
2. An ESG analysis has been performed in our internal analysis tool for all companies in whose credits the fund has invested.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
      Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in credits issued by companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

- The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
- The fund manager contacts the holding to discuss our concerns.
- The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
- If the holding's response is unsatisfactory, the holding is sold.

Read the Carnegie Fonder Policy for Responsible Investment and Shareholder Engagement here.

What is the asset allocation planned for this financial product?

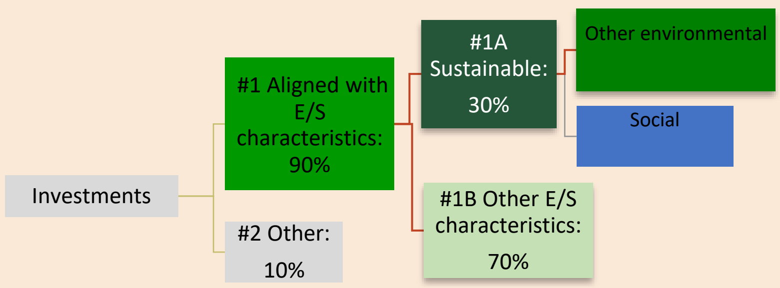
Asset allocation describes the share of investments in specific assets.

#1. All investments excluding cash in the fund promote environmental or social characteristics (minimum 90%).

1A. A minimum share of 30% of these investments have environmental or social objectives:
- Within this 30%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them.

1B. The remaining maximum share of 70% covers investments that are promote environmental or social characteristics but which do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives as part of the investment strategy. Any use of derivatives is intended solely for the purposes of increasing liquidity and minimising risk.

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.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

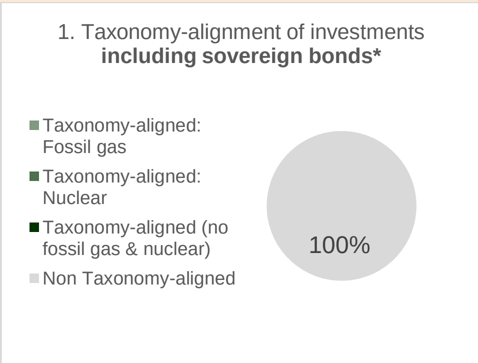
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

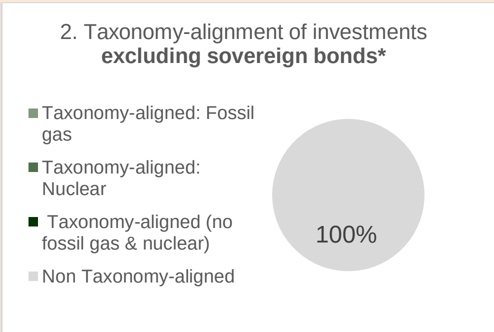
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with environmental criteria is thus 0%.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them. The minimum share in of sustainable investments expected to be invested in accordance with social criteria is thus 0%.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-likviditetsfond-a/

CARNEGIE LIKVIDITETSFOND FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Likviditetsfond. The fund is a UCITS fund as defined under the Swedish UCITS Act (SFS 2004:46). Fund assets are owned jointly by the fund unitholders and each unit in a unit class confers an equal right to the property that makes up the fund. The fund company (see § 2) represents unitholders in the fund in all matters regarding the fund, decides over property included in the fund and exercises the rights derived from such property.

The fund is not a legal entity and therefore cannot acquire rights or assume obligations. Fund unitholders are not liable for the fund's obligations.

The fund has the following unit classes:

- A – SEK
- B – SEK, Institutional
- C – SEK, Distribution

The unit classes differ in terms of subscription amount, management fee and distribution channel.

Unless otherwise specifically stated, the content of the fund rules is common to all unit classes.

If an investor no longer fulfils the terms and conditions to be invested in a certain unit class, the fund company shall – following prior notice to the person registered in the fund's unitholder register – transfer the investor to another unit class whose terms and conditions the investor fulfils. If the investor is eligible for more than one unit class, the fund company shall transfer the investor to the unit class with the lowest management fee. The fund company is not liable for any cost, charge, or loss that an investor suffers due to such a transfer, including possible tax consequences.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN: 556266-6049), hereinafter referred to as "the fund company".

§ 3 Depositary and its Function

The depositary institution for the assets of the fund is Skandinaviska Enskilda Banken AB (publ) (CRN: 502032-9081).

The depositary implements the fund company's decisions with regard to the fund and receives and retains the fund's assets. The depositary institution furthermore verifies that subscriptions and redemptions of fund units, the valuation of fund units and other use of the fund's assets do not contravene the provisions of the Swedish UCITS Act or the fund rules.

§ 4 Fund Characteristics

The fund is a fixed income fund that invests in fixed income transferable securities and money market instruments. The fund's objective is to create a positive and stable return.

§ 5 Investment Strategy

The fund may invest its assets in fixed income transferable securities, money market instruments, derivatives, fund units and accounts with credit institutions that have a Nordic association.

The fund’s assets may be invested in such derivative instruments where the underlying asset consists of transferable securities, money market instruments, financial indices, interest rates, exchange rates or foreign currencies.

The fund may invest a maximum of 10% of the fund's NAV in units in other funds.

The average interest rate duration shall not exceed 12 months.

The average maturity shall not exceed 24 months for all securities included in the portfolio.

§ 6 Marketplaces etc

The fund’s assets may be invested on a regulated market or equivalent market outside the EEA and on other markets, within or outside the EEA, that are regulated and open to the public and that are covered by the fund investment strategy in § 5.

§ 7 Special Investment Strategy

The fund’s assets may be invested in transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5 up to a maximum of 10% of the fund's NAV. The fund may invest in derivatives. Derivatives may be used to improve management efficiency aimed at reducing risks and costs, increasing return and generating leverage. The fund may make use of OTC derivatives as referred to in the UCITS Act Ch 5, § 12.

The fund may use currency derivatives and will hedge all entire holdings on a daily basis against SEK.

In accordance with the UCITS Act Ch 5, § 8, the fund may invest more than 35% of fund assets in bonds and other debt instruments issued or guaranteed by a state or municipal authority in a country within the EEA or by an international organisation in which one or more EEA states are members. The debt instruments must however have been issued by at least six different issuers and those issued in a single issue may not exceed 30% of the fund’s value.

The fund may enter into securities lending agreements.

§ 8 Valuation

§ 8.1 Fundamentals of Valuation

NAV per unit corresponds to the fund's NAV divided by the number of outstanding units, taking into account the terms and conditions attached to each unit class. The fund's NAV is calculated by deducting the liabilities related to the fund from its assets. NAV per unit is calculated each bank day and is used as the basis for determining subscription (selling) and redemption prices for trade in fund units. The outstanding liabilities of the fund are calculated and considered in the daily valuation. The fund company does not, however, calculate the unit value if the fund is closed for subscriptions or redemptions. In the event of large changes in the value of financial instruments included in the fund, the unit value may be established several times during the day.

The fund’s assets are calculated as follows:

- Financial instruments are valued at the current market value (last price paid or, if this is not available, last bid price).

- Cash and cash equivalents and current receivables, in the form of deposits in bank accounts, short-term investments on the money market and settlement for securities sold are included at the amount expected to be received.
- For transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5 a market value is established using a special valuation. The basis for this special valuation includes market prices from unapproved exchanges or market makers, other financial instruments or indices adjusted for differences in, for example, credit risk and liquidity (reference valuation), discounted cash flows (net present value) or share of net asset value (financial statement valuation).

For all assets, associated rights in the form of interest, dividends, issue rights and similar are considered

The liabilities of the fund are calculated as follows:

- Accrued management fees to the fund company
- Payments to the depositary
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

For such derivative instruments referred to in the UCITS Act, Ch 5, § 12, paragraph 2, i.e., OTC derivatives, a market price is established as follows.

- Market prices from an active market

If such market prices cannot be obtained, the market value shall be established using one of the methods below:

- Based on the market value of the included assets/components
- Based on recently completed transactions between knowledgeable, willing parties in an arm's length transaction, if these are available, or
- The use of market prices from an active market for another financial instrument that is materially similar
- If market prices cannot be established using one of the options above, or are obviously misleading, the applicable market value shall be established through the use of a valuation method generally accepted on the market, for example, option valuation models such as Black & Scholes.

§ 8.2 Adjusted Fund Unit Value

In order to ensure fair treatment of the fund's unit holders and to safeguard the common interests of the unit holders, the fund company applies a method for determining an adjusted fund unit value.

The purpose of calculating an adjusted fund unit value is to prevent a unit holder from bearing transaction costs due to the subscription and redemption of fund units in the fund carried out by other unit holders in the fund. The transaction costs referred to in this case are those that arise in situations where assets are bought or sold in the fund to handle requests for subscription or redemption of fund units in the fund, i.e., in the event of net inflows or net outflows.

The fund unit value is adjusted upwards or downwards if the fund has a net inflow or a net outflow that exceeds a threshold value predetermined by the fund company, expressed as a percentage of the fund's value, hereinafter referred to as the threshold value. On days when the net flow does not exceed the threshold value, no adjustment of the fund unit value is made. The level of the threshold value is determined based on the fund company's assessment of what is considered a significant net flow for the fund.

The size of the adjustment of the fund unit value, hereinafter referred to as the adjustment factor, is determined by the fund company and may vary over time. The adjustment factor is determined taking into account direct or indirect costs and includes, where relevant, brokerage fees, spreads, market impact, currency exchange costs, and transaction taxes.

The adjustment factor may amount to a maximum of 2 percent of the fund unit value.

The fund unit value shall, in accordance with the above, be determined as follows:

- In the event that the fund has a net inflow that exceeds the threshold value, the fund unit value calculated according to § 8.1 above shall be adjusted upwards by the adjustment factor determined by the fund company.
- In the event that the fund has a net outflow that exceeds the threshold value, the fund unit value calculated according to § 8.1 above shall be adjusted downwards by the adjustment factor determined by the fund company.
- In the event that the net flow in the fund does not exceed the threshold value, no adjustment of the fund unit value is made, and the value of a fund unit is calculated in the manner set out in § 8.1 above.

The threshold value and the adjustment factor are continuously evaluated by the fund company.

A more detailed description of the fund's application of the adjusted fund unit value can be found in the fund's prospectus.

§ 9 Subscriptions and Redemptions

The fund is normally open for the subscriptions and redemption of fund units every bank day. However the fund is not open for issues and redemptions on bank days when a valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of fund unit holders as a consequence of several of the marketplaces on which the fund's trade takes place being partly or entirely closed.

Requests to issue fund units must be made in writing to the fund company. Subscriptions of fund units are executed at the price established on the day payment is available to the fund company.

The minimum initial subscription amount for unit class B: SEK 1 million.

Redemption requests shall be made in writing to the fund company.

Redemption shall be executed at the NAV per unit established on the redemption date. Redemptions are executed immediately only to the extent possible without requiring the sale of securities in the fund. If cash must be acquired through the sale of securities in the fund, this shall be accomplished as soon as possible. The redemption will be executed as soon as the proceeds of sale have been received.

The subscription and redemption prices are the latest calculated NAV per unit when the order is executed. The procedures described above mean that purchase/redemption takes place at a price unknown to the unit holder when subscription/redemption is requested.

Information about subscription and redemption prices is available from the fund company and intermediary institution no later than the bank day following the bank day on which NAV per unit is established as above.

Unit class is reserved investors who subscribe for units through distributors which, according to an agreement with the fund company, in whole or in part, do not accept retrocession fees from the fund company and which, when the distributor provides the investment service in connection with the subscription of units, is paid directly by the distributor's customer. A prerequisite to be eligible to invest in share class C is that the holding is registered on one or more accounts in the distributor's name of behalf of client (nominee registration).

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if there exist extraordinary circumstances whereby a valuation of the fund's assets cannot be made in a manner that assures the equal rights of the fund unitholders.

§ 11 Charges and Fees

The management fee shall be paid to the fund company from the fund's assets. The management fee is paid at a fixed rate not exceeding 0.60% of the fund's net asset value per year for unit class A and not exceeding 0.30% for unit classes B and C. The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for storage of the securities included in the fund, including any statutory value-added tax, payment to Finansinspektionen for its supervisory activities in accordance with its current regulations, as well as payment to the fund company's auditors.

Brokerage and other expenses as well as tax consequent upon the fund's purchases and sales of financial instruments and statutory tax are charged to the fund.

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

For each calendar half-year, the fund company shall issue a half-yearly report for the fund not later than two months after the end of the half-year period. For each financial year, the fund company shall publish an annual report for the fund not later than four months after the end of the annual reporting period. The half-yearly report and the annual report shall be made available at the offices of the fund company and the intermediary institution and shall be sent to unitholders that have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall submitted to Finansinspektionen for approval. The amendment shall be published by the fund company in the manner instructed by Finansinspektionen.

§ 15 Pledges and Transfers

The pledging party and/or pledge holder must inform the fund company in writing when fund units that are not nominee-registered are pledged. The notification shall state:

- The identity of the pledge holder
- The unit class of the pledged units
- The number of fund units covered by the pledge
- Any restrictions on the scope of the pledge

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 400 for the administration of the registration of pledges.

Unitholders are permitted to transfer fund units.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

§ 16 Limitation of Liability

If the depositary has lost financial instruments held in custody at the depositary or its custodian bank, the depositary shall return financial instruments of identical type or an amount corresponding to the value to the fund without undue delay.

Neither the fund company nor depositary shall be liable for loss arising as a consequence of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether the fund company or the depositary is the object of or initiates such a labour action. Nor shall the fund company or the depositary pay compensation for losses arising in other cases if the fund company or depositary has observed customary prudence. The fund company or the depositary shall not be held liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If the fund company or the depositary is prevented from making or receiving payment as a consequence of such circumstance the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest will be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance set forth in the first paragraph above, the depositary has the right to interest for the time during which the obstacle has existed only according to terms that prevailed on the due date.

Neither the fund company nor the depositary is liable for loss caused by a - Swedish or foreign - stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities that provide equivalent services, nor other third parties retained with due care by the fund company or the depositary. The same shall apply to loss caused by the insolvency of the aforementioned organisations or third parties. The depositary is not responsible for engaged parties instructed by the fund company. Nor will the fund company or the depositary be liable for loss incurred by the fund, unitholders, or other parties by reason of restrictions upon disposition that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the fund company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund management company and the depositary is regulated under the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The fund is intended for the general public, but not for investors whose subscription of units in the fund would contravene the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose subscriptions or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions by such investors referred to in this paragraph.

The fund company has the right to redeem a unitholder’s units in the fund – notwithstanding the objections of the unitholder – if it should become apparent that the unitholder has subscribed for units in the fund in contravention of the provisions of Swedish or foreign law or regulation, or that the fund company has by reason of a unitholder’s subscription for or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE OBLIGATIONSFOND

INVESTMENT STRATEGY

The fund is an actively managed fixed income fund. The objective is that the fund will achieve value growth over time that exceeds the fund's benchmark index, OMRX Treasury Bond Index.

