

**PROSPECTUS**

**Nordea Funds Ltd**

**16.12.2024**

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**Prospectus and other material on funds**

The prospectus includes general and fund-specific information about the Nordea investment funds managed by Nordea Funds Ltd in Finland. According to the Finnish Act on Common Funds, the statutory fund material is composed of this prospectus and each fund's Key Information Documents (PRIIPS KIDs) and fund rules.

General SFDR product information on article 6 funds is available in SFDR appendix I to the prospectus. Fund-specific SFDR product information on article 8 funds to be provided before the contract will be entered into is presented SFDR appendix II to the prospectus.

Investors are advised to familiarise themselves with the prospectus with its SFDR appendices, the fund's KID and the fund rules, which together constitute the whole, before making an investment decision.

**Investment fund**

"Investment fund" refers to an investment portfolio mainly consisting of securities. The owners of a fund are the persons, organisations and foundations having invested assets in the fund. The ownership in a fund is fractional. The investment fund is managed by a management company.

The finances of a fund are kept separate from the assets of other funds, the management company, Nordea Bank Abp or Nordea Group. The assets of a fund cannot be used to cover the debts of the management company or the bank. A fund cannot go bankrupt, but depending on the market situation, the value of a fund unit can increase or decrease.

Subscriptions and redemptions of fund units are executed at the net asset value (NAV) of the unit, which is calculated on every banking day by deducting the liabilities from the market value of the fund's assets, and dividing the resulting net value by the number of outstanding fund units. The cut-off time for fund orders and the valuation times of funds are described in the rules.

**Nordea Funds Ltd**

Nordea Funds Ltd and its branches in Norway, Sweden and Denmark are responsible for managing Nordea's funds registered in Finland, Norway, Sweden and Denmark.

Nordea Funds Ltd (the 'Management Company') operates under a licence (UCITS licence) granted by the Ministry of Finance of Finland. The Management Company is engaged in investment fund operations and other activities materially related to them.

The Finnish Financial Supervisory Authority has granted the Management Company a licence (AIFM licence) to act as an alternative investment fund manager (AIFM) pursuant to the Finnish Act on Alternative Investment Funds Managers.

The Management Company invests assets acquired from the public on behalf of unitholders in accordance with the fund rules approved by the Finnish, Danish, Norwegian and Swedish Financial Supervisory Authorities. The Management Company acts in its own name on behalf of each fund and exercises the rights related to the assets in the fund.

**Basic information on Nordea Funds Ltd**

Established	1.1.2002
Nordea Funds Ltd	12.12.2013–
Nordea Investment Fund Company Finland Ltd	17.1.2003–11.12.2013
Nordea Fondbolag Finland Ab	28.6.2002–16.1.2003
Nordea FM Holding Ab	2.1.2002–27.6.2002

<b>Company name</b>	<b>Nordea Funds Ltd</b> (registered on 12.12.2013 in Finland)
Domicile	Helsinki
Share capital	EUR 3,350,000.00
Visiting address	Aleksis Kiven katu 7, 00500 Helsinki
Postal address	Satamaradankatu 5, FI-00020 NORDEA, Helsinki
Business Identity Code	1737785-9

Managing Director, CEO Josefin Degerholm

**Board of Directors** Jukka Perttula\*, Chairperson  
Finnish citizen  
Professional Board Member

Søren Thorius Mølhave Andresen  
Danish citizen  
Head of Integration Management Office (IMO),  
Nordea

Per Långsved  
Swedish citizen  
Head of Personal Banking Sweden & Country  
Senior Executive, Nordea

Vesa Ollikainen  
Finnish citizen  
Head of Partnerships, Nordea Asset Management

Marianne Philip\*, Vice Chairperson  
Danish citizen  
Attorney-at-Law, Partner, Kromann Reumert

Henrika Vikman  
Finnish citizen  
Head of Nordea Asset Management Governance

\* an independent board member

The Management Company has a branch in Denmark:  
**Nordea Fund Management, Filial af  
Nordea Funds Oy, Finland**  
Nicolai Eigtveds Gade 8, 1402 København K

Rasmus Eske Bruun is responsible for the operations of the branch  
Organisation number 35640851

The Management Company has a branch in Norway:  
**Nordea Funds, Norwegian branch**  
Essendrops gate 7, 0368 Oslo

Björn Stolpestad is responsible for the operations of the branch  
Organisation number 912651045

The Management Company has a branch in Sweden:  
**Nordea Funds Ab, Svensk filial**  
Mäster Samuelsgatan 21, M541  
105 71 Stockholm

Maria Rengefors is responsible for the operations of the branch  
Organisation number 516408-8782

**Auditors of Nordea Funds Ltd and the Nordea funds registered in Finland**

- PricewaterhouseCoopers Oy, Firm of Authorised Public Accountants
- principal auditor Taru Mäenpää, Authorised Public Accountant
- deputy auditor Jukka Paunonen, Authorised Public Accountant

**Agents used by the Management Company**

The Management Company is entitled to use external management and advisory services, such as portfolio management, accounting, IT and subscription and redemption services, in its investment fund operations.

The Management Company has outsourced the portfolio management and a part of the fund administration to Nordea Investment Management AB as well as entered into an agreement with Nordea Investment Management AB concerning the distribution of funds towards institutional customers.

The Management Company has outsourced the maintenance of the unitholder register and a part of the fund administration to Nordea Investment Funds S.A.

The Management Company has concluded an agreement with Nordea Bank Abp and Nordea Bank Abp, filial i Sverige as well as Nordea Bank Abp, filial i Norge on the distribution of funds in the Nordic countries. As distributors the banks also handle the keeping of the unitholder register for unitholders who have made subscriptions through them.

In addition, the Management Company has concluded an agreement based on which Nordea Investment Funds S.A. is the main distributor regarding the distribution in third party channels. The Management Company has also concluded distribution agreements with other co-operation partners.

Further, the Management Company has partly outsourced the maintenance of unitholder register to Evli Plc which handles the maintenance of the unitholder register of the unitholders who have made subscriptions through it.

Moreover, the Management Company has partly outsourced the maintenance of unitholder register to Swedbank AB to the extent units in the funds are subscribed through it and beneficially owned by Finnish investors.

Furthermore, the Management Company has outsourced the following functions either in full or in part to Nordea Bank Abp: bookkeeping and other financial administration of the Management Company and its branches.

#### About Management Company's Remuneration Policy

Nordea Funds Ltd has a comprehensive approach to compensation that recognises the importance of well-balanced, parallel remuneration structures, based on business and local market needs. It is equally important that remuneration is being consistent with and promoting sound and effective risk management not encouraging excessive risk-taking or counteracting Nordea's long-term interests or the interests of the funds managed by Nordea Funds Ltd.

The Board of Directors of the Management Company decides on the Remuneration policy.

The Nordea Funds Ltd's Remuneration Committee evaluates the remuneration policy and practices.

Information on the Remuneration Policy and Remuneration Committee of Nordea Funds Ltd is available at [www.nordea.fi/funds](http://www.nordea.fi/funds).

Investors may receive, free of charge and upon request, the prospectus in durable medium.

#### Trading in fund units

Subscription and redemption orders are received in Finland on every banking day at all Nordea branches providing investment services and at Nordea Investment Management AB, Finnish branch, during their office hours. Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service and in Nordea's Netbank on the Internet.

The Management Company may issue units before the fund receives the subscription payment if it can be ensured that the payment will be made to the fund within the time limit normally applied in the market. Different distributors may have different practises in order to ensure payment.

#### About trading in funds and cut-off times

**The cut-off time is the time when the fund's transaction date changes.** In most funds, the cut-off time is 16.30 Finnish time.

**N.B.** The feeder funds Nordea Conservative Yield Fund, Nordea

China Fund, Nordea European Stars Fund and Nordea India Fund are exceptions, and their cut-off time is 15.00 Finnish time.

As for fund orders of funds which are solely targeted at the Norwegian market and/or where the distributor is the Nordea branch network in Norway, the cut-off time is usually 11.00 Finnish time.

As for fund orders of funds which are solely targeted at the Swedish market and/or where the distributor is the Nordea branch network in Sweden, the cut-off time is usually 16.30 Finnish time.

Other distributors within Nordea or external distributors/ intermediaries might apply different cut-off times which may be earlier than the official cut-off time. Cut-off times can be clarified from the distributor/intermediary in question.

#### Nora feeder and master funds and their cut-off times

The cut-off time of the Nora feeder funds is 11.00 Finnish time in Norway and 13.00 Finnish time in Sweden and Finland. The cut-off time of the Nora master funds is 15.00 Finnish time.

#### ESG-enhanced feeder and master funds and their cut-off times

#### Fixed-income funds

The cut-off time of the feeder fund Nordea Bærekraftige Obligationer Global Fund (NOK) is 11.00 Finnish time in Norway and that of the feeder fund Nordea Hållbarhetsfond Obligationer Global Fund (SEK) 13.00 Finnish time in Sweden. The cut-off time of the master fund Nordea Sustainable Fixed Income Global Fund is 15.00 Finnish time.

#### Balanced funds

The cut-off time of the Nordea Sustainable Selection (NOK) feeder funds is 11.00 Finnish time in Norway and that of the feeder funds Nordea Sustainable Selection (SEK) 13.00 Finnish time in Sweden. The cut-off time of the Nordea Sustainable Selection master funds is 15.00 Finnish time.

Information on the cut-off times of the funds is available in the fund-specific and common fund rules.

#### Execution and payment of fund orders

##### Ordinary funds

Subscription- and redemption orders given before the cut-off time are normally executed during the same bank day. If the order is given after the cut-off time or on a day that is not a bank day, it will be executed during the next banking day.

Cut-off time of orders	Execution (T)	Transfer of proceeds from/to account
16.30 Finnish time	Any order received before the cut-off time will be executed during the same banking day	T+2

Redemption/subscription proceeds will be transferred two banking days from the redemption/subscription (T+2).

##### Delayed funds

Some funds are so called delayed funds, where fund orders and unit valuation times differ from normal funds.

In delayed funds, Nordea Emerging Market Equities Fund and Nordea Japan Fund, redemption and subscription orders received before the cut-off time, will be executed during the following banking day.

Cut-off time of orders	Execution (T)	Transfer of proceeds from/to account
16.30 Finnish time	Any order received before the cut-off time will be executed on the following banking day.	T+2

Redemption/subscription proceeds will be paid two banking days from the redemption/subscription (T+2).

*Examples of subscriptions and redemptions*

Ordinary funds	
Subscription	The order is given on Friday at 16.00. The subscription is executed on Friday and the subscription amount is debited from the account on Tuesday.
Redemption	The order is given on Friday at 16.00. The redemption is executed on Friday and the redemption amount is credited to the account on Tuesday.
Delayed funds	
Subscription	The order is given on Friday at 16.00. The subscription is executed on Monday and the subscription amount is debited from the account on Wednesday.
Redemption	The order is given on Friday at 16.00. The redemption is executed on Monday and the redemption amount is credited to the account on Wednesday.

**Trading in fund units in certain funds**

In certain funds, the process for execution of orders and payment of units differ from the above. The exceptional redemption and payment processes are described later in this prospectus under the header Information about the special characteristics of certain funds. An example of these funds is Nordea European Smaller Companies.

Information on subscription and redemption orders, execution of them and any exceptions from these concerning the funds are even laid down in the fund-specific rules and the common fund rules.

**Exceptional situations referred to in the common fund rules****– Exceptional market circumstances**

Funds can be subject to for instance a liquidity risk, which means the risk that the fund's investments cannot be converted into cash within the planned time frame or at the desired price. This may affect the performance of the NAV per unit, if the fund's investments have to be disposed at a disadvantageous time.

A liquidity risk can occur in exceptional market conditions when, for example, certain securities are not actively traded or their buy and sell quotations differ greatly or are missing entirely. In such a case, redemption of fund units may last longer than normally, and redemptions can be suspended in certain situations.

The Management Company can temporarily suspend the redemption of units, if the market place which, according to its investment policy, can be considered the fund's main market place is closed for an unpredictable reason, or if trading in this market place has been restricted, or if disturbances occur in normal data transfer.

**– Significant total amount of redemption orders**

As a rule, the amount of redemption orders considered to be significant is 10% of the value of the fund. It is however possible to deviate from this 10% limit in situations where the fund receives a single redemption order or several redemption orders, the execution of which, taking into account the special characteristics of the fund, according to a normal time frame would be against the interest of those unitholders who remain in the fund.

Such a special situation refers, for instance, to a situation where exceptional market conditions prevail and where, in addition to several small orders, the fund also receives a large redemption just before the cut-off time of trading in the fund units.

**– Postponement of execution date of redemptions**

If the total amount of redemption orders is significant in relation to the value of the Fund, the Management Company may postpone the execution date of either all or certain redemption orders in such a way that redemption orders can be executed either in full or partially at a later stage.

The execution date of redemption orders may be postponed by a maximum of eight banking days.

**– Redemption without a client order**

The Management Company may redeem the fund units of a unitholder at its own initiative if there is a compelling reason arising from the unitholder's ownership in the Fund, due to which the Fund may face obligations that the Management Company cannot reasonably be expected to fulfil.

A compelling reason may arise, for example, when:

- the unitholder is placed on an international or national sanctions list and any violation of such sanctions would probably result in significant damage to the Management Company's operations or result in the Management Company violating the legislation or official regulations governing its operations;
- the unitholder does not provide the required data for knowing and identifying them;
- the unitholder's holding may cause damage to other unitholders;
- for the unitholder in question, holding fund units is against the legislation of Finland or another country or against regulations issued under such legislation;
- the unitholder moves to a country that causes significant additional reporting or an obligation for the Management Company to register or carry out other measures, which it would not otherwise have;
- the unitholder is a natural person or a legal entity or another legal arrangement that is a US person (as defined in Regulation S of the United States Securities Act of 1933).

**Growth (accumulation) and distribution units**

The units in a certain unit series (A, B, I, P, S, Y) can be divided into growth units (accumulation unit) and distribution units (unit classes) on the basis of the fund-dividend distribution policy. All the unit series can include both growth and distribution units.

- The income accumulated on the growth units is reinvested and increases the value of the growth units
- **For a private person, it is usually worthwhile to invest in growth units** unless annual income is needed. In the case of growth units, the potential capital gain will not be subject to capital income taxation until the fund units are redeemed. When saving regularly into funds, growth units are also a natural choice.
- **Distribution units are best suited for the investment needs of foundations and similar non-profit organisations.**

**Exchange of unit class**

Distribution units can be exchanged for growth units without charge and vice versa. Exchange of a unit class within the same fund is not comparable to sales of units and is not subject to taxation based on the fact that no capital gain will be generated. When switching from one fund into another fund managed by the same management company, capital gain or loss can be generated.

**Fund unit register**

All the Fund's units are entered in a fund unit register, and if so requested by unitholders or nominees, the transfers of fund units are registered. The holder of the fund units registered by the nominee cannot be Finnish.

**Marketing funds in other countries**

Fund units are not intended to be marketed or subscribed for in countries other than those in which an appropriate notification of the start of marketing of the fund has been made in accordance with the regulation governing the notification of marketing of a fund.

In Sweden, Nordea Bank Abp, filial i Sverige accepts subscriptions for fund units in SEK. Only the distributor with whom the units were originally subscribed for can receive redemption orders for fund units. In addition, subscription and redemption orders are transmitted at locations approved by the Board of Directors of the Management Company.

In Norway, subscription and redemption orders are received at a location approved by the Board of Directors of the Management Company. The fund's subscription currency is the NOK. In Denmark, subscription and redemption orders are received at a location approved by the Board of Directors of the Management Company. The fund's subscription currency is the DKK.

**Depository of the Nordea funds registered in Finland**

The safekeeping of an investment fund's assets is entrusted to a depository which on the basis of its primary business area is a credit institution.

The assets of an investment fund are kept separate from the assets of other investment funds, the Management Company and the depositary. The finances of the Management Company are fully separated from the assets of the fund and the fund's assets cannot be used to cover the debts of the management company or the depositary. A fund cannot go bankrupt, but depending on the market situation, the value of a fund unit can increase or decrease.

The Board of Directors of the Management Company has appointed J.P. Morgan SE – Helsinki branch, Business Identity Code 3218701-7, as depositary (the 'Depositary') in relation to the funds' assets under a depositary and custodian agreement and as amended from time to time (the 'Agreement').

J.P. Morgan SE is a credit institution on the basis of its primary business area and has the legal form of a European Company under the laws of the Federal Republic of Germany. Its registered office is on Taunustor 1, 60310 Frankfurt am Main, Germany, and the registered office of the Branch is on Pohjoisesplanadi 33, 00100 Helsinki and its domicile is in Helsinki.

The Depositary shall perform all the duties and obligations of a depositary under the relevant laws and regulations on investment funds with respect to each fund.

The Agreement is concluded for an indefinite period of time and may be terminated by the Management Company with three months' notice. Before maturity of said notice period, the Management Company shall indicate the name of a new depositary which fulfils the requirements of the laws and regulations on the investment funds and alternative investment funds, and to which the assets shall be transferred, and which shall take over its duties as the funds' depositary from the Depositary. Until the replacement is appointed, the Depositary shall continue to perform the services under the Agreement and as required by a custodian or depositary pursuant to applicable law.

The Depositary will be responsible for the safekeeping and ownership verification of the assets of the funds, cash flow monitoring and oversight in accordance with the relevant laws and regulations on investment funds and alternative investment funds. In carrying out its role as depositary, the Depositary shall act independently from the investment funds and the Management Company and solely in the interest of the fund and the funds' unitholders.

In accordance with the provisions of the Agreement and the relevant laws and regulations on investment funds and alternative investment funds, the Depositary may, subject to certain conditions and in order to effectively conduct its duties, delegate part or all of its safe-keeping duties to one or more third party delegates, including sub-custodians, appointed by the Depositary from time to time. Such delegated duties may only include custody and ownership verification in accordance with the relevant laws and regulations on investment funds and alternative investment funds.

When selecting and appointing a delegate, the Depositary shall exercise all due skill, care and diligence as required by the relevant laws and regulations on investment funds and alternative investment funds to ensure that it entrusts the Management Company's assets only to a delegate who may provide an adequate standard of protection. The Depositary's liability will not be affected by the fact that it has entrusted to a third party some or all of the assets in its safekeeping.

As part of the normal course of global custody business, the Depositary may from time to time enter into arrangements with other clients, funds or other third parties for the provision of safekeeping and related services.

Conflicts may arise from time to time between the Depositary and its safekeeping delegates, for example, where an appointed delegate is an affiliated group company and is providing a product or service to a fund and has a financial or business interest in such product or service or where an appointed delegate is an affiliated group company which receives remuneration for other related custodial products or services it provides to the funds e.g. foreign exchange, securities lending, pricing or valuation services. In the event of any potential conflict of interest which may arise during the normal course of

business, the Depositary will at all times have regard to its obligations under applicable laws.

Up-to-date information will be made available to investors on request from the Management Company, namely information regarding the identity of the Depositary, a description of its duties and of conflicts of interests that may arise, a description of any safekeeping functions delegated by the Depositary, the list of delegates and sub-delegates.

The compensation for safekeeping and other related services paid by the Management Company to the Depositary consists in all the UCITS and non-UCITS funds registered in Finland of a safe custody fee, a depositary fee and a transaction fee. The safe custody/depositary fee is a certain percentage of the market value of the securities in custody or their underlying assets. These fees vary by country. The transaction fees are based on the number and type of transactions.

The Depositary will have no discretion in the decision-making process relating to the fund's investments. The Depositary is a service provider to the Management Company and is not responsible for the preparation of this document and therefore accepts no responsibility for the accuracy of any information contained in this document.

#### **Overall objective of the Nordea funds' ownership policy**

The Nordea funds have issued their corporate governance guidelines in 2001. The guidelines specify what the Management Company expects from the companies in which the assets of the funds managed by the Management Company are invested in.

Nordea Funds Ltd is convinced that companies' focus on corporate governance issues will have a positive impact on their share price performance and provide added value both to the company shareholders and the unitholders of the funds.

In their corporate governance guidelines, the Nordea funds emphasise that communication between a company and its shareholders should be transparent. The principles of openness and clarity also apply to the composition of the Board of Directors.

An important element in the funds' ownership responsibility is to promote good corporate governance in the companies the funds invest in and to see to the joint interests of the unitholders. The aim is to improve the return on the fund investment and to contribute to the functionality and reliability of capital markets.

Information about corporate governance activities and [Nordea Funds Ltd's ownership policy](#) (the attachment is in English) is available to unitholders/investors on [Nordea funds' web pages](#) and on the web pages of the branches.

#### **Risks relating to fund investment**

All investments involve risk. The risk descriptions below cover the main risk factors related to the funds. A fund could potentially be affected by risks beyond those described here, nor are these risk descriptions themselves intended to be exhaustive. Each risk is described as if for an individual fund.

Any of these risks could cause a fund to lose money, to perform less well than similar investments or a benchmark, to experience high volatility (ups and downs in NAV per unit), or to fail to meet its objective over any period of time.

##### *Concentration risk*

To the extent that the fund invests a large portion of its assets in a limited number of industries, sectors, or issuers, or within a limited geographical area, it can be more risky than a fund that invests more broadly.

Focusing on any company, industry, sector, country, region, type of stock, type of economy, etc. makes the fund more sensitive to the factors that determine market value for the area of focus. These factors may include economic, financial or market conditions as well as social, political, environmental or other conditions. The result can be both higher volatility and a greater risk of loss.

*Counterparty risk*

Any entity with which the fund does business could become unwilling or unable to meet its obligations to the fund.

If a counterparty becomes bankrupt, the fund could lose some or all of its money and could experience delays in getting back securities or cash that were in the possession of the counterparty. This could mean the fund is unable to sell the securities or receive the income from them during the period in which it seeks to enforce its rights, a process that itself is likely to create additional costs. In addition, the value of the securities could fall during the period of delay.

Agreements with counterparties can be affected by liquidity risk (how the investment can be converted into cash) and operational risk (including the risk of human error and criminal activity), either of which could cause losses or limit the fund's ability to meet redemption requests.

Because counterparties are not liable for losses caused by a "force majeure" event (such as a serious natural or human-caused disaster, riot, terrorist act or war), such an event could cause significant losses for which the fund would likely have no recourse.

*Credit risk*

A bond or money market security, whether from a public or private issuer, could lose value if the issuer's financial health deteriorates. This risk is greater the lower the credit quality of the debt, and the greater the fund's exposure to below investment grade bonds.

Certain high yield bonds rated Ba1 or BB+ and below by some Rating Agencies are very speculative, involve comparatively greater risks than higher quality securities, including price volatility, and may be questionable as to principal and interest payments. Compared to higher-rated securities, lower rated high yield bonds generally tend to be more affected by economic and legislative developments, changes in the financial condition of their issuers, have a higher incidence of default and be less liquid.

Certain funds may also invest in high yield bonds placed by emerging market issuers that may be subject to greater social, economic and political uncertainties.

In extreme cases, a debt security could go into default, meaning the issuers or guarantors of certain bonds could become unable to make payments on their bonds.

If the financial health of the issuer of a bond or money market security weakens, or if the market believes it may weaken, the value of the bond or money market security may fall or become more volatile (fluctuation in the value increases), and it may become illiquid.

Below investment grade bonds are considered speculative. Compared to investment grade bonds, the prices and yields of below investment grade bonds are more sensitive to economic events and more volatile, and the bonds are less liquid.

Debt issued by governments and government-owned or -controlled entities can be subject to many risks, especially in cases where the government is reliant on payments or extensions of credit from external sources, is unable to institute the necessary systemic reforms or control domestic sentiment, or is unusually vulnerable to changes in geopolitical or economic sentiment. Even if a government issuer is financially able to pay off its debt, investors may have little recourse should it decide to delay, discount or cancel its obligations. Debt issued by corporations is usually less liquid than debt issued by government or supranational entities.

Bonds that are in default may become illiquid or worthless. Trying to recover principal or interest payments from a defaulted issuer can be difficult, particularly if the bonds are unsecured or subordinate to other obligations, and can involve additional costs.

*Currency risk*

To the extent that the fund holds assets that are denominated in currencies other than the base currency, any changes in currency exchange rates could reduce investment gains or income, or increase investment losses, in some cases significantly.

Exchange rates can change rapidly and unpredictably, and it may be difficult for the fund to unwind its exposure to a given currency in time to avoid losses. Changes in exchange rates can be influenced by such factors as export-import balances, economic and political trends, governmental intervention and investor speculation.

Intervention by a central bank, such as aggressive buying or selling of currencies, changes in interest rates, restrictions on capital movements or a "de-pegging" of one currency to another, could cause abrupt or long-term changes in relative currency values.

*Custody risk*

The depositary, and any entity to whom custody of fund assets is further delegated, are all considered counterparties and are subject to counterparty risk. In addition, because cash deposits are not segregated at the depositary or sub-custodian level, these assets would be at greater risk in the event of a bankruptcy or other failure of any of these parties.

*Derivatives risk*

Small movements in the value of an underlying asset can create large changes in the value of a derivative, making derivatives highly volatile in general, and exposing the fund to potential losses significantly greater than the cost of the derivative.

Derivatives are subject to the risks of the underlying asset(s) as well as carrying their own risks. Some of the main risks of derivatives are:

- the pricing and volatility of some derivatives, in particular credit default swaps (CDS), may diverge from the pricing or volatility of their underlying reference(s)
- in difficult market conditions, it may be impossible or unfeasible to place orders that would limit or offset the market exposure or financial losses created by some derivatives
- using derivatives involves costs that the fund would not otherwise incur
- changes in tax, accounting, or securities laws could cause the value of a derivative to fall or could force the fund to terminate a derivative position under disadvantageous circumstances
- any hedging measures that the fund takes with derivatives that are designed to offset specific risks may work imperfectly, and they may not be feasible at all times.

*Exchange-traded derivatives* Trading in these derivatives or their underlying assets could be suspended or subject to limits. There is also a risk that settlement of these derivatives through a transfer system may not happen when or as expected.

*OTC derivatives — non-cleared* Because OTC derivatives are in essence private agreements between a fund and one or more counterparties, they are less highly regulated than market-traded securities. They also carry greater counterparty and liquidity risks. If a counterparty ceases to offer a derivative that a fund had been planning on using, the fund may not be able to find a comparable derivative elsewhere and may miss an opportunity for gain or find itself unexpectedly exposed to risks or losses, including losses from a derivative position for which it was unable to buy an offsetting derivative.

*OTC derivatives — cleared* Because these derivatives are cleared on a trading platform, their liquidity risks are similar to those for exchange-traded derivatives. However, they still carry counterparty risk that is similar to non-cleared OTC derivatives.

*Emerging and frontier markets risk*

Emerging and frontier markets are less established, and more volatile, than developed markets. They involve higher risks, particularly market, credit, legal and currency risks, and are more likely to experience risks that, in developed markets, are associated with unusual market conditions, such as liquidity and counterparty risks.

Reasons for this higher level of risk include:

- political, economic, or social instability
- economies that are heavily reliant on particular industries, commodities, or trading partners
- high or capricious tariffs or other forms of protectionism
- quotas, regulations, laws, restrictions on repatriation of monies, or other practices that place outside investors (such as the fund) at a disadvantage
- changes in laws or failure to enforce laws or regulations, to provide fair or functioning mechanisms for resolving disputes or pursuing recourse, or to otherwise recognise the rights of investors as understood in developed markets
- excessive fees, trading costs, taxation, or outright seizure of assets
- inadequate reserves to cover issuer or counterparty defaults
- incomplete, misleading, or inaccurate information about securities and their issuers
- non-standard or sub-standard accounting, auditing or financial reporting practices
- markets that are small and have low trading volumes, and consequently can be vulnerable to liquidity risk and to manipulation of market prices
- arbitrary delays and market closures
- less developed market infrastructure that is unable to handle peak trading volumes
- fraud, corruption and error
- increased sustainability risk

In certain countries, securities markets may also suffer from impaired efficiency and liquidity, which may worsen price volatility and market disruptions. To the extent that emerging markets are in different time zones, and may have different trading days, these risks could be compounded for the fund if it is not able to react in a timely fashion to price movements that occur when the fund is not open for business.

For purposes of risk, the category of emerging markets includes markets that are less developed, such as most countries in Asia, Africa, Latin America and Eastern Europe, as well as countries such as China and India that have successful economies but may not offer the highest levels of investor protection. Frontier markets are the least developed of the emerging market countries. The list of emerging and less developed markets is subject to continuous change.

#### *Equity risk*

Equities can lose value rapidly, and typically involve higher (often significantly higher) market risks than bonds or money market instruments.

If a company goes through bankruptcy or a similar financial restructuring, its equities may lose most or all of their value.

Initial public offerings (IPOs) can be highly volatile and can be hard to evaluate because of a lack of trading history and relative lack of public information.

#### *Event risk*

Unpredictable events for which the contracting parties are not liable and which cause unpredictable and insurmountable consequences that are independent of agreements and cause a risk of the discontinuation of operations are called force majeure events. For instance, severe natural catastrophes, uprisings, strikes and states of war can be considered force majeure events.

The realisation of force majeure risks may have a significant effect, for example, on the prices of the securities in the fund's portfolio or on the fund's possibility to engage in securities trade. Consequently, the realisation of force majeure risks may impact the execution schedule of fund redemptions.

#### *Interest-rate risk*

When interest rates rise, bond values generally fall. This risk is generally greater the longer the maturity or duration of the bond investment.

#### *Leverage risk*

The fund's high net exposure to certain investments could make its share price more volatile.

To the extent that the fund uses leverage to increase its net exposure to any market, rate, basket of securities or other financial reference source, fluctuations in the price of the reference source will be amplified at the fund level.

#### *Liquidity risk*

Certain securities may be hard to value or to buy or sell at a desired time and price, especially in larger quantity. In addition, temporary market conditions could cause any security to become hard to value or to sell at a desired time and price.

Trading in particular securities or other instruments may be suspended or restricted by the relevant exchange or by a governmental or supervisory authority and a fund may incur loss as a result. An inability to sell a portfolio position can adversely affect those funds' value or prevent those funds from being able to take advantage of other investment opportunities.

