

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

Product name: NORRON SICAV - Sustainable Premium

Legal entity identifier: 529900ACQLWH0JGMEU40

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.

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

Yes **No**

| | |
|---|--|
| <input type="checkbox"/> It made sustainable investments with an environmental objective: ___% <ul style="list-style-type: none"> <input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy | <input checked="" type="checkbox"/> It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a sustainable investment, it had a proportion of 66.8% of sustainable investments <ul style="list-style-type: none"> <input checked="" type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy <input checked="" type="checkbox"/> with a social objective |
| <input type="checkbox"/> It made sustainable investments with a social objective: ___% | <input type="checkbox"/> It promoted E/S characteristics, but did not make any sustainable investments |

To what extent were the environmental and/or social characteristics promoted by this financial product met?

The Sub-Fund has promoted both environmental and social characteristics and has partially made sustainable investments. These characteristics promote the contribution to the 2030 Agenda and the Sustainable Development Goals.

To promote the environmental and social characteristics the Sub-Fund uses negative screening of assets by excluding industries from the investment universe that the Investment Manager considers to be associated with particularly high sustainability risks and by its nature would risk to cause significant harm to the 2030 Agenda. All investments in 2022 were compliant with the exclusion criteria.

To promote the environmental and social characteristics the Investment Manager encourages investee companies to (i) become signatories to the UN Global Compact, (ii) set climate emission reduction targets in accordance with the Science Based Targets initiative, and (iii) disclose material sustainability risks in their annual and/or sustainability reports.

The Investment Manager has a target to over time increase the share of investments that meets all of these characteristics.

● **How did the sustainability indicators perform?**

- **Partially making sustainable investments contributing to the achievement of the 2030 Agenda**

The proportion of sustainable investments by 2022-12-31 was 67%. The indicators used to measure the Sub-Fund's promotion of the sustainable investment objectives are the allocation towards each of the 17 SDGs. By 2022-12-31 the allocation

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



between the SDGs as a share of the Sub-Fund's total net assets was:

1. No poverty: 2%
2. Zero hunger: 0%
3. Good health and well-being: 0%
4. Quality education: 0%
5. Gender equality: 0%
6. Clean water and sanitation: 0%
7. Affordable and clean energy: 10%
8. Decent work and economic growth: 25%
9. Industry, innovation and infrastructure: 9%
10. Reduced inequalities: 4%
11. Sustainable cities and infrastructure: 11%
12. Responsible consumption and production: 5%
13. Climate action: 1%
14. Life below water: 0%
15. Life on land: 0%
16. Peace, justice and strong institutions: 0%
17. Partnerships for the goals: 0%

- **Negative screening of assets**

The Investment Manager has continuously used negative screening of assets to ensure that the exclusion criteria has been met at all times. All investments by 2022-12-31 were compliant with the exclusion criteria.

- **Active management and ownership strategy**

Share of total net assets are signatories to the UN Global Compact: 72%

Share of total net assets have set Science Based Targets: 21%

Share of total net assets disclose material sustainability risks their annual and/or sustainability reports: 76%

● **...and compared to previous periods?**

No previous data, first year of reporting.

● **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

The Sub-Fund partially make sustainable investments which contributes to five sustainable investment objectives, including both environmental and social objectives, targeting the 17 SDGs. The purpose of the five sustainable investment objectives is to contribute to the achievement of the 2030 Agenda and the SDGs.

The sustainable investment objectives of the Sub-Fund, including the targeted SDGs for each objective, and the allocation between the objectives by 2022-12-31 was the following:

- **Climate and environment: 10%**

This sustainable investment objective targets the following SDGs: *7 Affordable and clean energy, 12 Responsible consumption and production, 13 Climate action, 14 Life below water and 15 Life on land.*


- **Healthy and prosperous society: 9%**

This sustainable investment objective targets the following SDGs: *1 No poverty, 2 Zero hunger, 3 Good health and well-being, 4 Quality education, 5 Gender equality, 6 Clean water and sanitation, 8 Decent work and economic growth and 10 Reduced inequalities.*

