

Information Brochure

2022-10-12

Swedbank Robur Access Edge Sweden

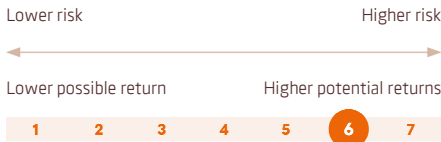
Fund type: Equity funds

Share classes open for trading: A, C

Dividends

The share classes do not issue a dividend.

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 6 fund, which means there is a high 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 C open for trading. Share class A is a non-dividend share class traded in SEK and class C is a non-dividend share class traded in EUR. 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 have equal rights to the assets in the fund. Additional information regarding the fund's share classes can be found further down in the information brochure.

Investment Policy

The fund is an equity fund that mainly invests in companies in various industries in Sweden. The goal is to provide a sustainable exposure to Sweden and the Nordic region. The fund aims to emulate the development of the OMX Stockholm Benchmark Cap GI, but there are expected to be differences between the fund's return and the benchmark index, which from time to time can be significant, due to the fund's sustainability focus. OMX Stockholm Benchmark Cap GI, is a market value index consisting of large and medium-sized companies from Sweden.

Companies in Sweden are companies whose shares are traded in Sweden, companies registered in or whose executive management is located in Sweden or companies that at the time of investment have at least 50% of their assets, production, profits or turnover in Sweden.

The fund also has the possibility to invest up to 10% of the assets in the Nordic region. Then in companies whose shares are traded in the Nordic countries, companies registered in or whose executive management is located in the Nordic countries or companies that at the time of investment have at least 50% of their assets, production, profits or turnover in the Nordic countries.

The fund may invest its funds in transferable securities, money market instruments, derivative instruments, mutual fund units and in credit accounts.

The fund complies with the fund company's policy for responsible investment. The fund also conducts in-depth sustainability work and thus complies with additional sustainability criteria. Investments are not made in companies that extract fossil fuels or have more than 5% of their turnover from the production and/or distribution of munitions, alcohol, tobacco, gambling, pornography or the production of electricity, coal or gas. Furthermore, the fund shall completely refrain from investments in companies that produced and/or distribute weapons as well as companies that produce pornographic materials.

The fund will refrain from investments in companies involved in violations of international human rights and environmental standards. In addition, the fund shall avoid investments in those companies that the investment company has identified as having the worst sustainability operations within respective sectors.

The fund selects companies with relevant sustainability operations in terms of risk in its sector. The fund puts a premium on companies with a low climatic risk, e.g. companies with a low carbon dioxide intensity. In addition to the fund's other investments, approximately 10% of the fund's assets can also be invested in shares in so-called impact companies. i.e. companies which, according to the assessment of the fund company, have products, services and activities that contribute to fulfilling the UN's global goals for sustainable development with focus on better climate. This includes, for example, contributions to the transition to renewable energy and a circular economy. Unlike the companies in the benchmark index, this percentage can also consist of small companies and companies from other Nordic markets.

The fund is managed in accordance with the Paris Agreement, which means that the fund selects underlying assets in such a way that it meets the requirements of the EU Paris Aligned Benchmark. The management method is based on the climate index guidelines set out in the Benchmark Regulation of the EU Sustainable Finance Action Plan (EU Benchmark Regulation). The guidelines, which among other things regulate the level of carbon footprint, are applied at fund level. The fund does not apply any direct restrictions to the carbon footprint of individual companies, but it is the fund as a whole that meets the requirements of the climate index on which the management method is based, i.e. the EU Paris Aligned Benchmark.

This means that companies can be included in the fund that have high carbon dioxide emissions. The carbon footprint is calculated using an intensity measure, tons of CO₂, scope 1+2 divided by the enterprise value. Sustainability is a crucial part of the investment process. The fund is administered passively through the application of a quantitative management strategy. The aim of this strategy is to create a portfolio with a high sustainability profile, while, as far as possible, its composition mimics the nature of the index. The fact that the fund is administered passively means that its management is rules-based and that no positions are taken for the purpose of creating excess returns against the index.

The fund's index is provided by an administrator based outside the EU.

The company has established an action plan in case the fund's index ceases to be provided or changes significantly. In such a situation, the company will identify an alternative index deemed appropriate for the fund in accordance with the action plan. Should the fund's index cease to be provided, the fund rules would have to be amended. In the event of a change in the fund provision of this kind, the unit holders are protected by the examination carried out by the Swedish Financial Supervisory Authority and by notifying the unit holders (Chapter 4. 9, 9 a and 9 b §§ Act [2004:46] on mutual funds).

Policy on responsible investments

The fund complies with Swedbank Robur's Policy for responsible investments. Swedbank Robur's vision is to be a world leader in sustainable value creation. By sustainable value creation, we mean that we want to create long-term returns for our customers and at the same time contribute to a positive development for society and the environment. We consider sustainability as an integral part of well-managed and profitable investments. Read more about the Company's Policy for responsible investments, strategies and methods for integrating sustainability under the heading Sustainability at 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?

