

Product name:
Swedbank Robur Access Edge Sweden

Legal entity identifier:
549300062CE0P42ECO79

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

The EU Taxonomy is a classification system, establishing a list of **environmentally sustainable economic activities**. For the time being, it does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?



Yes



No



It will make a minimum of **sustainable investments with an environmental objective**: _%



in economic activities that do qualify as environmentally sustainable under the EU



in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



It will make a minimum of **sustainable investments with a social objective**: _%



It promoted Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 8% of sustainable investments



with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy



with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy



with a social objective



It promoted E/S characteristics, but **will not make any sustainable investments**



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

The fund promotes the following environmental and social characteristics:

- Low emissions of carbon dioxide and consequently a reduction of the fund's carbon dioxide intensity over time (**Carbon emission indicator**).
- Business strategies that include UN Global Goals (SDG, Sustainable Development Goals) for sustainable development (**SDG aligned revenue indicator**).
- Company revenues that come from investments in alternative energy, energy efficiency, green buildings, sustainable water or sustainable agriculture, as well as company revenues generated from preventing emissions (**Green share indicator**).
- Different aspects of climatic improvements, aspects of environmental, social and corporate governance, as well as operations that contribute to achieving UN global goals for sustainable development (SDG) (**Swedbank Robur Quant Score indicator**).

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

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

- **Carbon emission indicator:** Weighted average carbon dioxide intensity [tCO₂e/USD sales].
- **SDG aligned revenue:** Percentage of assets under management (AUM) linked to the company's revenue streams that are in line with global UN goals for sustainable development (SDG).
- **Green share indicator:** The indicator measures the 'green' portion in the organisation's investments with revenue streams linked to any of the 6 'environmental impact themes', including alternative energy, energy efficiency, green buildings, emission prevention, sustainable water, or sustainable agriculture.
- **Swedbank Robur Quant score indicator:** Swedbank Robur's Quant Sustainability Score is a weighted sustainability score that takes into account every company's efforts in areas pertaining to the climate, environment, social aspects, and corporate governance, the company's greenhouse gas emissions as well as the company's contributions to global UN goals for sustainable development.

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

The purpose of the sustainable investments in the fund is to contribute to the fulfilment of the UN's Sustainable Development Goals (SDG), also known as the Global Goals, where social and environmental needs are taken into consideration. The sustainable investments consist of companies whose products and services contribute to the Global Goals. What the distribution between investments that contribute to either the social or environmental goals will look like can vary depending on the composition of the fund over time.

The Management Company uses criteria and limit values to assess whether a company constitutes a sustainable investment according to the EU SFDR framework (Sustainable Finance Disclosure Regulation). To constitute a sustainable investment, the company should have a turnover in line with one or more SDGs of at least 20%. Exceptions can be made for companies with an SDG-alignment of at least 15%, if the company's activities are deemed important for achieving the UN's Global Goals. Investments are also evaluated in order to make sure that they do not strongly counteract any of the UN's Global Goals. A sustainable investment must also not cause significant harm to any environmental or social objective and must adhere to good praxis for good governance.

According to SFDR, the proportion of an investment that is aligned with EU taxonomy for environmentally sustainable activities is deemed to constitute a sustainable investment. The fund's investments may target one or more of the environmental goals in the EU taxonomy. Read more about Swedbank Robur's definition of sustainable investments according to SFDR on our webpage.

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

The Fund analyses how the sustainable investments affect such things as emissions, water and biodiversity on an ongoing basis. The fund also ensures that the holdings do not seriously and systematically infringe on accepted international standards and conventions relating to sustainability as adopted by the UN, ILO and OECD or are otherwise involved in unacceptable operations relating to sustainability or corporate governance. The purpose for this is to guarantee that the sustainable investments do not cause significant harm to environmental or social goals.

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

When individual securities are assessed to see whether they cause substantial harm to any environmental or social goals, the indicators are studied with regard to negative consequences for sustainability factors (Principal Adverse Impacts, PAI). The Management Company analyzes PAI indicators that are considered to be able to measure significant harm and has set threshold values for when the PAI indicators should be considered to demonstrate such harm. In those cases where limit values are surpassed, the security will not constitute a sustainable investment.

In special cases where Swedbank Robur determines that, despite exceeded value, the investment does not constitute significant harm, e.g. due to corporate or sector-specific factors, it can be regarded as a sustainable investment if other criteria are met.

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

External suppliers will provide Swedbank Robur with an analysis of which companies can be associated with violations of international norms. The analysis providers will investigate whether there is systematic in how corporations are associated with such violations, determine whether the corporations are acting responsibly in the situation that has arisen and provide a signal on how serious this incident is.

