

# Information Brochure

2022-10-12

## Swedbank Robur Europafond

Fund type: Equity funds

Share classes open for trading: A, I

### Dividends

The share class does not pay dividends.

### Risk Class



The risk and reward profile shows the correlation between risk and possible returns of investing in the fund. The indicator is based on how the fund value has changed over the last five years. This fund is a category 5 fund, which means there is a medium risk for increases and decreases in the value of fund units. Category 1 does not imply that the fund is risk free. The fund risk class may change over time, as the indicator is based on historic data which is not a guarantee of future risk and performance.

### Fund management company

The fund is managed by Swedbank Robur Fonder AB, referred to herein as the fund company.

### Share classes

The fund currently has classes A and I open for trading. Share class A is a non-dividend share class traded in SEK and share class I is a non-dividend share class traded in SEK with a threshold for subscription charges. Other share classes are not currently open for trade. The various share classes differ with regards to charges, dividend, threshold for subscription charges, currency for subscription and redemption plus specific terms and conditions for distribution. Shares in a share class imply equal rights to the assets included in the fund. Additional information regarding the fund's share classes can be found further down in the information brochure.

### Investment Policy

The fund's long-term objective is to out-perform its benchmark index, which is MSCI USA Net, over a five-year period.

The fund assets are invested in companies across a variety of sectors in Europe. This refers to companies whose shares are traded in Europe, companies registered in or whose executive management is located in Europe or companies which, at the time of investment, have at least 50% of their assets, production, profits or turnover in Europe.

In addition to equities, the fund's assets may also be invested in equity - related transferable securities, money market instruments, in accounts with credit institutions and in fund units. The fund may use derivative instruments as part of its investment policy.

The fund has an active investment strategy that focuses on selecting companies, where theme analysis is an important component in the strategy. The fund has a long-term investment horizon and selects the companies we find attractively valued in relation to our view of the company's future earnings potential. The fund normally owns equity in 40 to 60 companies.

The fund complies with the fund company policy for responsible investment, see more information regarding the policy below.

### Policy on responsible investments

The fund complies with the Swedbank Robur Policy on Responsible Investment. Swedbank Robur's vision is to be a world leader in sustainable value creation. Sustainable value creation means that we want to create long-term returns for our customers while also contributing to positive development for society and the environment. We regard sustainability to be an integral part of well-managed and profitable investments. Read more about the company's policy for responsible investments, strategies and methods of integrating sustainability under the Sustainability heading at [swedbankrobur.se](http://swedbankrobur.se).

### The fund's sustainability work Transparency regarding the integration of sustainability risks, the promotion of environmental or social characteristics, and sustainable investments.

- The fund promotes, among other characteristics, environmental or social characteristics

### How are sustainability risks integrated into the investment-decision process?

The fund applies three overall approaches to sustainability risk management and to integrating these risks into investment-decision processes inclusion, exclusion and engagement.

A structured process is carried out to identify the fund's material sustainability risks. The fund factors the risks into every investment decisions and continuously throughout the portfolio companies' holding period. In addition to Swedbank Robur's fundamental process of identifying the companies with high sustainability risks that are excluded from the investment universe of all funds, the fund uses internal and external analysis and data to identify and continuously control sustainability risks in the fund's holdings. Engaging in dialogue with the companies concerned is a key component of the sustainability and climate-related risk assessment.

The risk assessment for each company includes, for example, specific climate-related risks, how the companies' business models have been positioned for a sustainability transformation, and social and governance-related risks. Should specific problems or uncertainties of a more serious nature be identified, a deeper analysis is carried out together with internal environmental, social and corporate governance (ESG) specialists.

### How could sustainability risks affect the financial return of the fund should they materialise?

Sustainability risks could affect the financial return of the fund if they materialise at several different levels. Weak governance and control structures may, for example, lead to irregularities that could have an adverse impact on the company's share price. Material exposures to both transition and physical risks of climate change may pose a vulnerability should the risks materialise and lower the value of the fund's underlying assets. The integration of sustainability risks into investment-decision processes is critical to achieving high and sustainable long-term returns.

### Environmental, social and corporate governance (ESG) characteristics that are promoted by the fund's management, or included in the fund's objective:

- Environmental characteristics (e.g. companies' impact on the environment and climate)
- Social characteristics (e.g. human rights, labour rights and equal treatment)
- Practice for good governance (e.g. shareholders' rights, questions about remuneration to senior executives and the fight against corruption)
- Other sustainable related characteristics

## What environmental or social characteristics are promoted by the product?

The fund promotes environmental and social characteristics by including companies based on the ESG factors described below and by excluding investments in the activities described below. In addition, the fund engages with the companies in which it invests.