To identify the greatest sustainability risks in the fund, a structured process is carried out taking quantitative environmental, social and corporate governance (ESG) data into account. The objectives of the fund's ESG strategy are regularly monitored to ensure that the fund can once again be steered towards its objective in the event of deviations.

The fund limits sustainability risks by excluding certain types of companies, which are the companies with the weakest ESG scores, companies with controversial operations and companies that breach international standards and conventions. To reduce exposure to climate-related risks, the fund also excludes companies that derive their revenue from fossil fuels, according to pre-defined and communicated criteria.

The companies owned by the fund are reviewed annually to identify the companies with the greatest sustainability risks. The identified companies are then added to the documentation used to prioritise future ESG engagement processes. that are executed by the Sustainability Analyst team.

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 excluding investments in the activities described below.

The fund uses quantitative ESG key performance indicators (KPIs) to select companies, comprising a weighted ESG score and a pre-defined climate strategy. This means that the ESG performance of each individual company, their greenhouse gas (GHG) emissions and contributions to achieving the UN Sustainable Development Goals are taken into account. In addition, the fund is focused on over time reducing its carbon footprint, investing in climate-positive activities, and systematically rewarding companies that are actively striving to reduce climate-related risks and have a science-based target for reducing their GHG emissions.

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 investment-decision process. The composition of the fund is based on quantitative ESG KPIs.

The fund's strategy for promoting environmental and social characteristics is to measure the fund's performance using KPIs linked to ESG factors. These include a weighted ESG score and a pre-defined climate strategy. The ESG score takes into account the ESG performance of each individual company, their GHG emissions and contributions to achieving the UN Sustainable Development Goals.

The climate strategy follows the guidelines for Climate Paris Aligned Indexes, based on the EU Paris-Aligned Benchmark. These guidelines include disclosure requirements on the fund's carbon footprint reduction (both starting point and continuous reductions), on investments in climate-positive activities rather than fossil-fuel users and producers, and on systematically rewarding companies that are actively striving to reduce climate-related risks and have a science-based target for reducing their GHG emissions.

A pre-determined portion of the fund's investments are invested specifically in companies that are making various contributions to limiting climate change.

The fund is passively managed using a quantitative management approach. The aim of this strategy is to create a portfolio with a high ESG profile, while the composition and structure of the fund exhibits similar characteristics to its index

☒ 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
- ☒ Weapons and/or armaments
- ☒ Alcohol
- ☒ 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.

Fund company comments: The fund invests in equities and other equity-related negotiable securities issued by companies which respect the principles in international norms for human rights and the environment. (Among other things, this involves companies acting to promote good working conditions, good work environments, union rights and to reject discrimination and child labour. In addition, companies must carry out environmentally acceptable environmental work for their industry and work with their environmental risks and opportunities.)

☐ 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.

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 country-specific 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 it is not applicable for investments in index derivatives or exchange-traded funds (ETF).

☒ 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 have higher potential for long-term value growth. But any investment in an equity fund also has a high risk, as share prices may fluctuate significantly in equity markets.

The fund invests in assets concentrated in one country (Sweden), which increases the risk relating to the fund.

The fund invests in securities denominated in the same currency as the base currency of the fund and is therefore not affected by exchange rate fluctuations. However, the fund consists of different share classes and changes in exchange rates may mean that the currency risk differs between different share classes depending on the currency in which the share class is traded.

As the fund only uses derivatives to a limited extent, the risk profile of the fund is affected to a certain degree. The use of derivatives may vary periodically.

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 administration applies a quantitative investment strategy aimed at minimising the risk of deviations from the index given the fund's sustainability focus. In order to meet the objectives of the fund, the management monitors and modifies the portfolio.

Explanation of the benchmark

The fund's benchmark index is OMX Stockholm Benchmark Cap Gross Index, which follows the development of the largest and most-publicized companies on the Stockholm Stock Exchange. The Fund Manager considers that the index is consistent with the fund's investment policy with regard to the choice of asset class, market and return and risk profile.

Active risk

The fund was launched in 2020. Because it takes 24 months of history to calculate the activity metric, there are no figures for the first two years.

Comment on achieved active risk

The fund has an index-oriented investment strategy with an objective of providing a sustainable exposure to emerging markets. The level 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. As a result of the fund's in-depth sustainability work, the fund has had overweights and underweights against the index and an active risk higher than zero. Under normal market conditions, active risk is estimated to vary between 1 and 2 per cent, which means that the fund may show both a positive and negative deviation from the development of the index. The fund's ability to follow indices is generally also affected by transaction costs, for example, arising from the reinvestment of dividends, management of flows and index changes. The active risk measure cannot be reported since the fund was launched in 2020.

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 | 0.31 |
| Share class C | 0.30 |

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 | 0.30 |
| Share class C | 0.30 |

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 | 0.40 |
| Share class C | 0.40 |

Risk measurement

The fund company measures daily the total exposure of the fund using the commitment approach.