- **Innovative and sustainable solutions: 15%**

| | |
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| | <p>This sustainable investment objective targets the following SDGs: 8 Decent work and economic growth, 9 Industry, innovation and infrastructure, 12 Responsible consumption and production and 13 Climate action.</p> <ul style="list-style-type: none"> - Sustainable cities and infrastructure: 13% <p>This sustainable investment objective targets the following SDGs: 7 Affordable and clean energy, 9 Industry, innovation and infrastructure, 11 Sustainable cities and infrastructure and 13 Climate action.</p> <ul style="list-style-type: none"> - Sustainable finance: 20% <p>This sustainable investment objective targets the following SDGs: 1 No poverty, 8 Decent work and economic growth, 16 Peace, justice and strong institutions and 17 Partnerships for the goals.</p> |
|--|---|

| | |
|--|--|
| <p>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.</p> | <ul style="list-style-type: none"> ● How did the sustainable investments that the financial product partially intends to make, not cause significant harm to any environmental or social sustainable investment objective? <p>As part of the investment process the Investment Manager assess the sustainable investments to ensure it does not cause significant harm to any environmental or social sustainable investment objective, including climate, biodiversity, water, human rights, social conditions or employees. This assessment takes into account the investment's adverse impact on sustainability factors and ensures the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. Incidents in the sustainable investments has been continuously monitored to ensure that any incidents that has occurred linked to the sustainable investments has not caused adverse impacts on the sustainability factors.</p> <ul style="list-style-type: none"> ○ How were the indicators for adverse impacts on sustainability factors taken into account? <p>The indicators for adverse impacts on sustainability factors are monitored for the Sub-Fund regularly. The assessment is made by using qualitative and quantitative information from the investee subjects and external data providers. Access to reliable data is however limited and no comparison to previous periods can be made, hence the Investment Manager has to make balanced decisions based on the data made available. The principal adverse impacts on sustainability factors <i>Exposure to companies active in the fossil fuel sector</i> and <i>Exposure to controversial weapons</i> are closely monitored for each investment since these indicators constitutes two of the Sub-Funds exclusion criteria.</p> ○ Were sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details: <p>The Investment Manager has made an assessment on each sustainable investment to ensure compliance with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. An investee company has been considered to be compliant if it has policies and compliance programs which are acceptable with regard to the size and nature of the business. Incidents related to the in the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights in the sustainable investments have been continuously monitored.</p> <p><i>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.</i></p> <p>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.</p> <p><i>Any other sustainable investments must also not significantly harm any environmental or social objectives.</i></p> |
|--|--|

| | |
|---|---|
|  | <p>How did this financial product consider principal adverse impacts on sustainability factors?</p> <p>The nature and extent of the adverse impact on sustainability factors has varied between each sustainable investment depending on sector affiliation, region, business type and financial instrument. An assessment of the indicators for adverse impact on sustainability factors has been performed prior to each new investment. Access to reliable data is however limited and no comparison to previous periods can be made, hence the Investment Manager has to make balanced decisions based on the data made available. In order to avoid investments that would risk to do significant harm to the Sub-Fund's sustainable investment objectives, a risk assessment on the principle adverse impact on sustainability factors is included in the investment process. Annual reviews to follow-up on the investments has been made to ensure that no changes in the strategy or risk management has been made in the company that could cause significant harm to the sustainable investment objectives or cause material changes to the adverse impact on sustainability factors.</p> <p>The Investment Manager considers the following indicators for adverse impact on sustainability factors for the Sub-Fund:</p> <ul style="list-style-type: none"> ○ GHG emissions |
|---|---|

- o Carbon footprint
- o GHG intensity of the investee companies
- o Exposure to companies active in the fossil fuel sector
- o Share of non-renewable energy consumption and production
- o Energy consumption intensity per high impact climate sector
- o Activities negatively affecting biodiversity-sensitive areas
- o Emissions to water
- o Hazardous waste and radioactive waste ratio
- o Violations of UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- o Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- o Unadjusted gender pay gap
- o Board gender diversity
- o Exposure to controversial weapons
- o Investments in companies without carbon emission reduction initiatives
- o Lack of anti-corruption and anti-bribery policies

The Investment Manager has due to lack of reliable data from the investee companies used a best effort approach to take into account these indicators for adverse impacts on sustainability factors in the sustainable investment assessment.

What were the top investments of this financial product?