When Swedbank Robur receives information about a corporation being associated with a violation of international norms or conventions, we will check the assessment of the norm analysis providers. Based on information from our suppliers and other available information, Swedbank Robur will make at its own assessment on whether it is a question of a serious and systematic violation. If it is determined that there is a violation, the company's securities will not constitute a sustainable investment.

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

The EU Taxonomy sets out a "do no significant harm" principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.

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

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



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



Yes

The fund follows Swedbank Robur's "Policy to identify and prioritise principal adverse sustainability impacts" (available only in Swedish). In its management, the fund takes into account the principle adverse impacts by particularly avoiding investments linked to products and services with high risks of damage related to sustainability and impact. The approach varies between the principle adverse impacts.

The fund is an index-related fund and invests widely in many different securities associated with different risks linked to sustainability, where adverse impacts for sustainability factors are included as a part of this. To a certain degree, the fund's sustainability work puts a premium on companies with lower risk while the portfolio of companies with higher risks are weighted lower and are completely rejected in some cases. The fund is managed based on a broad sustainability assessment where the fund's holdings are compared with the fund's benchmark index.

The fund's management takes into account the principle adverse impacts linked to the climate or environmental aspects (greenhouse gas emissions, biological diversity, water and waste), social conditions, staffing issues, respect for human rights as well as issues relating to the fight against corruption and bribes.

This process includes following up a number of indications for PAI (Principal Adverse Impacts) relevant for the fund.

The fund's Annual Report also includes information on how the fund has taken principle adverse impacts for sustainability factors into consideration.



No



What investment strategy does this financial product follow?

A description of the fund's investment strategy can be found on page 1 in the Information Brochure. As far as sustainability work is concerned, this is an integrated part in the investment strategy. The purpose of the work is to manage sustainability risks and to promote environmental and social characteristics. The purpose of this to ensure that potential investments fulfil Swedbank Robur's policy for responsible investments, expanded level. The purpose is also to influence portfolio companies to change their business models to be more sustainable and to increase transparency in the companies' sustainability reporting. Impact dialogues with companies will be carried out by Swedbank Robur's sustainability team.

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

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

The fund is obligated to follow the Management Company's "Policy for Responsible Investments" (adopted by the Board) and use the three main methods ("include", "exclude" and "engage") in order to achieve the environmental and social characteristics promoted by the fund.

When the fund includes investments, sustainability considerations constitute a natural part of our investment process. We do not only believe that sustainability is crucial for future economic returns, but we also want to ensure that our investment process promotes global development towards a more sustainable society.

The fund excludes products and services that we feel are harmful to society or the environment: Controversial weapons (cluster bombs, anti-personnel land mines, chemical or biological weapons), nuclear weapons, tobacco, cannabis, pornographic materials, commercial gaming activities and fossil fuels (as long as there are no clear conversion goals and they are included in Swedbank Robur's Green List) as well as weapons, war materials and alcohol. The fund also excludes companies that generally have high sustainability risks or are deficient when it comes to corporate governance. We do not invest if companies contravene international norms and conventions.

Swedbank Robur strives to actively engage companies to promote the environment, social responsibility and corporate governance (ESG). Our methods for engaging are adapted to the current situation with regard to such things as asset classes, size of holding, and the reason for the engagement. Dialogues with companies will be carried out by Swedbank Robur's sustainability team.

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

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

The Management Company has a monitoring process the aim of which, among other things, is to evaluate governance in companies in which the fund invests, both before and during the holding period. The scope of the monitoring includes, among other things, a review of the companies on the basis of international conventions, sustainability rating, personnel turnover and reputational and sustainability risks. Among other things, this process takes into account sound management structures, relationships between employees, personnel turnover and observance of tax regulations.

The Management Company also has "Principles for shareholder engagement" (adopted by the Board). As active owners, Swedbank Robur strives to ensure that the companies in which we invest are managed in an efficient and long-term sustainable way. Important ownership questions include safeguarding the interest of minority owners, the composition of the Board, auditing and internal control functions, reasonable compensation, an efficient capital structure, sustainability and transparency.