The fund invests in fixed income transferable securities, money market instruments and fund units mainly issued by governments, municipalities or credit institutions with good liquidity and high creditworthiness. The fund's investments must have a Swedish connection through the financial instrument being denominated in SEK. The fixed income securities the fund invests in must have a minimum credit rating of A- or the equivalent. Scale according to Standard & Poor's or equivalent from another credit rating agency.

The fund is managed with active risk-taking, and the investment strategy is based on an analysis in three areas: macroeconomics, valuation, and sentiment. The active exposure is achieved by taking positions in duration, the interest rate curve, credits, and choice of transferable securities. The fund's investments are not restricted to any predetermined average fixed interest term and may vary over time. The fund's investments should have an average fixed interest term within the range 0 to 10 years. Investments can be made in both long-term and short-term fixed income securities and money market instruments and are determined by the investment strategy that the fund company finds appropriate at any given time.

The asset classes that the fund's assets may invest in are transferable securities, money market instruments, derivative instruments, and accounts with credit institutions. Investments in derivative instruments can be made as part of the fund's investment strategy.

The fund may invest more than 35 percent of its assets in bonds and other debt securities issued or guaranteed by the Swedish state or by Swedish municipalities.

The fund applies a model that integrates sustainability factors into the credit analysis, with a focus on choosing issuers that, in the opinion of the fund company, have carefully considered sustainability governance and sustainability risk management and excludes issuers that present specific or difficult to assess environmental, social or ethical risks. The fund strives invest in green bonds or other instruments for financing social good in cases where such an investment is also considered to be in the interests of the unitholders in terms of long-term capital growth. The fund does not invest in companies that are judged to be in breach of the Ten Principles of the UN Global Compact.

INTENDED INVESTOR

This fund may be suitable for investors who plan to hold their investment for at least 3 years and who are aware that the money invested in the fund can both increase and decrease in value and that there is no guarantee that the entire capital invested can be returned. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Institutional (min. SEK 100,000,000)

RISK PROFILE

The fund is a fixed income fund. Fixed income funds generally have a lower risk level than, for example, equity funds. Through the fund’s investment focus on Swedish bonds with longer maturities, together with its less restrictive investment rules, the fund has a higher level of risk than fixed income funds on average.

The fund has a medium risk of rises and falls in unit value.

Investing in a fund is always associated with both opportunities and risks. Money invested in a fund can both increase and decrease in value depending on the market’s performance, and there is no guarantee that all invested capital will be recovered. Past returns are not a guarantee of future returns.

Investors should be aware that bonds are associated with interest rate risk. This means that adjustments in the fixed income market have direct impact on the fund’s underlying assets. If the interest rate increases, the value of the underlying bonds will decrease.

The fund is associated with a credit risk through the issuer of the underlying instruments. This risk is that the underlying issuer will be unable to fulfil the obligations associated with the terms and conditions of the instrument.

Liquidity risk is judged to be low since under normal market conditions there is good liquidity in the Swedish bond market.

The commitment approach is used to measure the fund’s total exposure. The commitment approach calculates the fund’s exposures arising from the use of derivatives. In the calculation, derivatives are converted to exposures corresponding to their underlying assets. When calculating the total exposures, the fund company considers netting and any hedging. The total exposures, when calculated in this way, may not exceed 100% of the fund’s NAV in accordance with the UCITS Act (2004:46).

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company’s products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund’s entire portfolio. The use of ESG criteria can affect the fund’s investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

CARNEGIE OBLIGATIONSFOND SUSTAINABILITY DISCLOSURES

Product name: Carnegie Obligationsfond
Legal entity identifier: 5493004O6UU3YOQ00H32

Environmental and/or social characteristics

Sustainable investment means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The EU Taxonomy is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities.** That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Does this financial product have a sustainable investment objective?	
☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** ___%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments
☐ In economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ In economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ With an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:**___%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for issuers that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from two angles:

1. The fund also promotes higher standards and good practices of general performance in E and S by issuers through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding issuers do not meet the standards
   - influencing holdings in the right direction as regards E and S.

2. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in credits issued by issuers for which at least 25% of turnover contributes to one or more SDG, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds.
3. Share of fund assets invested in credits issued by issuers whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in credits issued by issuers with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Number of advocacy dialogues held with investee issuers.
6. Share of fund assets invested in credits issued by issuers that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund achieves this by investing in bonds whose proceeds are used for green purposes, i.e., "green bonds". Green bonds may, for example, finance various areas within climate investment, such as promoting biodiversity, and railway maintenance.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).

2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.

3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that an issuer's activities and thus the fund's investment in its credits would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome, strategies are applied in accordance with the Carnegie Fonder Sustainability Policy.

An issuer's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement.

1. Positive screening: Implemented through investments in bonds where the proceeds are used for sustainable investments as they are classified in the EU Green Bond Standard or Green, Social and Sustainable Bonds in accordance with ICMA Bond Principles. The fund may also invest in bonds linked to clear sustainability targets.
2. Negative screening: Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.
3. Advocacy: Implemented through the Carnegie Fonder Shareholder Engagement Policy. As active fund managers, we continuously monitor all holdings to make investee issuers aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of issuers and thus the value of the fund's investments. With regard to fixed income funds, engagement takes place primarily through advocacy dialogues. We initiate formal advocacy dialogues with issuers that do not meet our expectations. The fund company also engages in proactive advocacy dialogues aimed at communicating identified improvement measures.

   Read more in the Carnegie Fonder Shareholder Engagement Policy here.

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 following binding elements of the investment strategy are used:

1. An ESG analysis has been performed in our internal analysis tool for all issuers in whose credits the fund has invested.
2. The fund excludes issuers in accordance with the fund company's policy.
3. By 2040, 100% of the fund's assets under management invested in credits shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
    - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
    - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
    Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in credits issued by issuers that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all holdings is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

    - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
    - The fund manager contacts the holding to discuss our concerns.
    - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
    - If the holding's response is unsatisfactory, the holding is sold.

Read the Carnegie Fonder Policy for Responsible Investment and Shareholder Engagement here.

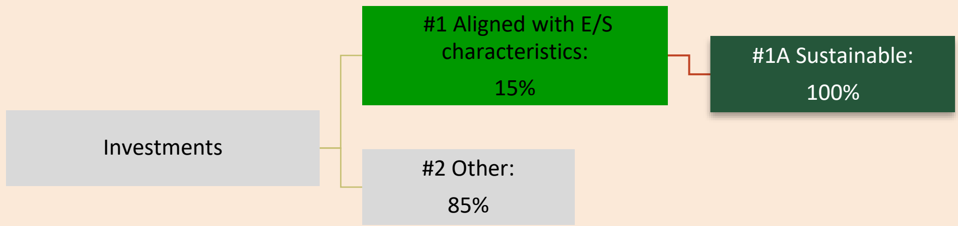
What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

#1 At least 15% of the fund’s investments promote environmental or social characteristics.

#1A. 100% of these investments have environmental or social objectives.
#1B. 0% of these investments are aligned with the environmental or social characteristics but do not qualify as sustainable investments

#2. The fund invests in government and municipal bonds and retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (maximum 85%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

Category **#1 Aligned with E/S characteristics** covers:
- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund does not use derivatives to attain environmental or social characteristics.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

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.

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

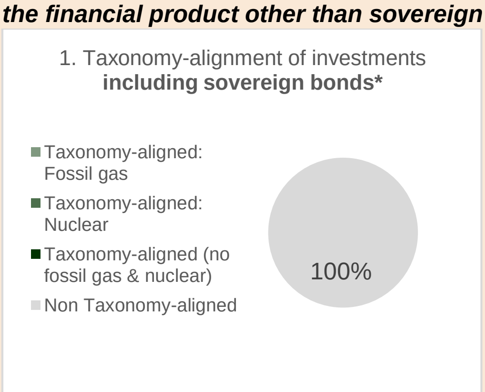
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

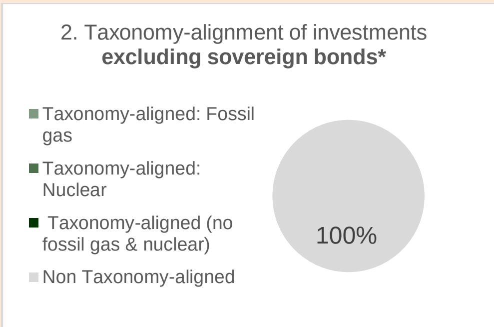
☐ Yes:

☐ In fossil gas ☐ In nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

VISITING ADDRESS Regeringsgatan 56 Stockholm, Sweden
POSTAL ADDRESS Box 7828 SE-103 97 Stockholm
WEBSITE carnegiefonder.se
E-MAIL spara@carnegiefonder.se
TELEPHONE +46 8 12 15 50 00

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund does not commit to a minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy.

What is the minimum share of socially sustainable investments?

The fund does not commit to a minimum share of sustainable investments with a social objective.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund’s custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund does not use a reference benchmark to determine that environmental and social characteristics are promoted. The previously mentioned Sustainability indicators and the binding elements of the investment strategy are used for this purpose instead.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-obligationsfond-a/

CARNEGIE OBLIGATIONSFOND FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Investment Grade. The fund is a UCITS fund as defined under the Swedish UCITS Act (SFS 2004:46).

The assets of the fund are owned jointly by the fund unitholders and each unit in a unit class confers equal right to the assets that make up the fund. The fund cannot acquire rights or assume obligations.

The fund is managed by the fund management company in §2 below. The fund company represents the unitholders in all matters concerning the fund, takes decisions concerning the property included in the fund and exercises the rights derived from the property.

Operations are conducted in accordance with these fund rules, the articles of association of the fund company, the Swedish UCITS Act and other applicable statutes.

These fund rules are complemented by and integrated with the fund prospectus. The prospectus is provided by the fund company.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder Sverige AB, (CRN: 556266-6049), hereinafter referred to as “the fund company”. The fund company conducts fund business in compliance with the Swedish UCITS Act (2004:46).

§ 3 Depositary and its Function

The fund's assets are stored by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081) as the depositary. The depositary acts independently of the fund company and shall implement the fund company’s decisions regarding the fund unless these contravene the UCITS Act (2004:46) or these fund rules.

The depositary shall receive and retain the property included in the fund and ensure that subscriptions and redemptions of fund units, calculation of NAV per unit and use of the fund’s assets do not contravene the UCITS Act or these fund rules.

The depositary shall also ensure that the assets of the fund are provided to the fund without delay.

§ 4 Fund Characteristics

The fund is a broad-based fixed income fund that invests in Swedish fixed income securities and money market instruments with good liquidity and high creditworthiness. The fund’s assets must be invested with a view to obtaining good capital growth. The fund managers apply guidelines for ethics and sustainability.

The management objective is to achieve value growth in the fund, while maintaining a good spread of risk, that over a period of 2 to 3 years exceeds the benchmark index (OMRX T-Bond), which the fund company has determined aligns best with the fund’s investment strategy.

§ 5 Investment Strategy

The fund's assets may be invested in the following asset classes:

- Transferable securities
- Money market instruments
- Derivative instruments
- Accounts with credit institutions

The fund's investments are not restricted to any predetermined average maturity and may vary over time. Investments can thus be made in both long-term and short-term fixed income transferable securities and money market instruments and are determined by the investment strategy that the fund company determines most suitable at any given time. The duration range for the fund is 0-10 years.

Under normal market conditions, the fund should be fully invested, which means that the cash component will be low.

The fund applies a model that integrates sustainability factors into the credit analysis, with a focus on choosing issuers that, in the opinion of the fund company, have carefully considered sustainability governance and sustainability risk management and excludes issuers that present specific or difficult to assess environmental, social or ethical risks. The fund strives invest in green bonds or other instruments for financing social good in cases where such an investment is also considered to be in the interests of the unitholders in terms of long-term capital growth. The fund does not invest in companies that are judged to be in breach of the Ten Principles of the UN Global Compact. The fund also refrains from investing in companies whose activities include the extraction of fossil fuels, production of weapons, alcohol, pornography, tobacco, or commercial gambling operations. The fund is also restrictive with companies that produce other military equipment or distribute tobacco, alcohol or pornography. These activities must not exceed 5% of the company's turnover. The fund prospectus contains more information on the selection criteria that are applied.

A maximum of 15% of fund assets may be deposited in accounts with credit institutions

A maximum of 10% of fund assets may be invested in units in other funds.

At least 90% of the investments shall be made in financial instruments that are admitted to trading on a regulated market in Sweden or that are frequently traded on another marketplace in Sweden that is regulated and open to the public.

In addition, the fund may invest globally in derivative instruments, up to a maximum of 10% of fund's NAV.

Derivative instruments have special characteristics that can entail significantly higher risks than, for example, trading in bonds.

§ 6 Marketplaces

The investments shall be made using financial instruments that are admitted to trading on a regulated market in Sweden or that are frequently traded on another market in Sweden that is regulated and open to the public.

§ 7 Special Investment Strategy

As part of the fund's investment strategy, the fund may use Swedish and foreign derivative instruments.

The fund may also use those derivative instruments referred to in the UCITS Act Ch 5, §12, second paragraph (OTC derivatives).

The fund may invest assets in those transferable securities and money market instruments referred to in the UCITS Act Ch 5, §5.

The fund company is authorised by Finansinspektionen to manage the fund in accordance with the UCITS Act Ch 5, § 8.

§ 8 Valuation

§ 8.1 Fundamentals of Valuation

The fund's NAV is calculated by deducting the liabilities relating to the fund from its assets. The fund's assets are valued at the current market value. The fund is valued daily at the last price paid or, if such is unavailable, the latest bid price and if this is not stated, the latest ask price.

To determine the value of unlisted transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5, the last price paid or the bid price is normally used

If the above valuation methods are deemed misleading by the fund company, a market value will be determined on an objective basis following a special valuation. The special valuation is based on, for example, market prices from:

- An unregulated market
- An independent broker
- Other external, independent sources
- Another listed financial instrument
- An index or corporate event that affects the market value

For such instruments referred to in the UCITS Act, Ch 5, § 12, paragraph 2 (OTC derivatives), a market price is established as follows.

- Market price quoted on an active market.
- If a market price cannot be obtained, OTC derivatives shall be valued using valuation models such as Black & Scholes and Black 76.
- NAV per unit is equal to the fund's NAV divided by the number of registered units, taking into account the conditions associated with each unit class.

§ 8.2 Adjusted Fund Unit Value

In order to ensure fair treatment of the fund's unit holders and to safeguard the common interests of the unit holders, the fund company applies a method for determining an adjusted fund unit value.

The purpose of calculating an adjusted fund unit value is to prevent a unit holder from bearing transaction costs due to the subscription and redemption of fund units in the fund carried out by other unit holders in the fund. The transaction costs referred to in this case are those that arise in situations where assets are bought or sold in the fund to handle requests for subscription or redemption of fund units in the fund, i.e., in the event of net inflows or net outflows.

The fund unit value is adjusted upwards or downwards if the fund has a net inflow or a net outflow that exceeds a threshold value predetermined by the fund company, expressed as a percentage of the fund's value, hereinafter referred to as the threshold value. On days when the net flow does not exceed the threshold value, no adjustment of the fund unit value is made. The level of the threshold value is determined based on the fund company's assessment of what is considered a significant net flow for the fund.