Liquidity risk could affect the fund's value and its ability to pay redemption proceeds or to repay, for example, buy-sell back agreement proceeds by the agreed deadline, because of unusual market conditions, an unusually high volume of redemption requests, or other uncontrollable factors. To meet redemption requests, those funds may be forced to sell investments at unfavourable times and/or conditions.

Securities that are inherently less liquid than, for example, large equities that trade daily on major exchanges, may include securities of any type that represent a small issue, are traded infrequently, or are traded on markets that are comparatively small or have long settlement times.

Investment in debt securities, small and mid-capitalisation stocks and emerging market issuers will be especially subject to the risk that during certain periods, the liquidity of particular issuers or industries, or all securities within a particular investment category, will shrink or disappear suddenly and without warning as a result of adverse economic, market or political events, or adverse investor perceptions, whether or not accurate.

#### *Market risk*

Prices and yields of many securities can change frequently – sometimes with significant volatility – and can fall, based on a wide variety of factors.

Examples of these factors include:

- political and economic news
- government policy
- changes in technology and business practices
- changes in demographics, cultures and populations
- natural or human-caused disasters (including but not limited to pandemics), whether they qualify as force majeure or not
- cybercrime, fraud and other criminal activities
- weather and climate patterns
- scientific or investigative discoveries
- costs and availability of energy, commodities and natural resources

The effects of market risk can be immediate or gradual, short-term or long-term, narrow or broad.

#### *Operational risk*

The fund could be subject to the risk of loss resulting from human error or criminal activity such as cybercrime and fraud, faulty processes or governance, or technological failures.

Operational risks may subject the fund to errors affecting valuation, pricing, accounting, tax reporting, financial reporting, custody and trading, among other things. Operational risks may go undetected for long periods of time, and even if they are detected it may prove impractical to recover prompt or adequate compensation from those responsible.

#### *Sustainability risk*

A sustainability risk means an environmental, social or governance (ESG) event, or condition that, if it occurs, could cause a negative material impact on the value of the investment.



Sustainability risk may significantly increase the volatility of the investment return of the fund.

Examples of sustainability risks include:

- **Climate-related risk:** the financial risks posed by the exposure to issuers that potentially contribute to or are affected by climate change. This includes not only the physical climate risk, for example, severe weather conditions due to climate change that may impact an investee company and increase the risk related to certain countries, but also the climate-transition risk which refers to changes in policy measures, technology or consumer behaviour that can have a negative effect on a company.
- **Social risk:** the risks of any negative financial impact on the issuer stemming from the current and/or prospective impacts of social factors, such as inequality and poor labour relations.
- **Governance risk:** the risks of any negative financial impact on the issuer stemming from the current and/or prospective impacts of governance factors, such as bribery and corruption.

Sustainability risks are included in the investment decision process as part of the overall risk assessment and are considered together with traditional investment risks (for example market, credit or liquidity risk). Sustainability risks may have a significant impact on traditional investment risks and be a factor that contributes to the materiality of these risks.

Portfolio managers and analysts have access to relevant ESG information, making it possible to identify sustainability risks within the investable universe. The ESG data from external data vendors is supplemented by NAM's\* internal proprietary ESG tools that are developed for use in selected investment teams and in NAM's Responsible Investments team.

\*NAM refers to Nordea Investment Management AB.

These tools, which include a NAM's proprietary ESG data platform, are aimed at promoting the understanding and assessment of sustainability risks, possessed by NAM's portfolio managers.

To support the integration of sustainability risks in the investment decisions made within NAM's investment teams, NAM's Risk & Performance Analysis team integrates, if applicable, an ESG analysis in the team's risk reporting that is made available to analysts and portfolio managers on a daily basis.

Additional expertise in the sustainability-risk domain may be provided by analysts within NAM's Responsible Investment team which supports NAM's analysts and portfolio managers who are ultimately responsible for the investment decision process.

The Risk Management Function of the management company, Nordea Funds Ltd, which is independent from NAM's investment organisation, performs risk oversight, monitoring and escalation based on established policies.

Examples of sustainability risks and how sustainability risks are integrated in the investment decision process can be found in the statement on sustainability risk integration in the investment decision-making process available at [www.nordeafunds.com](http://www.nordeafunds.com).

### Risks relating to dealing in Chinese securities

The legal rights of investors in China are uncertain, government intervention is common and unpredictable, and some of the major trading and custody systems are unproven.

In China, it is uncertain whether a court would protect the fund's right to securities it may purchase, whether purchased via a local broker under a Qualified Foreign Institutional Investor (QFII) Licence, the Stock Connect program or other methods. The structure of these schemes does not require full accountability of some of its component entities and leaves investors such as the fund with relatively little standing to take legal action in China. The regulations of these schemes may be subject to change.

In addition, Chinese securities exchanges or authorities may tax or limit short-swing profits, recall eligible stocks, set or change maximum

trading volumes, either at the investor level or at the market level) or otherwise block, limit, restrict or delay trading, hampering or preventing a fund from implementing its intended strategies.

#### *Stock Connect program*

The Shanghai- or Shenzhen-Hong Kong Stock Connect programs (Stock Connect) are joint projects of the Hong Kong Exchanges and Clearing Limited (HKEX), China Securities Depository and Clearing Corporation Limited (ChinaClear), and the Shanghai and the Shenzhen Stock Exchanges. Hong Kong Securities Clearing Company Limited (HKSCC), a clearing house that in turn is operated by HKEX, acts as nominee for investors accessing Stock Connect Securities.

Creditors of the nominee or custodian could assert that the assets in accounts held for the funds are actually assets of the nominee or custodian. If a court should uphold this assertion, creditors of the nominee or custodian could seek payment from the assets of the relevant fund. HKSCC, as nominee, does not guarantee the title to Stock Connect securities held through it and is under no obligation to enforce title or other rights associated with ownership on behalf of beneficial owners (such as the funds). Consequently, title to such securities, or the rights associated with them (such as participation in corporate actions or shareholder meetings), cannot be assured.

Should any fund suffer losses resulting from the performance or insolvency of HKSCC, the Management Company would have no direct legal recourse against HKSCC, because Chinese law does not recognize any direct legal relationship between HKSCC and either the Management Company or the depository. Should ChinaClear default, HKSCC's contractual liabilities will be limited to assisting participants with claims. A fund's attempts to recover lost assets could involve considerable delays and expenses, and may not be successful.

#### *China Interbank Bond Market (CIBM)*

China prohibits outside lenders from extending credit directly to individuals or entities within China. Foreign investors (such as the fund) can buy Chinese corporate and government bonds. Because these bonds are denominated in RMB, whose value and liquidity is to some extent controlled by the government, currency risks may affect the liquidity and trading price of Chinese bonds. Many of the same concerns about investor rights apply to Chinese bonds as well.

#### *Bond Connect*

Bond Connect aims to enhance the efficiency and flexibility of investing in the China Interbank Bond Market. Although Bond Connect removes CIBM's investment quota and the need for a bond settlement agent, investments made through Bond Connect may be subject to high price volatility and potential lack of liquidity due to low trading volume of certain debt securities. Large spreads between bid and offer prices, which make it harder to sell bonds at a profit, are also a risk, as is counterparty risk.

#### *Currencies*

In China, the government maintains two separate currencies: onshore renminbi (which must remain within China and generally cannot be owned by foreigners) and offshore renminbi (which can be owned by anyone). The exchange rate, and the extent to which the currencies can be exchanged, is determined by a combination of market and government actions. This effectively creates currency risk within a single nation's currency, as well as liquidity risk.

### Methods used to calculate the global exposure

#### – Methods for UCITS funds

In order to control the market risk within the fund, each fund shall calculate its global exposure. As for UCITS funds, meaning funds that comply with the EU UCITS Directive, Nordea Funds Ltd shall choose, as further described in applicable regulations, one of the following methods to measure the market risk components of such global exposure:

#### – The commitment approach

The positions on derivatives are converted into equivalent positions in underlying assets, after consideration of all netting and hedging arrangements. The total exposure to markets deriving from

derivatives may not exceed 100% of the Net Asset Value of the fund. This means that the total market exposure of the fund may not exceed 200% of the Net Asset Value of the fund. **All funds that are not mentioned in the below VaR tables, use the commitment approach.**

#### – The Value-at-Risk (VaR) method

Depending on the investment policy of the fund, a more advanced risk measurement methodology, Value-at-Risk (VaR), can be used instead of the commitment approach, to calculate the global exposure of the fund. The VaR approach is a measure of the maximum potential loss due to market risk, given confidence level (probability) over a specific time period, rather than leverage. Further either a relative or an absolute VaR methodology can be used. The VaR is measured at the whole fund level, and is validated through back as well as stress tests, in order to ensure the relevance of the model.

The funds below applying **the relative VaR** method to measure their global exposure compare their VaR with the one of their designated reference portfolios. VaR is calculated on a time horizon of 1 month (20 business days) and a confidence level not below 95%, and shall not exceed 2 times the VaR of the reference portfolio.

Name of fund	Reference portfolio	Expected level of leverage (in % of NAV) as sum of notional values
Nordea Obligasjon II Fund	NBP Norwegian Regular Market Index, group 1 and 2, fixed-rate securities, 3-year duration target (NORM12D3)	100
Nordea Obligasjon III Fund	NBP Norwegian Regular Market Index, group 1, 2 and 3, fixed-rate securities, 3-year duration target (NORM123D3)	100

The funds below applying the methodology called **the absolute VaR** measure their global exposure by calculating a VaR figure for the fund, based on a time horizon of 1 month (20 business days) and a confidence level not below 95%. The monthly VaR with a confidence level of 99% shall not exceed 20% of the Net Asset Value of the relevant fund. If different confidence levels are applied within the calculations the maximum limit of 20% must be adjusted accordingly.

Name of fund	Expected level of leverage (in % of NAV) as sum of notional values
Nordea Allokeringfond Fund	200
Nordea Discretionary Asset Allocation Fund	200
Nordea Conservative Yield Fund (*)	180 (concerns the master fund as well)
Nordea Fixed Income Credit Opportunities Fund	80
Nordea Kreditt Stars Fund	160
Nordea Obligasjon Stars Fund	600
Nordea Tactical Asset Allocation Fund	200
Nordea Yield Fund	100

\* Nordea Conservative Yield Fund is a feeder fund, and Nordea 1 – Conservative Fixed Income Fund is the master fund which also uses the Absolute VaR method to calculate the fund's global exposure.

Since the VaR approach does not directly limit the level of leverage in the fund, the expected level of leverage over time is presented above. The expected level of leverage shall be a fair indication of the actual level of leverage over time. The actual daily level of leverage may deviate (ie. be higher or lower) from such expected level depending on the strategies applied by the portfolio manager and the available investment opportunities. The expected level of leverage is not a regulatory limit and should be used for indicative purposes only. The method selected for leverage computation is based on the sum of notional, a measure of aggregated derivative usage.

The annual report will provide the actual level of leverage over the past period and additional explanations on this figure.

#### – Methods for alternative funds (AIF's)

As required by AIFM Regulation, the global exposure of alternative funds shall be calculated in accordance with commitment method and gross method, where all positions that potentially have market risk (derivatives, cash and securities) are taken into consideration. The maximum level of leverage applied to each fund is presented below. *Information on the total amount of leverage employed by the AIF shall be disclosed in the annual report.*

Name of AIF fund	Maximum level of leverage (in % of NAV), gross method*	Maximum level of leverage (in % of NAV), commitment approach (*)
Nordea Navigo	300	200
Nordea Private Banking Norsk Aksje Portefolje	300	200

\* The basis for calculation in situation where there is no leverage is 100%. There have been no changes to the maximum level of leverage.

No rights of re-use of collateral or any guarantee under the leveraging arrangements has been granted.

#### Credit ratings of funds' investments

The investment decisions of funds are not made solely on the basis of internationally approved credit ratings issued by external credit rating agencies. The assets of funds may also be invested in financial instruments which do not have the credit ratings mentioned below on the basis of the Management Company's internal assessment.

Certain funds may also invest in fixed-income instruments without a credit rating.

Further information on the fund-specific restrictions on credit ratings is presented in the fund rules.

#### Benchmark indices used by funds

The benchmark index is an index or indexed reference value to which the return of an investment fund is compared. The objective of the fund is usually to seek to provide investors with investment growth in the long term.. The chosen benchmark index should reflect the fund's investment universe and investment restrictions as well as possible. The index should include both the performance of the investments and their dividends or coupon yields. The activity of the fund's investment operations determines how much the return of the fund differs from the return of the benchmark index.

The equity index components of the composite indices are either NTR indices which include the dividends after taxes or GTR indices which include dividends.

All funds do not necessarily have a benchmark, and their investment objective is otherwise defined. The grounds for not selecting a benchmark or the reason why it is not sensible to use a benchmark are presented on a fund-specific level in the table below.

Unless mentioned specifically in the table below then the benchmark in a fund is used for performance comparison only. Furthermore, the risk characteristics of the fund's portfolio may bear some resemblance to those of the benchmark.

- The following text is included in the table below for certain funds, for instance, with a 1-month Euribor rate used as the benchmark:
  - The benchmark will be used for performance comparison only. The fund's portfolio is actively managed without reference or constraints relative to its benchmark.

There are certain funds that have taken in use several benchmarks, even for other than performance comparison purpose:

- The following features are mentioned in the table below:
  - The benchmark is to be used for risk comparison only. In this case, the risk characteristics of the fund's portfolio will bear some resemblance to those of the benchmarks.

**Information about previous benchmarks used by the funds is available in the annual and semi-annual reports.**

#### – Benchmark indices included in ESMA's register

\*The administrator (the entity that has control over the benchmark) of this benchmark is included in ESMA's public register of administrators pursuant to art. 36 of the EU-parliament's and the Council's Regulation (2016/1011) on indices used as benchmarks, etc. **In the valid prospectus, the administrators marked with the asterisk in the table below are registered administrators with ESMA.**

EU regulations stipulate that EU-based benchmark administrators have to be approved by and registered with ESMA. Third-country administrators must be approved and registered by 31.12.2025, at the latest. Those benchmarks with no asterisk shown below are either provided by administrators that have not yet been registered with ESMA, or the benchmark is not used in such a manner as referred to in the Regulation.

The Management Company has an action plan that will be taken if the index of the fund ceases to be provided or if material changes are made in the index. Further, if the administrator of an index will not be registered with ESMA within the prescribed time, or if the administrator's status changes materially, the Management Company will update the prospectus accordingly and in addition to this, amend the rules of certain funds when necessary.

	Benchmark Index
<b>Nora funds</b>	
Nora Fund Three EUR	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, EUR hedged 10.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 5.00%; ICE BofA Euro Corporate 10.00%; ICE BofA Developed Markets High Yield Constrained, EUR hedged 8.00%; JP Morgan EMU Government Bond 12.00%; ICE BofA 0-1Y Euro Broad Market 5.00%; MSCI Emerging Markets NTR 7.50%; MSCI Europe NTR 5.97%; MSCI Japan NTR 1.77%; MSCI North America NTR 12.60%; MSCI World NTR 20.40%; MSCI World Small Cap NTR 1.77%.</i>
Nora Fund Four EUR	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, EUR hedged 5.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 2.50%; ICE BofA Euro Corporate 5.00%; ICE BofA Developed Markets High Yield Constrained, EUR hedged 4.00%; JP Morgan EMU Government Bond 6.00%; ICE BofA 0-1Y Euro Broad Market 2.50%; MSCI Emerging Markets NTR 11.25%; MSCI Europe NTR 8.95%; MSCI Japan NTR 2.65%; MSCI North America NTR 18.90%; MSCI World NTR 30.60%; MSCI World Small Cap NTR 2.65%.</i>
Nora Fund Five EUR	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, EUR hedged 1.75%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 1.50%; ICE BofA Euro Corporate 1.75%; ICE BofA Developed Markets High Yield Constrained, EUR hedged 1.40%; JP Morgan EMU Government Bond 2.10%; ICE BofA 0-1Y Euro Broad Market 1.50%; MSCI Emerging Markets NTR 13.50%; MSCI Europe NTR 10.74%; MSCI Japan NTR 3.18%; MSCI North America NTR 22.68%; MSCI World NTR 36.72%; MSCI World Small Cap NTR 3.18%.</i>
Nora Fund Three NOK	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, NOK hedged 10.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity, NOK hedged 5.00%; ICE BofA Euro Corporate, NOK hedged 10.00%; ICE BofA Developed Markets High Yield Constrained, NOK hedged 8.00%; JP Morgan EMU Government Bond, NOK hedged 12.00%; ICE BofA 0-1Y Euro Broad Market, NOK hedged 5.00%; MSCI Emerging Markets NTR 7.50%; MSCI Europe NTR 5.97%; MSCI Japan NTR 1.77%; MSCI North America NTR 12.60%; MSCI World NTR 20.40%; MSCI World Small Cap NTR 1.77%.</i>
Nora Fund Four NOK	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, NOK hedged 5.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity, NOK hedged 2.50%; ICE BofA Euro Corporate, NOK hedged 5.00%; ICE BofA Developed Markets High Yield Constrained, NOK hedged 4.00%; JP Morgan EMU Government Bond, NOK hedged 6.00%; ICE BofA 0-1Y Euro Broad Market, NOK hedged 2.50%; MSCI Emerging Markets NTR 11.25%; MSCI Europe NTR 8.95%; MSCI Japan NTR 2.65%; MSCI North America NTR 18.90%; MSCI World NTR 30.60%; MSCI World Small Cap NTR 2.65%.</i>

Nora Fund Two SEK	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, SEK hedged 13.75%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity, SEK hedged 10.00%; ICE BofA Euro Corporate, SEK hedged 13.75%; ICE BofA Developed Markets High Yield Constrained, SEK hedged 11.00%; JP Morgan EMU Government Bond, SEK hedged 16.50%; ICE BofA 0-1Y Euro Broad Market, SEK hedged 10.00%; MSCI Emerging Markets NTR 3.75%; MSCI Europe NTR 2.98%; MSCI Japan NTR 0.88%; MSCI North America NTR 6.30%; MSCI World NTR 10.20%; MSCI World Small Cap NTR 0.88%.</i>
Nora Fund Three SEK	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, SEK hedged 10.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity, SEK hedged 5.00%; ICE BofA Euro Corporate, SEK hedged 10.00%; ICE BofA Developed Markets High Yield Constrained, SEK hedged 8.00%; JP Morgan EMU Government Bond, SEK hedged 12.00%; ICE BofA 0-1Y Euro Broad Market, SEK hedged 5.00%; MSCI Emerging Markets NTR 7.50%; MSCI Europe NTR 5.97%; MSCI Japan NTR 1.77%; MSCI North America NTR 12.60%; MSCI World NTR 20.40%; MSCI World Small Cap NTR 1.77%.</i>
Nora Fund Four SEK	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, SEK hedged 5.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity, SEK hedged 2.50%; ICE BofA Euro Corporate, SEK hedged 5.00%; ICE BofA Developed Markets High Yield Constrained, SEK hedged 4.00%; JP Morgan EMU Government Bond, SEK hedged 6.00%; ICE BofA 0-1Y Euro Broad Market, SEK hedged 2.50%; MSCI Emerging Markets NTR 11.25%; MSCI Europe NTR 8.95%; MSCI Japan NTR 2.65%; MSCI North America NTR 18.90%; MSCI World NTR 30.60%; MSCI World Small Cap NTR 2.65%.</i>
Nora Fund Five SEK	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, SEK hedged 1.75%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity, SEK hedged 1.50%; ICE BofA Euro Corporate, SEK hedged 1.75%; ICE BofA Developed Markets High Yield Constrained, SEK hedged 1.40%; JP Morgan EMU Government Bond, SEK hedged 2.10%; ICE BofA 0-1Y Euro Broad Market, SEK hedged 1.50%; MSCI Emerging Markets NTR 13.50%; MSCI Europe NTR 10.74%; MSCI Japan NTR 3.18%; MSCI North America NTR 22.68%; MSCI World NTR 36.72%; MSCI World Small Cap NTR 3.18%.</i>
Nora Fund Two Master	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, EUR hedged 13.75%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 10.00%; ICE BofA Euro Corporate 13.75%; ICE BofA Developed Markets High Yield Constrained, EUR hedged 11.00%; JP Morgan EMU Government Bond 16.50%; ICE BofA 0-1Y Euro Broad Market 10.00%; MSCI Emerging Markets NTR 3.75%; MSCI Europe NTR 2.98%; MSCI Japan NTR 0.88%; MSCI North America NTR 6.30%; MSCI World NTR 10.20%; MSCI World Small Cap NTR 0.88%.</i>
Nora Fund Three Master	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, EUR hedged 10.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 5.00%; ICE BofA Euro Corporate 10.00%; ICE BofA Developed Markets High Yield Constrained, EUR hedged 8.00%; JP Morgan EMU Government Bond 12.00%; ICE BofA 0-1Y Euro Broad Market 5.00%; MSCI Emerging Markets NTR 7.50%; MSCI Europe NTR 5.97%; MSCI Japan NTR 1.77%; MSCI North America NTR 12.60%; MSCI World NTR 20.40%; MSCI World Small Cap NTR 1.77%.</i>
Nora Fund Four Master	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, EUR hedged 5.00%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 2.50%; ICE BofA Euro Corporate 5.00%;</i>

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	ICE BofA Developed Markets High Yield Constrained, EUR hedged 4.00%; JP Morgan EMU Government Bond 6.00%; ICE BofA 0-1Y Euro Broad Market 2.50%; MSCI Emerging Markets NTR 11.25%; MSCI Europe NTR 8.95%; MSCI Japan NTR 2.65%; MSCI North America NTR 18.90%; MSCI World NTR 30.60%; MSCI World Small Cap NTR 2.65%.		
Nora Fund Five Master	<i>The fund has taken in use a composite index as of 1.1.2023. One of the sub-indices in the composite index has been changed as of 1.1.2024 and 1.5.2024: Bloomberg US Corporate Investment Grade, EUR hedged 1.75%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 1.5%; ICE BofA Euro Corporate 1.75%; ICE BofA Developed Markets High Yield Constrained, EUR hedged 1.40%; JP Morgan EMU Government Bond 2.10%; ICE BofA 0-1Y Euro Broad Market 1.50%; MSCI Emerging Markets NTR 13.50%; MSCI Europe NTR 10.74%; MSCI Japan NTR 3.18%; MSCI North America NTR 22.68%; MSCI World NTR 36.72%; MSCI World Small Cap NTR 3.18%.</i>		
<b>Other Nordea-funds</b>			
Nordea Allokeringfond Fund	<i>The fund has taken in use a composite index as of 1.1.2023: NBP Norwegian Regular Market 1-3 Duration 3 NOK NORM123D3 70%; NBP Norwegian Regular Market 1-2, floating-rate securities, NOK NORM12FRN 30%.</i>		
Nordea Bærekraftige Obligasjoner Global Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024: Bloomberg US Credit Bond, NOK hedged 18%; ICE BofA Euro Corporate, NOK hedged 18%; ICE BofA Euro Currency High Yield Constrained, NOK hedged 15%; ICE BofA US High Yield Constrained, NOK hedged 15%; JP Morgan EMU Government Bond 1-3 year, NOK hedged 17%; JP Morgan EMU Government Bond, NOK hedged 17%.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.		
Nordea China Fund	MSCI China 10/40 NTR EUR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.		
Nordea Conservative Yield Fund	The fund's benchmark index is 1-month Euribor as of 14.12.2020. Over the time span 29.6.-13.12.2020, the fund applied no benchmark.  The fund's benchmark was iBoxx EUR Liquid Investment Grade Ultrashort 50% and Euro London Interbank Bid Rate, LIBID, 7 days 50% until 28.6.2020.  The benchmark is used for performance comparison only. The fund is a feeder fund. The master fund's portfolio is actively managed without reference or constraints relative to its benchmark.		
Nordea Corporate Bond Fund	ICE BofA Euro Corporate Bond.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.		
Nordea Defensive Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 20.9.2024: ICE BofA Euro Corporate, NOK hedged 11.02%; ICE BofA Global High Yield Constrained, NOK hedged 7.98%; MSCI Emerging Markets NTR 0.75%; MSCI World NTR, NOK hedged 3.00%; NBP Liquidity Standard NOK NOLIQSTD 63.33%; NBP Norwegian Regular Market 1-3 Duration 3 NOK NORM123D3 12.67%; Oslo Exchange Mutual Fund 1.25%.</i>		
Nordea Discretionary Asset Allocation Fund	<i>The fund has taken in use a composite index as of 1.1.2023: OMRX Treasury Bond 1-30 years 50%; OMRX Treasury Bill 50%.</i>		
Nordea Discretionary Corporate Credit Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 12.6.2024: Bloomberg US Credit Bond, SEK hedged 35.00%; ICE BofA Euro Corporate, SEK hedged 35.00%; ICE BofA Euro Currency High Yield Constrained, SEK hedged 15.00%; ICE BofA US High Yield, SEK hedged 15.00%.</i>		
Nordea Discretionary Global Equity Fund	<i>The fund has taken in use a composite index as of 1.1.2023: MSCI Emerging Markets NTR 15.00%; MSCI World NTR 85.00%.</i>		
Nordea Discretionary Swedish Equity Fund	<i>The fund has taken in use a benchmark as of 1.1.2023: OMX Stockholm Benchmark ESG Responsible Capped Gross Index.</i>		
		The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Emerging Europe Fund		MSCI Emerging Market Europe ex Russia 10/40 NTR.	
Nordea Emerging Market Bond Fund		JP Morgan Emerging Market Bond Index Global Diversified.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Emerging Market Equities Fund		MSCI Emerging Markets NTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Equity Opportunities Fund		<i>The fund has taken in use a benchmark index as of 1.1.2023: MSCI Emerging Markets NTR.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Euro Bond Fund		JP Morgan EMU Government Bond.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Euro Medium Term Bond Fund		JP Morgan EMU Government Bond index 1-3 years.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea European High Yield Fund		ICE BofA European Currency High Yield Constrained, EUR hedged.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea European Passive Fund		MSCI Europe NTR.	
Nordea European Smaller Companies Fund		<i>The fund has taken in use a composite index as of 1.1.2023: MSCI Europe SMID Cap 75%; 1-month Euribor 25%.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea European Stars Fund		MSCI Europe NTR.	
Nordea Finnish Passive Fund		The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Finnish Stars Fund		OMX Helsinki Benchmark CAP GTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Fixed Income Credit Opportunities Fund		<i>The fund has taken in use a composite index as of 1.1.2023: Bloomberg US Corporate Investment Grade, EUR hedged 24%; 3-month Euribor 4%; ICE BofA Custom EUR Investment Grade ESG 36%; ICE BofA Global High Yield Constrained, EUR hedged 36%.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Focus Fixed Income Fund		ICE BofA Euro Corporate 40%; ICE BofA Euro Government AAA-AA Rated 40%; 3-month Euribor 20%.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	
Nordea Global Dividend Fund		<i>The fund has taken in use a benchmark as of 1.1.2023: MSCI World ACWI High Dividend Yield</i>	

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	NTR.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.		has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Global Enhanced Fund	MSCI World NTR.	Nordea Nordic Covered Bond Fund	OMRX Mortgage Bond 1–3 years.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Global Equity Allocation Fund	<i>The fund has taken in use a benchmark as of 1.1.2023: MSCI World NTR.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Nordic Small Cap Fund	Carnegie Nordic Small Cap GTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Global High Yield Fund	ICE BofA Global Currency High Yield Constrained.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea North American Dividend Fund	MSCI North America NTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Global Passive Fund	MSCI World NTR.	Nordea North American Enhanced Fund	MSCI North America NTR.
Nordea Hållbarhetsfond Obligationer Global Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024: Bloomberg US Credit Bond, SEK hedged 18%; ICE BofA Euro Corporate, SEK hedged 18%; ICE BofA Euro Currency High Yield Constrained, SEK hedged 15%; ICE BofA US High Yield Constrained, SEK hedged 15%; JP Morgan EMU Government Bond 1-3 year, SEK hedged 17%; JP Morgan EMU Government Bond, SEK hedged 17%.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Norwegian Stars Fund	<i>The fund has taken in use a benchmark as of 1.1.2023: OBX ESG ex Oil and Gas GTR.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea India Fund	MSCI India 10/40 NTR EUR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Obligasjon Stars Fund	<i>The fund has taken in use a benchmark as of 1.1.2023: NBP Norwegian Regular Market 1–3 Duration 3 NOK NORM123D3.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Innovation Stars Fund	VINX Benchmark CAP EUR NTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Premium Asset Management Balanced Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024: Bloomberg US Credit Bond, EUR hedged 7.50%; 3-month Euribor 7.50%; HFRX Global Hedge Fund EUR 7.00%; ICE BofA Euro Corporate 7.50%; ICE BofA Global High Yield Constrained, EUR hedged 7.50%; JP Morgan EMU Government Bond 13.00%; MSCI Emerging Markets NTR 6.50%; MSCI World NTR 36.00%; OMX Helsinki Cap GTR 7.50%.</i>
Nordea Institutionella Småbolagsfonden Sverige Fund	Carnegie Small Cap Sweden SEK GTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Premium Asset Management Conservative Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024: Bloomberg US Credit Bond, EUR hedged 12.75%; 3-month Euribor 12.75%; HFRX Global Hedge Fund EUR 11.90%; ICE BofA Euro Corporate 12.75%; ICE BofA Global High Yield Constrained, EUR hedged 12.75%; JP Morgan EMU Government Bond 22.10%; MSCI Emerging Markets NTR 1.95%; MSCI World NTR 10.80%; OMX Helsinki Cap GTR 2.25%.</i>
Nordea Japan Fund	MSCI Japan NTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Premium Asset Management Growth Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024: Bloomberg US Credit Bond, EUR hedged 3.75%; 3-month Euribor 3.75%; HFRX Global Hedge Fund EUR 3.50%; ICE BofA Euro Corporate 3.75%; ICE BofA Global High Yield Constrained, EUR hedged 3.75%; JP Morgan EMU Government Bond 6.50%; MSCI Emerging Markets NTR 9.75%; MSCI World NTR 54.00%; OMX Helsinki Cap GTR 11.25%.</i>
Nordea Kredit Stars Fund	<i>The fund has taken in use a composite index as of 1.1.2023: NBP Norwegian Regular Market Index 1–3, floating-rate securities, NOK NORM123FRN 50%; NBP Norwegian Regular Market 1–3 Duration 1 NOK NORM123D1 50%.</i>  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Premium Asset Management Moderate Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024: Bloomberg US Credit Bond, EUR hedged 10.50%; 3-month Euribor 10.50%; HFRX Global Hedge Fund EUR 9.80%; ICE BofA Euro Corporate 10.50%; ICE BofA Global High Yield Constrained, EUR hedged 10.50%; JP Morgan EMU Government Bond 18.20%; MSCI Emerging Markets NTR 3.90%; MSCI World NTR 21.60%; OMX Helsinki Cap GTR 4.50%.</i>
Nordea Moderate Yield Fund	The fund's composite index has changed and is as of 1.1.2022: iBoxx EUR Liquid Investment Grade Ultrashort 50%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 50%.  The fund's benchmark was up to 31.12.2021 iBoxx EUR Liquid Investment Grade Ultrashort 50%; Euro London Interbank Bid Rate, LIBID, 7 days 50%.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Private Banking Norsk Aksje Portefølje	Oslo Børs OBX GTR.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Navigo	<i>The fund has taken in use a composite index as of 1.1.2023: ICE BofA Euro Corporate 35%; JP Morgan EMU Government Bond 15%; MSCI World NTR 50%.</i>	Nordea Pro Euro Bond Fund	JP Morgan EMU Government Bond.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Nordic Fund	VINX Benchmark CAP EUR NTR.  The fund has taken in use a benchmark which		