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 31.12.2022

| Largest investments | Sector | % Assets | Country |
|---------------------|---|----------|---------------|
| STADSHYPOTEK AB | Financial and insurance activities | 3.51% | SWEDEN |
| VOLVO TREAS AB | Manufacturing | 2.79% | SWEDEN |
| LANDSBANKINN HF | Financial and insurance activities | 2.33% | ICELAND |
| SIRIUSPOINT LTD | Financial and insurance activities | 2.31% | BERMUDA |
| ARION BANKI HF | Financial and insurance activities | 2.24% | ICELAND |
| ORIFLAME INVEST | Manufacturing | 2.22% | JERSEY |
| PRA GROUP INC | Financial and insurance activities | 2.14% | UNITED STATES |
| KOMMUNINVEST | Public administration and defence; compulsory social security | 2.11% | SWEDEN |
| SWEDISH COVERED | Financial and insurance activities | 2.06% | SWEDEN |
| CASTELLUM AB | Real estate activities | 2.02% | SWEDEN |
| SCATEC ASA | Electricity, gas, steam and air conditioning supply | 1.98% | NORWAY |
| LINK MOBILITY | Information and communication | 1.93% | NORWAY |
| GARFUNKELUX HOLD | Financial and insurance activities | 1.92% | LUXEMBOURG |
| BICO GROUP AB | Manufacturing | 1.90% | SWEDEN |
| BOLIDEN AB | Manufacturing | 1.86% | SWEDEN |

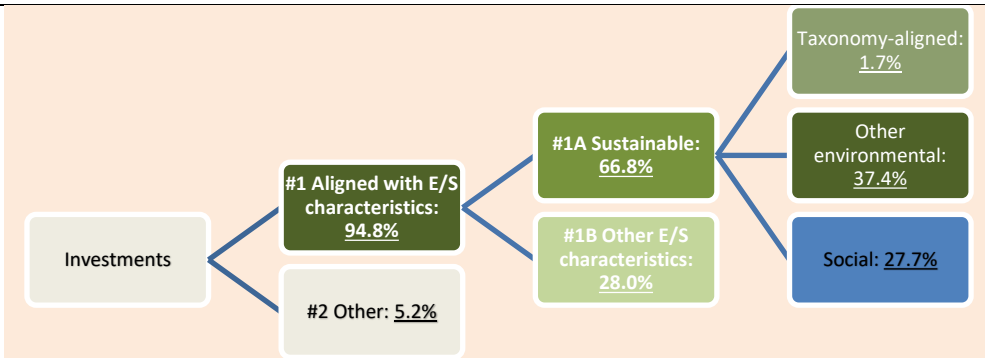
The Top investments are determined as at the year-end of the reporting period.

What was the proportion of sustainability-related investments?

Asset allocation describes the share of investments in specific assets.

As of December 31st 2022, 94.8% of the portfolio was aligned with the stated E/S characteristics and 66.8% of the portfolio holdings were classified as sustainable investments in accordance with the defined sustainable objectives.

- **What was the asset allocation?**



#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.

● **In which economic sectors were the investments made?**

| Sector | Weight |
|---|--------|
| Financial and insurance activities | 37% |
| Manufacturing | 24% |
| Real estate activities | 14% |
| Electricity, gas, steam and air conditioning supply | 6% |
| Information and communication | 4% |
| Construction | 3% |
| Public administration and defence; compulsory social security | 2% |
| Accommodation and food service activities | 1% |
| Administrative and support service activities | 1% |
| Education | 1% |
| Transportation and storage | 0% |

●



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

The Investment Manager has used best effort approach to integrate a consideration of environmentally sustainable economic activities (as prescribed by the EU Taxonomy) into the investment process for the Sub-Fund. In those circumstances, and based on data on EU Taxonomy alignment obtained directly from investee companies, 1.7% of the Sub-Fund's underlying investment is aligned with the EU Taxonomy during 2022.

The compliance of those investments with the requirements laid down in Article 3 of Regulation (EU) 2020/852 was not subject to an assurance provided by one or more auditors or a review by one or more third parties.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy?