The size of the adjustment of the fund unit value, hereinafter referred to as the adjustment factor, is determined by the fund company and may vary over time. The adjustment factor is determined taking into account direct or indirect costs and includes, where relevant, brokerage fees, spreads, market impact, currency exchange costs, and transaction taxes.

The adjustment factor may amount to a maximum of 2 percent of the fund unit value.

The fund unit value shall, in accordance with the above, be determined as follows:

- In the event that the fund has a net inflow that exceeds the threshold value, the fund unit value calculated according to § 8.1 above shall be adjusted upwards by the adjustment factor determined by the fund company.
- In the event that the fund has a net outflow that exceeds the threshold value, the fund unit value calculated according to § 8.1 above shall be adjusted downwards by the adjustment factor determined by the fund company.
- In the event that the net flow in the fund does not exceed the threshold value, no adjustment of the fund unit value is made, and the value of a fund unit is calculated in the manner set out in § 8.1 above.

The threshold value and the adjustment factor are continuously evaluated by the fund company.

A more detailed description of the fund's application of the adjusted fund unit value can be found in the fund's prospectus.

§ 9 Subscriptions and Redemptions

Unit Classes A and B

The price per unit sold by the fund company (unitholder's subscription) is the NAV per unit on the bank day on which the sale is executed.

The price of one unit redeemed by the fund company (unitholder's redemption/sale) is the NAV per unit on the bank day on which redemption is executed.

Subscriptions and redemptions of fund units through the fund company can be made on any bank day. Subscription and redemption prices may be obtained from the fund company. Prices are also published in daily newspapers or similar media. Prices on any given bank day are normally published in the evening of the same bank day.

Requests to subscribe for fund units (purchases by unitholders) shall be made in writing by fax or, upon special agreement, by electronic media.

Requests for redemption (sales by unitholders) of fund units shall be made in writing by fax or, upon special agreement, via electronic media.

Requests made in writing by fax must be signed by the unitholder.

Requests are executed on the date submitted, provided that the request is received by the fund company no later than the cut-off time specified and in accordance with the conditions stated in the fund prospectus. Otherwise, the request will be executed the next bank day.

Redemption requests may be withdrawn only if the fund company consents.

Subscriptions and redemptions are transacted at a NAV per unit that is unknown when the request is submitted.

Unit Class B

In addition to the foregoing regarding subscriptions and redemptions of fund units, there is a minimum initial investment for unit class B of SEK 100 million. Subsequent investments may be made in any amount.

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary events have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of all unitholders. The same applies if all or part of the fund's assets cannot be valued because the markets in which the fund invests are closed.

§ 11 Charges and Fees

Unit Classes A and B

The management fee shall be paid to the fund company from the fund's assets.

A management fee is charged for unit class A at a fixed rate not exceeding 0.5% of the total NAV for unit class A per year.

A management fee is charged for unit class B at a fixed rate not exceeding 0.08% per year.

The management fee is calculated daily and is paid to the fund company monthly in arrears. The fixed management fee includes payments to the depositary for storage of the financial instruments included in the fund, payments to the fund company's auditors and payments to Finansinspektionen for its supervisory activities.

Other Costs and Fees

Brokerage and other costs attributable to purchases and sales of financial instruments are also paid from fund assets.

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund's annual and half-yearly reports shall be available at the fund company within four and two months, respectively, after the end of the reporting period.

If the fund company decides to amend these fund rules, the decision shall be submitted to Finansinspektionen for approval. The decision shall be made available at the fund company and the depositary and shall be announced in the manner instructed by Finansinspektionen.

The amendments shall take legal force in conjunction with the announcement or at the later date specified in the announcement. The amendments shall apply to all unitholders.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

§ 15 Pledges and Transfers

The fund company must be notified in writing of pledges of fund units. The notification shall state the identity of the unitholder, the identity of the pledge holder, the scope of the pledge and any restrictions to the pledge. The notification shall be signed by the pledging party.

The fund company shall record the pledge in the unitholder register and inform the unitholder of the registration. Information about the pledge shall be removed from the register after notification from the pledge holder.

The fund company is entitled to charge a fee for the cost incurred due to the pledge, which shall not exceed SEK 500 per pledge.

§ 16 Limitation of Liability

Neither the fund company nor the depositary shall be liable for loss arising because of Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances, such as data or telecommunications failures. The reservation in respect of strike, blockade, boycott and lockout shall apply notwithstanding whether the fund manager initiates or is the target of such labour action.

Neither the fund company nor the depositary will pay compensation for losses arising in other cases if the fund company or depositary has acted with customary prudence. Neither the fund company nor the depositary shall be liable for indirect loss under any circumstances.

That said above in this paragraph does not limit the rights of unitholders to damages in accordance with the UCITS Act Ch 2, 21 or Ch 3, §§ 14-16.

§ 17 Restriction of Sales Rights, etc

The circumstance that the fund is intended for the general public does not mean that it is intended for such investors whose purchases of units in the fund or participation in the fund otherwise contravenes the provisions of Swedish or foreign law or regulation. Nor is the fund intended for those investors whose purchase or holding of units in the fund means that the fund or the fund company becomes required to take registration measures or other measures that the fund or the fund company would otherwise not be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund management company may redeem a unitholder’s units in the fund – notwithstanding the objection of the unitholder – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of provisions of Swedish or foreign law, ordinance, regulation or decision by governmental authority, or that the fund company is required to take a registration measure or other measures for the fund or the fund company due to a unitholder’s sales or holdings of fund units that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE BEAR

INVESTMENT STRATEGY

The fund’s objective is to generate daily return corresponding to 90% of the daily inverse change of the Nasdaq OMX Stockholm 30 ESG Responsible Gross Index (“the index”). * This means that if the index rises by 1%, the net asset value of the fund (NAV) will decrease by 0.9% and if the index falls by 1%, NAV will increase by 0.9%.

The fund aims for negative exposure against the index on a daily basis that corresponds to 90% of NAV through holdings in, primarily, bonds, money market instruments, derivative instruments and deposits to accounts with credit institutions. The fund’s holdings shall be adjusted if the fund’s exposure against the index, in relation to NAV, deviates from -90% by more than 10 basis points.

The fund’s assets are invested mainly in interest-related transferable securities and money market instruments (issued by companies, states and governmental authorities and organisations with or without official ratings), derivative instruments, fund units and accounts with credit institutions.

A maximum of 10% of fund assets may be invested in units in other funds.

* The benchmark index was changed in 2022 to the OMX Stockholm 30 ESG Responsible Gross Index. Until 17 May, the benchmark was the OMX Stockholm 30 Gross Index.

INTENDED INVESTOR

The fund is suitable for the investor who believes that the Swedish stock market will have a negative development and who is aware that there is a high risk of decline in share value. Since the Swedish stock market tends to rise over time, an investment in the fund should be short-term. The fund is suitable for an investor who plans to keep the investment for a maximum of one month. The fund’s daily negative leverage means that strong stock market fluctuations will have a negative impact on the fund’s share value. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has no unit classes. The base currency of the fund is SEK and the fund does not pay dividends.

RISK PROFILE

The fund’s NAV can vary widely due to the composition of the fund and the management methods used by the fund.

The risk profile of the fund consists mainly of the following risks:

Counterparty risk: The risk that an issuer of a security will fail to perform its payment obligations in full. Arises if a counterparty does not satisfy its debts to the fund, for example by failing to pay a determined amount or failing to deliver securities as agreed.

Liquidity risk: Low liquidity that can make it difficult or impossible to buy or sell a security within a reasonable time and the price may be lower or higher than expected. Liquidity risk in the fund is associated primarily with equities included in the OMX Stockholm 30 ESG Responsible Gross Index.

Operational risk: The risk of loss due to system error, human error or external events.

Market risk: The risk of loss due to changes in the market value of positions held in the fund. Investments in equity funds are characterised by high risk because the value can vary widely over time.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

CARNEGIE BEAR SUSTAINABILITY DISCLOSURES

Product name: Carnegie Bear
Legal entity identifier: 549300CXBFWPJH0VHL46

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.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

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.

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes environmental and social characteristics by raising capital and creating financing for issuers that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally (E) and socially (S) sustainable future. The fund promotes environmental and social characteristics from two angles:

1. The fund also promotes higher standards and good practices of general performance in E and S by issuers through
   - careful analysis of every holding from an ESG perspective prior to investing
   - excluding issuers do not meet the standards
   - influencing holdings in the right direction as regards E and S.

2. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

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

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in credits issued by issuers for which at least 25% of turnover contributes to one or more SDG, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds.
3. Share of fund assets invested in credits issued by issuers whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in credits issued by issuers with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Number of advocacy dialogues held with investee issuers.
6. Share of fund assets invested in credits issued by issuers that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The fund does not commit to a minimum share of sustainable investments.

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.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

The fund does not commit to making sustainable investments.

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

The fund does not commit to making sustainable investments.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder ascertains that all investments consider principle adverse impacts. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

7. Emissions Scope 1, 2, 3
8. Carbon footprint (CO2/Enterprise Value)
9. Carbon intensity
10. Exposure to fossil fuels
11. Share non-renewable energy
12. Energy intensity for companies in high impact climate sectors
13. Activities with adverse impact on biodiversity-sensitive areas
14. Discharges to water
15. Hazardous waste ratio
16. Share of investments that violate international norms and standards (e.g. UNGC)
17. Share of investments that lack policies to monitor compliance with international norms and standards
18. Unadjusted gender pay gap
19. Board gender diversity
20. Exposure to companies involved in controversial weapons
21. Investments in companies that do not have carbon emission reduction initiatives
22. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement.

1. Significant ESG-related risks and opportunities are assessed when a new holding is being considered for the fund. Sustainable alternatives are preferred and the issuers' ESG programmes are assessed using internal research, as well as public lists and ratings.
2. Negative screening: The fund does not invest in instruments issued by companies involved in the products and services listed below. A maximum of 5% of turnover in the company in which the investment is may be derived from operations attributable to the specified product or service.
   - *Cluster bombs and landmines: 0%*
   - *Chemical and biological weapons: 0%*
   - *Nuclear weapons: 0%*
   - *Weapons and/or munitions: Production: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
   - *Alcohol: Production: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
   - *Tobacco: Production: 0% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
   - *Commercial gambling operations: Production: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
   - *Pornography: Production: 0% of turnover. Distribution: 5% of turnover. Services: 5% of turnover.*
   - *Fossil fuels (oil, gas, coal): Production/extraction: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
   - *Cannabis: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
3. Advocacy/engagement: The fund company exerts its influence over companies concerning ESG-related matters. All bond holdings are continuously monitored. Formal shareholder engagement processes are initiated with companies that do not meet the fund company's expectations (see "international norms" above). Advocacy dialogues may also take place prior to a possible investment, often with a view to increasing transparency regarding ESG-related matters. ESG-related advocacy dialogues are documented and reported annually.

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

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 following binding elements of the investment strategy are used:

1. An ESG analysis has been performed in our internal analysis tool for all issuers in whose credits the fund has invested.
2. The fund excludes issuers in accordance with the fund company's policy.
3. By 2040, 100% of the fund's assets under management invested in credits shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
   - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
   - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
     Read more about the analysis tool here.
2. Negative screening. Carnegie Fonder does not invest in credits issued by issuers that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all holdings is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

   - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
   - The fund manager contacts the holding to discuss our concerns.
   - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
   - If the holding's response is unsatisfactory, the holding is sold.

   Read the Carnegie Fonder Policy for Responsible Investment and Shareholder Engagement here.

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

What is the asset allocation planned for this financial product?

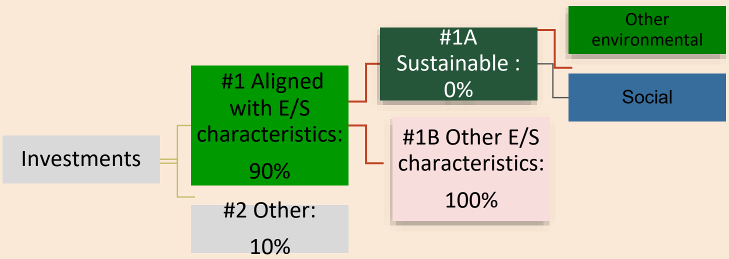
Asset allocation describes the share of investments in specific assets.

#1 All investments including cash in the fund promote environmental or social characteristics (approx. 90%).

#1A. The fund does not commit to making sustainable investments. Hence, 0% of these investments have environmental or social objectives.

1B. The remaining share of 100% covers investments that are aligned with environmental or social characteristics but do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (approx. 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2 Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund's use of derivatives promotes environmental and social characteristics in that they relate to the OMX Stockholm 30 ESG Responsible Index. The use of derivatives thus satisfies the fund's ESG requirements.

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.

In order to meet the EU taxonomy, the criteria for fossil gas include emission limitations and transition to renewable energy or low-carbon fuels by the end of 2035 at the latest. Regarding **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimums share expected to be invested in accordance with EU Taxonomy. Thus, the minimum share is 0%.

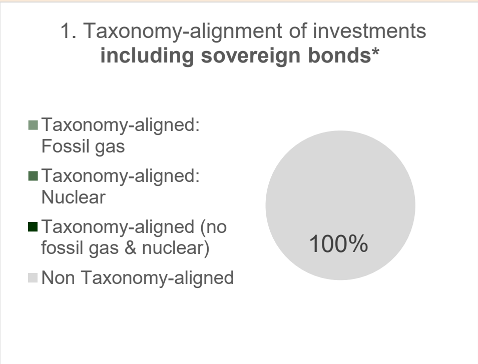
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

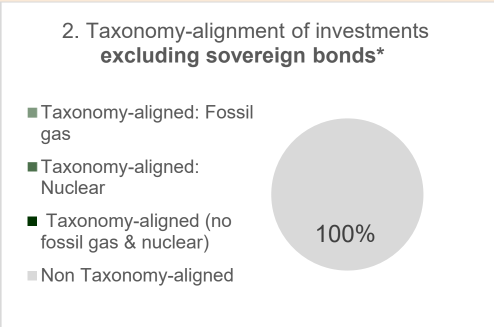
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

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

The minimum share expected to be invested in accordance with EU Taxonomy is thus 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

VISITING ADDRESS Regeringsgatan 56 Stockholm, Sweden

POSTAL ADDRESS Box 7828 SE-103 97 Stockholm

WEBSITE carnegiefonder.se

E-MAIL spara@carnegiefonder.se

TELEPHONE +46 8 12 15 50 00

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund does not commit to a minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy.

What is the minimum share of socially sustainable investments?

The fund does not commit to a minimum share of socially sustainable investments.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund has a short exposure to the OMX Stockholm 30 ESG Responsible index, an equity index comprising the most frequently traded equities on Nasdaq Stockholm that satisfy the index's ESG requirements. The fund's benchmark index takes into account the same environmental and social characteristics that are promoted by the fund. The method used to calculate the index is available on the Nasdaq OMX website. However, the index is not used as a reference benchmark to determine whether the fund promotes environmental and/or social characteristics.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-bear-2/

CARNEGIE BEAR FUND RULES

§ 1 Name and Legal Position

Carnegie Bear, hereinafter “the fund”, is a UCITS fund as defined in the Swedish UCITS Act (2004:46).