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Nordea Pro Finland Fund	<p>OMX Helsinki Benchmark CAP GTR.</p> <p>The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>		<p>The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Pro Stable Return Fund	<p><i>The fund has taken in use three benchmark indices for different purposes as of 1.1.2023:</i> MSCI World NTR, EUR hedged 70%; 1-month Euribor 30%; to be used for performance comparison only.</p> <p>MSCI World NTR, EUR hedged; to be used for risk comparison only. MSCI World Minimum Volatility, EUR hedged; to be used for risk comparison only. The risk characteristics of the fund portfolio will bear some resemblance to those of the benchmarks.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>		<p><i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, EUR hedged 18%; ICE BofA Euro Corporate 18%; ICE BofA Euro Currency High Yield Constrained, EUR hedged 15%; ICE BofA US High Yield Constrained, EUR hedged 15%; JP Morgan EMU Government Bond 1–3 year 17%; JP Morgan EMU Government Bond 17%.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Savings 15 Fund	<p><i>The fund's composite index as of 1.5.2024:</i> MSCI World NTR 12.75%; OMX Helsinki CAP GTR 2.25%; JP Morgan EMU Government Bond 22.1%; ICE BofA Euro Corporate 10.2%; Bloomberg US Credit Bond, EUR hedged 6.8%; iBoxx EUR Covered Bond 8.5%; ICE BofA Global High Yield Constrained, EUR hedged 8.5%; 3-month Euribor 17.0%; HFRX Global Hedge Fund EUR 11.9%.</p>		<p><i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, EUR hedged 8.75%; ICE BofA Euro Corporate 8.75%; ICE BofA Euro Currency High Yield Constrained, EUR hedged 3.75%; ICE BofA US High Yield Constrained, EUR hedged 3.75%; JP Morgan EMU Government Bond 1–3 year 12.50%; JP Morgan EMU Government Bond 12.50%; MSCI ACWI NTR 50.00%.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Savings 30 Fund	<p><i>The fund's composite index as of 1.5.2024:</i> MSCI World NTR 25.5%; OMX Helsinki CAP GTR 4.5%; JP Morgan EMU Government Bond 18.2%; ICE BofA Euro Corporate 8.4%; Bloomberg US Credit Bond, EUR hedged 5.6%; iBoxx EUR Covered Bond 7.0%; ICE BofA Global High Yield Constrained, EUR hedged 7.0%; 3-month Euribor 14.0%; HFRX Global Hedge Fund EUR 9.8%.</p>		<p><i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, NOK hedged 8.75%; ICE BofA Euro Corporate, NOK hedged 8.75%; ICE BofA Euro Currency High Yield Constrained, NOK hedged 3.75%; ICE BofA US High Yield Constrained, NOK hedged 3.75%; JP Morgan EMU Government Bond 1–3 year, NOK hedged 12.50%; JP Morgan EMU Government Bond, NOK hedged 12.50%; MSCI ACWI NTR 50.00%.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Savings 50 Fund	<p><i>The fund's composite index as of 1.5.2024:</i> MSCI World NTR 42.5%; OMX Helsinki CAP GTR 7.5%; JP Morgan EMU Government Bond 13.0%; ICE BofA Euro Corporate 6.0%; Bloomberg US Credit Bond, EUR hedged 4.0%; iBoxx EUR Covered Bond 5.0%; ICE BofA Global High Yield Constrained, EUR hedged 5.0%; 3-month Euribor 10.0%; HFRX Global Hedge Fund EUR 7.0%.</p>		<p><i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, SEK hedged 8.75%; ICE BofA Euro Corporate, SEK hedged 8.75%; ICE BofA Euro Currency High Yield Constrained, SEK hedged 3.75%; ICE BofA US High Yield Constrained, SEK hedged 3.75%; JP Morgan EMU Government Bond 1–3 year, SEK hedged 12.50%; JP Morgan EMU Government Bond, SEK hedged 12.50%; MSCI ACWI NTR 50.00%.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Savings 75 Fund	<p><i>The fund's composite index as of 1.5.2024:</i> MSCI World NTR 63.75%; OMX Helsinki CAP GTR 11.25%; JP Morgan EMU Government Bond 6.5%; ICE BofA Euro Corporate 3.0%; Bloomberg US Credit Bond, EUR hedged 2.0%; iBoxx EUR Covered Bond 2.5%; ICE BofA Global High Yield Constrained, EUR hedged 2.5%; 3-month Euribor 5.0%; HFRX Global Hedge Fund EUR 3.5%.</p>		<p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Savings Fixed Income Fund	<p><i>The fund's composite index as of 1.5.2024:</i> JP Morgan EMU Government Bond 40.0%; ICE BofA Euro Corporate 12.0%; Bloomberg US Credit Bond, EUR hedged 8.0%; iBoxx EUR Covered Bond 10.0%; ICE BofA Global High Yield Constrained, EUR hedged 10.0%; 3-month Euribor 20.0%.</p>		<p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Stable Return Fund	<p>The fund does not have a benchmark index as no standard benchmark available matches its investment profile. Using such a benchmark would potentially lead to evaluating the risk and performance of the fund on irrelevant grounds.</p>		<p><i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, EUR hedged 5.25%; ICE BofA Euro Corporate 5.25%; ICE BofA Euro Currency High Yield Constrained, EUR hedged 2.25%; ICE BofA US High Yield Constrained, EUR hedged 2.25%; JP Morgan EMU Government Bond 1–3 year 7.50%; JP Morgan EMU Government Bond 7.50%; MSCI ACWI NTR 70.00%.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Stratega 90 Fund	<p>MSCI World NTR 76.5%; OMX Stockholm Benchmark Cap ESG GTR 13.5%; OMRX Treasury Bond 6.5%; OMRX Treasury Bill 2%; HFRX Global Hedge Fund, SEK hedged 1.5%</p> <p>The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>		<p><i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, NOK hedged 5.25%; ICE BofA Euro Corporate, NOK hedged 5.25%; ICE BofA Euro Currency High Yield Constrained, NOK hedged 2.25%; ICE BofA US High Yield Constrained, NOK hedged 2.25%; JP Morgan EMU Government Bond 1–3 year, NOK hedged 7.50%; JP Morgan EMU Government Bond, NOK hedged 7.50%; MSCI ACWI NTR 70.00%.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>
Nordea Stratega Fixed Income Fund	<p><i>The fund's composite index as of 30.8.2024:</i> OMRX Treasury Bill 20%; OMRX Treasury Bond 35%; ICE BofA Euro Corporate, SEK hedged 17.50%; Bloomberg Barclays US Credit Bond, SEK hedged 17.50%; ICE BofA European Currency High Yield Constrained, SEK hedged 5%; ICE BofA US High Yield, SEK hedged 5%.</p> <p>The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.</p>		<p><i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, NOK hedged 5.25%; ICE BofA Euro Corporate, NOK hedged 5.25%; ICE BofA Euro Currency High Yield Constrained, NOK hedged 2.25%; ICE BofA US High Yield Constrained, NOK hedged 2.25%; JP Morgan EMU Government Bond 1–3 year, NOK hedged 7.50%; JP Morgan EMU Government Bond, NOK hedged 7.50%; MSCI ACWI NTR 70.00%.</p> <p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the</p>
Nordea Sustainable Equities Global Fund	<p>MSCI ACWI NTR.</p>		<p>The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the</p>

	environmental or social characteristics promoted by the fund.		environmental or social characteristics promoted by the fund.
Nordea Sustainable Selection Growth Fund SEK	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, SEK hedged 5.25%; ICE BofA Euro Corporate, SEK hedged 5.25%; ICE BofA Euro Currency High Yield Constrained, SEK hedged 2.25%; ICE BofA US High Yield Constrained, SEK hedged 2.25%; JP Morgan EMU Government Bond 1–3 year, SEK hedged 7.50%; JP Morgan EMU Government Bond, SEK hedged 7.50%; MSCI ACWI NTR 70.00%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Sustainable Selection Return Fund SEK	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> MSCI ACWI NTR 90.00%; JP Morgan EMU Government Bond, SEK hedged 2.50%; JP Morgan EMU Government Bond 1–3 year, SEK hedged 2.50%; ICE BofA Euro Corporate, SEK hedged 1.75%; Bloomberg US Credit Bond, SEK hedged 1.75%; ICE BofA Euro Currency High Yield Constrained, SEK hedged 0.75%; ICE BofA US High Yield Constrained, SEK hedged 0.75%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Sustainable Selection Moderate Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, EUR hedged 12.25%; ICE BofA Euro Corporate 12.25%; ICE BofA Euro Currency High Yield Constrained, EUR hedged 5.25%; ICE BofA US High Yield Constrained, EUR hedged 5.25%; JP Morgan EMU Government Bond 1–3 year 17.50%; JP Morgan EMU Government Bond 17.50%; MSCI ACWI NTR 30.00%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea SWE Inflation Linked Bond Fund	OMRX Real  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Sustainable Selection Moderate Fund NOK	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, NOK hedged 12.25%; ICE BofA Euro Corporate, NOK hedged 12.25%; ICE BofA Euro Currency High Yield Constrained, NOK hedged 5.25%; ICE BofA US High Yield Constrained, NOK hedged 5.25%; JP Morgan EMU Government Bond 1–3 year, NOK hedged 17.50%; JP Morgan EMU Government Bond, NOK hedged 17.50%; MSCI ACWI NTR 30.00%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Swedish Ideas Equity Fund	The fund has changed its benchmark as of 1.6.2023. The new benchmark is OMX Stockholm Benchmark ESG Responsible Capped Gross Index.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Sustainable Selection Moderate Fund SEK	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> Bloomberg US Credit Bond, SEK hedged 12.25%; ICE BofA Euro Corporate, SEK hedged 12.25%; ICE BofA Euro Currency High Yield Constrained, SEK hedged 5.25%; ICE BofA US High Yield Constrained, SEK hedged 5.25%; JP Morgan EMU Government Bond 1–3 year, SEK hedged 17.50%; JP Morgan EMU Government Bond, SEK hedged 17.50%; MSCI ACWI NTR 30.00%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Swedish Institutional Short Duration Bond Fund	<i>The fund has taken in use a benchmark as of 1.1.2023:</i> OMRX Mortgage Bond 1-3Y 25%; OMRX Treasury Bill 75%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Sustainable Selection Return Fund	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> MSCI ACWI NTR 90.00%; JP Morgan EMU Government Bond 2.50%; JP Morgan EMU Gov Bond 1–3 year 2.50%; ICE BofA Euro Corporate 1.75%; Bloomberg US Credit Bond, EUR hedged 1.75%; ICE BofA Euro Currency High Yield Constrained, EUR hedged 0.75%; ICE BofA US High Yield Constrained, EUR hedged 0.75%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea Tactical Asset Allocation Fund	<i>The fund has taken in use a composite index as of 1.1.2023:</i> iBoxx EUR Liquid Investment Grade Ultrashort 18%; ICE Euro Currency 1-Week Deposit Bid Rate Constant Maturity 18%; iBoxx € EURO Covered 16%; JP Morgan EMU Government Bond 48%.
Nordea Sustainable Selection Return Fund NOK	<i>The fund has taken in use a composite index as of 1.1.2023. The composite index has been changed as of 1.5.2024:</i> MSCI ACWI NTR 90.00%; JP Morgan EMU Government Bond, NOK hedged 2.50%; JP Morgan EMU Government Bond 1–3 year, NOK hedged 2.50%; ICE BofA Euro Corporate, NOK hedged 1.75%; Bloomberg US Credit Bond, NOK hedged 1.75%; ICE BofA Euro Currency High Yield Constrained, NOK hedged 0.75%; ICE BofA US High Yield Constrained, NOK hedged 0.75%.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.	Nordea World Fund	MSCI World NTR.
		Nordea World Passive Fund	MSCI World ex Business Involvement and Fossil Fuel Screened Select NTR.  The benchmark used by the fund has been designated as a reference benchmark for the purpose of attaining the E/S characteristics promoted by the fund.
		Nordea Yield Fund	<i>The fund has taken in use a benchmark as of 1.1.2023:</i> 3-month Euribor.  The benchmark will be used for performance comparison only. The fund's portfolio is actively managed without reference or constraints relative to its benchmark.  The fund has taken in use a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
<b>Other Nordea funds for the Norwegian market</b>			
		Nordea Avkastning Fund	Oslo Børs Mutual Fund Index.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
		Nordea FRN Kreditt Fund	NBP Norwegian Regular Market 1–3, floating-rate securities, NOK NORM123FRN.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
		Nordea FRN OMF Fund	NBP Norwegian Regular Market 1, floating-rate securities, NOK NORM1FRN.  The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
		Nordea FRN Pensjon Fund	NBP Norwegian Regular Market 1–2, floating-rate securities, NOK NORM12FRN.

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	The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.		The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Global Statsobligasjon Fund	JP Morgan Global GBI, NOK hedged.	Nordea Plan Offensiv Fund	<i>The fund's composite index is:</i> MSCI Emerging Markets NTR 13.5%; MSCI World NTR 63%; Oslo Børs Mutual Fund Index 13.5%; Bloomberg US Credit Bond, NOK hedged 1.2%; ICE BofA EUR Corporate, NOK hedged 1.2%; ICE BofA Global High Yield Constrained, NOK hedged 1.2%; NBP Norwegian Regular Market 1–3 Duration 3, NOK NORM123D3 1.5%; NBP Liquidity Standard NOK NOLIQTSD 5 %.
Nordea Kort Obligasjon Fund	NBP Liquidity Standard NOK NOLIQTSD.		The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Kort Obligasjon Pluss Fund	NBP Liquidity Standard NOK NOLIQTSD.	Nordea Plan Vektororientert Fund	<i>The fund's composite index is:</i> MSCI Emerging Markets NTR 9.8%; MSCI World NTR 45.5%; Oslo Børs Mutual Fund Index 9.8%; Bloomberg US Credit Bond, NOK hedged 6.7%; ICE BofA EUR Corporate, NOK hedged 6.7%; ICE BofA Global High Yield Constrained, NOK hedged 6.7%; NBP Norwegian Regular Market 1–3 Duration 3, NOK NORM123D3 10%; NBP Liquidity Standard NOK NOLIQTSD 5%.
Nordea Norge Pluss Fund	Oslo Børs Mutual Fund Index.		The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Norge Verdi Fund	Oslo Børs Mutual Fund Index.	Nordea Stabile Aksjer Global Fund	<i>The fund has taken in use three benchmark indices for different purposes:</i> MSCI World NTR, NOK hedged 70%; 1-month Nibor 30%; to be used for performance comparison only.
Nordea Norwegian Passive Fund	OBX ESG ex Oil and Gas Index.		MSCI World NTR, NOK hedged; to be used for risk comparison only. MSCI World Minimum Volatility, NOK hedged; to be used for risk comparison only. The risk characteristics of the fund portfolio will bear some resemblance to those of the benchmarks.
Nordea Obligasjon II Fund	NBP Norwegian Regular Market 1–2 Duration 3 NOK NORM12D3.		The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Obligasjon III Fund	NBP Norwegian Regular Market 1–3 Duration 3 NOK NORM123D3.	Nordea Stabile Aksjer Global Valuta-sikret Fund	<i>The fund has taken in use three benchmark indices for different purposes:</i> MSCI World NTR, NOK hedged 70%; 1-month Nibor 30%; to be used for performance comparison only.
Nordea Plan Balansert Fund	<i>The fund's composite index is:</i> MSCI Emerging Markets NTR 7.5%; MSCI World NTR 35%; Oslo Børs Mutual Fund Index 7.5%; Bloomberg US Credit Bond, NOK hedged 6.7%; ICE BofA EUR Corporate, NOK hedged 6.7%; ICE BofA Global High Yield Constrained, NOK hedged 6.7%; NBP Norwegian Regular Market 1–3 Duration 3, NOK NORM123D3 10%; NBP Liquidity Standard NOK NOLIQTSD 20%.		MSCI World NTR, NOK hedged; to be used for risk comparison only. MSCI World Minimum Volatility, NOK hedged; to be used for risk comparison only. The risk characteristics of the fund portfolio will bear some resemblance to those of the benchmarks.
	The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.		The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.
Nordea Plan Konservativ Fund	<i>The fund's composite index is:</i> MSCI Emerging Markets NTR 1.5%; MSCI World NTR 7%; Oslo Børs Mutual Fund Index 1.5%; Bloomberg US Credit Bond, NOK hedged 6.7%; ICE BofA EUR Corporate, NOK hedged 6.7%; ICE BofA Global High Yield Constrained, NOK hedged 6.7%; NBP Norwegian Regular Market 1–3 Duration 3, NOK NORM123D3 10%; NBP Liquidity Standard NOK NOLIQTSD 60%.		
	The fund uses a benchmark which has not been designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the fund.		
Nordea Plan Moderat Fund	<i>The fund's composite index is:</i> MSCI Emerging Markets NTR 4.5%; MSCI World NTR 21%; Oslo Børs Mutual Fund Index 4.5%; Bloomberg US Credit Bond, NOK hedged 6.7%; ICE BofA EUR Corporate, NOK hedged 6.7%; ICE BofA Global High Yield Constrained, NOK hedged 6.7%; NBP Norwegian Regular Market 1–3 Duration 3, NOK NORM123D3 10%; NBP Liquidity Standard NOK NOLIQTSD 40%.		

An interest-rate-based benchmark index can be used as part of the composite index in certain funds or as the sole benchmark index in a fund. Interest-rate-based benchmark returns are derived by using a total return index based on the daily quoted interest rate (e.g. Euribor, Nibor or Stibor). Source: Refinitiv.

### Responsible investment

#### The SFDR appendices available at the end of this prospectus include sustainability-related information

Nordea pays special attention to social, governance and environmental issues in many of its products and services, including investment funds. Nordea's funds have applied the Responsible Investment Policy (RI) in all Nordic countries since 2007. The fund companies in the Nordea Group have signed the United Nations Principles for responsible investment (UNPRI). Issues related to environmental and social responsibility and corporate governance have thus been integrated in the funds' investment operations.

Nordea is one of the first large Nordic banks to engage itself in the process of dealing with the ethical issues related to the companies' business practices.

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In general, Nordea's funds do not invest in companies manufacturing armaments against international agreements, such as anti-personnel mines and cluster munitions. Similarly, investments are not made in companies that manufacture nuclear weapons or develop nuclear weapon programmes.

More information about [responsible investment](#) (partly in English) is presented at the website [www.nordea.com](http://www.nordea.com). [The Responsible Investment Policy](#) (the attachment is in English) is available at the website [www.nordeafunds.com/downloads](http://www.nordeafunds.com/downloads).

#### About funds' transaction costs

The transaction costs of the Nordea funds over the past 12 months are reported in the annual and semi-annual report. This key figure shows how the commission expenses and brokerage fees related to the fund's trading and paid to the securities brokers effect on the fund's Net Asset Value on a yearly basis. Transaction costs are reported as a percentage of the fund's maximum market value over the review period (past 12 months).

Both internal and external investment research is used to add value and to promote efficient portfolio management in the funds. Costs related to research material are not charged from the funds' assets.

#### About fund of funds and their investments in underlying funds

On a general level, the underlying funds can be fixed-income, balanced or equity funds or other funds such as hedge funds. The underlying funds may have different investment strategies and/or restrictions compared with the fund of funds. In addition to this, regarding other characteristics possessed by the underlying fund, there might be differences, such as in use of derivatives, level of leverage, method used to calculate the global exposure, sensitivity to interest-rate movements, credit exposure, asset allocation, regional breakdown etc.

In certain funds of funds there might be a restriction on the maximum proportion for e.g. hedge funds having different investment strategies and/or restrictions.

Fund name (feeder funds or fund of funds)
As for all these funds listed below, the underlying funds may have different investment strategies and/or restrictions and/or possess other characteristics compared with the fund of funds or feeder funds.
Other Nordea funds/ fund of funds
Nordea Savings 15 Fund
Nordea Savings 30 Fund
Nordea Savings 50 Fund
Nordea Savings 75 Fund

#### Information about the special characteristics of certain funds

##### Efficient Portfolio Management Techniques and Transparency of Securities Financing Transactions

###### General information

For the purpose of efficient portfolio management, the funds included in this prospectus may use buy-sell back transactions, repurchase agreement transactions and total return swaps.

Efficient portfolio management is used for the purpose of generating an excess return on a fund or reducing costs or risk within a fund.

###### – **Securities lending arrangements**

When a fund enters into a securities lending arrangement, it is the act of lending securities to a borrower in exchange of a fee.

The Nordea funds do no longer use securities lending/borrowing although it is possible according to the fund rules.

###### – **Buy-sell back transactions, repurchase agreement transactions and total return swaps**

###### Buy-sell back transactions

Buy-sell back transactions consist of transactions which are not governed by a repurchase agreement or a reverse repurchase agreement and where an entity buys or sells securities or instruments to or from a counterparty, and agrees, respectively, to sell to or buy back from that counterparty securities or instruments of the same description at a specified price on a future date. Such transactions are commonly referred to as buy-sell back transactions for the entity buying

the securities or instruments and sell-buy back transactions for the counterparty selling them.

###### Repurchase agreements

Repurchase agreements consist of transactions governed by an agreement in which an entity sells securities or instruments to a counterparty, subject to a commitment to repurchase them, or substituted securities or instruments of the same description, from the counterparty at a specified price on a future date already specified, or to be specified by the transferor. Such transactions are commonly referred to as repurchase agreements for the entity selling the securities or instruments, and reverse repurchase agreements for the counterparty buying them.

###### Total return swaps

A total return swap (TRS) is an agreement in which one entity (total return payer) transfers the total economic performance of a reference asset to another entity (total return receiver). Total economic performance includes interest income, fees, gains or losses from market movements, and credit losses. In addition to total return swaps the funds' investments targets can also be other instruments with characteristics similar to the TRSs, such as contracts for difference (CFD).

In the selection of a counterparty a credit risk assessment and a due diligence will have to be performed, including a review of terms and conditions, and of the execution policy to secure compliance with the general market standard. All approved counterparties are subject to a regular review.

Collateral is typically received to reduce risk. The fund does only accept cash as collateral, the safekeeping of which will be entrusted to the depositary of the fund. The fund does not reuse collateral.

###### – **Risks and potential conflicts of interest**

There is no assurance that a fund will achieve the objective for which it entered into a specific transaction. The risks related to these transactions can have a negative impact on the return of the fund.

Lending securities to borrowers constitutes a risk that a borrower defaults and is not able to return borrowed securities. In order to mitigate this risk, the securities lending agent to the fund is obliged to ensure that the retrieval of any borrowed securities is carried out in accordance with the normal market practice and when doing so to the best of securities lending agent's ability.

Repurchase agreement transactions might expose a fund to risks similar to those associated with other types of derivatives. If a counterparty of the repurchase agreement transactions defaults, a loss may be realised on the sale of the underlying security to the extent that the proceeds from the sale and accrued interest of the security are less than the resale price, including interest, set forth in the repurchase agreement transactions. Moreover, should a counterparty declare bankruptcy or become insolvent, a fund may incur delays and costs in selling the underlying security, or it may suffer a loss of principal and interest.

During the life of a repurchase agreement contract, the fund is not entitled to sell the securities which are the object of the contract, either before the right to repurchase these securities has been exercised by the counterparty, or the repurchase term has expired.

Counterparty risk is generally mitigated by the transfer or pledge of collateral in favour of the fund. However, there are certain risks associated with collateral management, including difficulties in selling collateral and/or losses incurred upon realisation of collateral, as described below.

Securities lending transactions and repurchase agreement transactions also entail liquidity risks resulting from, inter alia, locking cash or securities positions in transactions of excessive size or duration relative to the liquidity profile of the fund or delays in recovering cash or securities paid to the counterparty. These circumstances may delay or restrict the ability of the fund to meet redemption requests. The fund may also incur operational risks such as, inter alia, non-settlement or delay in settlement of instructions, failure or delays in satisfying delivery obligations under sales of securities, and legal risks related to the documentation used in connection of such transactions.

The risks of such securities lending arrangements as well as buy-sell back transactions, repurchase agreement transactions and total return swaps are sufficiently captured by the risk management process of the fund.

Conflict of interests is handled by the Management company's/ Fund's policy on conflict of interests.

**– Sharing of return as well as costs and fees**

The fund will get the income derived from buy-sell back transactions, repurchase agreement transactions and total return swaps deducted with the direct and indirect operational costs. Direct and indirect operational costs may vary depending on the type of the transaction and the counterparty. Particularly, a fund may pay fixed or variable fees that might be a percentage of the generated income to agents and other intermediaries, which may be affiliated with the depository, the investment management organisation or the Management Company, in consideration of the functions they perform and risks they assume.

Information on direct and indirect operational costs and fees incurred by each fund in this respect, as well as the identity of the entities to which such costs and fees are paid, if applicable, is available in the fund's annual and semi-annual report.

**– Investment vehicles and utilisation rates**

- Securities lending: A fund is entitled to use securities lending to a maximum of 25 % of the fund's securities portfolio according to fund rules. However, the funds do not use securities lending in their investment activities meaning that the expected use is 0 %.
- Buy-sell back/sell-buy back transactions and repurchase agreements: A fund is entitled to use buy-sell back transactions and repurchase agreement transactions to a maximum of 10 % of the fund's NAV. However, the expected use is 0 %.
- Total return swaps are not used, meaning that the expected use is 0 %.

**Swing pricing method**

Subscriptions for and redemptions of fund units entail trading costs since the portfolio manager has to buy new securities for the fund in order to invest the assets gathered from subscriptions, or to sell securities in order to get liquid assets to pay for redemptions. The costs resulting from buying or selling securities are shared by all the fund's unitholders.

Using the swing pricing method, the above-mentioned costs can be allocated to the unitholders making the subscriptions or redemptions, in other words those unitholders who cause the need to trade in securities. Thus, the aim of the method is to promote the equal treatment of all unitholders.

**Principles of the swing pricing method**

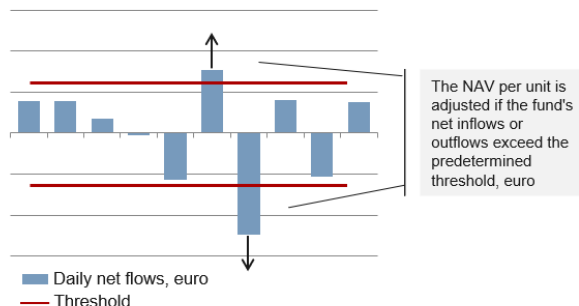
Under the swing pricing method, the net asset value (NAV) per unit is adjusted using a *swing factor*.

- If the fund experiences net inflows, the NAV is adjusted upwards using the swing factor, which means that the NAV per unit increases.
- If the fund experiences net outflows, the NAV is adjusted downwards using the swing factor, which means that the NAV per unit decreases.

The benefit from the adjustment of the NAV per unit using the swing factor always goes to the fund, and thus its existing unitholders.

**Swing pricing in funds**

In funds, the NAV per unit is adjusted on the valuations dates on which the fund's net inflows or net outflows exceed a pre-determined threshold. This is referred to as the partial swing pricing method. In net inflows, the NAV per unit is adjusted upwards using the swing factor (the NAV per unit increases) and in net outflows the NAV per unit is adjusted downwards using the swing factor (the NAV per unit decreases).



More information about the swing pricing method can be found in the fund-specific rules and in the key information document. Fund-specific information on the actual use of the swing factor is presented in the Nordea funds' annual report and semi-annual report.

**Terminology related to the swing pricing method:**

**Net inflows:** The volume of subscriptions made in a fund during one NAV calculation day is greater than the volume of redemptions.

**Net outflows:** The volume of redemptions made in a fund during one NAV calculation day is greater than the volume of subscriptions.

**Swing factor:** A pre-determined percentage used to adjust the NAV per unit.

**Threshold:** A pre-determined threshold (percentage of the NAV of the fund) that must be exceeded before the NAV per unit is adjusted using the swing factor.

**Partial swing pricing:** the NAV per unit is adjusted if a fund's net inflows or net outflows exceed a pre-determined threshold.