Yes:

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)**

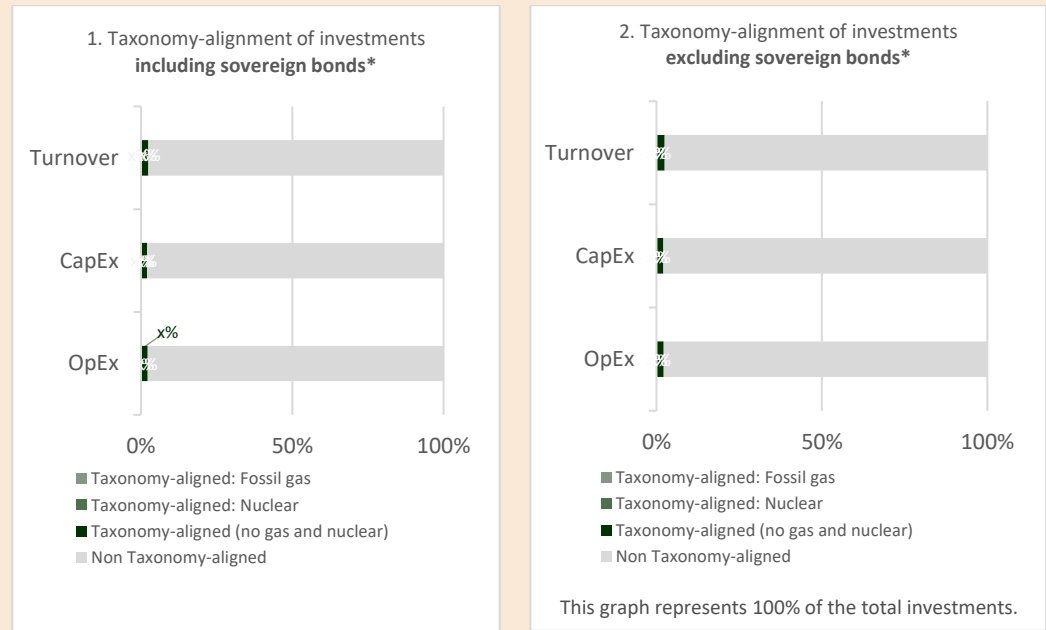
reflecting green operational activities of investee companies.

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.

In fossil gas In nuclear energy
x No

The graphs below show in green the percentage of investments that were 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 was the share of investments in transitional and enabling activities?**
0%
- **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**
No previous data, first year of reporting.

are sustainable investments with an environmental objective that **do not take into account**



What was the share of sustainable investments with an environmental objective not aligned with the EU Taxonomy?

37.4%

The Investment Manager has used best effort approach to integrate a consideration of environmentally sustainable economic activities (as prescribed by the EU Taxonomy) into the investment process for the Sub-Fund, however Information on EU Taxonomy alignment is not yet readily available from all investee companies' public disclosures and third-party providers.

the criteria for environmentally sustainable economic activities under the EU Taxonomy.



What was the share of socially sustainable investments?

27.7%



What investments were included under “Other”, what was their purpose and were there any minimum environmental or social safeguards?

This share of the Sub-Fund has been used for liquidity purposes. The share contains other assets such as money market instruments, cash and cash equivalents held as ancillary liquidity. The Sub-Fund may also use exchange traded derivatives on equities as well as financial indices and exchange traded funds for investment purposes. The Sub-Fund may also use financial derivative instruments to hedge its foreign currency exposure. The purpose of the use of these instruments and investments are not to promote environmental and social characteristics. When the Sub-Fund invest in different indices for liquidity, the Sub-Fund may have an indirect exposure towards excluded industries. No minimum environmental or social safeguards were applied for these instruments.



What actions have been taken to meet the environmental and/or social characteristics during the reference period?

The Investment Manager performs a thorough ESG analysis pre investment to find investee companies that can promote the environmental and social characteristics of the Sub-Fund.

To promote the environmental and social characteristics of the Sub-Fund the Investment Manager has focused on engagements to improve the ESG performance in the investee companies. The engagements has focused on making investee companies setting science based emission reduction targets aligned with the Paris Agreement, become signatories of the UN Global Compact and setting policies and processes for human rights and labour rights, or implementing more transparent sustainability reporting including sustainability risk reporting.



How did this financial product perform compared to the reference benchmark?

N/A

- **How does the reference benchmark differ from a broad market index?**

N/A

- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?**

N/A

- **How did this financial product perform compared with the reference benchmark?**

N/A

- **How did this financial product perform compared with the broad market index?**

N/A

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