The fund is intended for the general public (natural and legal persons). Fund assets are owned jointly by the unitholders and each fund unit confers an equal right to the property included in the fund. The fund cannot acquire rights or assume obligations. Nor can the fund institute legal proceedings before a court of law or other public authority. Property included in the fund is not subject to seizure.

The fund manager specified in § 2 represents unitholders in matters concerning the fund, takes decisions concerning the property included in the fund and exercises the rights derived from the property.

The fund is managed in accordance with these fund rules, the articles of association of the fund company, the UCITS Act and other applicable statutes.

§ 2 Fund Manager

The fund is managed by Carnegie Fonder AB (CRN 556266-6049), hereinafter referred to as the “fund company”.

§ 3 Depositary and its Function

The depositary for the fund’s assets is Skandinaviska Enskilda Banken AB (publ) (CRN 502032-9081) hereinafter referred to as “the depositary”.

The duties of the depositary include implementing the fund company’s instructions regarding the fund provided that the instructions do not contravene the provisions of the UCITS Act or these fund rules. The depositary shall further receive, verify and retain the property included in the fund, monitor the fund’s cash flows and ensure that:

- Subscriptions and redemptions of fund units comply with the provisions of the UCITS Act and these fund rules.
- NAV per unit is calculated in accordance with the UCITS Act and these fund rules.
- Payments for transactions related to the fund’s assets are paid into the fund without delay.
- The fund’s income is used in compliance with the provisions of the UCITS Act and these fund rules.

§ 4 Fund Characteristics

The fund’s objective is to generate daily return corresponding to 90% of the daily inverse change of the OMX Stockholm 30 ESG Responsible Gross Index (“the index”). This means that if the index rises by 1%, the net asset value of the fund (NAV) will decrease by 0.9% and if the index falls by 1%, NAV will increase by 0.9%.

§ 5 Investment Strategy

The fund’s assets may be invested in the following asset classes:

- Transferable securities
- Money market instruments
- Derivative instruments
- Fund units
- Accounts with credit institutions

A maximum of 10% of fund assets may be invested in units in other funds or UCITS management companies.

The fund aims for negative exposure against the index on a daily basis that corresponds to 90% of NAV through holdings in, primarily, bonds, money market instruments, derivative instruments and deposits to accounts with credit institutions. The fund's holdings shall be adjusted if the fund's exposure against the index, in relation to NAV, deviates from -90% by more than 10 basis points.

The deviation from the target exposure against index may be greater than 10 basis points during a limited period of time. This can occur if there are large inflows to or outflows from the fund or in connection with extraordinary events.

Underlying assets to derivative instruments included in the fund shall consist of or be related to assets as referred to in the UCITS Act Ch 5, § 12, paragraph 1.

§ 6 Exchanges and Marketplaces

The fund's assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading is also permitted on a multilateral trading facility (MTF) or other markets within or outside the EEA that are regulated and open to the public.

§ 7 Special Investment Strategy

- The fund may invest assets in such transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5.
- The fund may use derivative instruments as an aspect of its investment strategy.
- The Fund may also use such derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2 (OTC derivatives).
- The fund may use techniques and instruments referred to in Finansinspektionen's Regulations regarding Swedish UCITS (FFFS 2013:9) Ch 25, § 21 to generate leverage in the Fund.
- In accordance with the UCITS Act Ch 5, § 8, the fund is permitted to invest more than 35% of fund assets in bonds and other debt instruments issued or guaranteed by a state within the EEA, a municipality, state or municipal authority in a country within the EEA or issued by an international organisation in which one or more EEA states are members. The debt instruments must, however, have been issued by at least six different issuers and instruments issued in a single issue may not exceed 30% of the fund's NAV.

§ 8 Valuation

The fund's net asset value (NAV) is calculated by deducting liabilities related to the fund, including accrued costs and taxes, from its assets. NAV per unit corresponds to the fund's NAV divided by the number of outstanding units.

Fund assets are valued at current market value. Valuation takes place daily at the last price paid or, if such is unavailable, the latest bid price and if this is not quoted, the latest ask price.

The bid or ask price is normally used to determine the value of non-market listed transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5.

If the fund company deems the valuation methods mentioned above to be misleading, the market value will set based on a special valuation determined on an objective basis.

The special valuation is based on the factors that may include market prices from:

- An unregulated market
- An independent broker
- Other external, independent sources

- Another listed financial instrument
- An index or corporate event that affects the market value

The market value of OTC derivatives as referred to in the UCITS Act Ch 5, § 12 paragraph 2 shall be determined as follows:

- Market price quoted on an active market.
- If a market price cannot be obtained, OTC derivatives shall be valued using valuation models such as Black & Scholes and Black 76.

§ 9 Subscriptions and Redemptions

The subscription price of fund units sold by the fund company (unitholder purchases) corresponds to NAV per unit on the bank day when the subscription is executed.

The redemption price of fund units redeemed by the fund company (unitholder sales) corresponds to NAV per unit on the bank day when the redemption is executed.

Subscriptions and redemptions of fund units can be carried out on all bank days through the fund company. Subscription and redemption prices can be obtained from the fund company. Prices are also published in daily newspapers or comparable media. The price on a specific bank day is normally published in the evening of the same bank day.

Requests for subscription for fund units (unitholder purchases) shall be made in writing by fax or, upon separate agreement, via electronic media.

Requests for redemption (unitholder sales) of fund units shall be made in writing by fax or, upon separate agreement, via electronic media.

Requests submitted in writing by fax shall be signed by the unitholder.

Requests are executed on the same day they are submitted, provided that the request has been received by the fund company before the cut-off time and in accordance with the terms and conditions stated in the fund prospectus. Otherwise, the request will be executed on the next bank day.

Requests for redemption may be withdrawn only if the fund company consents.

Subscriptions and redemptions are executed at a NAV per unit that is unknown when the request is submitted.

The fund may be closed for subscriptions and redemptions if all or part of the fund’s assets cannot be valued because the markets in which the fund invests are closed.

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary events have occurred that prevent valuation of the fund’s assets in a manner that assures the equal rights of all unitholders.

§ 11 Charges and Fees

Subscription and Redemption Fees

Upon subscriptions and redemptions of fund units, the fund company is entitled to charge a fee not exceeding 0.05% of the amount deposited or withdrawn. The purpose of the fee is to protect fund unitholders and the entire fee accrues to the fund.

VISITING ADDRESS Regeringsgatan 56 Stockholm, Sweden
POSTAL ADDRESS Box 7828 SE-103 97 Stockholm
WEBSITE carnegiefonder.se
E-MAIL spara@carnegiefonder.se
TELEPHONE +46 8 12 15 50 00

Management Fee

Payments shall be made from fund assets to compensate the fund company for managing the fund. The fee includes the costs of custody, supervision and audit services. The management fee is calculated daily and shall not exceed 0.95% of the fund's NAV per year. The fee is paid to the fund company monthly in arrears.

Other Costs and Fees

Brokerage and other costs arising from purchases and sales of financial instruments are charged to the fund.

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund company shall prepare a half-yearly report for the fund within two months of the end of the half-yearly reporting period and an annual report within four months of the end of the annual reporting period. The annual report and the half-yearly report shall be made available for inspection by unitholders at the fund company and the depositary and shall be provided free of charge to unitholders who have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall be subject to the approval of Finansinspektionen. After the amendment has been approved, the decision applicable to the amended fund rules must be published by making it available for inspection at the fund company and the depositary and must be announced in the manner instructed by Finansinspektionen.

The amendments shall take legal force in conjunction with the announcement or at the later date specified in the announcement. The amendments shall apply to all unitholders.

§ 15 Pledges and Transfers

Pledges of fund units shall be notified in writing to the fund company. The notification shall state the identity of the unitholder (the creditor) and the pledge holder, the fund units covered by the pledge and any restrictions on the scope of the pledge. The notification shall be signed by the pledging party.

- The unitholder will be notified in writing that the fund company has recorded a pledge in the unitholder register.
- The pledge will expire when the pledge holder has notified the fund company in writing thereto, whereupon the fund company will remove the record of the pledge from the register.
- Unitholders who wish to transfer their fund units to another person shall notify the fund company thereto.
- The fund company is entitled to charge the unitholder a fee not exceeding SEK 500 for administering a pledge and/or transfer.

§ 16 Limitation of Liability

Every unitholder should have studied the risks associated with the financial instruments in which the fund invests that are described in Key Investor Information Document (KIID) and the fund prospectus.

The limitations of liability for the fund company listed below also apply to the depositary.

The fund company shall not be liable for loss arising from legal enactment, intervention by a government or governmental authority, act of war, strike, blockade, boycott, lockout or other comparable circumstance, such as data communications or telecommunications failures. The reservation in respect of strike, blockade, boycott and lockout shall apply notwithstanding whether the fund company initiates or is the target of such labour action.

The fund company will not pay compensation for losses arising in other cases if it has acted with customary prudence.

The fund company shall not under any circumstances be liable for indirect loss or loss caused by a custodian bank or other third party that the company has engaged with due care. Nor shall the fund company be held liable for loss incurred by reason of restrictions upon rights of disposal that may be imposed on the fund company.

If the fund company is prevented from taking measures as a consequence of a circumstance set forth in the second paragraph above, these measures may be deferred until the obstacle has ceased to exist. If as a consequence of such a circumstance the fund company is prevented from executing or receiving payment, the fund company shall not be liable to pay penalty interest.

If the depositary or a custodian bank has lost financial instruments held in custody at the depositary or a custodian bank, the depositary shall without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the fund company on the fund’s behalf. The depositary shall not, however, be held liable if the loss of the financial instruments was caused by an external event beyond the reasonable control of the depositary and whose consequences were impossible to avoid even though all reasonable efforts were made to do so, such as losses arising from Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, act of war, strike, blockade, boycott, lockout or comparable circumstance. The reservation in respect of strike, blockade, boycott and lockout will apply notwithstanding whether the depositary initiates or is the target of such a labour action.

That stated above in this clause does not limit the unitholder’s right to damages in accordance with the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The circumstance that the fund is intended for the general public does not mean that it is intended for such investors whose purchases of units in the fund or participation in the fund otherwise contravenes the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose purchase or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company may redeem a unitholder’s units in the fund – notwithstanding the objections of the unitholder – if it becomes apparent that the unitholder has subscribed for shares in the fund in contravention of the provisions of Swedish or foreign law, ordinance, regulation or official decision, or that the fund company has by reason of a unitholder’s sale of units or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

CARNEGIE BULL

INVESTMENT STRATEGY

The fund is an index fund as defined in the Swedish UCITS Act Ch 5, § 7. The fund's objective is to generate daily return corresponding to 150% of the daily change of the OMX Stockholm 30 ESG Responsible Gross Index ("the index"). *

The objective means that if the index rises by 1%, the net asset value of the fund (NAV) will increase by 1.5% and if the index falls by 1%, NAV will decrease by 1.5%.

The fund buys equities and uses exchange-traded index futures to create exposure geared against the OMX Stockholm 30 ESG Responsible Gross Index. The fund's holdings are adjusted if the exposure against the index deviates from 150% of NAV by more than 5 basis points.

The fund may invest its assets mainly in equity-related transferable securities, derivative instruments, fund units and deposits to accounts with credit institutions. A maximum of 10% of fund assets may be invested in units in other funds.

* The benchmark index was changed in 2022 OMX Stockholm 30 ESG Responsible Gross Index. Until 17 May, the benchmark was the OMX Stockholm 30 Gross Index.

INTENDED INVESTOR

The fund is suitable for the investor who believes that the Swedish stock market will have a strong development and who is aware of the risk of decline in the share value is high. The fund is suitable for an investor who plans to keep the investment in at least five years. The fund's daily leverage means that strong stock market fluctuations will have a negative impact on the fund's share value. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has no unit classes. The base currency of the fund is SEK and the fund does not pay dividends.

RISK PROFILE

The fund's NAV can vary widely due to the composition of the fund and the management methods used by the fund.

The risk profile of the fund consists mainly of the following risks:

Counterparty risk: The risk that an issuer of a security fails to perform its payment obligations in full. Arises if a counterparty does not satisfy its debts to the fund, for example by failing to pay a determined amount or failing to deliver securities as agreed.

Liquidity risk: Low liquidity that can make it difficult or impossible to buy or sell a security within a reasonable time and the price may be lower or higher than expected. Liquidity risk in the fund is associated primarily with equities included in the OMX Stockholm 30 ESG Responsible Gross Index.

Operational risk: The risk of loss due to system error, human error or external events.

Market risk: The risk of loss due to changes in the market value of positions held in the fund. Investments in equity funds are characterised by high risk because the value can vary widely over time.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund's entire portfolio. The use of ESG criteria can affect the fund's investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

CARNEGIE BULL SUSTAINABILITY DISCLOSURES

Product name: Carnegie Bull
Legal entity identifier: 549300TBX8S2WHK7OG57

Environmental and/or social characteristics

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.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	☐ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of _50_% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☐ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☒ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund promotes good governance practices and environmental and social characteristics through its selected index, in which ESG requirements are defined and ESG risks are taken into account. The fund excludes companies and issuers operating in sectors assessed as having adverse impact on the aforementioned factors, or which are in breach of international norms and conventions. In addition, the fund can promote ESG-related characteristics through active shareholder engagement and advocacy.

The fund is an index fund that provides long exposure to the OMX Stockholm 30 ESG Responsible index, an equity index comprising the most frequently traded equities on Nasdaq Stockholm that satisfy the index's ESG requirements. The fund's benchmark index takes into account the same environmental and social characteristics that are promoted by the fund.

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

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 environmental and social characteristics that are promoted:

1. Share of fund assets invested in companies for which at least 25% of turnover contributes to at least one SDG.
2. Share of fund assets invested in companies whose turnover is aligned with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
3. Share of fund assets invested in companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
4. Share of excluded companies is in accordance with the fund's reference index OMX Stockholm 30 ESG Responsible Index, in relation to OMX Stockholm 30 Index.
5. Number of general meetings at which votes are cast in accordance with the fund company's voting policy.
6. Number of advocacy dialogues held with investee companies.
7. Share of fund assets invested in companies that have committed to having or have already had their climate targets approved by Science Based Target initiative.

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The fund does not commit to a minimum share of sustainable investments.

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.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

The fund does not commit to a minimum share of sustainable investments.

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

The fund does not commit to making sustainable investments.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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,

Carnegie Fonder ascertains that all investments consider principle adverse impacts. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

☐ No

What investment strategy does this financial product follow?

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

The fund is an index fund that follows the OMX Stockholm 30 ESG Responsible Index. The index that the fund follows includes sustainability requirements, which means that companies that do not meet the requirements for responsible investments may not be included in the index.

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement.