Sustainability focused on the environment and climate change is integrated into the fund's selection process. There is a strong focus on greenhouse gas (GHG) emissions, since the fund prefers to invest in positive structural growth trends and aims to minimise climate-related risks. The fund actively seeks investments that promote the transition to a more sustainable society and achievement of the Paris Climate Agreement goals. In addition, social and governance-related issues are assessed. Respect for international human rights standards and conventions is fundamental for us as investors. We perform an assessment of these risks for all investments.

Based on relevant ESG approaches, the fund actively engages with the companies in which it invests, for example, dialogue, voting at shareholder meetings and participating in nomination committees.

The fund excludes holdings with high sustainability risk scores and that provide products and services the fund management company considers harmful to society and the environment, according to the information below under "The fund excludes."

How the fund intends to promote environmental or social characteristics is described under "Methods used to integrate sustainability risks, promote environmental or social characteristics, or achieve a sustainable investment objective."

### Reference values

The fund uses the following index as a reference benchmark:

No index has been chosen as a reference benchmark

The financial return of the fund is compared with the chosen market index. The chosen index does not fully reflect the environmental and social characteristics promoted by the fund and is therefore not used as a reference benchmark for assessing the fund's environmental and social characteristics.

### Methods used to integrate sustainability risks, promote environmental or social characteristics, or achieve a sustainable investment objective:

The fund includes

### What investment strategy does the fund follow to promote its environmental or social characteristics?

Sustainability and climate-related risk assessment is integrated into the fund's fundamental analysis of companies. A strong focus on GHG emissions is naturally interwoven with the fund's management, since the fund prefers to invest in positive structural growth trends and aims to minimise climate-related risks.

A key objective for the fund is to strive for continuous improvement in quantitative and qualitative ESG approaches. For example, the fund strives for a continuous repositioning towards a higher level of sustainability and lower climate-related risks. This process includes engaging with portfolio companies and encouraging them to adopt more sustainable business models and to increase the transparency of their ESG reporting.

In line with global thematic trends and to minimise the portfolio's sustainability and climate-related risks, the fund actively seeks investments with a positive impact on the transition to a more sustainable society and achievement of the Paris Climate Agreement goals. The fund's aim is that an increasing share of the holdings will consist of companies that are accelerating or benefiting from the transition. The selection criteria include the company's exposure to, and management of, environmental challenges and sustainability risks and how well the company's business model is positioned for the transformation.

### The fund excludes

The fund does not invest in companies involved in the following products and services. A maximum of five per cent of the turnover of the company in which the placement takes place may relate to activities relating to the specified product or service.

### Products and services

Under this heading, a fund which does not take sustainability aspects into account may also indicate which products and services are not included in the fund as a result of the fund's investment policy.

Cluster bombs, anti-personnel mines

Chemical and biological weapons

Nuclear weapons

Tobacco & Cannabis

Fund company comments: The fund also refrains from making investments in companies whose turnover exceeds 5% from cannabis.

Commercial gambling activities

Pornography

Fossil fuels (oil, gas, coal)

Fund company comments: The fund excludes companies with mining or refining activities linked to fossil fuels (coal, oil and gas) or transport from coal and oil. The fund takes a restrictive approach to the transport of gas and services associated with fossil fuels. The fund also takes a restrictive approach with regard to companies involved in power generation or network operations that make use of fossil fuels. Read more about our definitions, criteria and the possibility to invest in conversion companies in Swedbank Robur's Strategy to opt out.

### International standards

The fund avoids investing in companies involved in violations of international norms and conventions with regard to the environment, human rights, working conditions and business ethics, e.g. the UN Global Compact and OECD's guidelines for multinational companies.

The fund does not invest in companies that violate international standards. The assessment is made either by the fund manager itself or by a subcontractor.

The fund does not invest in companies that do not take steps to address identified problems or where the fund considers that the companies will not address the problems for a period that the Fund Manager deems reasonable in the individual case. This option concerns funds that develop an action plan for contested companies, which are excluded if specified conditions are not met during the prescribed period of time.