Asset allocation describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

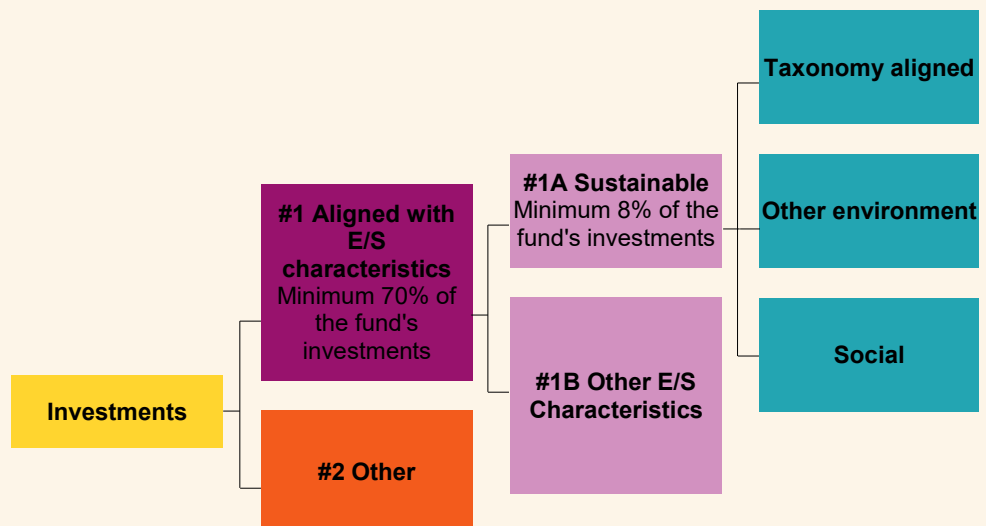
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **turnover** reflecting the share of revenue from green activities of investee companies

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

What is the asset allocation planned for this financial product?

The fund is following Swedbank Robur's Policy for responsible investments, which must be used for all investments. Exceptions from the policy are permitted for such things as cash, derivatives and when sustainability-screened alternatives are not available on the market, if required liquidity is lacking or where there is a lack of product transparency. There are plans for at least 70% of the fund's assets to consist of investments suitable to favour environmental or social characteristics as per the Management Company's policy. It is also planned that at least 8% of the fund's assets will consist of sustainable investments.



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

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

The category **#1 Aligned** with E/S characteristics covers:

- The Subcategory **#1A Sustainable** covers sustainable investments with environmental or social objectives.

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



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

In accordance with EU taxonomy, the Fund has no commitment to invest a given proportion. EU regulations for sustainability reporting are under development and there is limited access to reported data about the alignment of companies, emitters, and emissions with the taxonomy. However, it cannot be ruled out that individual holdings in the Fund are fully or partially classified as compliant with the taxonomy.

• Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy¹?

☐ Yes

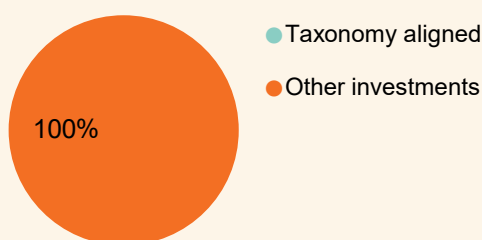
☐ In fossil gas

☐ In nuclear energy

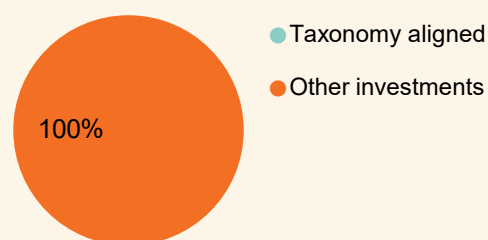
☒ No

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

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



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



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

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

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

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

The fund has no obligation to make a certain number of investments in transitional and enabling activities.



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



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

The Fund has no minimum proportion for sustainable investments with an environmental goal that is not consistent with the requirements in EU taxonomy. However, the Fund does have overriding goals for sustainable investments in which such investments are included. EU regulations for sustainability reporting are under development and there is limited access to reported data about the alignment of companies, emitters, and emissions with the taxonomy.



What is the minimum share of socially sustainable investments?

The fund has no minimum proportion of socially sustainable investments. However, the fund does have an overriding promise of sustainable investments, where investments with social goals are included.

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



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

A part of the Fund's are placed in accounts or in assets that do not promote environmental or social characteristics. The "No 2 Other" category also includes securities for which relevant sustainability data are not available. Instruments not covered by Swedbank Rebur's Policy for Responsible Investments also belong here.

The category also includes such things as the Fund's cash, which, among other things, is used to manage the outflow of capital. The category also includes derivatives that can be used to protect and/or expose the portfolio against/to market risk.



Where can I find more product specific information online?

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

<https://swedbankrobur.fundlist.com/>