1. Significant ESG-related risks and opportunities are assessed when a new holding is being considered for the fund. Sustainable alternatives are preferred and the issuers' ESG programmes are assessed using internal research, as well as public lists and ratings.
2. Negative screening: The fund does not invest in instruments issued by companies involved in the products and services listed below. A maximum of 5% of turnover in the company in which the investment is may be derived from operations attributable to the specified product or service.
    - *Cluster bombs and landmines: 0%*
    - *Chemical and biological weapons: 0%*
    - *Nuclear weapons: 0%*
    - *Weapons and/or munitions: Production: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
    - *Alcohol: Production: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
    - *Tobacco: Production: 0% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
    - *Commercial gambling operations: Production: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
    - *Pornography: Production: 0% of turnover. Distribution: 5% of turnover. Services: 5% of turnover.*
    - *Fossil fuels (oil, gas, coal): Production/extraction: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
    - *Cannabis: 5% of turnover. Distribution: 5% of turnover. Services: 50% of turnover.*
3. Advocacy/engagement: The fund company exerts its influence over companies concerning ESG-related matters. All bond holdings are continuously monitored. Formal shareholder engagement processes are initiated with companies that do not meet the fund company's expectations (see "international norms" above). Advocacy dialogues may also take place prior to a possible investment, often with a view to increasing transparency regarding ESG-related matters. ESG-related advocacy dialogues are documented and reported annually.

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 following binding elements of the investment strategy are used:

1. The fund excludes companies in accordance with Carnegie Fonder's policies.

CARNEGIE FONDER

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

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

The fund promotes good governance practices by choosing an index in which sustainability requirements are defined and sustainability risks are taken into account. By selecting out companies that violate international norms and conventions linked to, for example, tax, workers' rights as well as corruption and bribery, it is ensured that the companies the fund invests in live up to basic requirements in terms of good corporate governance.

What is the asset allocation planned for this financial product?

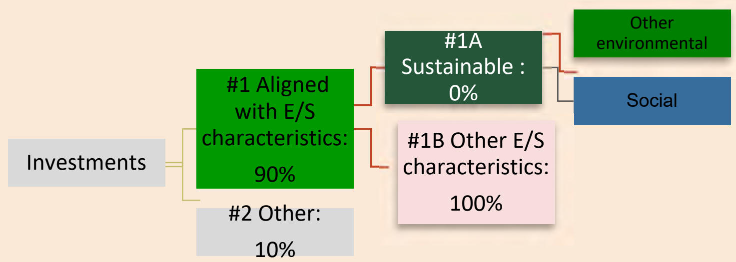
Asset allocation describes the share of investments in specific assets.

#1 All investments including cash in the fund promote environmental or social characteristics (approx. 90%).

#1A. The fund does not commit to a minimum share of sustainable investments. Hence, 0% of the these investments have environmental or social objectives.

1B. The remaining share of 100% covers investments that are aligned with environmental or social characteristics but do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (approx. 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

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.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund's use of derivatives promotes environmental and social characteristics in that they relate to the OMX Stockholm 30 ESG Responsible Index. The use of derivatives thus satisfies the fund's ESG requirements.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

In order to meet the EU taxonomy, the criteria for fossil gas include emission limitations and transition to renewable energy or low-carbon fuels by the end of 2035 at the latest. Regarding **nuclear energy**, the criteria include comprehensive safety and waste management rules.
Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.
Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

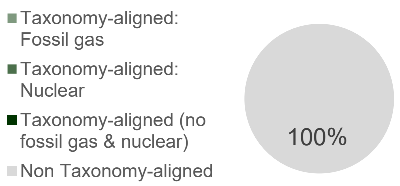
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

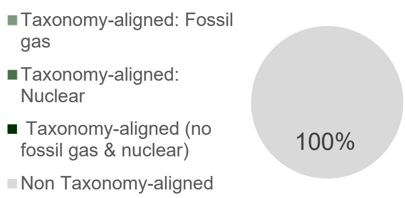
☒ No

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.

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



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



This graph represents 100% of the total investments.

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

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

The fund does not commit to a minimum share of sustainable investments with an environmental objective that is not aligned with the EU Taxonomy.

What is the minimum share of socially sustainable investments?

The fund does not commit to a minimum share of socially sustainable investments.

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

The fund retains a certain portion of total fund assets as cash reserves in order to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund’s custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is in compliance with minimum environmental and social safeguards.

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

The fund has the following index as a reference value: OMX Stockholm 30 ESG Responsible Gross Index.

The fund is an index fund that provides long exposure to the OMX Stockholm 30 ESG Responsible Index, a stock index consisting of the most traded stocks on Nasdaq Stockholm that meet the index's sustainability requirements. The fund's index considers the same environmental and social characteristics that the fund promotes. The method for calculating the index is available on the Nasdaq OMX website.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

  It is continuously monitored that the companies included in the index meet the sustainability requirements set. The composition of the index is checked twice every year and rebalancing takes place if necessary.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

  It is continuously monitored that the fund's investments correspond to the composition of the index. The fund's holdings are adjusted in connection with index rebalancing.

How does the designated index differ from a relevant broad market index?

OMX Stockholm 30 ESG Responsible Index is a stock index that consists of the most traded stocks on Nasdaq Stockholm that meet the index's sustainability requirements. This means that the index consists of fewer shares than the OMX Stockholm 30.

Where can the methodology used for the calculation of the designated index be found?
https://indexes.nasdaqomx.com/Index/Overview/OMXS30ESG

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fonder/carnegie-bull-2/

CARNEGIE BULL FUND RULES

§ 1 Name and Legal Position

Carnegie Bull, hereinafter referred to as “the fund” is a UCITS fund as defined in the Swedish UCITS Act (2004:46).

The fund is intended for the general public (natural and legal persons). Fund assets are owned jointly by the unitholders and each fund unit confers an equal right to the property included in the fund. The fund cannot acquire rights or assume obligations. Nor can the fund institute legal proceedings before a court of law or other public authority. Property included in the fund is not subject to seizure.

The fund manager specified in § 2 represents unitholders in matters concerning the fund, takes decisions concerning the property included in the fund and exercises the rights derived from the property.

The fund is managed in accordance with these fund rules, the articles of association of the fund company, the UCITS Act and other applicable statutes.

§ 2 Fund Manager

The Fund is managed by Carnegie Fonder AB (CRN 556266-6049), hereinafter referred to as the “fund company”.

§ 3 Depositary and its Function

The depositary for the fund’s assets is Skandinaviska Enskilda Banken AB (publ) (CRN 502032-9081) hereinafter referred to as the “depositary”).

The duties of the depositary include implementing the fund company’s instructions regarding the fund, provided that the instructions do not contravene the provisions of the UCITS Act or these fund rules. The depositary shall furthermore receive, verify and retain the property included in the fund and ensure that:

- Subscriptions and redemptions of fund units comply with the provisions of the UCITS Act and these fund rules.
- NAV per unit is calculated in accordance with the UCITS Act and these fund rules.
- Payments for transactions related to the fund’s assets are paid into the fund without delay.
- The fund’s income is used in compliance with the provisions of the UCITS Act and these fund rules.

§ 4 Fund Characteristics

The fund is an index fund as defined in the UCITS Act Ch 5, § 7. The fund’s objective is to generate daily return corresponding to 150% of the daily change of the Swedish OMX Stockholm 30 ESG Responsible Gross Index (“the index”). The objective means that if the index rises by 1%, the net asset value of the fund (NAV) will increase by 1.5% and if the index falls by 1%, NAV will decrease by 1.5%.

§ 5 Investment Strategy

The fund’s assets may be invested in the following asset classes:

- Transferable securities
- Money market instruments
- Derivative instruments
- Fund units
- Accounts with credit institutions

A maximum of 10% of fund assets may be invested in units in other funds or UCITS management companies.

The fund aims for positive exposure against the index on a daily basis that corresponds to 150% of NAV through holdings in, primarily, equities, bonds, money market instruments, derivative instruments and deposits to accounts with credit institutions. The fund’s holdings shall be adjusted if the fund’s exposure against the index, in relation to NAV, deviates from 150% by more than 5 basis points.

The deviation from the target exposure against index may be greater than 5 basis points during a limited period of time. This can occur if there are large inflows to or outflows from the fund or in connection with extraordinary events.

Underlying assets to derivative instruments included in the fund shall consist of or be attributable to assets as referred to in the UCITS Act Ch 5, § 12, paragraph 1.

§ 6 Exchanges and Marketplaces

The fund’s assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading is also permitted on a multilateral trading facility (MTF) or other markets within or outside the EEA that are regulated and open to the public.

§ 7 Special Investment Strategy

- The fund may invest assets in such transferable securities and money market instruments referred to in the UCITS Act Ch 5, § 5.
- The fund may use derivative instruments as an aspect of its investment strategy.
- The Fund may also use such derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2 (OTC derivatives).
- The fund may use techniques and instruments referred to in Finansinspektionen’s Regulations regarding Swedish UCITS (FFFS 2013:9) Ch 25, § 21 to generate leverage in the fund.
- The fund may engage in securities lending.

§ 8 Valuation

The fund’s net asset value (NAV) is calculated by deducting liabilities related to the fund, including accrued costs and taxes, from its assets. NAV per unit corresponds to the fund’s NAV divided by the number of outstanding units.

Fund assets are valued at current market value. Valuation takes place daily at the last price at the last price paid or, if such is unavailable, the latest bid price and if this is not quoted, the latest ask price.

The bid or ask price is normally used to determine the value of non-market listed transferable securities and money market instruments as referred to in the UCITS Act Ch 5, § 5.

If the fund company deems the valuation methods mentioned above to be misleading, the market value will set based on a special valuation determined on an objective basis.

The special valuation is based on the factors that may include, among else, market prices from:

- An unregulated market
- An independent broker
- Other external, independent sources
- Another listed financial instrument
- An index or corporate event that affects the market value

The market value of OTC derivatives as referred to in the UCITS Act Ch 5, § 12 paragraph 2 shall be determined as follows:

- Market price quoted on an active market.
- If a market price cannot be obtained, OTC derivatives shall be valued using valuation models such as Black & Scholes and Black 76.

§ 9 Subscriptions and Redemptions

The subscription price of fund units sold by the fund company (unitholder purchases) corresponds to NAV per unit on the bank day when the subscription is executed.

The redemption price of fund units redeemed by the fund company (unitholder sales) corresponds to NAV per unit on the bank day when the redemption is executed.

Subscriptions and redemptions of fund units can be carried out on all bank days through the fund company. Subscription and redemption prices can be obtained from the fund company. Prices are also published in daily newspapers or comparable media. The price on a specific bank day is normally published in the evening of the same bank day.

Requests for subscription for fund units (unitholder purchases) shall be made in writing by fax or, upon separate agreement, via electronic media.

Requests for redemption (unitholder sales) of fund units shall be made in writing by fax or, upon separate agreement, via electronic media.

Requests submitted in writing by fax shall be signed by the unitholder.

Requests are executed on the same day they are submitted, provided that the request has been received by the fund company before the cut-off time and in accordance with the terms and conditions stated in the fund prospectus. Otherwise, the request will be executed on the next bank day.

Requests for redemption may be withdrawn only if the fund company consents.

Subscriptions and redemptions are executed at a NAV per unit that is unknown when the request is submitted.

The fund may be closed for sales and redemptions if all or part of the fund's assets cannot be valued because the markets in which the fund invests are closed.

§ 10 Extraordinary Circumstances

The fund may be closed for subscriptions and redemptions if such extraordinary events have occurred that prevent valuation of the fund's assets in a manner that assures the equal rights of all unitholders.

§ 11 Charges and Fees

Subscription and Redemption Fees

Upon subscriptions and redemptions of fund units, the fund company is entitled to charge a fee not exceeding 0.05% of the amount deposited or withdrawn. The purpose of the fee is to protect fund unitholders and the entire fee accrues to the fund.

Management Fee

The management fee charged by the fund company shall be paid from the fund's assets. The fee includes the costs of custody, supervision and audit services. The management fee is calculated daily and shall not exceed 0.95% of the fund's NAV per year. The fee is paid to the fund company monthly in arrears.

Other Costs and Fees

Brokerage and other costs arising from purchases and sales of financial instruments are charged to the fund.

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund company shall prepare a half-yearly report for the fund within two months of the end of the half-yearly reporting period and an annual report within four months of the end of the annual reporting period. The annual report and the half-yearly report shall be made available for inspection by unitholders at the fund company and the depositary and shall be provided free of charge to unitholders who have requested this information.

Any decision by the board of directors of the fund company to amend these fund rules shall be subject to the approval of Finansinspektionen. After the amendment has been approved, the decision applicable to the amended fund rules must be published by making it available for inspection at the fund company and the depositary and must be announced in the manner instructed by Finansinspektionen.

The amendments shall take legal force in conjunction with the announcement or at the later date specified in the announcement. The amendments shall apply to all unitholders.

§ 15 Pledges and Transfers

Pledges of fund units shall be notified in writing to the fund company. The notification shall state the identity of the unitholder (the creditor) and the pledge holder, the fund units covered by the pledge and any restrictions on the scope of the pledge. The notification shall be signed by the pledging party.

- The unitholder shall be notified in writing that the fund company has recorded the pledge in the unitholder register.
- The pledge will expire when the pledge holder has notified the fund company in writing thereto, whereupon the fund company will remove the record of the pledge from the register.
- Unitholders who wish to transfer their fund units to another person shall notify the fund company thereto.
- The fund company is entitled to charge the unitholder a fee not exceeding SEK 500 for administering a pledge and/or transfer.

§ 16 Limitation of Liability

Every unitholder should have studied the risks associated with the financial instruments in which the fund invests that are described in Key Investor Information Document (KIID) and the fund prospectus.

The limitations of liability for the fund company listed below also apply to the depositary.

The fund company shall not be liable for loss arising from legal enactment, intervention by a government or governmental authority, act of war, strike, blockade, boycott, lockout or other comparable circumstance, such as data communications or telecommunications failures. The reservation in respect of strike, blockade, boycott and lockout shall apply notwithstanding whether the fund company initiates or is the target of such a labour action.

The fund company will not pay compensation for losses arising in other cases if it has acted with customary prudence.

The fund company shall not under any circumstances be liable for indirect loss or loss caused by a custodian bank or other third party that the company has engaged with due care. Nor shall the fund company be liable for loss incurred by reason of restrictions upon rights of disposal that may be imposed on the fund company.

If the fund company is prevented from taking measures as a consequence of a circumstance set forth in the second paragraph above, these measures may be deferred until the obstacle has ceased to exist. If as a consequence of such a circumstance the fund company is prevented from executing or receiving payment, the fund company shall not be liable to pay penalty interest.

If the depositary or a custodian bank has lost financial instruments held in custody at the depositary or a custodian bank, the depositary shall without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the fund company on the fund's behalf. The depositary shall not, however, be held liable if the loss of the financial instruments was caused by an external event beyond the reasonable control of the depositary and whose consequences were impossible to avoid even though all reasonable efforts were made to do so, such as losses arising from Swedish or foreign legal enactment, intervention by Swedish or foreign governmental authorities, act of war, strike, blockade, boycott, lockout or comparable circumstance. The reservation in respect of strike, blockade, boycott and lockout will apply notwithstanding whether the depositary initiates or is the target of such a labour action.

That stated above in this subsection does not limit the unitholder's right to damages in accordance with the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The circumstance that the fund is intended for the general public does not mean that it is intended for such investors whose purchases of units in the fund or participation in the fund otherwise contravenes the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose purchases or holdings of units in the fund would require the fund or the fund company to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse subscriptions from such investors referred to above in this paragraph.