Fund company comments: When we reach the view that a company is grossly and systematically in breach of international standards and conventions or is otherwise involved in unacceptable activities with respect to sustainability and/or corporate governance, we contact them for a response. If companies exhibit a willingness to change, Swedbank Robur can remain a shareholder, otherwise the companies will be excluded from investment.

### Countries

For sustainability reasons, the fund does not invest in companies involved in certain countries/debt securities issued by certain states. This option refers to funds that carry out a countryspecific sustainability analysis that results in the exclusion of companies involved in certain countries or the exclusion of debt securities issued by certain states.

### Other

Other

Fund company comments: The above is applicable for direct investments in companies and equity derivatives in companies, but does not apply for investments in index derivatives or exchange-traded funds (ETFs).

The fund company influences

The Fund Management Company uses its ownership power to influence companies in sustainability matters.

Corporate Influence in-house

Fund company comments: In total, we have ten internal specialists in sustainability and owner governance. The specialists conduct an ongoing dialogue with different companies and/or issuers to influence them to be more sustainable and to move them in a positive direction. The fund managers are also involved in the advocacy work.

Corporate influence in cooperation with other investors

Fund company comments: We engage with companies within the framework of PRI (Principles for Responsible Investment) and together with other investors on our own initiative.

Corporate influence through external suppliers/consultants

Fund company comments: Influence is conducted through two external suppliers: ISS Ethix and Sustainalytics Engagement Service.

Votes at general meetings

Fund company comments: The fund company participates and votes on general meetings based on the fund company's principles of unitholder engagement.

Participates in nomination committees to influence the composition of the Board of Directors

Other corporate influence

**Information on the methodology used to assess, measure and monitor the environmental or social characteristics of the overall sustainable impact of the financial product**

The fund has a documented investment and environmental, social and corporate governance (ESG) approach, which the fund's managers follow when making investment decisions. The fund's holdings are screened using data from several providers. This ensures that the fund complies with the pre-defined criteria for excluding holdings. The data may also be used to assess the holdings included in the fund. Every day, the risk department determines whether the fund is in line with the exclusion criteria. The fund's sustainability parameters, such as the fund's carbon footprint, are measured on a regular basis if such measurement is possible given the fund's investment universe and access to underlying data.

**Fund risk profile**

Equity funds normally provide the greatest opportunity for high value growth in the long term. Any investment in an equity fund also has a higher risk, however, as share prices may fluctuate significantly in equity markets.

The fund invests in assets concentrated in one region (Europe), which increases the risk relating to the fund. However, the risk is somewhat diminished, as most European equity markets are established and mature markets, and in addition, investments are diversified over several sectors, which reduces the risk somewhat. The fund invests in securities denominated in other currencies than Swedish kronor and is therefore also affected by exchange rate fluctuations.

As the fund normally only uses derivatives to a limited extent, the risk profile of the fund is only affected to some degree. The use of derivatives can vary from time to time.

**Target market**

This fund may not be appropriate for investors who plan to withdraw their investment within 5 years.

**Level of activity**

Equity funds can be measured in various ways. A common measure is active risk, or tracking error showing how much the fund's historical returns have varied in value in relation to its benchmark. The level of tracking error differs between different fund categories (equities, interest rates) as the volatility of the underlying markets differs. Tracking error is calculated according to industry standards and is based on monthly data and covers the last 24-month period.

**Description of activity rate**

The fund is actively managed. The fund manager conducts an ongoing analysis and makes active decisions regarding the fund's composition and holdings. The fund manager monitors and modifies the portfolio in order to meet the fund's objectives.

**Explanation of the benchmark**

The fund's benchmark index is the MSCI Europe Index, which monitors the performance of large and medium-sized companies in stock markets in countries throughout Europe. The index does not include emerging market countries. The fund manager assesses whether the index is consistent with the fund's investment policy with regard to the choice of asset class, market and profile of return and risk.

**Active risk**

Year	Active risk (Tracking Error), %
2021	7.60
2020	7.20
2019	3.63
2018	2.83
2017	2.84
2016	3.19
2015	2.55
2014	1.64
2013	1.63
2012	1.81
2011	1.59
2010	1.51

**Comment on achieved active risk**

Since the fund is actively managed, the fund's investments differ from those of the benchmark index and result in an Active risk higher than zero. The rate of activity of the fund has varied over the last 10 years, or less if the fund has not existed or had a benchmark index for 10 years, depending on the market view of the management company responsible and the investment strategy, as well as general changes in the market. In terms of the last 24-month period, which is reported in 2021, the activity rate was relatively high compared with the average for previous years in the table.