Partial swing pricing is in use in the following funds	
Nordea Avkastning Fund	Nordea Moderate Yield Fund
Nordea Corporate Bond Fund	Nordea Nordic Fund
Nordea Discretionary Swedish Equity Fund	Nordea Nordic Small Cap Fund
Nordea Emerging Europe Fund	Nordea Norge Pluss Fund
Nordea Emerging Market Bond Fund	Nordea Norge Verdi Fund
Nordea Emerging Market Equities Fund	Nordea North American Dividend Fund
Nordea European High Yield Fund	Nordea North American Enhanced
Nordea European Passive Fund	Nordea Norwegian Passive Fund
Nordea European Smaller Companies Fund	Nordea Norwegian Stars Fund
Nordea Finnish Passive Fund	Nordea Private Banking Norsk Aksje Portefølje
Nordea Finnish Stars Fund	Nordea Pro Finland Fund
Nordea Focus Fixed Income Fund	Nordea Pro Stable Return Fund
Nordea Global Dividend Fund	Nordea Stabile Aksjer Global Fund
Nordea Global Enhanced Fund	Nordea Stabile Aksjer Global Valutasikret Fund
Nordea Global High Yield Fund	Nordea Sustainable Equities Global Fund
Nordea Global Passive Fund	Nordea Swedish Ideas Equity Fund
Nordea Innovation Stars Fund	Nordea World Fund
Nordea Institutionella Småbolagsfonden Sverige Fund	Nordea World Passive Fund
Nordea Japan Fund	Nordea Yield Fund

**Duration hedging**

Duration-hedged unit series are available for selected funds. Currently duration-hedged unit series is available in the funds listed below. Duration-hedged unit series is denoted with "ID" which refers to the duration-hedged I unit series designed for institutional investors.

*Nordea Corporate Bond Fund ID*

A unit series using duration hedging typically aims at maintaining the duration at a target level. The duration hedging may be monitored and adjusted daily as necessary. The hedge construction and adjustments are performed by trading fixed-income derivatives.

**Currency hedging**

Currently, there are no currency-hedged unit series in the funds managed by Nordea Funds Ltd.

**Active portfolio management and Active Share, %**

The Nordea funds disclose Active Share in the annual and semi-annual reports.

**Definition of the key figure**

Active Share (AS) is mainly calculated for those equity funds which have a benchmark. AS is reported as a percentage and it illustrates how large a proportion of the fund's portfolio differs from the breakdown of the benchmark.

Active Share indicates the degree of active portfolio management. If the figure is 0–20% when calculating the Active Share it usually refers to a passive fund or fund similar to an index fund. The higher the AS figure the more the equities in the fund's portfolio and/or their weights differ from the breakdown of the benchmark and the more active the fund's investment operations have been.

**Concentrated funds**

Some funds invest in a concentrated investment universe. If this is the case it will be disclosed in the KID document. The degree of concentration will typically have a limiting effect on the achievable level of active share (the percentage of the portfolio that differs from the benchmark of the fund)

**Passive equity funds****Nordea Finnish Passive Fund**

The fund's benchmark is OMX Helsinki Benchmark CAP GTR (incl. dividends).

Details on the index and its constituents are available at [www.nasdaqomxnordic.com](http://www.nasdaqomxnordic.com).

The fund is a passively managed equity fund which aims to achieve a return which is corresponding to the performance of the benchmark. The fund seeks to invest in as many companies as possible, represented in the benchmark. The fund mainly makes direct equity investments. In addition the fund may use equity and index derivatives.

The fund aims to follow the benchmark by using so-called full replication, meaning that the composition of the fund corresponds to that of the benchmark as closely as possible. As the fund uses full replication and the fund's investments are widely diversified, the (counterparty) risk related to a single investment target is usually low. The counterparty risk refers normally to a situation where the issuer of an investment instrument does not comply with the agreed terms.

There can occur deviation between the return of the fund unit and the performance of the benchmark, resulting from the Responsible Investment Policy which the fund follows. This means that certain equities included in the benchmark, can be excluded.

Fund management fee, transaction costs, taxes, subscriptions and redemptions, benchmark re-balancing, dividend re-investments among others can have an effect on the fund's ability to follow the benchmark.

The expected level of active risk (tracking error) in normal market conditions is usually below 0.50% according to the Barra risk analysis. This expected (anticipated) tracking error is a forward-looking term, and due to computational reasons, differences can occur between the expected tracking error and the realised, historical tracking error.

Fund management fee, transaction costs, taxes, subscriptions and redemptions, benchmark re-balancing, dividend re-investments among others can have an effect on the fund's ability to follow the benchmark.

Details on the re-balancing frequency are available at [www.nasdaqomxnordic.com](http://www.nasdaqomxnordic.com). The cost effects of re-balancing are low.

**Nordea European Passive Fund**

The fund's benchmark is MSCI Europe NTR (incl. dividends after taxes).

Details on the index and its constituents are available at [www.msci.com](http://www.msci.com).

The fund is a passively managed equity fund which aims to achieve a return corresponding to the performance of the benchmark. The fund seeks to invest in as many companies as possible, represented in the benchmark. The fund mainly makes direct equity investments. In addition the fund may use equity and index derivatives.

The fund aims to follow the benchmark by using so-called full replication, meaning that the composition of the fund corresponds to that of the benchmark as closely as possible. As the fund uses full replication and the fund's investments are widely diversified, the (counterparty) risk related to a single investment target is usually low. The counterparty risk refers normally to a situation where the issuer of an investment instrument does not comply with the agreed terms.

There can occur deviation between the return of the fund unit and the performance of the benchmark, resulting from the Responsible Investment Policy which the fund follows. This means that certain equities included in the benchmark, can be excluded.

The expected level of active risk (tracking error) in normal market conditions is usually below 0.50% according to the Barra risk analysis. This expected (anticipated) tracking error is a forward-looking term, and due to computational reasons, differences can occur between the expected tracking error and the realised, historical tracking error.

Fund management fee, transaction costs, taxes, subscriptions and redemptions, benchmark re-balancing, dividend re-investments among others can have an effect on the fund's ability to follow the benchmark.

Details on the re-balancing frequency are available at [www.msci.com](http://www.msci.com). The cost effects of re-balancing are low.

**Nordea Global Passive Fund**

The fund's benchmark is MSCI World NTR. (incl. dividends after taxes)

Details on the index and its constituents are available at [www.msci.com](http://www.msci.com).

The fund is a passively managed equity fund which aims to achieve a return corresponding to the performance of the benchmark. The fund seeks to invest in as many companies as possible, represented in the benchmark. The fund mainly makes direct equity investments. In addition the fund may use equity and index derivatives.

The fund aims to follow the benchmark by using so-called full replication, meaning that the composition of the fund corresponds to that of the benchmark as closely as possible. As the fund uses full replication and the fund's investments are widely diversified, the (counterparty) risk related to a single investment target is usually low. The counterparty risk refers normally to a situation where the issuer of an investment instrument does not comply with the agreed terms.

There can occur deviation between the return of the fund unit and the performance of the benchmark, resulting from the Responsible Investment Policy which the fund follows. This means that certain equities included in the benchmark, can be excluded.

The expected level of active risk (tracking error) in normal market conditions is usually below 0.50% according to the Barra risk analysis. This expected (anticipated) tracking error is a forward-looking term, and due to computational reasons, differences can occur between the expected tracking error and the realised, historical tracking error.

Fund management fee, transaction costs, taxes, subscriptions and redemptions, benchmark re-balancing, dividend re-investments among others can have an effect on the fund's ability to follow the benchmark.

Details on the re-balancing frequency are available at [www.msci.com](http://www.msci.com). The cost effects of re-balancing are low.

#### Nordea Norwegian Passive Fund

The fund's benchmark is OBX ESG ex Oil and Gas Index.

Details on the index and its constituents are available at [www.live.euronext.com](http://www.live.euronext.com).

The fund is a passively managed equity fund which aims to achieve a return corresponding to the performance of the benchmark. The fund seeks to invest in as many companies as possible, represented in the benchmark. The fund mainly makes direct equity investments. In addition the fund may use equity and index derivatives.

The fund aims to follow the benchmark by using so-called full replication, meaning that the composition of the fund corresponds to that of the benchmark as closely as possible. As the fund uses full replication and the fund's investments are widely diversified, the (counterparty) risk related to a single investment target is usually low. The counterparty risk refers normally to a situation where the issuer of an investment instrument does not comply with the agreed terms.

There can occur deviation between the return of the fund unit and the performance of the benchmark, resulting from the Responsible Investment Policy and other exclusions the fund follows. This means that certain equities included in the benchmark, can be excluded.

The Fund promotes environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR). Further information is available in the prospectus and at [www.nordea.fi/funds](http://www.nordea.fi/funds).

The expected level of active risk (tracking error) in normal market conditions is usually below 0.50% according to the Barra risk analysis. This expected (anticipated) tracking error is a forward-looking term, and due to computational reasons, differences can occur between the expected tracking error and the realised, historical tracking error.

Fund management fee, transaction costs, taxes, subscriptions and redemptions, benchmark re-balancing, dividend re-investments among others can have an effect on the fund's ability to follow the benchmark.

Details on the re-balancing frequency are available at [www.live.euronext.com](http://www.live.euronext.com). The cost effects of re-balancing are low.

#### Nordea World Passive Fund

The fund's benchmark is MSCI World ex Business Involvement and Fossil Fuel Screened Select NTR. (incl. dividends after taxes).

Details on the index and its constituents are available at [www.msci.com](http://www.msci.com).

The fund is a passively managed equity fund which aims to achieve a return corresponding to the performance of the benchmark. The fund seeks to invest in as many companies as possible, represented in the benchmark. The fund mainly makes direct equity investments. In addition the fund may use equity and index derivatives.

The fund aims to follow the benchmark by using so-called full replication, meaning that the composition of the fund corresponds to that of the benchmark as closely as possible. As the fund uses full replication and the fund's investments are widely diversified, the (counterparty) risk related to a single investment target is usually low. The counterparty risk refers normally to a situation where the issuer of an investment instrument does not comply with the agreed terms.

There can occur deviation between the return of the fund unit and the performance of the benchmark, resulting from the Responsible Investment Policy and other exclusions the fund follows. This means that certain equities included in the benchmark, can be excluded.

The Fund promotes environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR). Further information is available in the prospectus and at [www.nordea.fi/funds](http://www.nordea.fi/funds).

The expected level of active risk (tracking error) in normal market conditions is usually below 0.50% according to the Barra risk analysis. This expected (anticipated) tracking error is a forward-looking term, and due to computational reasons, differences can occur between the expected tracking error and the realised, historical tracking error.

Fund management fee, transaction costs, taxes, subscriptions and redemptions, benchmark re-balancing, dividend re-investments among others can have an effect on the fund's ability to follow the benchmark.

Details on the re-balancing frequency are available at [www.msci.com](http://www.msci.com). The cost effects of re-balancing are low.

#### Investments in securities issued by sovereign states and similar public-sector issuers

Fixed income and balanced funds may invest over 35% of their assets in the securities or money market instruments of any one issuer, provided that the issuer or underwriter is the Finnish government, a Finnish municipality or joint municipal authority, a member state of the European Economic Area, a state or other local public corporation of such a country, another OECD member state, or a supranational organization of which at least one member is a member state of the European Economic Area.

#### Feeder/ master funds and their structure

##### Feeder fund – Nordea India Fund

The Fund is a feeder fund. The Fund seeks to invest all of its assets (minimum 85%) in Nordea 1 – Indian Equity Fund (share class Y) ("Master Fund"). The fund is a feeder fund, and is therefore not actively managed.

For the Fund no more than 15% of the Fund's assets can be 1) held in liquid assets to the extent required by the operations or 2) invested in such standardised and OTC derivative contracts which can only be used for the purpose of hedging.

The risk and return of the Fund may deviate from the risk and return of the Master Fund depending on the weight of the liquid assets as well as currency fluctuations.

The Fund will be exposed (through investments or cash) to other currencies than the base currency.

The Fund promotes environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR). Further information is available in the prospectus and at [www.nordea.fi/funds](http://www.nordea.fi/funds).

The Fund's base currency is EUR.

The NAV of the Fund is calculated on such days when banks are generally open in Finland as well as in Luxembourg and the NAV calculation of the Master Fund has not been suspended in exceptional circumstances permitted by its rules.

##### Master fund Nordea 1 – Indian Equity Fund

The Master Fund is an equity fund that invests at least 75% of the total assets in equities and equity-related securities issued by companies that are domiciled, or conduct the majority of their business, in India.

The Master Fund may be exposed (through investments or cash) to other currencies than the base currency. The Master Fund is actively managed.

Further relevant information on the Master Fund is available free of charge at [www.nordea.lu](http://www.nordea.lu) in languages applicable when marketing the Fund.

Master Fund's base currency is USD.

If the amount of subscription, redemption or switch orders in the Master Fund exceed 10% of the Master Fund's NAV, the Master Fund's rules allow to postpone the execution of orders either in part or in full by eight Master Fund's NAV calculation days at the maximum.

The Master Fund's statutory documents are available free of charge at [www.nordea.lu](http://www.nordea.lu) in the languages applicable when marketing the Fund.

#### Information on the master fund organisation

Nordea 1, SICAV is an Undertaking for Collective Investment in Transferable Securities (UCITS / Société d'Investissement à Capital variable, SICAV) established under the laws of the Grand Duchy of Luxembourg.

The board of directors of the UCITS has selected Nordea Investment Funds S.A. as the management company and portfolio management organisation. This has been registered by the financial supervisory authority in Luxembourg. Nordea Investment Funds S.A. has selected Manulife Investment Management (Singapore) Pte Ltd as the sub-manager of Nordea 1 – Indian Equity Fund.

The fund's depository is J.P. Morgan SE, Luxembourg Branch. The auditor firm is PricewaterhouseCoopers, Luxembourg.

#### Agreement between the fund companies managing the feeder fund and the master fund

In their agreement governing the disclosure of information, the fund companies managing the feeder fund and the master fund have agreed on the procedures ensuring how and when the fund company managing the master fund delivers to the fund company managing the feeder fund the information and documents on the master fund needed to meet the requirements prescribed in the Finnish Act on Common Funds.

Among other things, the agreement covers the basic conditions of the investment operations of the feeder fund, arrangements relating to subscription and redemption orders, special events affecting subscription and redemption orders, changes to permanent arrangements (such as changes in the documents related to the establishment of the master fund, changes to the Key Information Document and prospectus, reorganisations of the master fund, change of the depository and change of the auditor) as well as the law applied to the agreement.

The agreement is available to unitholders free of charge from the Management Company.

#### Fees and expenses arising from the investment of the feeder fund's assets and the total expenses of the feeder fund and the master fund

The total expenses of the feeder fund and master fund consist of administrative costs. The charges debited by the feeder fund over a year, i.e. administrative costs, are 1.85%. The figure is based on the expenses in 2023, and it may vary from year to year. The master fund's launch date is 5.7.2012.

The feeder fund invests in the unit series Y of the master fund. This unit series does not charge a management fee. The investment of the feeder fund's assets in the master fund does not cause other expenses, as Nordea Funds Ltd pays the administrative costs of the master fund on behalf of the feeder fund.

#### Feeder fund – Nordea China Fund

The Fund is a feeder fund. The Fund seeks to invest all of its assets (minimum 85%) in Nordea 1 – Chinese Equity Fund (share class Y) ("Master Fund"). The fund is a feeder fund, and is therefore not actively managed.

For the Fund no more than 15% of the Fund's assets can be  
1) held in liquid assets to the extent required by the operations or  
2) invested in such standardised and OTC derivative contracts which can only be used for the purpose of hedging.

The return and risk of the Fund may deviate from the return and risk of the Master Fund depending on the weight of the liquid assets as well as currency fluctuations.

The Fund will be exposed (through investments or cash) to other currencies than the base currency.

The Fund's base currency is EUR.

The Fund promotes environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR). Further information is available in the prospectus and at [www.nordea.fi/funds](http://www.nordea.fi/funds).

The NAV of the Fund is calculated on such days when banks are generally open in Finland as well as in Luxembourg and the NAV calculation of the Master Fund has not been suspended in exceptional circumstances permitted by its rules.

#### Master fund Nordea 1 – Chinese Equity Fund

The Master Fund is an equity fund that invests at least 75% of the total assets in equities and equity-related securities issued by companies that are domiciled, or conduct the majority of their business in People's Republic of China.

The Master Fund may invest in, or be exposed to, the following instruments up to the percentage of total assets indicated:  
• China A-shares: 50%

The Master Fund will be exposed (through investments or cash) to other currencies than the base currency.

The Master Fund is actively managed.

Further relevant information on the Master Fund is available free of charge at [nordea.lu](http://nordea.lu) in languages applicable when marketing the fund.

Master Fund's base currency is USD.

If the amount of subscription, redemption or switch orders in the Master Fund exceed 10% of the Master Fund's NAV, the Master Fund's rules allow to postpone the execution of orders either in part or in full by eight Master Fund's NAV calculation days at the maximum.

China-related risk: The master fund's investments in mainland China may involve a higher risk of financial loss, not least due to related operational and regulatory risks, when compared with countries generally regarded as being more developed.

The Master Fund's statutory documents are available free of charge at [www.nordea.lu](http://www.nordea.lu) in the languages applicable when marketing the Fund.

#### Information on the master fund organisation

Nordea 1, SICAV is an Undertaking for Collective Investment in Transferable Securities (UCITS/ Société d'Investissement à Capital variable, SICAV) established under the laws of the Grand Duchy of Luxembourg.

The board of directors of the UCITS has selected Nordea Investment Funds S.A. as the management company and portfolio management organisation. This has been registered by the financial supervisory authority in Luxembourg. Nordea Investment Funds S.A. has selected Manulife Investment Management (Hong Kong) Ltd as the sub-manager of Nordea 1 – Chinese Equity Fund.

The fund's depository is J.P. Morgan SE, Luxembourg Branch. The auditor firm is PricewaterhouseCoopers, Luxembourg.

#### Agreement between the fund companies managing the feeder fund and the master fund

In their agreement governing the disclosure of information, the fund companies managing the feeder fund and the master fund have agreed on the procedures ensuring how and when the fund company managing the master fund delivers to the fund company managing the feeder fund the information and documents on the master fund needed to meet the requirements prescribed in the Finnish Act on Common Funds.

Among other things, the agreement covers the basic conditions of the investment operations of the feeder fund, arrangements relating to subscription and redemption orders, special events affecting subscription and redemption orders, changes to permanent arrangements (such as changes in the documents related to the establishment of the master fund, changes to the Key Information Document and prospectus, reorganisations of the master fund, change of the

depository and change of the auditor) as well as the law applied to the agreement.

The agreement is available to unitholders free of charge from the Management Company.

#### **Fees and expenses arising from the investment of the feeder fund's assets and the total expenses of the feeder fund and the master fund**

The total expenses of the feeder fund and master fund consist of administrative costs. The charges debited by the feeder fund over a year, ie. administrative costs, are 1.85%. The figure is based on the expenses in 2023, and it may vary from year to year. The master fund's launch date is 29.11.2013.

The feeder fund invests in the unit series Y of the master fund. This unit series does not charge a management fee. The investment of the feeder fund's assets in the master fund does not cause other expenses, as Nordea Funds Ltd pays the administrative costs of the master fund on behalf of the feeder fund.

#### **Feeder fund – Nordea Conservative Yield Fund**

The Fund is a feeder fund. The Fund seeks to invest all of its assets (minimum 85%) in Nordea 1 – Conservative Fixed Income Fund (share class Y) ("Master Fund"). The fund is a feeder fund, and is therefore not actively managed.

For the Fund no more than 15% of the Fund's assets can be  
1) held in liquid assets to the extent required by the operations or  
2) invested in such standardised and OTC derivative contracts which can only be used for the purpose of hedging.

The return and risk of the Fund may deviate from the return and risk of the Master Fund depending on the weight of the liquid assets.

The Fund's main currency exposure is to the base currency, although the Fund may also be exposed (through investments or cash) to other currencies.

Both the Fund and Master Fund's base currency is EUR.

The NAV of the Fund is calculated on such days when banks are generally open in Finland as well as in Luxembourg and the NAV calculation of the Master Fund has not been suspended in exceptional circumstances permitted by its rules.

#### **Master fund Nordea 1 – Conservative Fixed Income Fund**

The Master Fund is a fixed income fund that mainly invests, directly or through derivatives, in bonds, money market instruments and currencies globally.

The Master Fund may invest in corporate and government debt securities and debt-related securities, as well as inflation-linked bonds, covered bonds, convertible bonds, money market instruments, and UCITS/UCIs, including exchange-traded funds. The Master Fund may invest in credit default swaps.

The Master Fund may invest in, or be exposed to, the following instruments up to the percentage of total assets indicated:

- asset- and mortgage-backed securities (ABSs/MBSs): 20%
- defaulted corporate bonds: 5% (as a result of holding corporate bonds defaulting. The Master Fund will not invest actively in defaulted corporate bonds)
- equities: 2.5% (as a result of holding defaulted securities)

The Master Fund may be exposed (through investments or cash) to other currencies than the base currency.

The Master Fund is actively managed.

Further relevant information on the Master Fund is available free of charge at [nordea.fi](http://nordea.fi) in languages applicable when marketing the fund.

If the amount of subscription, redemption or switch orders in the Master Fund exceed 10% of the Master Fund's NAV, the Master Fund's rules allow to postpone the execution of orders either in part or in full by eight Master Fund's NAV calculation days at the maximum.

The Master Fund's statutory documents are available free of charge at [www.nordea.lu](http://www.nordea.lu) in the languages applicable when marketing the Fund.

#### **Information on the master fund organisation**

Nordea 1, SICAV is an Undertaking for Collective Investment in Transferable Securities (UCITS / Société d'Investissement à Capital variable, SICAV) established under the laws of the Grand Duchy of Luxembourg.

The board of directors of the UCITS has selected Nordea Investment Funds S.A. as the management company and portfolio management organisation. This has been registered by the financial supervisory authority in Luxembourg. Nordea Investment Funds S.A. has selected Nordea Investment Management AB as the investment manager of Nordea 1 -Conservative Fixed Income Fund.

The fund's depository is J.P. Morgan SE, Luxembourg Branch. The auditor firm is PricewaterhouseCoopers, Luxembourg.

#### **Agreement between the fund companies managing the feeder fund and the master fund**

In their agreement governing the disclosure of information, the fund companies managing the feeder fund and the master fund have agreed on the procedures ensuring how and when the fund company managing the master fund delivers to the fund company managing the feeder fund the information and documents on the master fund needed to meet the requirements prescribed in the Finnish Act on Common Funds.

Among other things, the agreement covers the basic conditions of the investment operations of the feeder fund, arrangements relating to subscription and redemption orders, special events affecting subscription and redemption orders, changes to permanent arrangements (such as changes in the documents related to the establishment of the master fund, changes to the Key Information Document (KID) and prospectus, reorganisations of the master fund, change of the depository and change of the auditor) as well as the law applied to the agreement.

The agreement is available to unitholders free of charge from the Management Company.

#### **Fees and expenses arising from the investment of the feeder fund's assets and the total expenses of the feeder fund and the master fund**

The total expenses of the feeder fund and master fund consist of administrative costs. The total expenses of the feeder and the master fund are 0.20%. The figure is based on the expenses in 2023, and it may vary from year to year, especially if the management fee has changed during the calendar year. The management fees of Nordea Conservative Yield Fund have been revised upwards as of 1.12.2023, which will be reflected in the administrative costs for 2024.

When the feeder fund invests in the master fund, other expenses such as depository fee or subscription tax are debited from the assets of the master fund. These costs are included in the administrative costs of the master fund and thereby reflected on the feeder fund as well. The fund turned into a feeder fund on 29.6.2020. The master fund's launch date is 14.5.2020.

#### **Feeder fund – Nordea European Stars Fund**

The Fund is a feeder fund. The Fund aims to invest all of its assets (minimum 85%) in the master fund Nordea 1 – European Stars Equity Fund (share class Y) ("Master Fund"). The fund is a feeder fund, and is therefore not actively managed.

For the Fund no more than 15% of the Fund's assets can be  
1) Held in liquid assets to the extent required by fund operations or  
2) Invested in such standardised and OTC derivative contracts which can only be used for the purpose of hedging.  
The return and risk of the Fund may deviate from the return and risk of the Master Fund depending on the weight of the liquid assets.

The Fund will be exposed (through investments or cash) to other currencies than the base currency.

The base currency of both the Fund and the Master Fund is the EUR. The Fund promotes environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation

(SFDR). Further information is available in the prospectus and at [www.nordea.fi/funds](http://www.nordea.fi/funds).

The NAV of the Fund is calculated on such days when banks are generally open in Finland as well as in Luxembourg and the NAV calculation of the Master Fund has not been suspended in exceptional circumstances permitted by its rules.

#### Master fund Nordea 1 – European Stars Equity Fund

Specifically, the Master Fund is an equity fund that invests at least 75% of total assets in equities and equity-related securities issued by companies that are listed, domiciled, or conduct the majority of their business in Europe.

The investments are made with a particular focus on environmental, social and corporate governance aspects.

The Master Fund may be exposed (through investments or cash) to other currencies than the base currency.

The Master Fund is actively managed.

Further relevant information on the Master Fund is available free of charge at [nordea.lu](http://nordea.lu) in languages applicable when marketing the fund.

If the amount of subscription, redemption or switch orders in the Master Fund exceed 10% of the Master Fund's NAV, the Master Fund's rules allow to postpone the execution of orders either in part or in full by eight Master Fund's NAV calculation days at the maximum.

The Master Fund's statutory documents are available free of charge at [www.nordea.lu](http://www.nordea.lu) in the languages applicable when marketing the Fund.

#### Information on the master fund organisation

Nordea 1, SICAV is an Undertaking for Collective Investment in Transferable Securities (UCITS / Société d'Investissement à Capital variable, SICAV) established under the laws of the Grand Duchy of Luxembourg.

The board of directors of the UCITS has selected Nordea Investment Funds S.A. as the management company and portfolio management organisation. This has been registered by the financial supervisory authority in Luxembourg. Nordea Investment Funds S.A. has selected Nordea Investment Management AB as the investment manager of Nordea 1 – European Stars Equity Fund.

The fund's depositary is J.P. Morgan SE, Luxembourg Branch. The auditor firm is PricewaterhouseCoopers, Luxembourg.

#### Agreement between the fund companies managing the feeder fund and the master fund

In their agreement governing the disclosure of information, the fund companies managing the feeder fund and the master fund have agreed on the procedures ensuring how and when the fund company managing the master fund delivers to the fund company managing the feeder fund the information and documents on the master fund needed to meet the requirements prescribed in the Finnish Act on Common Funds.

Among other things, the agreement covers the basic conditions of the investment operations of the feeder fund, arrangements relating to subscription and redemption orders, special events affecting subscription and redemption orders, changes to permanent arrangements (such as changes in the documents related to the establishment of the master fund, changes to the Key Information Document (KID) and prospectus, reorganisations of the master fund, change of the depositary and change of the auditor) as well as the law applied to the agreement.

The agreement is available to unitholders free of charge from the Management Company.

#### Fees and expenses arising from the investment of the feeder fund's assets and the total expenses of the feeder fund and the master fund

The total expenses of the feeder fund and master fund consist of administrative costs. The total expenses of the feeder and the master fund unit series A are 1.47%. The consist of administrative costs for other unit series of the fund are presented in section 'Fees, administrative costs and turnover rates for the Nordea funds as well as minimum subscriptions'.

The figure is based on the expenses in 2023, and it may vary from year to year.

When the feeder fund invests in the master fund, no administration fee, depositary fee, subscription tax or other expenses are debited from the assets of the master fund. The fund turned into a feeder fund on 10.5.2022. The master fund's launch date is 14.11.2017.

#### Nora feeder funds focused on the Swedish, Norwegian and Finnish markets

##### Subscription and redemption of units in the feeder funds

###### Sweden

Subscription, redemption and switching orders to the Nora feeder funds (SEK) are received in Sweden on every banking day at all branches of Nordea providing investment services, during their office hours.

Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service or in Nordea's Netbank.

Orders are executed on every banking day when the banks are generally open in Finland and Sweden, and when the NAVs per both the feeder and master funds are calculated.

###### Norway

Subscription, redemption and switching orders to the Nora feeder funds (NOK) are received in Norway on every banking day at all branches of Nordea providing investment services, during their office hours.

Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service or in Nordea's Netbank.

Orders are executed on every banking day when the banks are generally open in Finland and Norway, and when the NAVs per both the feeder and master funds are calculated.

###### Finland

Subscription and redemption orders to the Nora feeder funds (EUR) are received in Finland on every banking day at all branches of Nordea providing investment services, during their office hours. Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service or in Nordea's Netbank.

Orders are executed on every banking day when the banks are generally open in Finland, and when the NAVs per both the feeder and master funds are calculated.

##### Subscription and redemption of units in the master fund

Investors can give subscription, redemption and switching orders on every Finnish banking day and they will be executed on banking days when the banks are generally open in Finland.

#### – Nora feeder and master funds and their structure

The Nora funds are so-called feeder funds or master funds.

The feeder funds (SEK) invest in the master funds; the funds' official names:

Feeder fund	Master fund
Nora Fund Two (SEK)	Nora Fund Two Master
Nora Fund Three (SEK)	Nora Fund Three Master
Nora Fund Four (SEK)	Nora Fund Four Master
Nora Fund Five (SEK)	Nora Fund Five Master

The launch date of the feeder funds is 11.12.2017. The launch date of the master funds is 11.12.2017. The feeder funds have been marketed in Sweden as of 11.12.2017.

The feeder funds (NOK) invest in the master funds; the funds' official names:

Feeder fund	Master fund
Nora Fund Three (NOK)	Nora Fund Three Master
Nora Fund Four (NOK)	Nora Fund Four Master

The launch date of the feeder funds is 16.4.2018. The launch date of the master funds is 11.12.2017. The feeder funds have been marketed in Norway as of 16.4.2018.

The feeder funds (EUR) invest in the master funds; the funds' official names:

Feeder fund	Master fund
Nora Fund Three (EUR)	Nora Fund Three Master
Nora Fund Four (EUR)	Nora Fund Four Master
Nora Fund Five (EUR)	Nora Fund Five Master

The launch date of the feeder funds is 15.3.2018. The launch date of the master funds is 11.12.2017. The feeder funds have been marketed in Finland as of 15.3.2018

#### Objective and investment policy – feeder and master fund

At the minimum 85% of the assets of the feeder fund is continuously invested in the corresponding Nora Master fund. The fund is a feeder fund, and is therefore not actively managed. The Master Fund is actively managed.