The fund company may redeem a unitholder's units in the fund – notwithstanding the objections of the unitholder – if it becomes apparent that the unitholder has subscribed for shares in the fund in contravention of the provisions of Swedish or foreign law, ordinance, regulation or official decision or that the fund company has by reason of a unitholder's sale of units or holdings in the fund become required to take registration measures or other measures for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

CARNEGIE GLOBAL PLUS

INVESTMENT STRATEGY

The fund is an equity fund with the objective to create exposure to global shares with a geographical and industry diversification. The fund utilizes leverage to increase exposure beyond its net asset value. The fund's objective is to generate a performance higher than the global stock market's performance.

The fund's performance is benchmarked to MSCI World Climate Paris Aligned Index. The fund is actively managed. Therefore, the performance may deviate from this index over time.

The fund's base currency is the US dollar.

The fund's assets may be invested in the following:

- Transferable securities
- Money market instruments
- Fund units
- Derivative instruments related to underlying assets according to Chapter 5, Section 12, point 1 of the Swedish UCITS Act (2004:46)
- Accounts with credit institutions

The fund's objective is to generate an exposure corresponding to 140% of the global stock market through investments in stocks and other equity-related financial instruments. Equity-related investments may be combined with other placements, such as bonds, money market instruments, fixed-income funds, and placements in accounts with credit institutions.

The fund may use futures and other derivative instruments to achieve the intended exposure to the stock market. The underlying exposed value resulting from these derivative instruments may exceed the fund's net asset value. This is subject to the condition that the fund simultaneously holds treasury bills with a market value at least equal to the portion of the underlying exposed value that exceeds the fund's net asset value. These treasury bills should be denominated in Swedish kronor, US dollars, or euros and have a remaining maturity of up to three months.

Both market volatility as well as investor transactions may cause changes in the fund's equity exposure. The fund's holdings should be adjusted if the equity exposure, measured in relation to the fund's net asset value, deviates by more than 5 percentage points from 140 percent.

The fund may use futures and other derivative instruments to convert currency exposure from transferable securities to US dollars.

The fund's investments in fund units may amount to a maximum of 10 percent of the fund's net asset value.

The fund is authorized in accordance with Chapter 5, Section 8 of the Swedish UCITS Act (2004:46) to invest more than 35% of its assets in bonds and other debt securities issued or guaranteed by a state, municipality, or state or municipal authority in an EEA country or by any intergovernmental organization of which one or more EEA states are members.

INTENDED INVESTOR

The fund is suitable for the investor who believes that the global stock market will have a strong development over time and who is aware that there is a high risk of decline in share value. The fund is suitable for an investor who plans to keep the investment in at least five years. The fund's leverage means that strong stock market fluctuations will have a negative impact on the fund's share value. No special knowledge or experience in investment funds or financial markets is required to invest in the fund.

UNIT CLASSES

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Distribution
- C – SEK, Accumulation, Institutional (min. SEK 3,000,000)
- D – NOK, Accumulation
- E – NOK, Accumulation, Distribution
- F – NOK, Accumulation, Institutional (min. NOK 3,000,000)
- G – USD, Accumulation, US

RISK PROFILE

The fund's objective is to generate a performance higher than the global stock market's performance over time. During normal market conditions, the fund's exposure to the global market is 140% of the fund's net asset value. The objective means that if the global stock market increases by 1%, the net asset value of the fund will increase by 1.4%. If the global stock market falls by 1%, the net asset value of the fund will decrease by 1.4%.

Investments with exposure to global equities can be combined with placements in interest-related financial instruments with the aim of the fund achieving the intended return and risk profile.

The fund's ability to generate the intended market exposure may be reduced at times, for example, due to high market volatility or due to investor transactions with high impact of the net asset value of the fund. During these periods, the fund may be prevented from achieving the stated objective.

The fund uses derivative instruments, and these may carry risk that have a greater impact on the fund than if the underlying investment instrument had been purchased directly.

Leverage risks are the risk caused by the fund's exposure exceeding the fund's net asset value. The additional exposure, or "leverage", that futures or other derivative instruments provide, increases the risk. Thereby, there is the possibility of higher returns than would otherwise be possible in the fund. At the same time, the use of financial leverage can lead to a potential negative return being greater.

The fund' investment strategy may give rise to market risks, defined as the risk of a loss due to changes in the market value of positions in the fund. Investments in equity funds are characterized by high risk because the value can vary greatly over time.

The fund may suffer a loss due to counterparty risks, which is the risk that an issuer of a security does not fully meet its payment commitments or that a counterparty does not fulfil its obligations, for example, by not delivering securities according to agreement.

The fund's investment strategy may also give rise to liquidity risks, defined as the risk that a position in the fund cannot be sold, redeemed, or closed at a limited cost within a reasonable time. The investment strategy may also give rise to operational risks, defined as the risk of loss due to system errors, human errors, or external events.

Sustainability risks are managed through ESG analysis of all investments. Investments are either selected or excluded in this process. Carnegie Fonder also manages sustainability risks through shareholder engagement and advocacy dialogues. Investments in the fund may be subject to downturns in value due to sustainability risks. Sustainability risks can lead to fines, lower demand for an investee company's products or services, disruptions in the supply chain, higher operating costs, inability to acquire further capital or reputational damage.

A sustainability-related event could affect an individual investment or could have wider impact on an economic sector, a geographical or political region, or a country, which could have impact on the fund’s entire portfolio. The use of ESG criteria can affect the fund’s investment results and, as such, the investment may work differently than similar funds that do not apply such criteria. According to the sustainability policy, the fund is barred from investing in certain sectors and companies based on the ESG screening performed by Carnegie Fonder. This could mean that the fund is more sensitive to certain market movements than are other funds. The ESG-based exclusion criteria applied could lead to the fund refraining from opportunities to make certain investments when it might otherwise be advantageous to do so, and/or selling an investment based on ESG characteristics when it might be disadvantageous to do so.

When evaluating an investment based on ESG criteria, Carnegie Fonder is dependent upon information and data that can sometimes be incomplete, inaccurate, or unavailable. Consequently, there is risk that the Carnegie Fonder may inaccurately evaluate an investment. There is also risk that the Carnegie Fonder will not correctly apply all relevant ESG criteria or that the fund could have indirect exposure to companies that do not fulfil the relevant ESG criteria applied by the fund.

FINANCIAL LEVERAGE

The commitment approach is applied as the risk assessment method to calculate the total exposure of the fund.

CLOSURE OF THE FUND FOR SUBSCRIPTIONS

The fund company has the right to decide to close the subscription of new units in order to avoid a situation where the fund’s assets exceeds a size where the fund cannot be managed in a way that is optimal for the fund and existing unitholders. Such a decision presupposes that the fund's assets under management exceed a capital limit set by the fund company. The capital limit set by the fund company currently amounts to thirty (30) billion SEK.

The notice of fund closure will be published on the fund company’s website at least 20 calendar days before implementation, and a notification shall be sent to Finansinspektionen. Subscriptions received by the fund company after the public announcement will not be processed. After the fund has closed, the fund company’s board has the option to decide on what specific banking day the fund will reopen for new subscriptions. The decision will be published at least a month before the subscription date and a notification shall be sent to Finansinspektionen. The fund company may decide a maximum total amount for subscriptions to limit additional assets under management, thereby avoiding significant disadvantage to the other fund unit holders. If a maximum subscription amount is decided, the fund company will provide information about this on its website, along with the principles to be applied in case of oversubscription.

The fund company’s decisions regarding fund closure or reopening will be published on the company’s website, https://www.carnegiefonder.se/en/, in conjunction with the decisions.

CARNEGIE GLOBAL PLUS SUSTAINABILITY DISCLOSURES

Product name: Carnegie Global Plus
Legal entity identifier: 6367009SYS558E2VZW50

Environmental and/or social characteristics

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.

Does this financial product have a sustainable investment objective?

☐ **Yes**	☒ **No**
☐ It will make a minimum of **sustainable investments with an environmental objective:** __%	☒ It **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
☐ in economic activities that qualify as environmentally sustainable under the EU Taxonomy	☐ with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
☐ in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	☒ with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
	☒ with a social objective
☐ It will make a minimum of **sustainable investments with a social objective:** ___%	☐ It promotes E/S characteristics, but **will not make any sustainable investments**

What environmental and/or social characteristics are promoted by this financial product?

The fund generates exposure to a global stock market with geographical and industry diversification. The fund utilizes leverage to generate an exposure greater than the fund's net asset value. The fund invests in derivate instruments with exposure to MSCI World Climate Paris Aligned Index (referred to as the "CPA-index"). The CPA-index is designed for investors aiming to reduce climate-related risks and capitalize on opportunities arising from global carbon emissions reductions. The companies in the CPA-index adhere to the TCFD framework ("Task Force on Climate-Related Financial Disclosures") and the index aims to exceed the miimum criteria for the EU Paris-Aligned Benchmark.

How derivative instruments promote environmental and social characteristics is presented in the sub-question about derivatives (in the section "Asset Allocation").

The fund promotes environmental and social characteristics by raising capital and creating financing for investee companies that meet or exceed Carnegie Fonder's sustainability-related standards and thus contribute to an environmentally and socially sustainable future. The fund promotes environmental and social characteristics from three different angles:

1. The fund's investments promote attainment of the Paris Agreement and UN SDGs ("Sustainable Development Goals") through the investee company's activities.
2. The fund also promotes higher standards and good practices of general performance in environmental and social characteristics by investee companies through:
    - careful analysis of every holding from an ESG perspective prior to investing
    - excluding companies that do not meet the standards
    - influencing investee companies in the right direction as regards to environmental and social characteristics in line with the demands of Carnegie Fonder
3. The fund also promotes high standards of governance through Carnegie Fonder's policies and procedures related to governance.

The fund invests in debt securities issued by states within EEA and the US state, which we consider fulfil our sustainability, social and governance criteria.

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

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

The fund uses the following sustainability indicators to measure the environmental and social characteristics that are promoted:

1. Share of fund assets invested in credits issued by companies for which at least 25% of turnover contributes to UN SDG, excluding green and social bonds.
2. Share of fund assets invested in green and social bonds.
3. Share of fund assets invested in credit issued by companies with a turnover in line with the environmental objectives "climate change mitigation" and "climate change adaptation" in the EU Taxonomy.
4. Share of fund assets invested in credits issued by companies with Adequate, Strong or Very Strong ratings in the fund company's internally developed tool for ESG analysis.
5. Number of advocacy dialogues held with investee companies.
6. Share of fund assets invested in credits issued by companies that have committed to having or have already had their climate targets approved by Science Based Target initiative (SBTi).

What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?

The objective of the fund's sustainable investments is to contribute to sustainable environmental and social development. The fund does this by raising capital and creating financing for companies whose activities offer a solution to the UN SDG.

At Carnegie Fonder, investments are considered sustainable if more than 25% of a company's turnover can be clearly linked to one or more SDG and their sub-goals. Additionally, these investments must not significantly harm the remaining goals and must adhere to good governance standards. Even if an issuer is not classified as sustainable, investments in "Green Bonds" or "Social Bonds" are still categorized as sustainable. We view this as a clear contribution to the United Nations' SDGs.

Examples of contributions to environmental goals include companies involved in renewable energy production, climate-resilient infrastructure, and sustainable materials. Similarly, investments in research-intensive companies focusing on global health issues contribute to social goals.

The fund's investments target solution-oriented companies and those transitioning existing products to be more sustainable.

Through these sustainable investments, our fund also supports the environmental goals outlined in the EU's taxonomy. Investee companies' turnover is linked to one of the 27 selected SDG sub-goals. According to the fund company's categorisation, 16 of these are environmental targets and 11 are social targets. We also map the environmental targets against the goals as expressed in the EU Taxonomy according to the following classification.

How do the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective?

Carnegie Fonder investigates and ascertains that the investments do not cause significant harm to any of the environmental or social objectives from three angles, as is done for all fund investments.

1. Positive screening – All investments are analysed in the fund company's internally developed analysis tool. The tool analyses more than 100 key indicators and data points in the areas of environmental, social and corporate governance factors in order to ascertain that the investments do not cause significant harm to any environmental or social sustainable investment objectives. The analysis and its indicators include consideration of 16 indicators for Principal Adverse Impacts (14 mandatory and 2 voluntary).
2. Negative screening – The fund ensures that the investment complies with minimum social safeguards by excluding economic activities that are deemed according to the Carnegie Fonder Policy for Responsible Investment to cause significant harm to environmental and/or social factors. Third-party screenings are carried out at least twice a year to ensure compliance with the exclusion policy.
3. Advocacy – The fund company influences investee companies to continuously improve their work to promote good development within environmental and social factors and to rectify any incidents that could or have caused harm to these factors.

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

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

Each individual investment is assessed with consideration of that deemed to constitute the possible adverse impact of the investment from the ESG perspective. Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. If the assessment shows that a company's activities and thus the fund's investment in the same would cause significant harm in relation to the fund's environmental or social objectives, the investment in question is excluded.

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

Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights to ensure that an investee company's activities are not in breach of the same. In addition, third-party data is used to continuously monitor the fund's holdings. Any suspected breaches are addressed in accordance with the Carnegie Fonder Policy for Responsible Investment.

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 consider the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not consider 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,

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts on sustainable development. These are positive screening, negative screening and shareholder engagement/advocacy. Specific objectives, tools and strategies are used in the assessment of each indicator. The analysis of the mandatory indicators is dependent upon access to data for the underlying investments. Carnegie Fonder has processes and procedures for identifying, prioritising and managing these. Depending on the outcome of the analysis, strategies are applied for company selection, advocacy dialogues, exclusion and voting at general meetings in accordance with the Carnegie Fonder Sustainability Policy.

A company's principle adverse impacts are assessed in our internal analysis tool. The following indicators are considered:

1. Emissions Scope 1, 2, 3
2. Carbon footprint (CO2/Enterprise Value)
3. Carbon intensity
4. Exposure to fossil fuels
5. Share non-renewable energy
6. Energy intensity for companies in high impact climate sectors
7. Activities with adverse impact on biodiversity-sensitive areas
8. Discharges to water
9. Hazardous waste ratio
10. Share of investments that violate international norms and standards (e.g. UNGC)
11. Share of investments that lack policies to monitor compliance with international norms and standards
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to companies involved in controversial weapons
15. Investments in companies that do not have carbon emission reduction initiatives
16. Insufficient protection of whistleblowers

Read more about how we manage principle adverse impacts here.

Principal adverse impacts are not assessed by Carnegie Fonder concerning the fund's exposure in derivative instruments. The derivative instruments generate exposure to the CPA-index, which includes exclusion criteria and processes to fulfil the Paris Agreement. How derivative instruments promote environmental and social characteristics is presented in the sub-question about derivatives (in the section "Asset Allocation").

No

What investment strategy does this financial product follow?

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

The derivative instrument generates exposure to the CPA-index. How derivative instruments promote environmental and social characteristics is presented in the sub-question about derivatives (in the section "Asset Allocation").