**Fees**

**Ongoing charges:**

Ongoing charges represent the total costs for operating the fund, including marketing and distribution, and this figure, unless otherwise stated, regards costs for the previous year. Ongoing charges do not include transaction costs or any performance-based fees.

Ongoing charges	%
Share class A	1.25
Share class I	0.52

**Current management fee:**

The current management fee is the annual management fee the company takes from the fund. The management fee includes compensation for the expenses related to custody of the fund's assets plus the costs of financial supervision and fees from auditors.

Current management fee	%
Share class A	1.25
Share class I	0.52

**Maximum management fee:**

The maximum management fee is the annual management fee that the company is permitted to charge the fund in accordance with the fund rules. The management fee includes compensation for the expenses related to custody of the fund's assets plus the costs of financial supervision and fees from auditors.

Maximum management fee	%
Share class A	1.35
Share class I	0.62

**Entry charge:**

A deposit fee will be charged for purchases less than SEK 1 million. When accumulated purchases with deductions for redemption at a historical rate exceed SEK 1 million there will not be any deposit fee on additional purchases. The fee will accrue to the Company.

Entry charge	%
Share class I	2.00

**Risk measurement**

The company measures, on a daily basis, the total exposure of the fund using the commitment approach.

The commitment approach measures fund exposure arising from the use of derivatives. This calculation involves converting derivative positions into a comparable position in the derivative's underlying assets. A delta calculation is used for options, which is included in the total exposure when using the commitment method. When calculating total exposure, the Company considers netting and hedging. The total exposure, when calculated in this way, may not exceed 100% of the fund's value.

### Valuation

The value of the fund is calculated by deducting the debts related to the fund from the assets. The principles and assessment of the assets in the fund are described in the fund rules.

### Derivative instruments

When the fund does use derivatives in its management strategy, both the total and the active risk levels can fluctuate significantly.

The purpose of the use of derivatives may be to protect the fund against certain risks, e.g. currency risks. It may also be to create leverage in the fund's market exposure in order to benefit from the fund management's prevailing market expectations. Derivatives are also used to increase efficiency in the fund exposure to direct market risk as may be desirable for the fund from time to time.

### Collateral management

Entering OTC financial derivative transactions exposes the fund to counterparty risk. In order to regulate counterparty risk, the company has a policy of entering into collateral agreements with the counterparties. The type of collateral accepted is defined in the company's collateral instruction established in accordance with applicable regulations and ESMA's guidelines on exchange-traded funds and other matters relating to fund companies (ESMA 2014/937).

As collateral, cash and cash equivalents are primarily accepted. Collaterals by other means than cash and cash equivalents may, however, arise. Collateral received which does not consist of cash and cash equivalents shall have a low market, credit and liquidity risk. Collateral obtained for OTC derivatives which are not cash and cash equivalents may not be reinvested, sold or pledged.

### Limitation of sale and redemption orders

Sales or redemption orders for fund units cannot be limited. There is no maximum or minimum limit for purchases.

### Customer's purchase and redemption of fund units

Customer's purchase and redemption of fund units are made through Swedbank AB (publ) and cooperating savings banks etc. The requests for customer's purchases and redemptions may only be withdrawn if the company permits it.

In the event of customer's purchase and redemption, made before 4:00 pm (cut-off point) on a certain banking day, the trading price is normally set on the same banking day. The cut-off time may vary with our distributors. For customer's purchase and redemption made after the cut-off time, the trading price is normally set on the next banking day.

On certain banking days, the cut-off point can occur earlier than as stated above.

The trading price is normally available at the company no later than the banking day following the banking day on which the trading price is set as described above.

The fund company acknowledges that fund shares are issued before payment is made only in connection with a swap between two fund company funds.

Visit [swedbankrobur.com](http://swedbankrobur.com) for additional information on fund distributors and current fund rates.