No more than 15% of the feeder Fund's assets can be

- 1) Held in liquid assets to the extent required by the operations or
- 2) Invested in such standardised and OTC derivative contracts which can only be used for the purpose of hedging.

#### EUR feeder funds

The risk and return of the Fund may deviate from the risk and return of the Master Fund depending on the weight of the liquid assets as well as currency fluctuations.

#### NOK and SEK feeder funds

The risk and return of the Fund may deviate from the risk and return of the Master Fund depending on the weight of the liquid assets as well as currency fluctuations.

Specifically, the Master Fund invests mainly in units of other investment funds (UCITS), non-UCITS funds, alternative investment funds and Undertakings for Collective Investments (UCIs).

Furthermore, the Master Fund may invest up to 45% of the total assets in bonds, debt securities and other fixed income instruments as well as equity and equity-related securities.

Investments are made globally.

The range of the modified duration of the Master fund is 0–10.

The Master Funds' allocation between the fixed-income and equity investments may vary.

The range of equity investments

Master fund	Minimum, %	Maximum, %
Nora Fund Two Master	0	50
Nora Fund Three Master	25	75
Nora Fund Four Master	50	100
Nora Fund Five Master	65	100

The risk category (SRI) has been updated in accordance with the Key Information Document (KID) in early 2023.

#### The risk category from Key Information Document (KID)

Feeder fund	Risk category	Master fund	Risk category
Nora Fund Two (SEK)	3	Nora Fund Two Master	3
Nora Fund Three (SEK)	3	Nora Fund Three Master	3
Nora Fund Four (SEK)	3	Nora Fund Four Master	4
Nora Fund Five (SEK)	4	Nora Fund Five Master	4

Feeder fund	Risk category	Master fund	Risk category
Nora Fund Three (EUR)	3	Nora Fund Three Master	3
Nora Fund Four (EUR)	4	Nora Fund Four Master	4
Nora Fund Five (EUR)	4	Nora Fund Five Master	4

Feeder fund	Risk category	Master fund	Risk category
Nora Fund Three (NOK)	3	Nora Fund Three Master	3
Nora Fund Four (NOK)	3	Nora Fund Four Master	4

#### Recommended minimum holding period

Feeder fund	years	Master fund	years
Nora Fund Two (SEK)	3	Nora Fund Two Master	3
Nora Fund Three (SEK)	3	Nora Fund Three Master	3
Nora Fund Four (SEK)	5	Nora Fund Four Master	5
Nora Fund Five (SEK)	5	Nora Fund Five Master	5

Feeder fund	years	Master fund	years
Nora Fund Three (EUR)	3	Nora Fund Three Master	3
Nora Fund Four (EUR)	5	Nora Fund Four Master	5
Nora Fund Five (EUR)	5	Nora Fund Five Master	5

Feeder fund	years	Master fund	years
Nora Fund Three (NOK)	3	Nora Fund Three Master	3
Nora Fund Four (NOK)	5	Nora Fund Four Master	5

#### Management fees

Feeder fund	% p.a.	Master fund	% p.a.
Nora Fund Two (SEK)	0.64	Nora Fund Two Master	0.64
Nora Fund Three (SEK)	0.69	Nora Fund Three Master	0.69
Nora Fund Four (SEK)	0.74	Nora Fund Four Master	0.74
Nora Fund Five (SEK)	0.79	Nora Fund Five Master	0.79

Feeder fund	% p.a.	Master fund	% p.a.
Nora Fund Three (EUR)	0.69	Nora Fund Three Master	0.69
Nora Fund Four (EUR)	0.74	Nora Fund Four Master	0.74
Nora Fund Five (EUR)	0.79	Nora Fund Five Master	0.79

Feeder fund	% p.a.	Master fund	% p.a.
Nora Fund Three (NOK)	0.68	Nora Fund Three Master	0.69
Nora Fund Four (NOK)	0.73	Nora Fund Four Master	0.74

#### Fees and expenses arising from the investment of the feeder fund's assets and the total expenses of the feeder fund and the master fund

The total expenses of the feeder fund and master fund consist of administrative costs. The figure is based on the expenses over the previous calendar year, and it may vary from year to year.

The management fees of the feeder funds vary 0.64–0.79 % p.a. and those of the master funds 0.64–0.79% p.a. The total expenses of the feeder fund and master fund which are caused by the management fee are however e.g. 0.64% p.a., for the reason that no management fee is charged for the feeder fund's investments in the master fund. The management fee of the master fund is otherwise 0.64–0.79% p.a.

As for the feeder fund's investments in the master fund, no subscription or redemption fees are charged. As for the master fund's investments in the domestic and foreign underlying Nordea funds, no subscription or redemption fees are charged. As for the master fund's investments in other Nordea funds, no management fee is charged from the underlying funds' assets. However, a performance-based fee (that is a part of the management fee) corresponding to the units in the underlying investment funds or collective investment undertakings (UCIs) can be charged from the assets of these funds/ undertakings. When the master fund invests in foreign UCIs managed by Nordea, no subscription tax or other expenses will usually be charged from the assets of the UCIs. These other costs are typically levied on the assets of UCIs.

The total expenses of the feeder and master funds consist therefore of the feeder fund's management fee and the other expenses, which are charged from the assets of the underlying exchange-traded funds (ETFs) in which the master fund has possibly invested and which are not managed by Nordea.

The basic currency of the feeder funds is SEK, NOK or EUR and that of the master funds EUR. The feeder fund subscribes for euro-denominated growth units in the master fund. Any income received from the feeder fund's investments is reinvested. In the same way, the units in the master fund are growth units.



**Information on the master fund organisation**

Both the feeder funds and the master funds are registered in Finland and they are managed by Nordea Funds Ltd.

J.P. Morgan SE – Helsinki branch acts as the funds' depository. The auditor firm is PricewaterhouseCoopers Oy, Authorised Public Accountant Firm.

**ESG-enhanced feeder funds focused on the Swedish and Norwegian markets and their master fund****– Fixed-income funds**

- Nordea Bærekraftige Obligasjoner Global Fund (feeder fund, NOK)
- Nordea Hållbarhetsfond Obligationer Global Fund (feeder fund, SEK)
- Nordea Sustainable Fixed Income Global Fund (master fund, EUR)

**Subscription and redemption of units in the feeder funds****Sweden**

Subscription, redemption and switching orders to the feeder fund (SEK) are received in Sweden on every banking day at all branches of Nordea providing investment services, during their office hours. Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service and in Nordea's Netbank.

Orders are executed on every banking day when the banks are generally open in Finland and Sweden, and when the NAVs per both the feeder and master funds are calculated.

**Norway**

Subscription, redemption and switching orders to the feeder fund (NOK) are received in Norway on every banking day at all branches of Nordea providing investment services, during their office hours. Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service and in Nordea's Netbank.

Orders are executed on every banking day when the banks are generally open in Finland and Norway, and when the NAVs per both the feeder and master funds are calculated.

**Subscription and redemption of units in the master fund**

Investors can give subscription, redemption and switching orders on every Finnish banking day and they will be executed on banking days when the banks are generally open in Finland.

**• ESG-enhanced fixed-income funds and their structure**

The ESG-enhanced fixed-income funds are so-called feeder funds or master funds.

The feeder fund (SEK) invests in the master fund; the funds' official names:

Feeder fund	Master fund
Nordea Hållbarhetsfond Obligationer Global Fund (SEK)	Nordea Sustainable Fixed Income Global Fund

The launch date of the feeder fund (SEK) is 9.4.2019. The launch date of the master fund is 9.4.2019. The feeder fund has been marketed in Sweden as of 9.4.2019.

The feeder fund (NOK) invest in the master fund; the funds' official names:

Feeder fund	Master fund
Nordea Bærekraftige Obligasjoner Global Fund (NOK)	Nordea Sustainable Fixed Income Global Fund

The launch date of the feeder fund (NOK) is 9.4.2019. The launch date of the master fund is 9.4.2019. The feeder fund has been marketed in Norway as of 9.4.2019.

**Objective and investment policy – feeder and master fund**

The Fund is a feeder fund. The Fund seeks to invest all of its assets (minimum 85%) in the master fund Nordea Sustainable Fixed Income Global Fund ('Master Fund'). The fund is a feeder fund, and is therefore not actively managed.

No more than 15% of the feeder Fund's assets can be  
1) Held in liquid assets to the extent required by the operations or  
2) Invested in such standardised and OTC derivative contracts which can only be used for the purpose of hedging.

The risk and return of the Fund may deviate from the risk and return of the Master Fund depending on the weight of the liquid assets as well as currency fluctuations.

The feeder Fund's main currency exposure is to the base currency, although the Fund may also be exposed (through investments or cash) to other currencies.

*Nordea Sustainable Selection Fixed Income Global Fund (master fund), Nordea Bærekraftige Obligasjoner Global Fund (NOK) (feeder fund) and Nordea Hållbarhetsfond Obligationer Global Fund (SEK) (feeder fund) promote environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR). Further information is available in the prospectus and at [www.nordea.fi/funds](http://www.nordea.fi/funds).*

Specifically, the Master Fund is a fund of funds that invests mainly in units of other investment funds (UCITS), non-UCITS funds, alternative investment funds and Undertakings for Collective Investments (UCIs).

Furthermore, the Master Fund may invest up to 45% of the total assets in bonds, debt securities and other fixed income instruments issued by governments, public authorities, supranational institutions as well as companies.

The investments are made globally with particular focus on environmental, social and corporate governance aspects.

The Master Fund is actively managed.

The majority of the Master Fund's direct investments, other than those issued or guaranteed governments shall have a long-term credit rating of at least BBB-, Baa3 (or a corresponding). If the instrument does not have a credit rating, the credit rating of the issuer is monitored.

The range of the modified duration of the Master Fund is 0–10.

A major part of the Master Fund's currency exposure is hedged to the base currency, although the Fund may also be exposed (through investments or cash) to other currencies.

The risk category (SRI) has been updated in accordance with the Key Information Document (KID) in early 2023.

**The risk category from Key Information Document (KID)**

Feeder fund	Risk category	Master fund	Risk category
Nordea Hållbarhetsfond Obligationer Global Fund (SEK)	2	Nordea Sustainable Fixed Income Global Fund	2
Nordea Bærekraftige Obligasjoner Global Fund (NOK)	2	Nordea Sustainable Fixed Income Global Fund	2

**Recommended minimum holding period**

Feeder fund	Years	Master fund	Years
Nordea Hållbarhetsfond Obligationer Global Fund (SEK)	3	Nordea Sustainable Fixed Income Global Fund	3
Nordea Bærekraftige Obligasjoner Global Fund (NOK)	3	Nordea Sustainable Fixed Income Global Fund	3

**Management fees**

Feeder fund	% p.a.	Master fund	% p.a.
Nordea Hållbarhetsfond Obligationer Global Fund (SEK)	0.75	Nordea Sustainable Fixed Income Global Fund	0.75
Nordea Bærekraftige Obligasjoner Global Fund (NOK)	0.75	Nordea Sustainable Fixed Income Global Fund	0.75

**Fees and expenses arising from the investment of the feeder fund's assets and the total expenses of the feeder fund and the master fund**

The total expenses of the feeder fund and master fund consist of administrative costs. The figure is based on the expenses over the previous calendar year, and it may vary from year to year.

The management fee of the feeder and master funds is 0.75% p.a. The total expenses of the feeder fund and master fund which are caused by the management fee are however e.g. 0.75% p.a., for the reason that no management fee is charged for the feeder fund's investments in the master fund. The management fee of the master fund is otherwise 0.75% p.a.

As for the feeder fund's investments in the master fund, no subscription or redemption fees are charged. As for the master fund's investments in the domestic and foreign underlying Nordea funds, no subscription or redemption fees are charged. As for the master fund's investments in other Nordea funds, no management fee is charged from the underlying funds' assets. However, a performance-based fee (that is a part of the management fee) corresponding to the units in the underlying investment funds or collective investment undertakings can be charged from the assets of these funds/ undertakings. Even other expenses can be charged from the assets of the underlying collective investment undertakings managed by Nordea, and these are included in the administrative costs of the master fund.

The total expenses of the feeder and master funds consist therefore of the feeder fund's management fee and the other expenses, like depositary fee and subscription tax, which are charged from the assets of the underlying foreign collective investment undertaking in which the master fund has possibly invested.

The basic currency of the feeder funds is SEK or NOK and that of the master funds EUR. The feeder fund subscribes for euro-denominated growth units in the master fund. Any income received from the feeder fund's investments is reinvested. In the same way, the units in the master fund are growth units.

**Information on the master fund organisation**

Both the feeder funds and the master funds are registered in Finland and they are managed by Nordea Funds Ltd.

J.P. Morgan SE – Helsinki branch acts as the funds' depository. The auditor firm is PricewaterhouseCoopers Oy, Authorised Public Accountant Firm.

**ESG-enhanced feeder funds focused on the Swedish and Norwegian markets and their master funds****– Balanced fund families**

- *Nordea Sustainable Selection Balanced Fund (master fund, EUR)*
- *Nordea Sustainable Selection Balanced Fund (feeder fund, NOK)*
- *Nordea Sustainable Selection Balanced Fund (feeder fund, SEK)*
- *Nordea Sustainable Selection Growth Fund (master fund, EUR)*
- *Nordea Sustainable Selection Growth Fund (feeder fund, NOK)*
- *Nordea Sustainable Selection Growth Fund (feeder fund, SEK)*
- *Nordea Sustainable Selection Moderate Fund (master fund, EUR)*
- *Nordea Sustainable Selection Moderate Fund (feeder fund, NOK)*
- *Nordea Sustainable Selection Moderate Fund (feeder fund, SEK)*
- *Nordea Sustainable Selection Return Fund (master fund, EUR)*
- *Nordea Sustainable Selection Return Fund (feeder fund, NOK)*
- *Nordea Sustainable Selection Return Fund (feeder fund, SEK)*

**Sweden**

Subscription, redemption and switching orders to the feeder funds (SEK) are received in Sweden on every banking day at all branches of Nordea providing investment services, during their office hours.

Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service and in Nordea's Netbank.

Orders are executed on every banking day when the banks are generally open in Finland and Sweden, and when the NAVs per both the feeder and master funds are calculated.

**Norway**

Subscription, redemption and switching orders to the feeder funds (NOK) are received in Norway on every banking day at all branches of Nordea providing investment services, during their office hours. Orders can also be given with Nordea's Netbank access codes by calling Nordea Customer Service and in Nordea's Netbank.

Orders are executed on every banking day when the banks are generally open in Finland and Norway, and when the NAVs per both the feeder and master funds are calculated.

**Subscription and redemption of units in the master funds**

Investors can give subscription, redemption and switching orders on every Finnish banking day and they will be executed on banking days when the banks are generally open in Finland.

**• ESG-enhanced balanced funds and their structure**

The ESG-enhanced balanced funds are so-called feeder funds or master funds.

The feeder funds (SEK) invest in the master funds; the funds' official names:

Feeder fund	Master fund
Nordea Sustainable Selection Balanced Fund (SEK)	Nordea Sustainable Selection Balanced Fund
Nordea Sustainable Selection Growth Fund (SEK)	Nordea Sustainable Selection Growth Fund
Nordea Sustainable Selection Moderate Fund (SEK)	Nordea Sustainable Selection Moderate Fund
Nordea Sustainable Selection Return Fund (SEK) (†)	Nordea Sustainable Selection Return Fund (†)

The launch date of the feeder funds (SEK) is 12.11.2019. The launch date of the master funds is 26.9.2016 and funds have been master funds as of 12.11.2019. The feeder funds have been marketed in Sweden as of 12.11.2019.

†The launch date of the feeder fund (SEK) is 18.1.2022. The launch date of the master fund is 18.1.2022. The feeder fund has been marketed in Sweden as of 18.1.2022.

The feeder fund (NOK) invest in the master fund; the funds' official names:

Feeder fund	Master fund
Nordea Sustainable Selection Balanced Fund (NOK)	Nordea Sustainable Selection Balanced Fund
Nordea Sustainable Selection Growth Fund (NOK)	Nordea Sustainable Selection Growth Fund
Nordea Sustainable Selection Moderate Fund (NOK)	Nordea Sustainable Selection Moderate Fund
Nordea Sustainable Selection Return Fund (NOK) (†)	Nordea Sustainable Selection Return Fund (†)

The launch date of the feeder funds (NOK) is 12.11.2019. The launch date of the master funds is 26.9.2016 and funds have been master funds as of 12.11.2019. The feeder funds have been marketed in Norway as of 12.11.2019.

†The launch date of the feeder fund (NOK) is 18.1.2022. The launch date of the master fund is 18.1.2022. The feeder fund has been marketed in Norway as of 18.1.2022.

**Objective and investment policy – feeder and master fund**

The Fund is a feeder fund. The Fund seeks to invest all of its assets (minimum 85%) in the master fund. The fund is a feeder fund, and is therefore not actively managed.

No more than 15% of the feeder Fund's assets can be  
1) Held in liquid assets to the extent required by the operations or  
2) Invested in such standardised and OTC derivative contracts which can only be used for the purpose of hedging.

The risk and return of the Fund may deviate from the risk and return of the Master Fund depending on the weight of the liquid assets as well as currency fluctuations.

The feeder Fund may be exposed (through investments or cash) to other currencies than the base currency. The majority of the master fund's fixed income exposure is hedged to the base currency.

The master fund *Nordea Sustainable Selection Balanced Fund* is an actively managed fund of funds focusing on both fixed income and equity investments globally (balanced fund).

Specifically, the Fund invests mainly in units of other investment funds (UCITS), non-UCITS funds, alternative investment funds and Undertakings for Collective Investments (UCIs). Furthermore, the Fund may invest up to 45% of the total assets in bonds, debt securities and other fixed income instruments as well as equities and equity-related securities.

The Fund will invest 25–75% of total assets in equities and equity-related securities either through direct investments or funds. The investments are made globally with particular focus on environmental, social and corporate governance aspects.

The master fund *Nordea Sustainable Selection Growth Fund* is an actively managed fund of funds focusing on both fixed income and equity investments globally (balanced fund).

Specifically, the Fund invests mainly in units of other investment funds (UCITS), non-UCITS funds, alternative investment funds and Undertakings for Collective Investments (UCIs). Furthermore, the Fund may invest up to 45% of the total assets in bonds, debt securities and other fixed income instruments as well as equities and equity-related securities.

The Fund will invest 50–100% of total assets in equities and equity-related securities either through direct investments or funds. The investments are made globally with particular focus on environmental, social and corporate governance aspects.

The master fund *Nordea Sustainable Selection Moderate Fund* is an actively managed fund of funds focusing on both fixed income and equity investments globally (balanced fund).

Specifically, the Fund invests mainly in units of other investment funds (UCITS), non-UCITS funds, alternative investment funds and Undertakings for Collective Investments (UCIs). Furthermore, the Fund may invest up to 45% of the total assets in bonds, debt securities and other fixed income instruments as well as equities and equity-related securities.

The Fund will invest 0–50% of total assets in equities and equity-related securities either through direct investments or funds. The investments are made globally with particular focus on environmental, social and corporate governance aspects.

The master fund *Nordea Sustainable Selection Return Fund* an actively managed fund focusing on both fixed income and equity investments globally (balanced fund).

Specifically, the Fund invests mainly in equities and equity-related securities as well as bonds, debt securities and other fixed income instruments. Furthermore, the Fund may invest up to 45% of the total assets in units of other investment funds (UCITS), non-UCITS funds, alternative investment funds and Undertakings for Collective Investments (UCIs).

The Fund will invest 80–100% of total assets in equities and equity-related securities either through direct investments or funds. The investments are made globally with particular focus on environmental, social and corporate governance aspects.

*Nordea Sustainable Selection master and feeder funds* promotes environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR). Further information is available in the prospectus and at [www.nordea.fi/funds](http://www.nordea.fi/funds).

The range of the modified duration of the Master Fund is 0-10.

The Master Fund's main currency exposure is to the base currency, although it may also be exposed (through investments or cash) to other currencies.

The risk category (SRI) has been updated in accordance with the Key Information Document (KID) in early 2023.

#### The risk category from Key Information Document (KID)

Feeder fund	Risk category	Master fund	Risk category
Nordea Sustainable Selection Balanced Fund (SEK)	3	Nordea Sustainable Selection Balanced Fund	3
Nordea Sustainable Selection Growth Fund (SEK)	3	Nordea Sustainable Selection Growth Fund	4
Nordea Sustainable Selection Moderate Fund (SEK)	3	Nordea Sustainable Selection Moderate Fund	3
Nordea Sustainable Selection Return Fund (SEK)	4	Nordea Sustainable Selection Return Fund	4
Nordea Sustainable Selection Balanced Fund (NOK)	3	Nordea Sustainable Selection Balanced Fund	3
Nordea Sustainable Selection Growth Fund (NOK)	3	Nordea Sustainable Selection Growth Fund	4
Nordea Sustainable Selection Moderate Fund (NOK)	3	Nordea Sustainable Selection Moderate Fund	3
Nordea Sustainable Selection Return Fund (NOK)	4	Nordea Sustainable Selection Return Fund	4

#### Recommended minimum holding period

Feeder fund	Years	Master fund	Years
Nordea Sustainable Selection Balanced Fund (SEK)	3	Nordea Sustainable Selection Balanced Fund	3
Nordea Sustainable Selection Growth Fund (SEK)	5	Nordea Sustainable Selection Growth Fund	5
Nordea Sustainable Selection Moderate Fund (SEK)	3	Nordea Sustainable Selection Moderate Fund	3
Nordea Sustainable Selection Return Fund (SEK)	5	Nordea Sustainable Selection Return Fund	5
Nordea Sustainable Selection Balanced Fund (NOK)	3	Nordea Sustainable Selection Balanced Fund	3
Nordea Sustainable Selection Growth Fund (NOK)	5	Nordea Sustainable Selection Growth Fund	5
Nordea Sustainable Selection Moderate Fund (NOK)	3	Nordea Sustainable Selection Moderate Fund	3
Nordea Sustainable Selection Return Fund (NOK)	5	Nordea Sustainable Selection Return Fund	5

#### Management fees

Feeder fund	% p.a.	Master fund, I unit series	% p.a.
Nordea Sustainable Selection Balanced Fund (SEK)	1.35	Nordea Sustainable Selection Balanced Fund	0.75
Nordea Sustainable Selection Growth Fund (SEK)	1.35	Nordea Sustainable Selection Growth Fund	0.85
Nordea Sustainable Selection Moderate Fund (SEK)	1.20	Nordea Sustainable Selection Moderate Fund	0.65
Nordea Sustainable Selection Return Fund (SEK)	1.40	Nordea Sustainable Selection Return Fund	0.95
Nordea Sustainable Selection Balanced Fund (NOK)	1.18	Nordea Sustainable Selection Balanced Fund	0.75
Nordea Sustainable Selection Growth Fund (NOK)	1.37	Nordea Sustainable Selection Growth Fund	0.85
Nordea Sustainable Selection Moderate Fund (NOK)	0.99	Nordea Sustainable Selection Moderate Fund	0.65
Nordea Sustainable Selection Return Fund (NOK)	1.47	Nordea Sustainable Selection Return Fund	0.95

#### Fees and expenses arising from the investment of the feeder fund's assets and the total expenses of the feeder funds and the master funds

The total expenses of the feeder fund and master fund consist of administrative costs. The figure is based on the expenses over the previous calendar year, and it may vary from year to year.

The management fees of the feeder funds vary 0.99–1.47 % p.a. and those of the master funds 0.65–0.95% p.a. The total expenses of the feeder fund and master fund which are caused by the management fee are however e.g. 0.99% p.a., for the reason that no management fee is charged for the feeder fund's investments in the master fund. The management fee of the master fund is otherwise 0.65-0.95% p.a.

As for the feeder fund's investments in the master fund, no subscription or redemption fees are charged. As for the master fund's investments in the domestic and foreign underlying Nordea funds, no subscription or redemption fees are charged. As for the master fund's investments in other Nordea funds, no management fee is charged from the underlying funds' assets. However, a performance-based fee (that is a part of the management fee) corresponding to the units in the underlying investment funds or collective investment undertakings can be charged from the assets of these funds/ undertakings. Even other expenses can be charged from the assets of the underlying collective investment undertakings managed by Nordea, and these are included in the administrative costs of the master fund.

The total expenses of the feeder and master funds consist therefore of the feeder fund's management fee and the other expenses, like depositary fee and subscription tax, which are charged from the assets of the underlying foreign collective investment undertaking in which the master fund has possibly invested.

The basic currency of the feeder funds is SEK or NOK and that of the master funds EUR. The units in the feeder fund can be both growth or distribution units. The feeder fund subscribes for euro-denominated growth or distribution units in the master funds' I-series.

#### Information on the master fund organisation

Both the feeder funds and the master funds are registered in Finland and they are managed by Nordea Funds Ltd.

J.P. Morgan SE – Helsinki branch acts as the funds' depository. The auditor firm is PricewaterhouseCoopers Oy, Authorised Public Accountant Firm.

#### Nordea European Smaller Companies

– *Exceptional procedure in subscription for and redemption of fund units*

Units in the fund can be subscribed for and redeemed twice a calendar month. Subscriptions and redemption orders are executed on the second and fourth Wednesday of each calendar month (transaction date, T). If this a non-banking day in Finland the transaction day will be following banking day.

Orders must be given at the latest two weeks ie. ten (10) banking days before the said transaction date (T) in such a way that the orders is received and registered at the Fund Company on the last transaction date before 16.30 Finnish time or before 15.30 Swedish time, whereas in Norway, before 10.00 Norwegian time (ie. before 11.00 Finnish time).

The execution of the orders given on the last transaction day at or after 16.30 Finnish time or 15.30 Swedish time or 10.00 Norwegian time will be postponed by one transaction day and will be executed four weeks later.

Cut-off time	Transaction date (T)	Transfer of proceeds to/from account
T-10, 16.30 Finnish time	Orders received before the cut-off time will be executed on the transaction date.	T+2
T-10, 15.30 Swedish time		T+2
T-10, 10.00 Norwegian time		T+2

The table lists the transactions days and the corresponding last order days until the end of 2024 (valid for Finland, Sweden and Norway).

Last order day	Transaction day
28.11.2023	13.12.2023
11.12.2023	27.12.2023
22.12.2023	10.1.2024
10.1.2024	24.1.2024
31.1.2024	14.2.2024
14.2.2024	28.2.2024
28.2.2024	13.3.2024
13.3.2024	27.3.2024
25.3.2024	10.4.2024
10.4.2024	24.4.2024
23.4.2024	08.5.2024

07.5.2024	22.5.2024
29.5.2024	12.6.2024
11.6.2024	26.6.2024
26.6.2024	10.7.2024
10.7.2024	24.7.2024
31.7.2024	14.8.2024
14.8.2024	28.8.2024
28.8.2024	11.9.2024
11.9.2024	25.9.2024
25.9.2024	09.10.2024
09.10.2024	23.10.2024
30.10.2024	13.11.2024
13.11.2024	27.11.2024
26.11.2024	11.12.2024
10.12.2024	27.12.2024
18.12.2024	08.01.2025

Exchanges from or to Nordea European Smaller Companies another are not possible.

Exchanges from an external, non-Nordea sub-fund to either a Nordea fund or to another external sub-fund are not possible.

#### Fees

##### – Subscription and redemption fees

The Management Company will not charge any fees in connection with the subscription or redemption of fund units. Distributors/ intermediaries can however charge a fee of their own in accordance with the list of fees and costs of the distributor/ intermediary.

In addition to the existing unit series offered to private and/or institutional investors, the Management Company can, at its discretion, decide to offer in the future Fund unit series that are designed for different target groups and differ from each other in terms of the management fee and/or minimum subscription, for example. Each such series can have both distribution and growth units (unit class).

The Board of Directors of the Management Company may decide that the Fund has different unit series that deviate from each other in terms of the management fee. The subscription requirements of different fund unit series may differ in terms of the subscription amount, market area (country) or the customer's total relationship concerning or employment at the Nordea Group. In addition to these, if the unitholder has entered into a contract for tied long-term savings and if the assets are invested in fund units in accordance with the contract, a specific PS unit series may be used.

No handling fees are charged upon issuing and delivering a unit certificate. Registration of a transfer of right of ownership from one customer to another is free of charge.

##### – Management fee

The Management company charges a fixed management fee (fee % / 365) for the management of the investment fund's assets. The management fee is determined as an annual percentage of the value of the entire investment fund. The management fee (p.a.) is taken into account in calculating the daily NAV (Net Asset Value) per unit, ie., it is deducted from the NAV per unit, meaning that it is not charged from the unitholder separately. The depositary's fee is included in the management fee.

The management fee covers virtually all the costs incurred by the Management Company for the management of the investment fund. These include the costs of carrying out the fund's investment activities and managing the fund's actual administration, such as NAV calculation and maintenance of the unitholder register, as well as the production of fund material required by law or regulations laid down by authorities. Transaction costs are not included in the management fee however. In addition to the management fee and transaction costs, it is possible to charge interest costs or fees from the fund's assets, resulting from drawing down a short-term loan or using external financing, when the purpose of using the loan is to facilitate the fund's investment operations in the North American market.

##### – Fund-of-funds and their fee structure

In most cases, the fund of funds does not pay subscription or redemption fees when investing in funds managed by the fund

#### NORDEA FUNDS LTD

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www.nordea.fi/rahasto, www.nordea.fi/funds, tel 0200 70000 (Nordea Customer Service)

companies belonging to Nordea Group or when selling units in an underlying fund.

As for the fund of fund's investments in domestic or foreign Nordea funds, the management fee of the underlying target funds does not affect the fund of fund's total management fee that is fixed. When the fund of funds invests in a Nordea fund, the management fee charged from the assets of the underlying fund and paid to the Management Company, corresponding the fund of fund's investment, will be returned to the fund of funds to avoid double charging of the management fee.