The commitment method measures fund exposure arising from the use of derivatives. This calculation involves converting derivative positions into a comparable position in the underlying assets of the derivative. Delta is also calculated for options, which is included in the total exposure when using the commitment approach. When calculating total exposure, the fund 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.

Special information on total return swaps

The fund may trade total return swaps. A total return swap is an agreement between two parties to exchange the total return in an asset for interest compensation. The asset in this case is a share, a basket of shares or an index and the total return is based on the price change in the asset including any dividends and other capital income that took place during the holding period.

Total return swaps can be used in the management of the fund as a capital-efficient way of achieving desired exposures to selected shares and indices. This can be done, for example, by the fund management choosing to create an exposure to an industry sector, region or individual share in a way that binds less capital than an investment through a share or index. These instruments can also be used to manage flows in the fund. Normally, total return swaps will not be used to increase or reduce exposure to the market. An increased position in a financial instrument will therefore not change the fund's overall market exposure.

When selecting a counterparty, due diligence is carried out, including a review of the terms, conditions and principles related to the implementation of the assignment. This is to ensure compliance with general market practices. All eligible counterparties undergo an evaluation every two years, no later than two years after the counterparty has been accepted and the activity has begun. Counterparties shall have a minimum credit rating of BBB +.

The fund deals with total return swaps with the counterparty Citigroup Global Markets Limited.

Collateral is received to reduce the fund's risk. As collateral, only cash and cash equivalents stored at the fund's custodial bank are accepted. These cash and cash equivalents are not reinvested.

The maximum share of total return swaps is limited to 10% of the fund's value.

The expected use of total collection swaps will be limited.

All revenue that accrues in the use of total return swaps shall after deduction of administrative costs for collateral management and other costs be credited to the fund.

The fund does not use any other types of transactions for securities financing.

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 for additional information on fund distributors and current fund rates.

Share classes - dividends, conditions, etc.

The fund consists of the following unit classes:

- A. Cumulative (non-distributing) share class traded in SEK.
- B. Distribution share class traded in SEK.
- C. Accumulating (non-distributing) share class traded in EUR.
- D. The distribution share class traded in EUR.
- E. Accumulating (non-distributing) share class traded in NOK.
- F. Share class that is traded in NOK.
- G. Accumulating (non-distributing) share class traded in USD.
- H. Distribution share class traded in USD.
- I. Accumulating (non-distributing) share class traded in SEK with threshold for subscription fee of 10,000,000 SEK.
- J. Distribution share class traded in SEK with threshold for subscription fee of 10,000,000 SEK.
- K. Accumulating (non-distributing) unit class traded in EUR with a subscription fee threshold of EUR 1,000,000.
- L. Accumulating (non-distributing) 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-distributing) share class traded in EUR under distribution conditions.
- O. Accumulating (non-distributing) share class traded in NOK with distribution conditions.
- P. Cumulative (non-distributing) share class traded in USD with distribution terms and conditions.
- Q. Accumulating (non-distributing) share class traded in SEK with terms and conditions for distribution.
- R. Distribution share class traded in SEK with terms and conditions for distribution.
- A. Accumulating (non-distributing) share class traded in EUR under distribution conditions.
- T. Accumulating (non-distributing) share class traded in NOK with distribution conditions.
- U. Cumulative (non-distributing) share class traded in USD with distribution terms and conditions.

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

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

A share class with deployment conditions (share class L-U) is open only to:

- shareholders who, under the investment service contracts referred to in Chapter 2, 1 § 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 Manager 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 Manager, and for

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

If, with the same funds, a unit holder simultaneously fulfils the conditions for more than one unit class, the funds 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 funds cease to meet the conditions for a share class, the funds shall be re-transferable to the unit class with the lowest management fee in accordance with § 11 whose conditions the unit holder's funds meet.

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 there is an entitlement.

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 funds no longer meet the conditions for a share class, the share class shall be carried out which corresponds almost to the share class whose conditions the unit holder's funds no longer meet.

Non-transfer shall be made to or from class I-K.

Currency hedging will not occur because of the currency in which the shares are subscribed for and redeemed.

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 ($100,000 \times 0.004$). The imputed income is then included in income of capital which is then taxed at 30%. The tax is then SEK 120 (400×0.3).

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
Norway
Estonia
Latvia
Lithuania

and the company has employed third-party distributors of the funds to make payments to fund unitholders, redeem units, and provide information. Please see more information about our dealers abroad at swedbankrobur.se.

Unitholder register

The company maintains a register of all unit holders and their holdings. To maintain this register the fund company has commissioned Swedbank AB (publ) for share classes in SEK and European Fund Administration S.A. for share classes in EUR.

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. 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 Ugglå
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 Ranta
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 Förbundsrentefond
Swedbank Robur Förbundsrentefond 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 Rantefond Kort
Swedbank Robur Rantefond 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 Rantefond 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.