### Share classes - dividends, conditions, etc.

The fund consists of the following share classes:

A. Accumulating (non-distribution) share class traded in SEK.

B. Distribution share class traded in SEK.

C. Accumulating (non-distribution) share class traded in EUR.

D. The distribution share class traded in EUR.

E. Accumulating (non-distribution) share class traded in NOK.

F. Distribution share class that is traded in NOK.

G. Accumulating (non-distribution) share class traded in USD.

H. Distribution share class traded in USD.

I. Accumulating (non-distribution) share class traded in SEK with threshold for subscription fee of SEK 1.000.000.

J. Distribution share class traded in SEK with threshold for subscription fee of SEK 1.000.000.

K. Accumulating (non-distribution) share class traded in EUR with a subscription fee threshold of EUR 100.000.

L. Accumulating (non-distribution) share class traded in SEK with terms and conditions for distribution.

M. Distribution share class traded in SEK with terms and conditions for distribution.

N. Accumulating (non-distribution) share class traded in EUR with terms and conditions for distribution.

O. Accumulating (non-distributing) share class traded in NOK with terms and conditions for distribution.

P. Accumulating (non-distributing) share class traded in USD with terms and conditions for distribution.

Q. Accumulating share class (pays no dividends) traded in SEK with terms and conditions for distribution.

R. Distribution share class traded in SEK with terms and conditions for distribution.

S. Accumulating (non-distribution) share class traded in EUR with terms and conditions for distribution.

T. Accumulating (non-distribution) share class traded in NOK with terms and conditions for distribution.

U. Accumulating (non-distributing) share class traded in USD with terms and conditions for distribution.

V. Accumulating (non-distribution) share class traded in SEK. Open only for funds managed by Swedbank Robur Fonder AB.

A share class with a subscription threshold is associated with a sales fee.

A share class with terms and conditions for distribution (share class L-U) is open only to:

- shareholders who, under the investment service contracts referred to in Chapter 2, Section 1 of Act (2007:528) on the securities market or equivalent Swedish or foreign regulation, invests in the fund, provided that, and only for as long as, there is a written agreement between the fund management company and the provider of the investment service, or an intermediary at the distribution stage, which expressly allows the distribution of the unit class without entitling the distributor to compensation from the fund management company, and for

- insurance companies investing in the fund under contracts with policyholders, provided that, and only for as long as, there is a written agreement between the fund company and the insurance company or an insurance distributor which expressly authorises investment in the unit class without entitling the insurance company or distributor to compensation from the fund company.

If, with the same financial means, a unit-holder simultaneously fulfils the conditions for more than one share class, such means shall be re-transferable to that with the lowest management fee in accordance with Section 11 of the fund rules. If a unit-holder's means ceases to meet the conditions for a share class, such means shall be re-transferred to the share class with the lowest administration fee in accordance with section 11 the conditions of which are met by the financial means of the unit-holder.

Conversion shall take place without changing the terms of distribution and currency.

The person who has distributed fund units to a unit-holder is responsible for ensuring that the unit-holder receives the share class to which it is entitled.

If there is no receiving share class open to subscription with the same conditions for distribution and currency when the transfer is to take place because the unit holder's financial means no longer meet the conditions for a share class, the transfer shall take place to the share class which most closely corresponds to the share class whose conditions the unit holder's means no longer meet. Transfers shall not take place to or from share class I-K. Currency hedging will not take place as a consequence of the currency used for share subscription and share redemption.

#### **Limitation of liability**

According to the Act, the fund company and the custodial bank are responsible for damages they have caused the fund or fund unit holders. That mentioned below does not limit the unit holders' rights to damages under Chapter 2, section 21 and Chapter 3, sections 14-16 of the Act.

The fund company and the custodial bank are not liable for damages resulting from Swedish or foreign legislation, measures taken by Swedish or foreign authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The provision regarding strikes, blockades, boycotts and lockouts shall also apply should the fund company or the custodial bank be the subject of or take such action.

The fund company and custodial bank shall not be liable for losses arising from circumstances not described above if they have acted with reasonable diligence. The fund company and the custodial bank are not responsible in any case for indirect damage, nor for damage caused by the custodial bank or other contractor that has been engaged using the required diligence by the fund company or custodial bank. The fund company and the custodial bank are not responsible for damage that may arise in relation to disposal restrictions which may be applied to the fund company or custodial bank.

Should the fund company or the custodial bank be prevented from taking action due to circumstances mentioned in the second paragraph above, such action must be postponed until the obstacle has been removed.

#### **Permitted investors**

Neither the fund nor the company are or intend to be registered under the applicable version of the United States Securities Act 1933, United States Investment Advisers Act 1940 or other similar legislation in the USA, Canada, Japan, Australia, or other country. The fund rules therefore contain certain restrictions as to the natural persons or legal entities that may be unit holders in the fund. To enable company compliance with these restrictions, all those who want to subscribe to fund units must provide, from time to time, information regarding national residence and other circumstances the fund company considers relevant. Unit holders shall provide notification of changes to these circumstances when necessary. The fund units and their rights may only be re-transferred to a non-U.S. citizen (as defined in Regulation S of the United States Securities Act 1933) and must be executed in a transaction outside the USA that complies with Regulation S of the United States Securities Act 1933.