It is also possible to charge other expenses from the assets of foreign collective investment undertaking managed by Nordea, including fees paid to the auditors and to the depository. The administrative costs of the funds of funds are affected by the above-mentioned fees if the fund of funds invests in these undertakings – including the funds which are feeder funds with a master fund itself is a fund of funds.

In addition to the annual management fee, the performance of the NAV per unit is affected by the fixed and variable management fees or other costs charged from the assets of the underlying external funds or collective investment undertakings not managed by Nordea, and ETF's management fees.

## Taxation

### Taxation of investment funds

Investment funds registered in Finland are entities exempt from income tax. An investment fund does not pay any tax on its capital gains in Finland, or on dividends and interest income derived from Finland. On dividend and interest income derived from abroad, a fund pays the tax at source specified in the tax treaty between the country in question and Finland.

### Taxation of unitholders

The taxation of unitholders described herein relates to natural persons generally liable to taxation in Finland.

A fund investor may receive capital gain when selling (redeeming) fund units. The capital gain is the difference between the redemption price and the subscription price. If fund units are sold at a price lower than their subscription price, the unit holder suffers a capital loss. Capital losses may be deducted from capital gains during the tax year and the five subsequent years, as gains are generated.

The fund dividend paid on the fund's distribution units and the capital gain possibly arising from the redemption of fund units are deemed as capital income, on which in 2023 a 30% tax is charged from the unitholder (the tax rate on the portion exceeding EUR 30 000 is 34%). The Management Company will collect withholding tax on the fund dividend paid on distribution units in connection with the payment. No withholding tax is collected on sales profits arising from the redemption of fund units.

The capital gain earned from the sale of fund units can be calculated in two ways - either by calculating the actual capital gain, or by calculating the 'presumed acquisition cost'. The actual capital gain is calculated by deducting the fund units' subscription price and costs of acquisition and sale from their redemption price.

However, instead of declaring the actual capital gain, a calculation based on the presumed acquisition cost may be used. In this case, instead of deducting the actual subscription price, the presumed

acquisition cost alone is deducted from the redemption price in calculating the capital gain. If the fund units have been held for less than 10 years, the presumed acquisition cost is 20% of the redemption price. If the fund units have been held for at least 10 years, the presumed acquisition cost is 40% of the redemption price. When using the presumed acquisition cost, fees such as subscription and redemption fees cannot be deducted.

Losses that may arise from redemption can be deducted from the sales profits received during the taxation year and five subsequent years. Redemption losses occurred in 2016 and thereafter can also be deducted from other capital gains than from the sales profit. However, capital gains are not considered taxable income, if the combined sales prices of the assets sold during the tax year do not exceed EUR 1,000. On the other hand, sales losses arising during the tax year are not deductible if the combined sales prices of the assets sold during the tax year do not exceed EUR 1,000 and the combined acquisition costs of the assets sold during the same tax year do not exceed EUR 1,000. Sales other than fund unit sales may be taken into account in calculating the EUR 1,000 thresholds.

When selling fund units that have been acquired at different times, the acquisition price of the sold units is formed so that the units acquired first are deemed to be sold first, unless the taxpayer proves otherwise.

The Management Company submits annually the fund unit sale transactions and ownership information to the Finnish tax authorities. The unit holder must also personally notify the tax authorities of sale of fund units and the sales profit or loss arising from it.

In accordance with the Act on Taxation of Income and Capital of a Person Subject to Limited Tax Liability, the profit paid by the fund to a person with limited tax liability is subject to a 30% withholding tax, unless a lower tax rate has been agreed upon in the relevant tax treaty. The Management Company will provide the tax authorities with an annual report on the distribution of profit. No withholding tax is charged on sales profits, but they are taxed in the recipient's state of residence.

The taxation of the profits or sales profits earned by individual investors depends on which country's tax laws are applied. If the investor is unsure of his/her taxation status, he/she should contact experts offering tax advice.

### Settlement of disputes and out-of-court redress procedures

In matters related to fund investments, customers should primarily contact the customer service of the distributor of the fund. When the fund is distributed by Nordea Bank Abp, the customer should primarily contact the branch office of Nordea, the branch office of Nordea Bank, Finnish Branch Private Banking or Nordea Customer Service, tel. +358 (0)200 70 000 (local call charge/mobile call charge).

Should there be any disagreements that cannot be settled through negotiation, the customer may turn to the Finnish Financial Ombudsman Bureau (FINE) for information on investment services and, if necessary, take disputes to the Finnish Financial Ombudsman Bureau.

Contact information for the FINE:  
Finnish Financial Ombudsman Bureau, Porkkalankatu 1, 00180 Helsinki. E-mail [info@fine.fi](mailto:info@fine.fi), tel. +358 (0)9 6850 120. For further information and a contact form please go to [www.fine.fi](http://www.fine.fi).

## Investment funds managed by Nordea Funds Ltd, registered in Finland

Fixed-income funds, UCITS	Launch date	Rules <sup>(1)</sup>	Portfolio manager
Nordea Bærekraftige Obligasjoner Global Fund	9.4.2019	22.3.2022	NIM Fi (feeder fund)
Nordea Conservative Yield Fund	12.2.2009	22.3.2022	NIM Fi (feeder fund)
Nordea Corporate Bond Fund	1.3.2000	22.3.2022	NIM Den* Jan Sørensen
Nordea Discretionary Corporate Credit Fund	21.3.2017	22.3.2022	NIM AB** Karl Hallberg, Jessica Carping
Nordea Emerging Market Bond Fund	15.9.2004	22.3.2022	NIM Den MetLife Investment Management LLC (sub-manager)
Nordea Euro Bond Fund	13.12.1993	22.3.2022	NIM Den Henrik Stille, Niels Bertelsen
Nordea Euro Medium Term Bond Fund	17.1.2000	22.3.2022	NIM Den *** Henrik Stille, Niels Bertelsen
Nordea European High Yield Fund	16.5.2005	22.3.2022	NIM Den Fredrik Strand
Nordea Fixed Income Credit Opportunities Fund	4.3.2015	11.5.2023	NIM Fi Timo Hyllinen
Nordea Focus Fixed Income Fund	4.4.2011	22.3.2022	NIM Fi Timo Hyllinen
Nordea FRN Kreditt Fund	17.5.2024	7.12.2023	NIM No**** Lise Johannessen
Nordea FRN OMF Fund	20.9.2024	20.12.2023	NIM No Lise Johannessen
Nordea FRN Pensjon Fund	20.9.2024	20.12.2023	NIM No Lise Johannessen
Nordea Global Statsobligasjon Fund	20.9.2024	20.12.2023	NIM Den Henrik Stille, Niels Bertelsen
Nordea Global High Yield Fund	2.1.2003	22.3.2022	NIM Den MacKay Shields LLC/ MacKay Shields UK LLP (sub-manager)
Nordea Hållbarhetsfond Obligationer Global Fund	9.4.2019	22.3.2022	NIM Fi (feeder fund)
Nordea Kreditt Stars Fund	23.5.2018	22.3.2022	NIM No Lars Andreas Løwe Løtvedt
Nordea Kort Obligasjon Fund	20.9.2024	7.12.2023	NIM No Linn Helene Eileng Yver
Nordea Kort Obligasjon Pluss Fund	17.5.2024	7.12.2023	NIM No Linn Helene Eileng Yver
Nordea Moderate Yield Fund	3.5.2009	22.3.2022	NIM Den Jacob Topp
Nordea Nordic Covered Bond Fund	9.12.2021	22.3.2022	NIM Den Christian Birkehøj Jensen
Nordea Obligasjon II Fund	17.5.2024	7.12.2023	NIM No Harald Willersrud
Nordea Obligasjon III Fund	17.5.2024	7.12.2023	NIM No Harald Willersrud
Nordea Obligasjon Stars Fund	14.11.2013	22.3.2022	NIM No Lars Andreas Løwe Løtvedt
Nordea Savings Fixed Income Fund	11.1.2010	22.3.2022	NIM Fi Tuomo Mattila
Nordea Stratega Fixed Income Fund	3.5.2010	3.7.2024	NIM AB Karl Hallberg, Jessica Carping
Nordea Sustainable Fixed Income Global Fund	9.4.2019	22.3.2022	NIM AB Karl Hallberg
Nordea SWE Inflation Linked Bond Fund	20.8.2003	22.3.2022	NIM AB Jerk Matero, Niclas Svennberg
Nordea Swedish Institutional Short Duration Bond Fund	25.4.2000	22.3.2022	NIM AB Anette Eineljung, Charlotta Sjölander
Nordea Yield Fund	3.5.2009	22.3.2022	NIM Den Michael Boye
<b>Balanced funds, UCITS</b>			
Nora Fund Three (EUR)	15.3.2018	3.7.2024	NIM Fi (feeder fund)
Nora Fund Four (EUR)	15.3.2018	3.7.2024	NIM Fi (feeder fund)
Nora Fund Five (EUR)	15.3.2018	3.7.2024	NIM Fi (feeder fund)
Nora Fund Three (NOK)	16.4.2018	3.7.2024	NIM Fi (feeder fund)
Nora Fund Four (NOK)	16.4.2018	3.7.2024	NIM Fi (feeder fund)
Nora Fund Two (SEK)	11.12.2017	3.7.2024	NIM Fi (feeder fund)
Nora Fund Three (SEK)	11.12.2017	3.7.2024	NIM Fi (feeder fund)
Nora Fund Four (SEK)	11.12.2017	3.7.2024	NIM Fi (feeder fund)
Nora Fund Five (SEK)	11.12.2017	3.7.2024	NIM Fi (feeder fund)
Nora Fund Two Master	11.12.2017	22.3.2022	NIM AB Per Walter
Nora Fund Three Master	11.12.2017	22.3.2022	NIM AB Per Walter
Nora Fund Four Master	11.12.2017	22.3.2022	NIM AB Per Walter
Nora Fund Five Master	11.12.2017	22.3.2022	NIM AB Per Walter
Nordea Allokeringsfond Fund	4.6.2018	22.3.2022	NIM Den Claus Carøe
Nordea Defensive Fund	18.8.2014	9.4.2024	NIM Fi Timo Hyllinen
Nordea Discretionary Asset Allocation Fund	21.3.2017	22.3.2022	NIM AB Jessica Carping
Nordea Plan Balansert Fund	20.9.2024	7.12.2023	NIM No Jørn Klepp
Nordea Plan Konservativ Fund	20.9.2024	7.12.2023	NIM No Jørn Klepp
Nordea Plan Moderat Fund	20.9.2024	7.12.2023	NIM No Jørn Klepp
Nordea Plan Offensiv Fund	20.9.2024	7.12.2023	NIM No Jørn Klepp
Nordea Plan Vekstorientert Fund	20.9.2024	7.12.2023	NIM No Jørn Klepp
Nordea Premium Asset Management Balanced Fund	2.1.2003	22.3.2022	NIM Fi Kaj Forsström
Nordea Premium Asset Management Conservative Fund	7.4.2014	22.3.2022	NIM Fi Kaj Forsström
Nordea Premium Asset Management Growth Fund	24.11.1999	22.3.2022	NIM Fi Kaj Forsström
Nordea Premium Asset Management Moderate Fund	2.1.2003	22.3.2022	NIM Fi Kaj Forsström
Nordea Savings 15 Fund	5.12.2010	22.3.2022	NIM Fi Tuomo Mattila
Nordea Savings 30 Fund	1.9.2004	22.3.2022	NIM Fi Tuomo Mattila
Nordea Savings 50 Fund	15.9.2003	22.3.2022	NIM Fi Tuomo Mattila
Nordea Savings 75 Fund	15.9.2003	22.3.2022	NIM Fi Tuomo Mattila
Nordea Stable Return Fund	24.1.2006	22.3.2022	NIM Fi Kaj Forsström
Nordea Stratega 90 Fund	8.6.2022	22.3.2022	NIM AB Jessica Carping, Rickard Waldenlind, Patrik Hammar
Nordea Sustainable Selection Balanced Fund	26.9.2016	22.3.2022	NIM AB Per Walter
Nordea Sustainable Selection Balanced Fund (NOK)	12.11.2019	22.3.2022	NIM Fi (feeder fund)
Nordea Sustainable Selection Balanced Fund (SEK)	12.11.2019	22.3.2022	NIM Fi (feeder fund)
Nordea Sustainable Selection Growth Fund	26.9.2016	22.3.2022	NIM AB Per Walter
Nordea Sustainable Selection Growth Fund (NOK)	12.11.2019	22.3.2022	NIM Fi (feeder fund)

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Nordea Sustainable Selection Growth Fund (SEK)	12.11.2019	22.3.2022	NIM Fi (feeder fund)
Nordea Sustainable Selection Moderate Fund	26.9.2016	22.3.2022	NIM AB Per Walter
Nordea Sustainable Selection Moderate Fund (NOK)	12.11.2019	22.3.2022	NIM Fi (feeder fund)
Nordea Sustainable Selection Moderate Fund (SEK)	12.11.2019	22.3.2022	NIM Fi (feeder fund)
Nordea Sustainable Selection Return Fund	18.1.2022	22.3.2022	NIM AB Jessica Carping
Nordea Sustainable Selection Return Fund (NOK)	18.1.2022	22.3.2022	NIM Fi (feeder fund)
Nordea Sustainable Selection Return Fund (SEK)	18.1.2022	22.3.2022	NIM Fi (feeder fund)
Nordea Tactical Asset Allocation Fund	19.11.2019	22.3.2022	NIM Fi Kaj Forsström, Tuomo Mattila

Equity funds, UCITS	Launch date	Rules <sup>(1)</sup>	Portfolio manager
Nordea Avkastning Fund	20.9.2024	20.12.2023	NIM No Jakob Vossgård
Nordea China Fund	26.9.2005	22.3.2022	NIM Fi (feeder fund)
Nordea Discretionary Global Equity Fund	21.3.2017	22.3.2022	NIM AB Per Walter, Rickard Waldenlind
Nordea Discretionary Swedish Equity Fund	21.3.2017	14.3.2024	NIM AB Filippa Gerstädt, Viktor Kockberg
Nordea Emerging Europe Fund	29.9.2023	14.3.2024	NIM Den Per Ulderup
Nordea Emerging Market Equities Fund	1.6.2005	14.3.2024	NIM Den Martin Junker Nielsen
Nordea European Passive Fund	19.2.2009	14.3.2024	NIM Den Ruben Knudsen
Nordea European Smaller Companies Fund	23.10.2013	13.6.2024	NIM Den Jesper Gulstad
Nordea European Stars Fund	22.12.1999	22.3.2022	NIM Fi (feeder fund)
Nordea Equity Opportunities Fund	4.3.2015	22.9.2022	NIM Fi Oona Tikkanen
Nordea Finnish Passive Fund	17.9.2008	14.3.2024	NIM Den Ruben Knudsen
Nordea Finnish Stars Fund	15.5.1992	14.3.2024	NIM AB Marie Karlsson
Nordea Global Dividend Fund	17.12.2012	14.3.2024	NIM Den Lars Hemmingsen, Claus F. Nielsen
Nordea Global Enhanced Fund	27.6.2017	14.3.2024	NIM Den Ruben Knudsen
Nordea Global Equity Allocation Fund	25.3.2015	14.3.2024	NIM AB Rickard Waldenlind
Nordea Global Passive Fund	9.10.2012	14.3.2024	NIM Den Ruben Knudsen
Nordea India Fund	1.6.2006	13.2.2024	NIM Fi (feeder fund)
Nordea Innovation Stars Fund	22.6.2020	14.3.2024	NIM AB Niklas Kristoffersson, Carl Mattiasson
Nordea Institutionella Småbolagsfonden Sverige Fund	15.6.2020	14.3.2024	NIM AB Björn Henriksson, Mats J. Andersson
Nordea Japan Fund	30.10.1997	14.9.2024	NIM Den Ruben Knudsen
Nordea Nordic Fund	15.10.1987	14.3.2024	NIM AB Carl Mattiasson, Niklas Kristoffersson
Nordea Nordic Small Cap Fund	4.6.1998	14.3.2024	NIM AB Mats J. Andersson, Björn Henriksson
Nordea Norge Pluss Fund	17.5.2024	7.12.2023	NIM No Jakob Vossgård, Jon Fredrik Hille-Walle
Nordea Norge Verdi Fund	20.9.2024	7.12.2023	NIM No Robert Næss
Nordea North American Dividend Fund	11.2.2002	14.3.2024	NIM Den Lars Hemmingsen
Nordea North American Enhanced Fund	27.6.2017	14.3.2024	NIM Den Ruben Knudsen
Nordea Norwegian Passive Fund	20.9.2024	20.12.2023	NIM No Jon Hille-Walle
Nordea Norwegian Stars Fund	19.9.2019	14.3.2024	NIM No Jakob Vossgaard, Robert Lingaas
Nordea Stabile Aksjer Global Fund	20.9.2024	7.12.2023	NIM No Robert Næss
Nordea Stabile Aksjer Global Valutasikret Fund	20.9.2024	7.12.2023	NIM No Robert Næss
Nordea Sustainable Equities Global Fund	3.12.2018	14.3.2024	NIM Den Ruben Knudsen
Nordea Swedish Ideas Equity Fund	29.4.2014	14.3.2024	NIM AB Filippa Gerstädt, Viktor Kockberg
Nordea World Fund	29.10.1997	13.11.2024	NIM Den Claus F. Nielsen, Julie Bech
Nordea World Passive Fund	21.6.2022	14.3.2024	NIM Den Ruben Knudsen

Non-UCITS/ alternative funds, AIFs	Launch date	Rules <sup>(1)</sup>	Portfolio manager
Nordea Private Banking Norsk Aksje Portefølje	26.11.2012	14.3.2024	NIM No Jakob Vossgård

Pro funds for institutional customers, UCITS	Launch date	Rules <sup>(1)</sup>	Portfolio manager
Nordea Pro Euro Bond Fund	13.5.1994	22.3.2022	NIM Den Henrik Stille, Niels Bertelsen
Nordea Pro Finland Fund	10.3.1993	14.3.2024	NIM Den Ruben Knudsen
Nordea Pro Stable Return Fund	24.9.1999	14.3.2024	NIM Den Claus Vorm

Funds under liquidation, UCITS	Launch date	Rules <sup>(1)</sup>	Portfolio manager
Nordea Eastern Europe Fund	29.1.2001	22.3.2022	-
Nordea Russia Fund	26.9.2005	22.3.2022	-

<sup>1)</sup> **Rules/ Date:** the last time the rules of the funds compliant with the UCITS directive, meaning all the investment funds, were ratified by the Finnish Financial Supervisory Authority or the last time the rules of an alternative, ie. a non-UCITS, fund have been submitted to the Finnish Financial Supervisory Authority for information.

The valid common rules of the Nordea funds registered in Finland and managed by Nordea Funds Ltd were ratified on 22 March 2022. The common rules are in force as of 10 May 2022.

- \* NIM Den – Nordea Investment Management AB, Denmark, branch of Nordea Investment Management AB, Sverige, registered in Denmark.
- \*\* NIM AB – Nordea Investment Management AB, registered in Sweden.
- \*\*\* NIM Fi – Nordea Investment Management AB, Finnish Branch, registered in Finland.
- \*\*\*\* NIM No – Nordea Investment Management AB, NUF filial Norge.

The financial period of the funds is a calendar year. The Fund's financial statements are published in connection with the annual report within three months from the end of the financial period.

**Fees, administrative costs and turnover rates for the Nordea funds as well as minimum subscriptions**

- The fund/ management company will not charge any fees in connection with the subscription or redemption of fund units. Distributors/ intermediaries can however charge a fee of their own in accordance with the list of fees and costs of the distributor/intermediary.
- Unit series refer to the letter codes like A, B, I or S whereas unit classes relate to growth units and distribution units with equal fees. The table below shows only the growth units with certain exceptions.
- Under a fund savings agreement, the minimum amount is EUR 10.
- When saving in funds in accordance with a fund savings agreement, the subscription can only be made for growth unit.
- Administrative costs<sup>(1)</sup> (formerly Ongoing charges) are presented in the Key Information Document (KID). Administrative costs indicate the fund's total expenses as per the previous calendar year. Alternatively, an estimate of the administrative costs is presented in the KID if the management fee has changed since the year end. The administrative costs for the previous calendar year are presented in the table below.
- Administrative<sup>(1)</sup> costs refer to management fees and other administrative or operating costs (the percentage includes management fee).

**Target group**

- \* These funds, unit series or unit classes are targeted at customers who have a discretionary portfolio management agreement with Nordea.
- \*\* In regard to certain funds, unit series A is targeted at private customers, unit series P at Premium customers, Y at companies as well as other corporate customers, and I respectively targeted at institutional customers.
- \*\* For the following fund families, the official fund name is disclosed in the table below: Premium Asset Management and Sustainable Selection. As for these funds, a marketing name for unit series is also used. More information under the table.
- \*\*\* For Nordea Bank distribution only.

Fund/ unit series	ISIN code	Base cur- rency	Sub- scrip- tion cur- rency	Manage- ment fee % p.a.	Admin. costs(1 % p.a. 2023 (formerly Ongoing charges)	Turn- over rate % 2023	Target group	Minimum subscription
Nora Fund Five (EUR) A growth EUR	FI4000301247	EUR	EUR	0,79	0,79	-31 %		EUR 10
Nora Fund Five (SEK) A growth SEK	FI4000292016	SEK	SEK	0,79	0,79	-20 %		SEK 100
Nora Fund Five Master A growth EUR	FI4000291950	EUR	EUR	0,79	0,79	-5 %		EUR 10
Nora Fund Four (EUR) A growth EUR	FI4000301239	EUR	EUR	0,74	0,74	-24 %		EUR 10
Nora Fund Four (NOK) A growth NOK	FI4000301288	NOK	NOK	0,73	0,73	-15 %		NOK 100
Nora Fund Four (SEK) A growth SEK	FI4000292008	SEK	SEK	0,74	0,74	-16 %		SEK 100
Nora Fund Four Master A growth EUR	FI4000291943	EUR	EUR	0,74	0,74	4 %		EUR 10
Nora Fund Three (EUR) A growth EUR	FI4000301221	EUR	EUR	0,69	0,69	-24 %		EUR 10
Nora Fund Three (NOK) A growth NOK	FI4000301270	NOK	NOK	0,68	0,68	-15 %		NOK 100
Nora Fund Three (SEK) A growth SEK	FI4000291992	SEK	SEK	0,69	0,69	-19 %		SEK 100
Nora Fund Three Master A growth EUR	FI4000291935	EUR	EUR	0,69	0,69	13 %		EUR 10
Nora Fund Two (SEK) A growth SEK	FI4000291984	SEK	SEK	0,64	0,64	-5 %		SEK 100
Nora Fund Two Master A growth EUR	FI4000291927	EUR	EUR	0,64	0,64	15 %		EUR 10
Nordea Allokeringfond Fund C growth NOK	FI4000282827	NOK	NOK	0,50	0,53	-7 %	*	NOK 1 000
Nordea Avkastning Fund A growth NOK	FI4000566146	NOK	NOK	1,50	-	-		NOK 100
Nordea Bærekraftige Obligasjoner Global Fund A growth NOK	FI4000375035	NOK	NOK	0,71	0,79	73 %		NOK 100
Nordea China Fund A growth EUR	FI0008809322	EUR	EUR	1,85	1,85	-25 %		EUR 10
Nordea China Fund A growth NOK	FI0008813290	EUR	NOK	1,85	1,85	-25 %		NOK 100
Nordea China Fund A growth SEK	FI0008813308	EUR	SEK	1,85	1,85	-25 %		SEK 100
Nordea Conservative Yield Fund A growth EUR	FI0008814280	EUR	EUR	0,35	0,20	-16 %		EUR 10
Nordea Conservative Yield Fund B growth EUR	FI0008814306	EUR	EUR	0,30	0,20	-16 %		EUR 100 000
Nordea Conservative Yield Fund I growth EUR	FI0008814322	EUR	EUR	0,25	0,19	-16 %		EUR m 1
Nordea Conservative Yield Fund S distr EUR	FI0008814355	EUR	EUR	0,20	0,19	-16 %		EUR m 10
Nordea Corporate Bond Fund A growth EUR	FI0008812458	EUR	EUR	0,60	0,60	250 %		EUR 10
Nordea Corporate Bond Fund C growth EUR	FI4000037437	EUR	EUR	0,45	0,45	250 %	*	EUR 0
Nordea Corporate Bond Fund I growth EUR	FI0008801303	EUR	EUR	0,40	0,40	250 %		EUR 100 000
Nordea Corporate Bond Fund IDH growth EUR	FI4000106273	EUR	EUR	0,40	0,40	250 %		EUR m 100
Nordea Defensive Fund A growth NOK	FI4000102629	NOK	NOK	0,71	0,78	34 %		NOK 100
Nordea Defensive Fund C growth NOK	FI4000566153	NOK	NOK	0,34	-	-		NOK m 5
Nordea Defensive Fund I growth NOK	FI4000102611	NOK	NOK	0,34	0,43	34 %		NOK m 10
Nordea Discretionary Asset Allocation Fund C growth SEK	FI4000237797	SEK	SEK	0,50	0,50	55 %	*	SEK 100
Nordea Discretionary Asset Allocation Fund I growth SEK	FI4000237805	SEK	SEK	0,25	0,25	55 %	*	SEK 50 000
Nordea Discretionary Corporate Credit Fund C growth SEK	FI4000237789	SEK	SEK	0,50	0,63	-7 %	*	SEK 100

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Nordea Discretionary Corporate Credit Fund I growth SEK	FI4000359732	SEK	SEK	0,25	0,38	-7 %	*	SEK 50 000
Nordea Discretionary Global Equity Fund C growth NOK	FI4000288436	SEK	NOK	0,75	0,77	36 %	*	NOK 1 000
Nordea Discretionary Global Equity Fund C growth SEK	FI4000237763	SEK	SEK	0,75	0,77	36 %	*	SEK 100
Nordea Discretionary Global Equity Fund I growth SEK	FI4000237771	SEK	SEK	0,50	0,52	36 %	*	SEK 50 000
Nordea Discretionary Swedish Equity Fund C growth SEK	FI4000237748	SEK	SEK	0,70	0,70	43 %	*	SEK 100
Nordea Discretionary Swedish Equity Fund I growth SEK	FI4000237755	SEK	SEK	0,40	0,40	43 %	*	SEK 50 000
Nordea Emerging Europe Fund A growth EUR	FI4000560685	EUR	EUR	1,60	1,60	-82 %		EUR 10
Nordea Emerging Europe Fund A growth NOK	FI4000560719	EUR	NOK	1,60	1,60	-82 %		NOK 100
Nordea Emerging Europe Fund A growth SEK	FI4000560701	EUR	SEK	1,60	1,60	-82 %		SEK 100
Nordea Emerging Market Bond Fund A growth EUR	FI0008807532	EUR	EUR	1,00	1,00	76 %		EUR 10
Nordea Emerging Market Bond Fund C growth EUR	FI4000288543	EUR	EUR	0,55	0,55	76 %	*	EUR 0
Nordea Emerging Market Equities Fund A growth EUR	FI0008808860	EUR	EUR	1,60	1,60	16 %		EUR 10
Nordea Emerging Market Equities Fund A growth NOK	FI0008813316	EUR	NOK	1,60	1,60	16 %		NOK 100
Nordea Emerging Market Equities Fund A growth SEK	FI0008813324	EUR	SEK	1,60	1,60	16 %		SEK 100
Nordea Emerging Market Equities Fund C growth EUR	FI4000288576	EUR	EUR	0,85	0,85	16 %	*	EUR 0
Nordea Equity Opportunities Fund C growth EUR	FI4000148416	EUR	EUR	0,85	0,86	32 %	*	EUR 0
Nordea Equity Opportunities Fund I growth EUR	FI4000148390	EUR	EUR	0,40	0,41	32 %	*	EUR 100 000
Nordea Euro Bond Fund A growth EUR	FI0008801451	EUR	EUR	0,60	0,60	37 %		EUR 10
Nordea Euro Bond Fund C growth EUR	FI4000037445	EUR	EUR	0,45	0,45	37 %	*	EUR 0
Nordea Euro Bond Fund I growth EUR	FI0008813159	EUR	EUR	0,40	0,40	37 %		EUR 100 000
Nordea Euro Medium Term Bond Fund A growth EUR	FI0008801287	EUR	EUR	0,60	0,60	36 %		EUR 10
Nordea European High Yield Fund A growth EUR	FI0008808845	EUR	EUR	1,00	1,00	75 %		EUR 10
Nordea European High Yield Fund C growth EUR	FI4000288477	EUR	EUR	0,55	0,55	75 %	*	EUR 0
Nordea European Passive Fund B growth NOK	FI4000581350	EUR	NOK	0,40	-	-		NOK 100
Nordea European Passive Fund B growth SEK	FI4000581327	EUR	SEK	0,40	-	-		SEK 100
Nordea European Passive Fund B growth EUR	FI4000010558	EUR	EUR	0,49	0,50	-12 %		EUR 10
Nordea European Passive Fund C growth EUR	FI4000037460	EUR	EUR	0,19	0,20	-12 %	*	EUR 0
Nordea European Passive Fund I growth EUR	FI0008002373	EUR	EUR	0,39	0,40	-12 %		EUR 100 000
Nordea European Passive Fund I growth SEK	FI4000074992	EUR	SEK	0,39	0,40	-12 %		SEK 100
Nordea European Smaller Companies Fund A growth EUR	FI4000068366	EUR	EUR	1,60	1,61	26 %		EUR 10
Nordea European Smaller Companies Fund A growth SEK	FI4000185434	EUR	SEK	1,60	1,61	26 %		SEK 100
Nordea European Smaller Companies Fund growth NOK	FI4000390877	EUR	NOK	1,60	1,61	26 %		NOK 100
Nordea European Smaller Companies Fund I growth EUR	FI4000506894	EUR	EUR	0,85	0,86	26 %		EUR m 1
Nordea European Stars Fund A growth EUR	FI0008802194	EUR	EUR	1,47	1,47	-8 %		EUR 10
Nordea European Stars Fund A growth NOK	FI4000301080	EUR	NOK	1,47	1,47	-8 %		NOK 100
Nordea European Stars Fund A growth SEK	FI4000048988	EUR	SEK	1,47	1,47	-8 %		SEK 100
Nordea European Stars Fund C growth EUR	FI4000062732	EUR	EUR	0,83	0,83	-8 %	*	EUR 0
Nordea European Stars Fund I growth EUR	FI4000415039	EUR	EUR	0,73	0,73	-8 %		EUR m 1
Nordea European Stars Fund I growth SEK	FI4000415054	EUR	SEK	0,73	0,73	-8 %		SEK m 10
Nordea Finnish Passive Fund B growth EUR	FI4000010533	EUR	EUR	0,49	0,50	39 %		EUR 10
Nordea Finnish Passive Fund C growth EUR	FI4000037577	EUR	EUR	0,19	0,20	39 %	*	EUR 0
Nordea Finnish Passive Fund I growth EUR	FI0008002381	EUR	EUR	0,39	0,40	39 %		EUR 100 000
Nordea Finnish Stars Fund A growth EUR	FI0008800016	EUR	EUR	1,40	1,40	45 %		EUR 10
Nordea Finnish Stars Fund C growth EUR	FI4000125430	EUR	EUR	0,85	0,85	45 %	*	EUR 0
Nordea Fixed Income Credit Opportunities Fund C growth EUR	FI4000148069	EUR	EUR	0,50	0,50	82 %	*	EUR 0
Nordea Fixed Income Credit Opportunities Fund I growth EUR	FI4000148085	EUR	EUR	0,20	0,20	82 %	*	EUR 0
Nordea Focus Fixed Income Fund A growth EUR	FI4000022207	EUR	EUR	0,60	0,60	-5 %		EUR 50 000
Nordea Focus Fixed Income Fund C growth EUR	FI4000037510	EUR	EUR	0,40	0,40	-5 %	*	EUR 0
Nordea Focus Fixed Income Fund I growth EUR	FI4000022215	EUR	EUR	0,40	0,40	-5 %		EUR 250 000
Nordea FRN Kreditt Fund B growth NOK	FI4000581426	NOK	NOK	0,35	-	-		NOK 500 000
Nordea FRN Kreditt Fund I growth NOK	FI4000565916	NOK	NOK	0,15	-	-		NOK m 10
Nordea FRN OMF Fund I growth NOK	FI4000566104	NOK	NOK	0,15	-	-		NOK m 10
Nordea FRN Pensjon Fund C growth NOK	FI4000566138	NOK	NOK	0,25	-	-	*	NOK 100
Nordea FRN Pensjon Fund I growth NOK	FI4000566120	NOK	NOK	0,15	-	-		NOK m 10
Nordea Global Dividend Fund A growth EUR	FI4000052170	EUR	EUR	1,50	1,50	-14 %		EUR 10
Nordea Global Dividend Fund A growth NOK	FI4000064084	EUR	NOK	1,50	1,50	-14 %		NOK 100
Nordea Global Dividend Fund A growth SEK	FI4000064076	EUR	SEK	1,50	1,50	-14 %		SEK 100