The fund's strategy to promote environmental and social characteristics is based on three components: positive screening, negative screening and engagement.

1. Positive screening: Implemented through investments in bonds where the proceeds are used for sustainable investments as they are classified in the EU Green Bond Standard or Green, Social and Sustainable Bonds in accordance with ICMA Bond Principles. The fund may also invest in bonds linked to clear sustainability targets.

2. Negative screening: Implemented by excluding economic activities deemed to cause significant harm to environmental or social objectives from the fund's investment universe in accordance with the fund company's policy. This is continuously monitored using third-party data.

3. Advocacy: Implemented through the Carnegie Fonder Shareholder Engagement Policy. Carneige Fonder continuously monitor all holdings to make investee issuers aware of potential improvements that we have identified, with a view to increasing or safeguarding the value of issuers and thus the value of the fund's investments. Regarding fixed income funds, engagement takes place primarily through advocacy dialogues. We initiate formal advocacy dialogues with issuers that do not meet our expectations. The fund company also engages in proactive advocacy dialogues aimed at communicating identified improvement measures.

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?

1. The fund places at least 10% of investments in credits issued by companies whose turnover related to the UN SDGs exceeds 25% and in green, social, sustainable and sustainability-linked bonds.
2. An ESG analysis has been performed in our internal analysis tool for all companies in whose credits the fund has invested.
3. The fund excludes companies in accordance with the fund company's policy.
4. By 2040, 100% of the fund's assets under management shall have a climate target approved by Science Based Targets initiative.

What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?

The fund does not commit to a minimum rate of the investments considered prior to the application of the investment strategy.

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

The fund company has a Responsible Investment and Shareholder Engagement Policy, which establishes our expectations and principles of good corporate governance. To ensure that all investments satisfy our requirements, we assess good governance practices from three angles:

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

1. Positive screening. All investments are analysed and scored using the fund company's proprietary analysis tool. The tool includes sections for Governance and Social, which are comprehensively analysed, both qualitatively and quantitatively, under several main topics.
   - "Governance" is the main section in the tool and is analysed under five main topics: Owners, Board, Management, Ethics and Corruption, Culture and Products. Examples of indicators under the main topics are director share ownership, incentive systems for senior management and tax management.
   - "Social" is analysed under three main topics: Health and Safety, Fair and Inclusive Workplace and Supply Chain. Examples of indicators under the main topics are occupational accident history, policies related to working conditions and practical management of employees (such as training, employee turnover, etc.).
     Read more about the analysis tool here.

2. Negative screening. Carnegie Fonder does not invest in credits issued by companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged to show sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises. A systematic review of all portfolio companies is carried out twice a year with an external third party.

3. Advocacy. If Carnegie Fonder receives information about serious violations regarding, for example, ESG issues in a holding, it is especially important to communicate our stance and demands for change. Each case is unique and is evaluated individually. The following are examples of potential escalation that are applied:

   - The fund manager seeks further information and consults with Carnegie Fonder's Sustainability Council.
   - The fund manager contacts the holding to discuss our concerns.
   - The CEO of Carnegie Fonder makes more formal contact with the CEO or chairman of the holding.
   - If the holding's response is unsatisfactory, the holding is sold.

Read the Carnegie Fonder Policy for Responsible Investment and Shareholder Engagement here.

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

What is the asset allocation planned for this financial product?

Asset allocation describes the share of investments in specific assets.

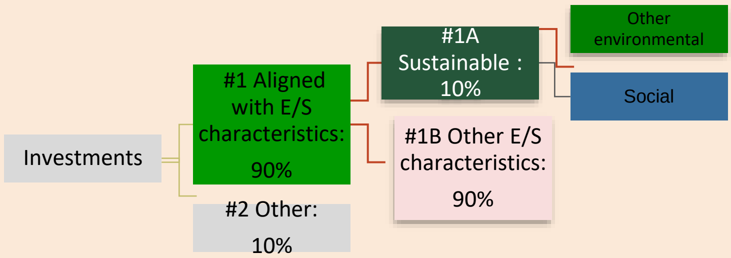
#1 All investments including cash in the fund promote environmental or social characteristics (approx. 90%).

#1A. A minimum share of 10% of these investments have environmental or social objectives:

- Within this 10%, the minimum share of investments that Taxonomy-aligned is currently 0%. There is no planned allocation between "Other environmental" and "Social" but all investments are aligned with at least one of them.

1B. The remaining share of 90% covers investments that are aligned with environmental or social characteristics but do not qualify as sustainable investments.

#2. The fund retains a certain portion of total fund assets as cash reserves to meet flows to and from fund unitholders on an ongoing basis. This share is not used to attain environmental or social characteristics (approx. 10%).



#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

#2Other includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:
- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

The fund's use of derivatives promotes environmental and social characteristics in that they generate exposure to the CPA-index. The sustainability criteria of the CPA-index satisfy the fund's promotion of environmental and social characteristics.

<u>Exclusion</u>
Through the selection of derivate instrument with exposure to the CPA-index derivate instrument with exposure to underlying securities with operations in sectors deemed to have a negative environmental or social impact, or that violate international norms and conventions, are excluded.

- Environmental characteristics, as emission reduction and compliance with the Paris Agreement are promoted through:
  - Exclusion of issuers within the industries coal, oil & gas and Power generation
  - Exclusion of issuers with severe or many controversies regarding environmental damage
  - Exclusion of issuers with severe ESG controversies.
- Social characteristics, as the promotion of international norms and conventions, are promoted through:
  - Exclusion of industries such as Controversial Weapons and tobacco
  - Exclusion of issuers with severe ESG controversies

Optimization process
At each semi-annual index review, the CPA-index is constructed using an optimization process. The aim is to make the index investable and to minimize the expected active risk relative to the benchmark index. Limitations are introduced with the purpose of:

- Promote objectives related to transition and physical risks, for example
  - Reducing greenhouse gas emissions by at least 50% relative to MSCI World
- Promote objectives related to transition opportunities, for example
  - Increasing weighted green turn over with at least 100% relative to MSCI World

The optimization process ensures that the use of derivative instrument also promotes environmental characteristics such as the reduction of greenhouse gas emissions.

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.

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

The fund does not have a minimum share of investments aligned with the EU Taxonomy, i.e., the minimum extent is 0%.

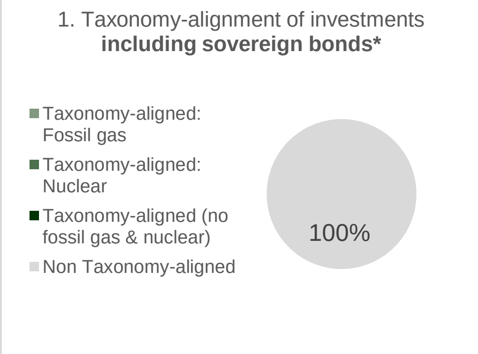
Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy[1]?

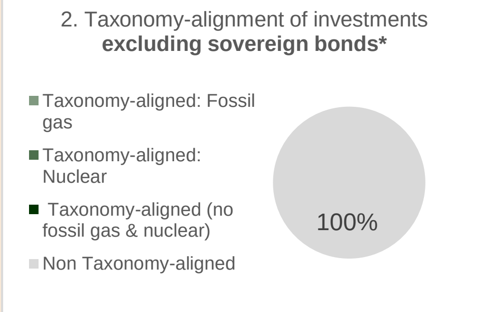
☐ Yes:

☐ In fossil gas In ☐ nuclear energy

☒ No

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.





This graph represents 100% of the total investments.

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

Enabling activities directly enable other activities to make a substantial contribution to an environmental objective.

Transitional activities are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

The fund does not have a minimum share of investments in transitional or enabling activities, i.e., 0%.

[1] Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all of the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them.

What is the minimum share of socially sustainable investments?

Carnegie Fonder internally assesses which investments are classified as sustainable, based on the environmental and social objectives found in the UN Global Goals (SDG). Social and environmental aspects are considered for holdings assessed as contributing to the SDGs through their activities. We therefore find that all the fund's sustainable investments promote both social and environmental objectives. There is no planned allocation between environmental and social objectives, but all sustainable investments are aligned with at least one of them.

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

The fund retains a certain portion of total fund assets as cash reserves to meet flows to and from fund unitholders on an ongoing basis. These assets are kept in a bank account with the fund's custodian bank, whose activities comply with the legal requirements imposed on such institutions. The fund company has therefore determined that this is following minimum environmental and social safeguards

Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund has exposure to the CPA-index using derivative instrument. The index is not used as a reference benchmark to determine that environmental and social characteristics are promoted.

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

Where can I find more product specific information online?

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

https://www.carnegiefonder.se/en/fondtyp/alternative-funds/

CARNEGIE GLOBAL PLUS FUND RULES

§ 1 Name and Legal Position

The name of the fund is Carnegie Global Plus, hereinafter referred to as "the fund". The fund is a UCITS fund pursuant to the Swedish UCITS Act (SFS 2004:46). The fund is aimed at the public and not a limited circle of persons.

The fund's assets are jointly owned by the unitholders and each unit in a unit class confers an equal right to the property included in the fund. The fund cannot acquire rights or assume obligations.

The fund is managed by the fund company specified § 2 below. The fund company represents the unitholders in all matters regarding the fund, makes decisions concerning property included in the fund and exercises the rights derived from the property.

Operations are conducted in accordance with these fund rules, the articles of association of the fund company, the Swedish UCITS Act and other applicable statutes.

These fund rules are complemented by and integrated with the fund prospectus. The prospectus is provided by the fund company.

The fund has the following unit classes:

- A – SEK, Accumulation
- B – SEK, Accumulation, Distribution
- C – SEK, Accumulation, Institutional
- D – NOK, Accumulation
- E – NOK, Accumulation, Distribution
- F – NOK, Accumulation, Institutional
- G – USD, Accumulation

The content of the fund rules is common to all unit classes unless otherwise stated below. The unit classes differ in terms of minimum initial subscription amount, charges and fees, distribution channel and dividends. The differences between the unit classes are described in full below in § 9 and §11

§ 2 Fund Manager

The Fund is managed by Carnegie Fonder AB (CRN 556266-6049), hereinafter referred to as the "fund company".

§ 3 Depositary and its Function

The fund's assets are stored by Skandinaviska Enskilda Banken AB (publ), (CRN: 502032-9081) as the depositary. The depositary is required to act independently of the fund company and exclusively in the interests of unitholders.

The depositary receives and retains the fund's assets and implements the fund company's instructions concerning the fund provided these do not contravene the UCITS Act, other statutes or the fund rules. The depositary further verifies that

- subscriptions, redemptions and cancellation of fund units are carried out in compliance with the UCITS Act and the fund rules,
- the value of fund units is calculated in accordance with the UCITS Act,
- the fund rules payments for transactions involving a fund's assets are paid into the fund without delay,

- the fund’s income is used in accordance with the provisions of the UCITS Act and the fund rules.

§ 4 Fund Characteristics

The fund is an equity fund with the objective to generate exposure to the global stock market. Global stocks refer to equity in diverse companies, industries and countries. The fund utilizes leverage to increase exposure beyond its net asset value. The fund’s objective is to generate a return similar to the return of the global stock market and the leverage.

§ 5 Investment Strategy

The fund’s assets may be invested in the following:

- Transferable securities
- Money market instruments
- Fund units
- Derivative instruments related to underlying assets according to Chapter 5, Section 12, point 1 of the Swedish UCITS Act (2004:46)
- Accounts with credit institutions

The fund’s objective is to generate an exposure corresponding to 140% of the global stock market through investments in stocks and other equity-related financial instruments. Equity-related investments may be combined with other placements, such as bonds, money market instruments, fixed-income funds, and placements in accounts with credit institutions.

The fund may use futures and other derivative instruments to achieve the intended exposure to the stock market. The underlying exposed value resulting from these derivative instruments may exceed the fund’s net asset value. This is subject to the condition that the fund simultaneously holds treasury bills with a market value at least equal to the portion of the underlying exposed value that exceeds the fund’s net asset value. These treasury bills should be denominated in Swedish kronor, US dollars, or euros and have a remaining maturity of up to three months.

Both market ups and downs as well as inflows or outflows can cause changes in the fund’s equity exposure. The fund’s holdings should be adjusted if the equity exposure, measured in relation to the fund’s net asset value, deviates by more than 5 percentage points from 140 percent.

The fund may use futures and other derivative instruments to convert currency exposure from transferable securities to US dollars.

The fund’s investments in fund units may amount to a maximum of 10 percent of the fund’s net asset value.

§ 6 Exchanges and Marketplaces

The fund’s assets may be invested in a regulated market within the EEA or an equivalent market outside the EEA. Trading is also permitted on a multilateral trading facility (MTF) or another market within or outside the EEA that is regulated and open to the public.

§ 7 Special Investment Strategy

- The fund’s assets may be invested in transferable securities and money market instruments referred to in the UCITS Act, Ch 5, § 5 up to a maximum of 10% of the fund’s NAV.
- To improve the investment strategy efficiency, the fund may use derivate instruments
- Fund assets may be invested in derivative instruments referred to in the UCITS Act Ch 5, §12, second paragraph (“OTC derivatives”).

- The fund may use currency derivatives to hedge holdings denominated in foreign currency.
- The fund may use such techniques and instruments as referred to in Ch 25, § 21 of Finansinspektionen's regulations regarding Swedish UCITS (FFFS 2013:9) to increase the return and generate leverage in the fund.
- In accordance with the UCITS Act Ch 5, § 8, the fund may invest more than 35% of fund assets in bonds and other debt instruments issued or guaranteed by a state or municipal authority in a country within the EEA or by an international organisation in which one or more EEA states are members. The debt instruments must however have been issued by at least six different issuers and those issued in a single issue may not exceed 30% of the fund's value.

§ 8 Valuation

The fund's net asset value (NAV) is calculated by deducting liabilities relating to the fund from its assets. The NAV per unit in a particular unit class is the value of the unit class divided by the number of outstanding fund units in that particular unit class.

NAV is calculated each day except for Saturday, Sunday and Swedish non-banking days, hereinafter referred to as banking days. The NAV forms the basis for establishing the subscription and redemption prices for trade in fund units. In the daily valuation, the outstanding liabilities of the fund are calculated and taken into account. The fund company does not, however, calculate NAV per unit if the fund is closed for subscriptions or redemptions.

The fund's assets are calculated as follows:

- Financial instruments, which are measured based on current market value. If no such market value is available, or is deemed misleading by the fund company, financial instruments may be included at the value determined by the fund company on an objective basis
- Cash and cash equivalents
- Accrued interest
- Accrued dividends
- Unsettled sales
- Other assets and receivables relating to the fund

The fund's liabilities comprise:

- Payments to the fund company (varies among unit classes)
- Unsettled purchases
- Tax liabilities
- Other liabilities relating to the fund

Unlisted transferable securities and money market instruments are included at the value determined by the fund company on an objective basis. This valuation is based on:

- Market prices from unapproved exchanges or market makers
- Other financial instruments or indices, adjusted for differentials in e.g. risk
- Discounted dividends or cash flows
- Share of equity.