If the company finds that an investor is not entitled to subscribe to or own units in the fund as specified in these restrictions, then the company is entitled to refuse subscription of the units, and without prior consent redeem units on their account.

#### **Discontinuation of the fund or transfer of fund business**

When the company determines to discontinue the fund or to transfer management of the fund to another fund company, subject to the consent of Finansinspektionen (the Swedish Financial Supervisory Authority), all unit holders will be informed. Management of the fund shall immediately be assumed by the custodial bank if the Swedish Financial Supervisory Authority revokes authorisation for the fund company, or the fund company enters liquidation or bankruptcy proceedings.

#### **Changes to fund rules**

The company may change the fund rules. Any such changes shall be submitted to the Swedish Financial Supervisory Authority for approval. Changes may affect fund characteristics, such as its investment policy, fees, and risk profile. When such changes are approved, the decision must be made available at the fund company and the custodial bank and must be notified as specified by the Swedish Financial Supervisory Authority.

#### **Tax rules**

##### **Swedish fund unitholders taxation (natural persons and estates of decedents).**

As of 1 January 2012, Swedish tax laws require that fund unit holders pay a standard withholding tax annually for their fund holdings. The standard tax is based on the fund's capital base which determines the unit holders' fund holding at the start of the tax year. An imputed income of 0.4% is calculated on the capital base. The imputed income is included in totals for income of capital which is then taxed at 30% for natural persons. This gives an actual tax of 0.12 percent of the fund value.

Example: A unitholder owns fund units valued at SEK 100,000 at the start of the tax year. The capital base is SEK 100,000 and the imputed income then SEK 400 (100,000 x 0.004). The imputed income is then included in income of capital which is then taxed at 30%. The tax is then SEK 120 (400 x 0.3).

When the units are sold or redeemed, the capital gain is taxed at 30%, while capital loss is deducted as follows. Capital losses on listed units in Swedish fixed income funds (funds that only invest in Swedish debt instruments) may be offset 100 percent against other capital income. For listed units in other funds, a capital loss may be offset 100% against capital gains in listed equities and other fund units. Otherwise, 70% of capital losses may be offset against capital gains.

The annual imputed income is reported to the Tax Agency (Skatteverket), but no preliminary tax is withheld. Preliminary tax at 30 per cent will be deducted from dividends. The total dividend will be reported to the Swedish Tax Agency. Capital gains and losses arising from sale or redemption of fund units are reported to the Swedish Tax Agency, but no tax deduction is made.

Special taxation rules apply to funds linked to investment savings accounts, unit-linked policies, IPS, or premium pension system. For natural persons, the imputed tax rate for income from business operations is currently taxed at 22%. For foreign fund unit holders, other rules apply.

Taxation may be affected by individual circumstances. If you are unsure about tax implications, you should seek expert advice.

#### **Marketing fund units in other EEA countries**

The fund is marketed in:  
Finland

and the Company has employed third-party distributors of the funds to make payments to fund unit holders, redeem units, and provide information. Please see further information about our distributors abroad at [swedbankrobur.se](http://swedbankrobur.se).

#### **Unitholder register**

The company maintains a register of all unit holders and their holdings. The fund company has commissioned Swedbank AB (publ) to maintain this register.

Unitholders' holdings are reported in interim and annual statements, which also contain information necessary for tax reporting purposes.

The right to a share of the fund and the rights deriving therefrom are contingent on registration of units.

#### **Third Party contract**

The company has mandated third parties to carry out certain demarcated parts of the business:

Internal audit and registrations in fund unitholder registers are carried out by Swedbank AB (publ). For some OTC derivatives, collateral management, confirmation management, reconciliation and reporting have been entrusted to GlobeOp.

The company has procedures that enable identifying, processing, monitoring, and reporting any conflicts of interest.

#### **The Custodian Bank**

Swedbank AB (publ)  
Domicile: Stockholm  
Corporate identity number: 502017-7753  
Legal form of the custodial bank: Limited company  
The principal operations of the custodial bank: Banking

The Custodian Bank shall monitor money flows in the fund, maintain custody of the fund assets, and execute decisions of the company. The Custodian Bank shall also ensure that the sale and redemption of fund units, valuation of fund units, and the use of fund assets comply with legal requirements and the fund rules.