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Nordea Global Dividend Fund B growth EUR	FI4000052204	EUR	EUR	0,95	0,95	-14 %		EUR 100 000
Nordea Global Dividend Fund C growth EUR	FI4000052212	EUR	EUR	0,85	0,85	-14 %	*	EUR 0
Nordea Global Dividend Fund I growth EUR	FI4000052238	EUR	EUR	0,80	0,80	-14 %		EUR m 1
Nordea Global Enhanced Fund A growth EUR	FI4000261300	EUR	EUR	0,60	0,60	8 %		EUR 10
Nordea Global Enhanced Fund A growth NOK	FI4000261334	EUR	NOK	0,60	0,60	8 %		NOK 100
Nordea Global Enhanced Fund A growth SEK	FI4000261326	EUR	SEK	0,60	0,60	8 %		SEK 100
Nordea Global Enhanced Fund C growth EUR	FI4000330915	EUR	EUR	0,20	0,20	8 %	*	EUR 0
Nordea Global Enhanced Fund I growth EUR	FI4000330931	EUR	EUR	0,425	0,42	8 %		EUR 100 000
Nordea Global Enhanced Fund I growth NOK	FI4000410493	EUR	NOK	0,425	0,42	8 %		NOK m 1
Nordea Global Enhanced Fund I growth SEK	FI4000410501	EUR	SEK	0,425	0,42	8 %		SEK m 1
Nordea Global Equity Allocation C growth EUR	FI4000148879	EUR	EUR	0,75	0,75	85 %	*	EUR 0
Nordea Global Equity Allocation I growth EUR	FI4000148895	EUR	EUR	0,40	0,40	85 %	*	EUR 100 000
Nordea Global High Yield Fund A growth EUR	FI0008806450	EUR	EUR	1,00	1,00	70 %		EUR 10
Nordea Global High Yield Fund C growth EUR	FI4000060405	EUR	EUR	0,55	0,55	70 %	*	EUR 0
Nordea Global Passive Fund A growth NOK	FI4000046693	EUR	NOK	0,40	0,40	-18 %		NOK 100
Nordea Global Passive Fund A growth SEK	FI4000046685	EUR	SEK	0,40	0,40	-18 %		SEK 100
Nordea Global Passive Fund B growth EUR	FI4000046669	EUR	EUR	0,50	0,50	-18 %		EUR 10
Nordea Global Passive Fund I growth EUR	FI4000046644	EUR	EUR	0,40	0,40	-18 %		EUR 100 000
Nordea Global Statsobligasjon Fund I growth NOK	FI4000566096	NOK	NOK	0,25	-	-		NOK m 5
Nordea Hållbarhetsfond Obligationer Global Fund A growth SEK	FI4000375027	SEK	SEK	0,75	0,79	-16 %		SEK 100
Nordea India Fund A growth EUR	FI0008810627	EUR	EUR	1,85	1,85	-26 %		EUR 10
Nordea India Fund A growth NOK	FI0008813233	EUR	NOK	1,85	1,85	-26 %		NOK 100
Nordea India Fund A growth SEK	FI0008813241	EUR	SEK	1,85	1,85	-26 %		SEK 100
Nordea Innovation Stars Fund A growth EUR	FI4000439609	EUR	EUR	1,40	1,40	4 %		EUR 10
Nordea Innovation Stars Fund A growth NOK	FI4000439633	EUR	NOK	1,40	1,40	4 %		NOK 100
Nordea Innovation Stars Fund A growth SEK	FI4000439625	EUR	SEK	1,40	1,40	4 %		SEK 100
Nordea Institutionella Småbolagsfonden Sverige Fund I growth SEK	FI4000439468	SEK	SEK	1,50	1,50	27 %		SEK 100
Nordea Japan Fund A growth EUR	FI0008800412	EUR	EUR	1,00	1,00	-2 %		EUR 10
Nordea Japan Fund A growth NOK	FI0008813266	EUR	NOK	1,00	1,00	-2 %		NOK 100
Nordea Japan Fund A growth SEK	FI4000048962	EUR	SEK	1,00	1,00	-2 %		SEK 100
Nordea Japan Fund C growth EUR	FI4000288501	EUR	EUR	0,85	0,84	-2 %	*	EUR 0
Nordea Japan Fund I growth EUR	FI4000068473	EUR	EUR	0,60	1,00	-2 %		EUR m 1
Nordea Kort Obligasjon Fund A growth NOK	FI4000565866	NOK	NOK	0,35	-	-		NOK 100
Nordea Kort Obligasjon Fund I growth NOK	FI4000565874	NOK	NOK	0,25	-	-		NOK 500 000
Nordea Kort Obligasjon Fund S growth NOK	FI4000565858	NOK	NOK	0,15	-	-		NOK m 50
Nordea Kort Obligasjon Pluss Fund C growth NOK	FI4000565908	NOK	NOK	0,20	-	-	*	NOK 0
Nordea Kort Obligasjon Pluss Fund I growth NOK	FI4000565890	NOK	NOK	0,15	-	-		NOK 500 000
Nordea Kort Obligasjon Pluss Fund S growth NOK	FI4000565882	NOK	NOK	0,10	-	-		NOK m 50
Nordea Kreditt Stars Fund A growth NOK	FI4000315742	NOK	NOK	0,40	0,41	113 %		NOK 100
Nordea Kreditt Stars Fund C growth NOK	FI4000566161	NOK	NOK	0,25	-	-		NOK m 5
Nordea Kreditt Stars Fund I growth NOK	FI4000315759	NOK	NOK	0,25	0,26	113 %		NOK m 10
Nordea Kreditt Stars Fund S growth NOK	FI4000315767	NOK	NOK	0,20	0,21	113 %		NOK m 50
Nordea Moderate Yield Fund A growth EUR	FI0008814595	EUR	EUR	0,25	0,16	1 %		EUR 10
Nordea Moderate Yield Fund B growth EUR	FI0008814611	EUR	EUR	0,20	0,13	1 %		EUR 100 000
Nordea Moderate Yield Fund C growth EUR	FI4000037478	EUR	EUR	0,20	0,12	1 %	*	EUR 0
Nordea Moderate Yield Fund I growth EUR	FI0008814637	EUR	EUR	0,15	0,10	1 %		EUR m 1
Nordea Moderate Yield Fund S growth EUR	FI0008814652	EUR	EUR	0,10	0,10	1 %		EUR m 10
Nordea Nordic Covered Bond Fund A growth SEK	FI4000512926	SEK	SEK	0,50	0,50	71 %		SEK 100
Nordea Nordic Fund A growth EUR	FI0008800065	EUR	EUR	1,40	1,40	30 %		EUR 10
Nordea Nordic Fund A growth NOK	FI4000038039	EUR	NOK	1,40	1,40	30 %		NOK 100
Nordea Nordic Fund A growth SEK	FI0008813399	EUR	SEK	1,40	1,40	30 %		SEK 100
Nordea Nordic Fund B growth EUR	FI4000306865	EUR	EUR	1,00	1,00	30 %		EUR 100 000
Nordea Nordic Small Cap Fund A growth EUR	FI0008800438	EUR	EUR	1,60	1,60	41 %		EUR 10
Nordea Nordic Small Cap Fund A growth NOK	FI4000020730	EUR	NOK	1,60	1,60	41 %		NOK 100
Nordea Nordic Small Cap Fund A growth SEK	FI0008813365	EUR	SEK	1,60	1,60	41 %		SEK 100
Nordea Nordic Small Cap Fund C growth EUR	FI4000288683	EUR	EUR	0,85	0,85	41 %	*	EUR 0
Nordea Norge Pluss Fund I growth NOK	FI4000565981	NOK	NOK	1,00	-	-		NOK 500 000

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Nordea Norge Verdi Fund A growth NOK	FI4000565973	NOK	NOK	1,50	-	-		NOK 100
Nordea North American Dividend Fund A growth EUR	FI0008805585	EUR	EUR	1,20	1,20	25 %		EUR 10
Nordea North American Dividend Fund A growth NOK	FI0008813373	EUR	NOK	1,20	1,20	25 %		NOK 100
Nordea North American Dividend Fund A growth SEK	FI0008813381	EUR	SEK	1,20	1,20	25 %		SEK 100
Nordea North American Dividend Fund C growth EUR	FI4000288709	EUR	EUR	0,85	0,86	25 %	*	EUR 0
Nordea North American Dividend Fund I growth EUR	FI4000068515	EUR	EUR	0,80	1,20	25 %		EUR m 1
Nordea North American Enhanced Fund A growth EUR	FI4000261268	EUR	EUR	0,60	0,60	7 %		EUR 10
Nordea North American Enhanced Fund A growth NOK	FI4000261292	EUR	NOK	0,60	0,60	7 %		NOK 100
Nordea North American Enhanced Fund A growth SEK	FI4000261284	EUR	SEK	0,60	0,60	7 %		SEK 100
Nordea North American Enhanced Fund C growth EUR	FI4000330873	EUR	EUR	0,20	0,20	7 %	*	EUR 0
Nordea North American Enhanced Fund I growth EUR	FI4000330899	EUR	EUR	0,425	0,42	7 %		EUR 100 000
Nordea North American Enhanced Fund I growth NOK	FI4000410519	EUR	NOK	0,425	0,42	7 %		NOK m 1
Nordea North American Enhanced Fund I growth SEK	FI4000410527	EUR	SEK	0,425	0,42	7 %		SEK m 1
Nordea Norwegian Passive Fund A growth NOK	FI4000566112	NOK	NOK	0,25	-	-		NOK 100
Nordea Norwegian Stars Fund A growth NOK	FI4000391099	NOK	NOK	1,50	1,50	-19 %		NOK 100
Nordea Norwegian Stars Fund C growth NOK	FI4000410402	NOK	NOK	0,85	0,85	-19 %	*	NOK 100
Nordea Norwegian Stars Fund I growth NOK	FI4000391511	NOK	NOK	1,00	1,00	-19 %		NOK m 1
Nordea Obligasjon II Fund I growth NOK	FI4000565924	NOK	NOK	0,20	-	-		NOK 500 000
Nordea Obligasjon III Fund C growth NOK	FI4000565965	NOK	NOK	0,25	-	-	*	NOK 0
Nordea Obligasjon III Fund I growth NOK	FI4000565957	NOK	NOK	0,15	-	-		NOK m 20
Nordea Obligasjon Stars Fund A growth NOK	FI4000071584	NOK	NOK	0,40	0,42	96 %		NOK 100
Nordea Obligasjon Stars Fund I growth NOK	FI4000415724	NOK	NOK	0,25	0,27	96 %		NOK m 10
Nordea Obligasjon Stars Fund S growth NOK	FI4000071592	NOK	NOK	0,15	0,17	96 %		NOK m 50
Nordea PB Norsk Aksje Portefolje B growth NOK	FI4000046990	NOK	NOK	0,80	0,80	47 %	*	NOK 1 000
Nordea Plan Balansert Fund A growth NOK	FI4000566039	NOK	NOK	1,15	-	-		NOK 100
Nordea Plan Balansert Fund B growth NOK	FI4000566047	NOK	NOK	1,07	-	-		NOK m 5
Nordea Plan Konservativ Fund A growth NOK	FI4000565999	NOK	NOK	0,72	-	-		NOK 100
Nordea Plan Konservativ Fund B growth NOK	FI4000566005	NOK	NOK	0,67	-	-		NOK m 5
Nordea Plan Moderat Fund A growth NOK	FI4000566013	NOK	NOK	0,95	-	-		NOK 100
Nordea Plan Moderat Fund B growth NOK	FI4000566021	NOK	NOK	0,87	-	-		NOK m 5
Nordea Plan Offensiv Fund A growth NOK	FI4000566070	NOK	NOK	1,38	-	-		NOK 100
Nordea Plan Offensiv Fund B growth NOK	FI4000566088	NOK	NOK	1,33	-	-		NOK m 5
Nordea Plan Vekstorientert Fund A growth NOK	FI4000566054	NOK	NOK	1,32	-	-		NOK 100
Nordea Plan Vekstorientert Fund B growth NOK	FI4000566062	NOK	NOK	1,22				NOK m 5
Nordea Premium AM Balanced Fund I growth EUR	FI4000171178	EUR	EUR	0,75	0,76	19 %	**	EUR m 1
Nordea Premium AM Balanced Fund P growth EUR	FI0008806419	EUR	EUR	1,36	1,41	19 %	**	EUR 1 000
Nordea Premium AM Balanced Fund Y growth EUR	FI4000090220	EUR	EUR	1,30	1,31	19 %	**	EUR 25 000
Nordea Premium AM Conservative Fund I growth EUR	FI4000171137	EUR	EUR	0,50	0,52	-8 %	**	EUR m 1
Nordea Premium AM Conservative Fund P growth EUR	FI4000087796	EUR	EUR	0,80	0,82	-8 %	**	EUR 1 000
Nordea Premium AM Conservative Fund Y growth EUR	FI4000087812	EUR	EUR	0,70	0,72	-8 %	**	EUR 25 000
Nordea Premium AM Growth Fund I growth EUR	FI4000171194	EUR	EUR	0,85	0,86	24 %	**	EUR m 1
Nordea Premium AM Growth Fund P growth EUR	FI0008802251	EUR	EUR	1,52	1,60	24 %	**	EUR 1 000
Nordea Premium AM Growth Fund Y growth EUR	FI4000090212	EUR	EUR	1,50	1,51	24 %	**	EUR 25 000
Nordea Premium AM Moderate Fund I growth EUR	FI4000171152	EUR	EUR	0,65	0,67	16 %	**	EUR m 1
Nordea Premium AM Moderate Fund P growth EUR	FI0008806435	EUR	EUR	1,09	1,12	16 %	**	EUR 1 000
Nordea Premium AM Moderate Fund Y growth EUR	FI4000090204	EUR	EUR	1,00	1,02	16 %	**	EUR 25 000
Nordea Pro Euro Bond Fund C growth EUR	FI4000037452	EUR	EUR	0,30	0,30	21 %	*	EUR 0
Nordea Pro Euro Bond Fund I growth EUR	FI0008800370	EUR	EUR	0,30	0,30	21 %		EUR m 1
Nordea Pro Finland Fund C growth EUR	FI4000037569	EUR	EUR	0,75	0,75	31 %	*	EUR 0
Nordea Pro Finland Fund I growth EUR	FI0008800362	EUR	EUR	0,50	0,50	31 %		EUR m 1
Nordea Pro Stable Return Fund C growth EUR	FI4000037551	EUR	EUR	0,85	0,85	76 %	*	EUR 0
Nordea Pro Stable Return Fund I growth EUR	FI0008800990	EUR	EUR	0,80	0,80	76 %		EUR m 1
Nordea Pro Stable Return Fund I growth SEK	FI0008813407	EUR	SEK	0,80	0,80	76 %		SEK m 10
Nordea Savings 15 Fund A growth EUR	FI4000018601	EUR	EUR	0,98	1,00	6 %		EUR 10
Nordea Savings 30 Fund A growth EUR	FI0008807433	EUR	EUR	1,11	1,17	21 %		EUR 10
Nordea Savings 50 Fund A growth EUR	FI0008806807	EUR	EUR	1,37	1,48	31 %		EUR 10
Nordea Savings 75 Fund A growth EUR	FI0008806823	EUR	EUR	1,53	1,62	42 %		EUR 10

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Nordea Savings Fixed Income Fund A growth EUR	FI4000008164	EUR	EUR	0,70	0,72	-11 %		EUR 10
Nordea Stabile Aksjer Global Fund A growth NOK	FI4000565841	NOK	NOK	1,50	-	-		NOK 100
Nordea Stabile Aksjer Global Fund I growth NOK	FI4000578034	NOK	NOK	1,00	-	-	***	NOK m 10
Nordea Stabile Aksjer Global Valutasikret Fund S growth NOK	FI4000565833	NOK	NOK	0,60	-	-		NOK m 50
Nordea Stable Return Fund A growth EUR	FI0008810254	EUR	EUR	1,75	1,77	56 %		EUR 10
Nordea Stable Return Fund I growth EUR	FI4000047295	EUR	EUR	1,20	1,22	56 %		EUR 100 000
Nordea Stratega 90 A growth SEK	FI4000519152	SEK	SEK	1,45	1,51	-50 %		SEK 100
Nordea Stratega Fixed Income Fund A growth SEK	FI4000010525	EUR	SEK	0,65	0,71	-14 %		SEK 100
Nordea Sustainable Equities Global Fund A growth EUR	FI4000349386	EUR	EUR	0,90	0,90	10 %		EUR 10
Nordea Sustainable Equities Global Fund A growth NOK	FI4000349428	EUR	NOK	0,90	0,90	10 %		NOK 100
Nordea Sustainable Equities Global Fund A growth SEK	FI4000349402	EUR	SEK	0,90	0,90	10 %		SEK 100
Nordea Sustainable Equities Global Fund C growth EUR	FI4000375191	EUR	EUR	0,60	0,60	10 %	*	EUR 0
Nordea Sustainable Equities Global Fund C growth NOK	FI4000375217	EUR	NOK	0,60	0,60	10 %	*	NOK 100
Nordea Sustainable Equities Global Fund C growth SEK	FI4000375209	EUR	SEK	0,60	0,60	10 %	*	SEK 100
Nordea Sustainable Equities Global Fund I growth EUR	FI4000410451	EUR	EUR	0,55	0,55	10 %		EUR 100 000
Nordea Sustainable Equities Global Fund I growth SEK	FI4000410485	EUR	SEK	0,55	0,55	10 %		SEK m 1
Nordea Sustainable Fixed Income Global Fund A growth EUR	FI4000375019	EUR	EUR	0,75	0,79	13 %		EUR 10
Nordea Sustainable Fixed Income Global Fund C growth EUR	FI4000391396	EUR	EUR	0,50	0,54	13 %	*	EUR 0
Nordea Sustainable Selection Balanced Fund (NOK) A growth NOK	FI4000391123	NOK	NOK	1,18	1,21	-13 %	**	NOK 100
Nordea Sustainable Selection Balanced Fund (SEK) A growth SEK	FI4000391131	SEK	SEK	1,33	1,38	-19 %	**	SEK 100
Nordea Sustainable Selection Balanced Fund A growth EUR	FI4000400098	EUR	EUR	1,36	1,58	0 %	**	EUR 10
Nordea Sustainable Selection Balanced Fund I growth EUR	FI4000219563	EUR	EUR	0,75	0,78	0 %	**	EUR m 1
Nordea Sustainable Selection Balanced Fund P growth EUR	FI4000219522	EUR	EUR	1,34	1,43	0 %	**	EUR 1 000
Nordea Sustainable Selection Balanced Fund Y growth EUR	FI4000219548	EUR	EUR	1,30	1,33	0 %	**	EUR 25 000
Nordea Sustainable Selection Growth Fund (NOK) A growth NOK	FI4000391107	NOK	NOK	1,37	1,39	-10 %	**	NOK 100
Nordea Sustainable Selection Growth Fund (SEK) A growth SEK	FI4000391156	SEK	SEK	1,35	1,37	-20 %	**	SEK 100
Nordea Sustainable Selection Growth Fund A growth EUR	FI4000400106	EUR	EUR	1,52	1,62	7 %	**	EUR 10
Nordea Sustainable Selection Growth Fund I growth EUR	FI4000219506	EUR	EUR	0,85	0,88	7 %	**	EUR m 1
Nordea Sustainable Selection Growth Fund P growth EUR	FI4000219464	EUR	EUR	1,51	1,62	7 %	**	EUR 1 000
Nordea Sustainable Selection Growth Fund Y growth EUR	FI4000219480	EUR	EUR	1,50	1,52	7 %	**	EUR 25 000
Nordea Sustainable Selection Moderate Fund (NOK) A growth NOK	FI4000391115	NOK	NOK	0,99	1,02	5 %	**	NOK 100
Nordea Sustainable Selection Moderate Fund (SEK) A growth SEK	FI4000391172	SEK	SEK	1,20	1,23	-14 %	**	SEK 100
Nordea Sustainable Selection Moderate Fund A growth EUR	FI4000400080	EUR	EUR	1,10	1,18	8 %	**	EUR 10
Nordea Sustainable Selection Moderate Fund I growth EUR	FI4000219613	EUR	EUR	0,65	0,68	8 %	**	EUR m 1
Nordea Sustainable Selection Moderate Fund P growth EUR	FI4000219571	EUR	EUR	1,08	1,13	8 %	**	EUR 1 000
Nordea Sustainable Selection Moderate Fund Y growth EUR	FI4000219597	EUR	EUR	1,00	1,03	8 %	**	EUR 25 000
Nordea Sustainable Selection Return Fund (NOK) A growth NOK	FI4000513361	NOK	NOK	1,47	1,49	-119 %	**	NOK 100
Nordea Sustainable Selection Return Fund (SEK) A growth SEK	FI4000513346	SEK	SEK	1,40	1,42	-24 %	**	SEK 100
Nordea Sustainable Selection Return Fund A growth EUR	FI4000513296	EUR	EUR	1,53	1,67	57 %	**	EUR 10
Nordea Sustainable Selection Return Fund I growth EUR	FI4000513320	EUR	EUR	0,95	0,97	57 %	**	EUR m 1
Nordea Sustainable Selection Return Fund P growth EUR	FI4000513304	EUR	EUR	1,51	1,64	57 %	**	EUR 1 000
Nordea SWE Inflation Linked Bond Fund A growth SEK	FI0008813449	EUR	SEK	0,50	0,50	1 %		SEK 100
Nordea SWE Institutional Short Duration Bond Fund I growth SEK	FI0008813431	EUR	SEK	0,15	0,15	28 %		SEK m 1
Nordea Swedish Ideas Equity Fund A growth SEK	FI4000088000	SEK	SEK	1,50	1,51	65 %		SEK 100
Nordea Tactical Asset Allocation Fund C growth EUR	FI4000387576	EUR	EUR	0,50	0,51	61 %	*	EUR 0
Nordea Tactical Asset Allocation Fund I growth EUR	FI4000387584	EUR	EUR	0,25	0,26	61 %	*	EUR 100 000
Nordea World Fund A growth EUR	FI0008800420	EUR	EUR	1,00	1,00	11 %		EUR 10
Nordea World Fund A growth NOK	FI4000301098	EUR	NOK	1,00	1,00	11 %		NOK 100
Nordea World Fund A growth SEK	FI0008813332	EUR	SEK	1,00	1,00	11 %		SEK 100
Nordea World Fund C growth EUR	FI4000288659	EUR	EUR	0,85	0,85	11 %	*	EUR 0
Nordea World Fund I growth EUR	FI4000068507	EUR	EUR	0,60	1,00	11 %		EUR m 1
Nordea World Passive Fund A growth EUR	FI4000523444	EUR	EUR	0,50	0,50	-12 %		EUR 10
Nordea World Passive Fund A growth SEK	FI4000523451	EUR	SEK	0,50	0,50	-12 %		SEK 100
Nordea World Passive Fund S growth NOK	FI4000523477	EUR	NOK	0,25	0,25	-12 %		NOK m 10
Nordea Yield Fund A growth EUR	FI0008814512	EUR	EUR	0,40	0,60	13 %		EUR 10
Nordea Yield Fund A growth SEK	FI4000020722	EUR	SEK	0,40	0,60	13 %		SEK 100
Nordea Yield Fund B growth EUR	FI0008814538	EUR	EUR	0,30	0,30	13 %		EUR 100 000

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Nordea Yield Fund C growth EUR	FI4000037486	EUR	EUR	0,30	0,30	13 %	*	EUR 0
Nordea Yield Fund I growth EUR	FI0008814553	EUR	EUR	0,20	0,25	13 %		EUR m 1

**Nordea Japan and Nordea North American Dividend**

**N.B.** The fund does not apply performance-based fee in unit series A as of 1.7.2020.

**Nordea World**

**N.B.** The fund does not apply performance-based fee in unit series A as of 2.7.2019.

**Unit series P is targeted at Premium customers, Y at companies as well as other corporate customers, and I is correspondingly targeted at institutional customers.**

Official fund name	Unit series code	Marketing name for the unit series
Nordea Premium Asset Management Balanced Fund	P	Nordea Premium Asset Management Balanced
	Y	Nordea Corporate Asset Management Balanced
	I	Nordea Institutional Asset Management Balanced
Nordea Premium Asset Management Conservative Fund	P	Nordea Premium Asset Management Conservative
	Y	Nordea Corporate Asset Management Conservative
	I	Nordea Institutional Asset Management Conservative
Nordea Premium Asset Management Growth Fund	P	Nordea Premium Asset Management Growth
	Y	Nordea Corporate Asset Management Growth
	I	Nordea Institutional Asset Management Growth
Nordea Premium Asset Management Moderate Fund	P	Nordea Premium Asset Management Moderate
	Y	Nordea Corporate Asset Management Moderate
	I	Nordea Institutional Asset Management Moderate

**Unit series A is targeted at private customers, unit series P is targeted at Premium customers, Y at companies as well as other corporate customers, and I is correspondingly targeted at institutional customers.**

Official fund name	Unit series code	Marketing name for the unit series
Nordea Sustainable Selection Balanced Fund	A	Nordea Sustainable Global Balanced
	P	Nordea Premium Sustainable Global Balanced
	Y	Nordea Corporate Sustainable Global Balanced
	I	Nordea Institutional Sustainable Global Balanced
Nordea Sustainable Selection Growth Fund	A	Nordea Sustainable Global Growth
	P	Nordea Premium Sustainable Global Growth
	Y	Nordea Corporate Sustainable Global Growth
	I	Nordea Institutional Sustainable Global Growth
Nordea Sustainable Selection Moderate Fund	A	Nordea Sustainable Global Moderate
	P	Nordea Premium Sustainable Global Moderate
	Y	Nordea Corporate Sustainable Global Moderate
	I	Nordea Institutional Sustainable Global Moderate
Nordea Sustainable Selection Return Fund	A	Nordea Sustainable Global Return
	P	Nordea Premium Sustainable Global Return
	I	Nordea Institutional Sustainable Global Return

**Turnover rate**

The turnover rate describes how frequently assets within a fund are bought and sold by the managers. The higher the turnover rate, the more the fund has traded in addition to trading due to subscriptions and redemptions. The turnover rate for the last calendar year has been presented. The turnover rate is calculated by subtracting from the total value of the securities bought and sold by the fund (sum 1, EUR) the combined value of the subscriptions and redemptions (sum 2, EUR). The turnover rate is the difference of the above sums (sum 2 subtracted with sum 1), divided with the average market capitalization of the fund. The average market capitalization of the fund is calculated based on the day specific market value during the last 12 months. If the turnover rate is 0 %, subscriptions and redemptions of fund units have mainly affected the trading of the fund. The turnover rate can also be negative, in which case the combined value of the subscriptions and redemptions exceeds the combined value of the purchases and sales of the fund.

**Summary risk indicators (SRI) according to the PRIIPS KID, and investor target group**

Investors should have sufficient knowledge of investing in funds and of the fund in order to understand whether the fund suits them. The investor must study the characteristics and risks of the fund and investing in funds, mentioned in this prospectus, and understand and accept them. The details of the fund are available in the fund rules and Key Information Document (KID). The funds are allocated in the risk categories listed in the table below on the basis of the risk indicator SRI disclosed in the KID valid **at the end of December 2023**.