For derivative instruments referred to in the UCITS Act Ch 5, § 12, paragraph 2 (OTC derivatives), a market value is established as follows:

- Quoted price in an active market

If such a market price is not available, market value should be determined using one of the following methods:

- Based on the market value of the included assets/constituents
- Based on recent transactions between knowledgeable, willing parties in an arm's-length transaction, if such is available
- Use of a quoted price in an active market for a substantially identical financial instrument

If the market price cannot be determined using one of the alternatives above, or becomes obviously misleading, the market value shall be determined by using a valuation method accepted in the market, such as an options valuation model such as Black & Scholes.

Valuations are conducted individually for each unit class.

§ 9 Subscriptions and Redemptions

The fund is normally open for subscriptions and redemptions of fund units on every bank day, and this takes place through the fund company or its intermediary. However, the fund is not open for subscriptions and redemptions on bank days when the valuation of the fund's assets cannot be conducted in a manner that assures the equal rights of fund unitholders as a consequence of one or more marketplaces on which the fund is traded being partly or entirely closed.

The subscription price of fund units sold by the fund company (unitholder purchases) corresponds to NAV per unit on the bank day when the subscription is executed, in accordance with §8.

The redemption price of fund units redeemed by the fund company (unitholder sales) corresponds to NAV per unit on the bank day when the redemption is executed, in accordance with §8.

The subscription and redemption prices may be obtained from the fund company. Prices are also published in daily newspapers or similar media. Prices on any given bank day are normally published in the evening of the same bank day.

Requests for subscription for fund units (unitholder purchases) shall be made in writing or via electronic media. Requests for redemption (unitholder sales) of fund units shall be made in writing or via electronic media. Unitholders are responsible for ensuring that the application is duly signed, that the correct bank account number has been provided and that other documents required by the fund company at any given time, and which are available on the fund company's website, have been provided to the fund company or another recipient as instructed by the fund company.

Requests are executed on the same day they are submitted, provided that the request has been received by the fund company before the cut-off time and in accordance with the terms and conditions stated in the fund prospectus. Otherwise, the request will be executed on the next bank day.

Requests for redemption may be withdrawn only if the fund company consents.

Subscriptions and redemptions are executed at a NAV per unit that is unknown when the request is submitted.

The minimum initial subscription amount in class C is SEK 3 million and in class F NOK 3 million.

Class B is restricted to investors who subscribe to units through distributors that, in whole or in part and in accordance with their agreement with the fund company, do not receive retrocession fees from the fund company and that, when the distributor provides the investment service to its customers in connection with subscription of units, are paid directly by the customer. A prerequisite for investing in class B is that the holding is registered in one or more accounts in the distributor's name on behalf of the customer (nominee registration).

Class E is restricted for investors who subscribe for units via distributors that, within the framework of their operations distribute the fund units on the Norwegian market, and which in accordance with the agreement with the fund company do not receive retrocession fees from the fund company for distribution on the

Norwegian market. A prerequisite for investing in the class E is that the holding is registered in an account in the distributor's name on behalf of the customer (nominee registration). Subscription and redemption is in NOK.

The fund company has the right to decide to close the subscription of new units in order to avoid a situation where the fund's assets exceed a size where the fund cannot be managed in a way that is optimal for the fund and existing unitholders. Such a decision presupposes that the fund's assets under management exceed a capital limit set by the fund company. The capital limit set by the fund company currently amounts to thirty (30) billion SEK.

The fund company's decisions regarding fund closure or reopening will be published on the company's website, https://www.carnegiefonder.se/en/, in conjunction with the decisions.

§ 10 Extraordinary Circumstances

The fund may be closed for entry or exit if there exist extraordinary circumstances that prevent valuation of the fund's assets in a manner that ensures the equal rights of the fund unitholders.

§ 11 Charges and Fees

Payments are made from the fund's assets to remunerate the fund company for its management, analysis, administration, accounting, and record keeping regarding the fund. The management fee is calculated daily and is paid to the fund company monthly in arrears. The management fee includes payments to the depositary for storage of the securities included in the fund, including any statutory value added tax, payments to Finansinspektionen for its supervisory activities in accordance with its current regulations, and payments to the fund company's auditors.

For unit class A, D and G, fees and charges shall not exceed 0.85% percent per year. For unit class B and E, fees and charges shall not exceed 0.45% percent per year. For unit class C and F, fees and charges shall not exceed 0.55% percent per year.

Management fees are paid to the fund company monthly in arrears.

Brokerage and other expenses associated with the fund's trade in financial instruments are charged to the fund on an ongoing basis. Any statutory value-added tax will be charged on the payments. Payment amounts are rounded to the nearest whole krona (SEK).

§ 12 Dividends

The fund does not pay dividends.

§ 13 Financial Year

The financial year of the fund is the calendar year.

§ 14 Half-yearly and Annual Reports and Amendments of Fund Rules

The fund's annual and half-yearly reports shall be available at the fund company within four and two months respectively after the end of the reporting period.

If the fund company decides to amend these fund rules, the decision shall be submitted to Finansinspektionen for approval. The decision shall be made available at the fund company and the depositary and shall be announced in the manner instructed by Finansinspektionen.

The amendments shall take effect in connection with the announcement or at the later date specified in Finansinspektionen's decision. The amendments shall apply to all unitholders.

§ 15 Pledges and Transfers

The pledging party and/or pledge holder must inform the management company in writing when fund units that are not nominee-registered are pledged.

The notification shall state:

- The identity of the pledge holder
- The number of fund units covered by the pledge.
- Any restrictions on the scope of the pledge.

The fund company shall notify the fund unitholder in writing that the pledge has been registered in the fund's unitholder register. In conjunction with the pledge of nominee-registered fund units, a corresponding notification shall instead be provided to the nominee.

Pledges remain in force until the pledge holder has notified the fund company in writing that the pledge has expired, and the fund company has removed the pledge from the unitholder register.

The fund company is entitled to charge the unitholder a fee not exceeding SEK 500 for the administration of the registration of pledges.

Unitholders are permitted to transfer fund units.

§ 16 Limitation of Liability

If the depositary or a custodian bank has lost financial instruments held in custody at the depositary or a custodian bank, the depositary must without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the fund.

The fund company or the depositary shall not be liable for damage arising as a consequence of Swedish or foreign legislation, intervention by Swedish or foreign governmental authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The reservation with respect to strikes, blockades, boycotts and lockouts shall apply notwithstanding whether the fund company or the depositary initiates or is the target of such a labour action. Nor shall the fund company or the depositary pay compensation for losses arising in other cases if the fund company or depositary has observed customary prudence. The fund company or the depositary shall not be liable for indirect losses under any circumstances.

If the fund company or the depositary is prevented partially or entirely from executing payments or taking other measures as a consequence of a circumstance set forth in the first paragraph of this section, these measures may be deferred until the obstacle no longer exists. If the fund company or the depositary is prevented from making or receiving payment as a consequence of such circumstance the fund company or depositary shall not be liable to pay penalty interest. If interest has been previously agreed, interest will be paid at the rate prevailing on the due date.

If the depositary is prevented from accepting payment for the fund by reason of a circumstance specified in the first paragraph of this section, the depositary shall have the right to interest for the period during which the obstacle existed only in accordance with the terms prevailing on the due date.

Neither the fund company nor the depositary is liable for loss caused by a - Swedish or foreign - stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities that provide equivalent services, nor other third parties engaged with due care by the fund company or the depositary. The same shall apply to loss caused by the insolvency of the aforementioned organisations or third parties. The depositary is not responsible for engaged parties instructed by the fund company. Nor will the fund company or the depositary be liable for loss incurred by the fund, unitholders, or other parties by

VISITING ADDRESS
Regeringsgatan 56
Stockholm, Sweden

POSTAL ADDRESS
Box 7828
SE-103 97 Stockholm

WEBSITE
carnegiefonder.se

E-MAIL
spara@carnegiefonder.se

TELEPHONE
+46 8 12 15 50 00

reason of restrictions upon disposition that may be imposed on the fund company or the depositary in respect of financial instruments.

Nor shall the fund company be liable for loss caused by violation of law, ordinance, regulation or these fund rules by a unitholder. Unitholders are hereby made aware that they are responsible for ensuring that the documents they provide to the management company are accurate and duly signed and for ensuring that the fund company is notified of any changes to information provided.

The tort liability of the fund company and the depositary is regulated under the UCITS Act Ch 2, § 21 and Ch 3, §§ 14-16.

§ 17 Permitted Investors

The circumstance that the fund is intended for the general public does not mean that it is intended for such investors whose purchases of units in the fund or participation in the fund otherwise contravenes the provisions of Swedish or foreign law or regulation. Nor is the fund intended for such investors whose purchases or holdings of units in the fund would mean that the fund or the fund would be required to take registration measures or other measures that the fund or the fund company would not otherwise be required to take. The fund company has the right to refuse sales to such investors referred to above in this paragraph.

The fund management company may redeem a unitholder’s units in the fund – notwithstanding the unitholder's objection – if it becomes apparent that the unitholder has subscribed for units in the fund in contravention of provisions of Swedish or foreign law, ordinance, regulation or decision by governmental authority, or if the fund company is required to take a registration measure or other measure for the fund or the fund company that the fund or the fund company would not be required to take if the unitholder did not hold units in the fund.

APPENDIX 1. EXAMPLE CALCULATIONS, PERFORMANCE-BASED FEE, CARNEGIE SPIN-OFF A

Period	Return for the Period Before Variable Performance-based Fee, %	Index Return %	Relative Return Against Index %	Value Before Performance-based Fee, SEK	Threshold Value, SEK	Performance-based Fee, SEJ	Performance-based Fee %	Return for the Period After Variable Performance-based Fee, %	Value after variable performance fee SEK	NAV per unit	Acc CF %	Acc index %	Acc relative %
0				100,000	100 000			100.00					
1	2.50	1.00	1.50	102,500	101,000	300	0.30	2.20	102,200	102.20	2.50	1.00	1.50
2	-5.00	2.50	-7.50	97,090	104,755	-	0.00	-5.00	97,090	97.09	-2.63	3.53	-6.15
3	7.50	2.50	5.00	104,372	107,374	-	0.00	7.50	104,372	104.37	4.68	6.11	-1.44
4	5.00	1.00	4.00	109,590	108,448	229	0.22	4.78	109,362	109.36	9.91	7.17	2.74
5	-5.00	-7.50	2.50	103,894	101,160	547	0.50	-5.50	103,347	103.35	4.42	-0.86	5.28
6	1.00	10.00	-9.00	104,380	113,682	-	0.00	1.00	104,380	104.38	5.46	9.05	-3.59
7	0.00	-10.00	10.00	104,380	102,313	413	0.40	-0.40	103,967	103.97	5.46	-1.86	7.32
8	0.00	0.00	0.00	103,967	103,967	-	0.00	0.00	103,967	103.97	5.46	-1.8	7.32

Fund unit class A applies a variable performance-based fee that is charged if the return on the unit class is better than the hurdle rate, SIXPRX (index). The performance-based fee is calculated and charged daily but deducted monthly. The fund applies a “collective model”, which means that all unitholders in class A pay the same charge per unit if a performance-based fee is payable. In addition, the fund applies a “high-water mark”, which means that the unit class must reach a new highest level in relative return against the hurdle rate for a new performance-based fee to be payable.

The examples below illustrate the performance-based fee charged when a unitholder invests SEK 100,000. In addition to the performance-based fee, there is an annual fixed management fee of 1.0 percent. The total annual fixed and performance-based fees may not exceed 3.0 percent of the value of the unit class. However, the example below shows only the effect of the performance-based fee.

EXAMPLE 1

Period 1

Return on the unit class: 2.5%

Index return: 1.0%

Relative return: 1.5%

The variable performance-based fee is 20% of the return that exceeds the index. In this case, the fee will be: 20% x (102,500 – 101,000) = SEK 300. The value of SEK 101,000 in the calculation is the elevated value (what the unitholder would have had by investing in the index) that must be exceeded before the performance-based fee can be charged.

Period 2

Return on the unit class:	-5.0%
Index return:	2.5%
Relative return	-7.5%

No variable performance-based fee is charged to the unit class in the second period since the return on the unit class is below the index.

Period 3

Return on the unit class:	7.5%
Index return:	2.5%
Relative return:	5.0%

The fund company does not receive any variable performance-based fee in the third period either, despite the return exceeding the index. The reason for this is that the underperformance of the previous period must be recovered, and the unit class's new threshold value exceeded before any variable performance-based fee is charged. The threshold value in the table above is based on the higher of two options: Either (1) the threshold value of the previous period increased by the index return in the current period; or (2) the closing value of the unit class in the previous period increased index return in that period.

Period 4

Return on the unit class:	5.0%
Index return:	1.0%
Relative return:	4.0%

During the fourth period, a variable performance-based fee is once again payable since the value of the investment before the variable performance-based fee exceeds the increased threshold value. In this case, the variable performance-based fee is: 20% x (109,590 – 108,448) = SEK 229. The value of SEK 108,448 in the calculation reflects the threshold value that must be exceeded before the variable performance-based fee is charged.

Period 5

Return on the unit class:	-5.0%
Index return:	-7.5%
Relative return:	2.5%

During this period, the unit class shows a negative return, but the index has decreased by more. This means that the unit value once again exceeds the threshold value. The fund company can therefore charge a variable performance-based fee corresponding to: 20% x (103,894 – 101,160) = SEK 547.

Period 6

Return on the unit class:	1.0%
Index return:	10.0%
Relative return:	-9.0%

The unit class has a positive return during this period, but the index performs better. No variable performance-based fee can be charged. The threshold value of the unit class is increased by the index return.

Period 7

Return on the unit class:	0.0%
Index return:	10.0%
Relative return:	10.0%

During this period, the value of unit class is unchanged, but the index loses 10%. The threshold value thus decreases and the unit value exceeds the same. The fund company may thus charge a variable performance-based fee corresponding to: 20% x (104,380 – 102,313) = SEK 413.

Period 8

Return on the unit class:	0.0%
Index return:	0.0%
Relative return:	0.0%

During this period, the value of both the unit class and the index are unchanged. No variable performance-based fee can be charged. The threshold value of the unit class is unchanged until the next period.

EXAMPLE 2. A UNITHOLDER INVESTS IN PERIOD 2 AND SELLS IN PERIOD 3

A unitholder who invests in period 2 buys fund units at a NAV price of 97.09. The price rises to 104.37 in period 3, a return of 7.5 percent, while the index during the same period rises by 2.5 percent. No variable performance-based fee is charged for the unit class because the threshold value has not been exceeded.

This example can also be used to illustrate the effect of the variable performance-based fee being taken collectively directly from the unit class and not from each individual unitholder.

EXAMPLE 3. A UNITHOLDER INVESTS IN PERIOD 4 AND SELLS IN PERIOD 5

A unitholder who invests in period 4 buys fund units at a NAV price of 109.36. The price falls by 5.0 percent while the index falls by 7.5 percent. The variable performance-based fee is 20% x (103,894 – 101,160) = SEK 547. The price after the variable performance-based fee is 103.35, which represents a decrease after the variable fee of 5.5 percent.

This example can also be used to illustrate the effect of the fund charging a variable performance-based fee even when the return on the unit class has been negative but has outperformed the index.