Swedbank AB (publ) has contracted with State Street Bank International GmbH to act as securities depository for securities held outside Sweden. Swedbank AB (publ) has procedures that enable identifying, managing, monitoring, and reporting any conflicts of interest.

Since the Custodian Bank is part of Swedbank AB, conflicts of interest may arise between the operations of the Custodian Bank and other operations with Swedbank AB, and its subsidiaries.

The Depository Institution has a legal obligation to identify and deal with such conflicts of interest and also report the conflicts of interest to the fund's investors. Examples of activities that can involve conflicts of interest are: (i) The provision of nominee registration, fund administration performance, the establishment of a unit holders' register, analyses, management of securities loans, asset management, investment advice and/or other fund advisory services; (ii) Participation in banking, securities trading including currency trading, derivatives trading, lending, brokerage, market making or other financial transactions with the fund., either on one's own account or on behalf of other customers.

The company and the Custodian Bank are part of the same group, which also may cause conflicts of interest involving control and priorities within the group. To ensure potential conflicts of interest have no negative impact on the fund and its investors, the Custodian Bank is functionally and organisationally separate from the other operations within Swedbank AB and the company. The custodial bank's business is always managed for the purpose of preserving the interests of the fund unit holders, and it complies with applicable market terms and conditions. Current information regarding the Depository Institution and its contractors is provided free of charge upon request.

#### **Remuneration policy**

The board of directors for Swedbank Robur Fonder have adopted a remuneration policy that is consistent with and promotes sound and efficient risk management. The Swedbank Robur Fonder (the company herein) remuneration policy is designed to counter risk taking that is inconsistent with the risk profiles of the company's managed funds. The remuneration policy shall counteract an excessive risk taking, and stimulate employees to provide sustainable performance, and a sound and efficient risk management for unit holders, the company and the funds managed by the company.

The remuneration policy consists of two variable remuneration programs, and a fixed remuneration (in the form of monthly salary). The fixed portion of remuneration represents a sufficiently large portion of total remuneration to enable setting all variable remuneration to nil. The variable remuneration is limited to a maximum of 12 times the fixed monthly salary.

The remuneration programme is designed to ensure, to the greatest possible extent, avoiding conflicts of interest. Each portfolio manager is monitored and assessed based on all their management assignments. The variable remuneration programme is continually followed and monitored. The variable remuneration is designed to stimulate sound behaviour and desired results, and to create a sound balance between reward and risk exposure in the fund.

The variable remuneration is based on the employee's performance, which is assessed according to the performance criteria set at the beginning of every calendar year, including in the risk mandate for each fund. The assessment is based on a combination of quantitative and qualitative results.

Information on the current remuneration policy can be found at [www.swedbankrobur.se/legal-documents](http://www.swedbankrobur.se/legal-documents). We can provide a paper copy on request, please contact Swedbank Robur Fonder AB.

#### **Information on the company and managed funds**

##### **The company**

Swedbank Robur Fonder AB  
Malmskillnadsgatan 23  
111 57 Stockholm

Corp. ID no.: 556198-0128. The company's legal form: Limited company with share capital of SEK 1,250,000. The company was formed in 1967 with its domicile in Stockholm.

##### **Board members**

Joachim Spetz, Chairman of the Board, former CEO  
Erik Penser Bank, former CEO  
Handelsbanken Fonder, self-employed  
Gunilla Nyström, LL.B., former CEO AMF Fonder AB  
Lars Afrell, LL.B., former General Counsel Svenska Fondhandlareföreningen  
Lennart Jacobsen, MSc, CEO Invesi Investment AB  
Monica Åsmyr, self-employed, former CEO Almi Stockholm Sörmland

#### **CEO**

Liza Jonson

#### **Deputy CEO**

Fredrik Ulfhielm

#### **Senior executives**

Head of Business & Product Development, Morgan Andersson  
Head of Support and Strategy, Olof Neiglick  
Compliance Manager, Helga Olander  
Head of Development Operations, Michaela Uggla  
Head of Finance & Controlling, Fredrik Ulfhielm  
Head HR, Helena von Koch  
Head of Investment Management, Pia Haak  
Head Risk, Ida Gustavsson  
Head legal & complaint manager, Pia Sodemann  
Head of Sales, Jens Grebäck  
Head of Sustainability & Corporate Governance, Pia Gisgård

#### **Auditors**

The fund's auditing company is PwC Sverige AB and the designated auditor is Peter Nilsson.

#### **Funds managed by Swedbank Robur Fonder AB**

Folksam LO Obligation  
Folksam LO Sverige  
Folksam LO Världen  
Folksam LO Västfonden  
KPA Etisk Aktiefond  
KPA Etisk Blandfond 2  
Swedbank Humanfond  
Swedbank Robur Access Asien  
Swedbank Robur Access Edge Emerging Markets  
Swedbank Robur Access Edge Europe  
Swedbank Robur Access Edge Global  
Swedbank Robur Access Edge Japan  
Swedbank Robur Access Edge Sweden  
Swedbank Robur Access Edge USA  
Swedbank Robur Access Europa  
Swedbank Robur Access Global  
Swedbank Robur Access Mix  
Swedbank Robur Access Sverige  
Swedbank Robur Access USA  
Swedbank Robur Aktiefond Pension  
Swedbank Robur Allemansfond Komplet  
Swedbank Robur Asienfond  
Swedbank Robur Bas 100  
Swedbank Robur Bas 25  
Swedbank Robur Bas 50  
Swedbank Robur Bas 75  
Swedbank Robur Bas Ränta  
Swedbank Robur Climate Impact  
Swedbank Robur Corporate Bond Europe  
Swedbank Robur Corporate Bond Europe High Yield  
Swedbank Robur Corporate Bond Europe IG  
Swedbank Robur Corporate Bond Europe Mix  
Swedbank Robur Corporate Bond Nordic  
Swedbank Robur Dynamic  
Swedbank Robur Europafond  
Swedbank Robur Exportfond  
Swedbank Robur Fastighet  
Swedbank Robur Fokus  
Swedbank Robur Förbundsfond Global  
Swedbank Robur Förbundsfond Sverige Plus  
Swedbank Robur Förbundsranterfond  
Swedbank Robur Förbundsranterfond Kort  
Swedbank Robur Global Emerging Markets  
Swedbank Robur Global High Dividend

Swedbank Robur Global Impact  
Swedbank Robur Globalfond  
Swedbank Robur Healthcare  
Swedbank Robur Japanfond  
Swedbank Robur Kapitalinvest  
Swedbank Robur Kinafond  
Swedbank Robur Microcap  
Swedbank Robur Mixfond Pension  
Swedbank Robur Nordenfond  
Swedbank Robur Ny Teknik  
Swedbank Robur Obligation  
Swedbank Robur Obligation Lång Inst  
Swedbank Robur Obligation Plus  
Swedbank Robur Östeuropafond  
Swedbank Robur Räntefond Kort  
Swedbank Robur Räntefond Kort Plus  
Swedbank Robur Realränta  
Swedbank Robur Rysslandsfond  
Swedbank Robur Selection 25  
Swedbank Robur Selection 50  
Swedbank Robur Selection 75  
Swedbank Robur Småbolagsfond Europa  
Swedbank Robur Småbolagsfond Global  
Swedbank Robur Småbolagsfond Norden  
Swedbank Robur Småbolagsfond Sverige  
Swedbank Robur Small Cap Emerging  
Markets  
Swedbank Robur Small Cap USA  
Swedbank Robur Stiftelsefond  
Swedbank Robur Stiftelsefond Utd  
Swedbank Robur Sverige  
Swedbank Robur Talenten Aktiefond MEGA  
Swedbank Robur Talenten Räntefond MEGA  
Swedbank Robur Technology  
Swedbank Robur Transfer 50  
Swedbank Robur Transfer 60  
Swedbank Robur Transfer 70  
Swedbank Robur Transfer 80  
Swedbank Robur Transfer 90  
Swedbank Robur Transition Energy  
Swedbank Robur Transition Global  
Swedbank Robur USA  
Swedbank Savings Fund 10  
Swedbank Savings Fund 100  
Swedbank Savings Fund 30  
Swedbank Savings Fund 60

#### **About the information brochure**

This information brochure was produced in accordance with the Investment Funds Act (LVF; 2004:46) and the Swedish Financial Supervisory Authority Directives (2013:9) on securities funds.

This brochure and the fund rules together form the so-called information brochure. See more information at [www.swedbankrobur.se/legal-documents](http://www.swedbankrobur.se/legal-documents).

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