The value of an investment in a fund may increase or decrease. When redeeming the fund investment, the investor may receive less money than the original amount invested. The fund is not covered by the Investor's Compensation Fund or the deposit guarantee. The summary risk indicator and risk-reward profile of a fund can change. Their development can be followed in the KID.

Risk category/ risk indicator	Fund	Investor target group
Very low 1	Nordea Kort Obligasjon Fund Nordea Kort Obligasjon Pluss Fund	<p>The lowest risk categories 1 or 2 do not mean a risk-free investment. Funds classified under risk category 1 are mainly short-term bond funds, typically with a low modified duration.</p> <p>Category 1: The fund suits <b>cautious investors</b> who primarily want to invest in fixed-income markets and prefer as low interest-rate risk as possible and a moderate credit risk.</p> <p>The fund is also suitable for companies' cash management purposes. Companies can enter into a service agreement on automatic transfer of liquid assets from a payment account into the fund and vice versa.</p> <p>The fund has been classified under category 1 if the fund's VaR-equivalent volatility is between 0.0 and 0.5%. VaR refers to Value-at-Risk.</p>

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<p><b>Low 2</b></p>	<p>Nordea Bærekraftige Obligasjoner Global Fund          Nordea Conservative Yield Fund          Nordea Corporate Bond Fund          Nordea Defensive Fund          Nordea Euro Medium Term Bond Fund          Nordea Fixed Income Credit Opportunities Fund          Nordea Focus Fixed Income Fund          Nordea FRN Kreditt Fund          Nordea FRN OMF Fund          Nordea FRN Pensjon Fund          Nordea Global Statsobligasjon Fund          Nordea Hållbarhetsfond Obligationer Global Fund          Nordea Kreditt Stars Fund          Nordea Moderate Yield Fund          Nordea Nordic Covered Bond Fund          Nordea Obligasjon II Fund          Nordea Obligasjon III Fund          Nordea Obligasjon Stars Fund          Nordea Plan Konservativ Fund          Nordea Plan Moderat Fund          Nordea Savings Fixed Income Fund          Nordea Stratega Fixed Income Fund          Nordea Sustainable Fixed Income Global Fund          Nordea SWE Inflation Linked Bond Fund          Nordea SWE Institutional Short Duration Bond Fund          Nordea Yield Fund</p>	<p>The lowest risk categories 1 or 2 do not mean a risk-free investment. Funds classified under risk category 2 are mainly short-term, medium-term or long-term bond funds or fixed-income-oriented balanced funds which can also be fund of funds where the investments are most often broadly diversified. This category includes both government bond and corporate bond funds.</p> <p>Category 2: The fund suits <b>moderate investors</b> who primarily want to invest in bonds issued by both governments and companies and prefer a rather high interest-rate risk and a medium credit risk.</p> <p>The fund suits <b>moderate investors</b> who through fixed-income-oriented balanced funds primarily want to invest in a diversified portfolio of bonds issued by governments and/or companies and accept a rather high interest-rate risk and a moderate credit risk.</p> <p>The fund has been classified under category 2 if the fund's VaR-equivalent volatility is between 0.5 and 5.0%. VaR refers to Value-at-Risk.</p>
<p><b>Medium low 3</b></p>	<p>Nora Fund Four (NOK)          Nora Fund Four (SEK)          Nora Fund Three (EUR)          Nora Fund Three (NOK)          Nora Fund Three (SEK)          Nora Fund Three Master          Nora Fund Two (SEK)          Nora Fund Two Master          Nordea Discretionary Corporate Credit Fund          Nordea Emerging Market Bond Fund          Nordea Euro Bond Fund          Nordea European High Yield Fund          Nordea Global High Yield Fund          Nordea Navigo          Nordea Plan Balansert Fund          Nordea Plan Vekstorientert Fund          Nordea Premium Asset Management Balanced Fund          Nordea Premium Asset Management Conservative Fund          Nordea Premium Asset Management Moderate Fund          Nordea Pro Euro Bond Fund          Nordea Savings 15 Fund          Nordea Savings 30 Fund          Nordea Savings 50 Fund          Nordea Stable Return Fund          Nordea Sustainable Selection Balanced Fund          Nordea Sustainable Selection Balanced Fund (NOK)          Nordea Sustainable Selection Balanced Fund (SEK)          Nordea Sustainable Selection Growth Fund (NOK)          Nordea Sustainable Selection Growth Fund (SEK)          Nordea Sustainable Selection Moderate Fund          Nordea Sustainable Selection Moderate Fund (NOK)          Nordea Sustainable Selection Moderate Fund (SEK)</p>	<p>Funds classified under risk category 3 are mainly long-term high-yield bond funds, emerging market bond funds or other than fixed-income-oriented balanced funds. This category includes both government bond and corporate bond funds.</p> <p>Category 3: The fund suits <b>investors who seek relatively high return</b> and who primarily want to invest part of their assets in a diversified portfolio of high-yield bonds and accept a high interest-rate and a rather high credit risk.</p> <p>The fund suits <b>investors who seek relatively high return</b> and who primarily want to invest part of their assets in a portfolio of emerging market bonds and prefer a high interest-rate and a high credit risk.</p> <p>The funds classified under category 3 are also suitable for long-term investing in funds, meaning saving in funds, where the investor seeks to stabilise the risk relating to timing by, for example, investing a certain amount at regular intervals.</p> <p>The fund has been classified under category 3 if the fund's VaR-equivalent volatility is between 5.0 and 12.0%. VaR refers to Value-at-Risk.</p>
<p><b>Medium 4</b></p>	<p>Nora Five (EUR)          Nora Five (SEK)          Nora Fund Five Master          Nora Four (EUR)          Nora Fund Four Master          Nordea Avkastning Fund          Nordea Discretionary Global Equity Fund          Nordea Discretionary Swedish Equity Fund          Nordea Emerging Market Equities Fund          Nordea Equity Opportunities Fund          Nordea European Passive Fund          Nordea European Smaller Companies Fund          Nordea European Stars Fund          Nordea Finnish Passive Fund          Nordea Finnish Stars Fund          Nordea Global Dividend Fund          Nordea Global Enhanced Fund          Nordea Global Equity Allocation Fund          Nordea Global Passive Fund          Nordea Japan Fund          Nordea Nordic Fund          Nordea Norge Pluss Fund          Nordea Norge Verdi Fund          Nordea North American Dividend Fund          Nordea North American Enhanced Fund</p>	<p>Funds classified under risk category 4 are mainly equity-oriented balanced funds or rather broadly diversified equity funds or equity funds which invest in the equity market of a single country or funds which invest in companies with small-to-medium-sized market value.</p> <p>Category 4: An equity-oriented balanced fund suits <b>return-oriented investors</b> who primarily want to invest part of their assets in equity markets and can bear even heavy fluctuations in the value of the invested assets.</p> <p>The fund suits <b>return-oriented investors</b> who primarily want to invest part of their assets in equity markets with a global diversification and can bear even heavy fluctuations in the value of the invested assets.</p> <p>The funds classified under category 4 are also suitable for long-term investing in funds, meaning saving in funds, where the investor seeks to stabilise the risk relating to timing by, for example, investing a certain amount at regular intervals.</p> <p>Equity funds and equity-oriented balanced fund are recommended for investing in the long term.</p> <p>The fund has been classified under category 4 if the fund's VaR-equivalent volatility is between 12.0 and 20.0%. VaR refers to Value-at-Risk.</p>

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	<p>Nordea Norwegian Passive Fund          Nordea Norwegian Stars Fund          Nordea Plan Offensiv Fund          Nordea Premium Asset Management Growth Fund          Nordea Private Banking Norsk Aksje Portefolje          Nordea Pro Finland Fund          Nordea Pro Stable Return Fund          Nordea Savings 75 Fund          Nordea Stratega 90 Fund          Nordea Stabile Aksjer Global Fund          Nordea Stabile Aksjer Global Valutasikret Fund          Nordea Sustainable Equities Global Fund          Nordea Sustainable Selection Growth Fund          Nordea Sustainable Selection Return Fund          Nordea Sustainable Selection Return Fund (NOK)          Nordea Sustainable Selection Return Fund (SEK)          Nordea Swedish Ideas Equity Fund          Nordea World Fund          Nordea World Passive Fund</p>	
<b>Medium high 5</b>	<p>Nordea Allokeringfond Fund          Nordea China Fund          Nordea Discretionary Asset Allocation Fund          Nordea Emerging Europe Fund          Nordea India Fund          Nordea Innovation Stars Fund          Nordea Institutionella Småbolagsfonden Sverige          Nordea Nordic Small Cap Fund          Nordea Tactical Asset Allocation Fund</p>	<p>Funds classified under risk category 5 are typically funds which invest in the equity market of a single country or a specific geographic area, for instance in the emerging markets.</p> <p>This category also includes balanced funds that employ several different investment strategies, invest in several asset classes and utilise for instance long/short positions in their investment activities.</p> <p>Category 5: The fund <b>suits high-return-oriented equity investors</b> who primarily want to invest part of their assets in a broadly diversified manner in the equity market of a single country or a specific geographic area and can bear even heavy fluctuations in the value of the invested assets.</p> <p>The funds classified under category 5 are also suitable for long-term investing in funds, meaning saving in funds, where the investor seeks to stabilise the risk relating to timing by, for example, investing a certain amount at regular intervals.</p> <p>Equity funds and balanced funds with specific strategies are recommended for investing in the long term (5 years at the minimum).</p> <p>The fund has been classified under category 5 if the fund's VaR-equivalent volatility is between 20.0 and 30.0%. VaR refers to Value-at-Risk.</p>
<b>Second-highest 6</b>		<p>Funds classified under risk category 6 are typically funds which invest for instance a single country or in a specific geographic area in the emerging markets, where it is possible that the fund may suffer high losses in extreme market conditions.</p> <p>Category 6: The fund <b>suits high-return-oriented equity investors</b> with a less risk-averse attitude towards significant uncertainty about investment outcomes who primarily want to invest part of their assets in a diversified manner in a single country or a specific geographic area in the emerging equity markets and can bear even very heavy fluctuations in the value of the invested assets.</p> <p>Equity funds are generally recommended for investing in the long term (5 years at the minimum), assuming the fund is the sole or major holding of the investor. The recommended holding period is primarily based on the historical volatility of the underlying investments and is not directly applicable if used in a portfolio based on the investor's risk profile. The fund is not intended for short term speculation purposes.</p> <p>The fund has been classified under category 6 if the fund's VaR-equivalent volatility is between 30.0 and 80.0%. VaR refers to Value-at-Risk.</p>

### History of name changes, mergers, divisions and terminations – partly available in Finnish only

Launch date	Merging fund	Receiving fund	Transaction	Date	The fund that continues operations
15.10.1987	Optio-SYP		Termination	28.1.1993	
15.10.1987	Tuotto-SYP	Merita Bond Fund II	Merger	15.1.1996	<i>MNB Euro Bond Fund 4.1.1999</i>
13.12.1993	Kansallis-Korko	Merita Bond Fund 15.1.1996	Name change		<i>Nordea Bond Fund.fi 21.3.2001</i>
	Nordea Euro Bond Fund	Nordea Bond Fund.fi	Merger	19.10.2003	<i>Nordea Euro Bond Fund</i>
15.10.1987	Riski-SYP	Merita Avanti Fund	Merger	15.1.1996	<i>MNB Avanti Fund 1.8.1999</i>
15.10.1987	Kasvu-SYP	Merita Nordia Fund	Merger	15.1.1996	<i>Nordea Nordia 21.6.2001</i>
	Nordea Nordia Fund	Nordea Avanti Fund	Merger	16.12.2007	<i>Nordea Nordic Fund</i>
15.5.1992	Kansallis- Kasvu	Merita Fennia Fund	Name change	15.1.1996	<i>Nordea Fennia Fund 21.3.2001</i>
24.11.1999	Trevise Suomi	Merita Fennia Plus Fund	Merger	1.1.2001	<i>Nordea Fennia Plus Fund 21.3.2001</i>
	Nordea Fennia Plus Fund	Nordea Fennia Fund	Merger	2.3.2009	<i>Nordea Finland Fund</i>
5.11.1993	Kansallis-Metsä	Merita Foresta Fund 15.1.1996	Name change	21.3.2001	<i>Nordea Foresta Fund (merger with Nordea Global Dividend Fund 20.9.2013)</i>
7.12.1987	Kansallis-Tuotto	Merita Optima Fund 15.1.1996	Name change	21.3.2001	<i>Nordea Optima Fund.fi</i>
	Merita Optima Plus	Nordea Optima Plus Fund.fi	Name change	21.3.2001	<i>Nordea Optima Plus 1.10.2004</i>
	Nordea Optima and Nordea	Nordea Stable Return Fund	Merger	23.4.2006	<i>Nordea Stable Return Fund</i>

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	Optima Plus				
1.4.1996	Investa-Lyhytkorko	Merita Pro Money Market	Merger	19.9.1997	<i>Merita Pro Euro Money Market 4.1.1999</i>
	MNB Euro Money Market Fund	Nordea Euro Money Market Fund	Name change	21.3.2001	<i>Nordea Euro Money Market Fund</i>
	Merita Money Market Fund	Nordea Money Market Fund.fi	Name change	21.3.2001	<i>Nordea Money Market Fund.fi</i>
	Nordea Euro Money Market Fund	Nordea Money Market Fund.fi	Merger and Name change	19.10.2003	<i>Nordea Euro Money Market Fund</i>
	Nordea Euro Money Market, Money Manager and Pro Euro Money Market	Nordea Moderate Yield Fund and Nordea Yield Fund	Division	3.5.2009	<i>Nordea Moderate Yield Fund and Nordea Yield Fund</i>
13.5.1994	Investa-Obligaatio	Merita Pro Bond Fund	Merger	19.9.1997	<i>Nordea Pro Euro Bond Fund 21.3.2001</i>
10.3.1993	Investa-Osake	Merita Pro Finland Equity Fund	Merger	19.9.1997	<i>Nordea Pro Finland Fund 21.3.2001</i>
24.11.1999	Trevise Eurokorko and Trevise Euro-obligaatio		Termination	15.1.2000	
22.12.1999	Trevise Euroland	Nordea Europe Plus	Merger	1.6.2001	<i>Nordea Europe Plus Fund</i>
30.10.1997	Merita Aasia	Nordea Asian Fund.fi	Name change	21.3.2001	<i>Nordea Japan Fund 1.6.2001</i>
	Merita American Fund	Nordea American Fund	Name change	1.6.2001	<i>Nordea American Fund</i>
	Nordea Latin America Fund	Nordea America Fund Plus	Merger	1.12.2002	<i>Nordea America Fund Plus 11.2.2002</i>
	Nordea American Fund	Nordea America Fund Plus	Merger and Name change	28.10.2007	<i>Nordea North America Fund</i>
	Merita European Fund	Nordea European Fund.fi	Name change	21.3.2001	<i>Nordea European 1.10.2004</i>
	MNB Euroland Fund	Nordea Euroland Fund	Name change	21.3.2001	<i>Nordea Euroland Fund</i>
	Nordea European Fund and Choice European Equities	Nordea Euroland Fund	Merger and name change	16.11.2008	<i>Nordea European Fund (merger 24.5.2013)</i>
	Merita Granit Fund	Nordea Granit Fund	Name change	21.3.2001	<i>Nordea Granit Fund (merger 7.10.2012)</i>
	Merita World Fund	Nordea World Fund	Name change	21.3.2001	<i>Nordea World Fund</i>
	Nordea Global Growth Fund (the fund's name was Nordea Selektä Tillväxtbolag in Sweden) and Nordea World Fund		Merger	15.12.2008	<i>Nordea World Fund</i>
	MNB Euro Midi Korko	Nordea Euro Medium Term Bond Fund	Name change	21.3.2001	<i>Nordea Euro Medium Term Bond Fund</i>
	MNB IT Fund	Nordea IT Fund	Name change	21.3.2001	<i>Nordea IT Fund</i>
	Nordea IT Fund	Nordea Global Mobility Fund	Merger and name change	2.3.2008	<i>Nordea Global Technology Fund (merger again 20.9.2013)</i>
	MNB MEDICA Life Science Fund	Nordea MEDICA Life Science	Name change	21.3.2001	<i>Nordea MEDICA Life Science</i>
	Nordea Medica Life Science Fund	Nordea Global Biotech Fund	Merger and Name change	25.11.2007	<i>Nordea Medica Fund</i>
	MNB Nordic Small Cap Fund	Nordea Nordic Small Cap Fund	Name change	21.3.2001	<i>Nordea Nordic Small Cap Fund</i>
	MNB Pro Balance Fund	Nordea Pro Balance Fund	Name change	21.3.2001	<i>Nordea Pro Stable Return Fund 1.4.2006</i>
	MNB Pro Corporate Bond Fund	Nordea Pro Corporate Bond Fund	Name change	21.3.2001	<i>Nordea Corporate Bond Fund 1.10.2007</i>
	MNB Pro European Fund	Nordea Pro European Fund	Name change	21.3.2001	<i>Nordea Pro European Fund</i>
	MNB SWE Bond Fund	Nordea SWE Bond Fund	Name change	21.3.2001	<i>Nordea SWE Bond Fund</i>
	Nordea SWE Bond Fund	Nordea SWE Inflation Linked Bond Fund	Merger	14.10.2006	<i>Nordea SWE Inflation Linked Bond Fund</i>
	Nordea Fixed Income Plus	Nordea Absolute Return Portfolio	Name change	21.8.2008	<i>Nordea Absolute Return Portfolio</i>
	Nordea Absolute Return Portfolio is merged with Nordea European Equity Hedge		Merger	14.12.2010	<i>Nordea Savings 10 Fund 15.12.2010. This totally new fund was the receiving fund.</i>
	Choice Global Equities		Termination	12.3.2008	
	Nordea CDO Debt and Nordea CDO Equity		Termination	5.1.2009	
	Nordea Fixed Income Hedge Fund and Nordea Fixed Income Portfolio Plus		Merger	20.6.2010	<i>Nordea Fixed Income Portfolio Plus</i>
	Non-UCITS Nordea Global High Yield	Nordea Global High Yield	Fund type change	11.7.2010	<i>Nordea Global High Yield</i>
	Nordea SWE Capital Guaranteed		Termination	8.12.2011	
	Nordea Money Market Fund		Name change	15.4.2011	<i>Nordea Short-Term Money Market Fund</i>
	Nordea SWE Institutional Money Market Fund		Name change	15.3.2012	<i>Nordea Swedish Institutional Short Duration Bond Fund</i>

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	Special Fund Treviso Active Asset Allocation (AAA)	Name change	1.1.2002	<i>Non-UCITS Nordea Private Banking Growth Portfolio</i>
	Nordea Growth Private Banking	Name change	27.3.2012	<i>Nordea Premium Asset Management Growth Fund</i>
	Nordea Conservative Private Banking	Name change	27.3.2012	<i>Nordea Premium Asset Management Moderate Fund</i>
	Nordea Balanced Private Banking	Name change	27.3.2012	<i>Nordea Premium Asset Management Balanced Fund</i>
	Nordea Granit Fund has merged with Nordea Stable Return Fund	Merger	7.10.2012	<i>Nordea Stable Return Fund</i>
	Nordea Tillväxtbolagsfond (Sweden) and Nordea Etiskt Urval Global (Sweden) are merged with Nordea World Fund	Cross-border merger	7.10.2012	<i>Nordea World Fund</i>
1.6.2006	Nordea India Fund	Conversion into a feeder fund	12.11.2012	<i>Nordea India Fund</i>
	Nordea IV Capital Guaranteed 100	Termination	1.12.2012	
	Nordea Fixed Income Portfolio and Nordea Savings Fixed Income	Domestic merger	1.12.2012	<i>Nordea Savings Fixed Income</i>
	Non-UCITS Nordea SEK Fixed Income Portfolio and Nordea Stratega Fixed Income (up to 4.4.2012 Non-UCITS)	Domestic merger	1.12.2012	<i>Nordea Stratega Fixed Income Fund</i>
	Nordea Japanfond (Sweden) and Nordea Japan Fund	Cross-border merger	17.2.2013	<i>Nordea Japan Fund</i>
	Nordea Nordamerikafond (Sweden) and Nordea North America Fund	Cross-border merger	17.2.2013	<i>Nordea North America Fund</i>
	Nordea European Fund and Non-UCITS Nordea Private Banking Focus Europe Fund are merged with Nordea European Plus	Domestic merger and name change	24.5.2013	<i>Nordea Europe Fund</i>
	Nordea Östeuropafond (Sweden) has merged with Nordea Eastern Europe Fund	Cross-border merger	26.5.2013	<i>Nordea Eastern Europe Fund</i>
	Nordea Fjärran Östernfond (Sweden) has merged with Nordea Far East Fund	Cross-border merger	26.5.2013	<i>Nordea Far East Fund</i>
	Nordea Foresta Fund, Nordea Medica Fund and Nordea Global Tecknology Fund are merged with Nordea Global Dividend Fund	Domestic merger	20.9.2013	<i>Nordea Global Dividend Fund</i>
	Nordea Spektra (Sweden) has merged with Nordea Global Dividend Fund	Cross-border merger	20.9.2013	<i>Nordea Global Dividend Fund</i>
	Nordea Fixed Income Portfolio Plus has merged with Nordea Savings 10 Fund	Domestic merger	9.11.2014	<i>Nordea Savings 10 Fund</i>
	Nordea China Fund converted into a feeder fund	Conversion into a feeder fund	29.11.2013	<i>Nordea China Fund</i>
	Nordea IV Capital Guaranteed 100	Termination	2.12.2013	
	Nordea Private Banking Focus Finland has merged with Nordea Pro Finland Fund	Domestic merger	5.9.2014	<i>Nordea Pro Finland Fund</i>
	Institutionella Aktiefonden Europa (Sweden) has merged with Nordea Pro European Fund	Cross-border merger	5.9.2014	<i>Nordea Pro European Fund</i>
	Nordea Europafond (Sweden) and Nordea Selekt Europa (Sweden) have merged with Nordea Europe Fund	Cross-border merger	6.9.2014	<i>Nordea Europe Fund</i>
	Institutionella Räntefonden korta placeringar (Sweden) has merged with Nordea Swedish Institutional Short Duration Bond	Cross-border merger	10.10.2014	<i>Nordea Swedish Institutional Short Duration Bond Fund</i>
	Non-UCITS Fund Nordea Capital Guaranteed 100 has merged with Nordea Moderate Yield Fund	Domestic merger	2.12.2014	<i>Nordea Moderate Yield Fund</i>
	Non-UCITS Fund Nordea Finnish 130/30 Equity has merged with Nordea Finland Fund	Domestic merger	20.3.2015	<i>Nordea Finland Fund</i>
	Nordea Short-Term Money Market Fund	Name change	11.5.2015	<i>Nordea Euro Liquidity</i>
	Nordea II Capital Guaranteed 100	Termination	1.12.2015	
	Nordea Capital Protection 75 has merged with Nordea Savings 10 Fund	Domestic merger	6.2.2016	<i>Nordea Savings 10 Fund</i>
	Nordea Pro Finland unit serie B has merged with Nordea Pro Finland unite series C and I	Merger	13.7.2016	<i>Nordea Pro Finland unite series C and I</i>
	Nordea Nordenfonden (Sweden) has merged with Nordea Nordic Fund	Cross-border merger	23.9.2016	<i>Nordea Nordic Fund</i>
	Nordea Global Emerging Markets Equities UCITS ETF Fund and Nordea Stable Equities UCITS ETF Fund	Termination	5.10.2016	

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Nordea III Capital Guaranteed 100	Termination	1.12.2016	
Nordea Plan Conservative Fund	Name change	28.10.2017	<i>Nordea Plan Defensive Fund</i>
Nordea Plan Defensive Fund	Name change	1.11.2017	<i>Nordea Defensive Fund</i>
Nordea European New Frontiers Fund	Name change	27.11.2017	<i>Nordea Global Frontier Markets Fund</i>
Nordea Private Banking Focus Fixed Income Fund	Name change	19.2.2018	<i>Nordea Focus Fixed Income Fund</i>
Nordea Private Banking Equity Core Fund	Name change	19.2.2018	<i>Nordea Equity Core Fund</i>
Nordea Private Banking Equity Opportunities Fund	Name change	19.2.2018	<i>Nordea Equity Opportunities Fund</i>
Nordea Private Banking Fixed Income Credit Opportunities Fund	Name change	19.2.2018	<i>Nordea Fixed Income Credit Opportunities Fund</i>
Non-UCITS Nordea Private Banking Focus Nordic has merged with Nordea Nordic Fund	Domestic merger	13.4.2018	<i>Nordea Nordic Fund</i>
Non-UCITS Nordea Equity Portfolio has merged with Nordea World Fund	Domestic merger	13.4.2018	<i>Nordea World Fund</i>
Nordea Finnish Index Fund, Nordea European Index Fund and Nordea Global Index Fund	Name change	15.8.2018	<i>Nordea Finnish Passive Fund, Nordea European Passive Fund, Nordea Global Passive Fund</i>
Nordea Latinamerikafond (Sweden) has merged with Nordea Emerging Market Equity Fund	Cross-border merger	9.11.2018	<i>Nordea Emerging Market Equity Fund</i>
Nordea Euro Liquidity Fund	Name change	11.12.2018	<i>Nordea Euro Short Term Bond Fund</i>
Nordea Private Banking Kort Obligasjon Fund			<i>Nordea Private Banking FRN Fund</i>
Nordea Private Banking Likviditet Fund			<i>Nordea Private Banking Kort Obligasjon Pluss Fund</i>
Nordea Finnish Small Cap Fund Nordea Nordic Small Cap Fund	Domestic merger	14.12.2018	<i>Nordea Nordic Small Cap Fund</i>
Nora Fund Five (NOK)	Termination	14.6.2019	
Nordea Premium Asset Management Global Balanced Fund	Name change	12.11.2019	<i>Nordea Sustainable Selection Balanced Fund, Nordea Sustainable Selection Growth Fund, Nordea Sustainable Selection Moderate Fund</i>
Nordea Premium Asset Management Global Growth Fund			
Nordea Premium Asset Management Global Moderate Fund			
Nordea Europe Fund	Name change	24.2.2020	<i>Nordea European Stars Fund</i>
Nordea Far East Fund	Name change	11.3.2020	<i>Nordea Asian Stars Fund</i>
Nordea Kreditt Pluss Etisk Fund	Name change	20.3.2020	<i>Nordea Kreditt Stars Fund</i>
Nordea Norsk Kredittobligasjon Fund	Name change	20.3.2020	<i>Nordea Obligasjon Stars Fund</i>
Nordea Pro European Fund Nordea European Stars Fund	Domestic merger	27.3.2020	<i>Nordea European Stars Fund</i>
Nordea Euro Short Term Bond Fund Nordea Conservative Yield Fund	Conversion into a feeder fund and name change	29.6.2020	<i>Nordea Conservative Yield Fund</i>
Nordea North America Fund	Name change	1.7.2020	<i>Nordea North American Dividend Fund</i>
Nordea Global Frontier Markets Fund	Termination	28.8.2020	
Nora Fund One (EUR)			
Nora Fund One (NOK)			
Nora Fund One (SEK)			
Nora Fund One Master	Termination	3.12.2020	
Nordea Finland Fund	Name change	13.4.2021	<i>Nordea Finnish Stars Fund</i>
Nordea Savings 10 Fund	Name change	13.4.2021	<i>Nordea Savings 15 Fund</i>
Nordea Savings 25 Fund	Name change	13.4.2021	<i>Nordea Savings 30 Fund</i>
Nordea Equity Core Fund	Name change	29.7.2021	<i>Nordea Global Equity Allocation Fund</i>
Nordea AAA Government Bond Fund Nordea Euro Bond Fund	Domestic merger	26.11.2021	<i>Nordea Euro Bond Fund</i>
Nordea Russia Fund	The first payment after the suspension of trading	31.8.2022	
Non-UCITS Swedish Ideas Equity Fund Swedish Ideas Equity Fund	Fund type change	1.6.2023	<i>Swedish Ideas Equity Fund</i>
Nordea Eastern Europe Fund	Partial division	29.9.2023	<i>Nordea Eastern Europe Fund and Nordea Emerging Europe Fund</i>
Nordea Russia Fund	The second payment after	10.10.2023	

## NORDEA FUNDS LTD

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Nora Fund Two (NOK) Nora Fund Two (EUR)	the suspension of trading	Termination	25.3.2024	
The feeder fund Nordea Private Banking Kort Obligasjon Pluss Fund registered in Finland has been merged with Nordea Kort Obligasjon Pluss Fund (receiving fund) registered in Finland. Correspondingly, the Nordea Kort Obligasjon Pluss master fund registered in Norway has also been merged with the same receiving fund.	Domestic merger		17.5.2024	Nordea Kort Obligasjon Pluss Fund registered in Finland
The feeder fund Nordea Private Banking Obligasjon Fund registered in Finland. Correspondingly, the Nordea Obligasjon III master fund registered in Norway has also been merged with the same receiving fund.	Domestic merger		17.5.2024	Nordea Obligasjon III Fund registered in Finland
Nordea Asian Stars Fund	Cross-border merger		26.6.2024	Nordea 1 – Asian Stars Equity Fund*
The feeder fund Nordea Private Banking FRN Fund registered in Finland has been merged with Nordea FRN Pensjon Fund (receiving fund) registered in Finland. Correspondingly, the Nordea FRN Pensjon master fund registered in Norway has also been merged with the same receiving fund.	Domestic merger		20.9.2024	Nordea FRN Pensjon Fund registered in Finland

\*) The fund is managed by Nordea Investment Funds S.A.

The prospectus of funds registered in Norway and managed by Nordea Funds Ltd is available at [www.nordea.no/investmentfunds](http://www.nordea.no/investmentfunds)

The prospectus of funds registered in Sweden and managed by Nordea Funds Ltd is available at [www.nordea.se/fonder](http://www.nordea.se/fonder)

The prospectus of funds registered in Denmark and managed by Nordea Funds Ltd is available at [www.nordeainvest.dk](http://www.nordeainvest.dk)

#### Errors possibly occurred in the net asset value (NAV) calculation of the funds

When determining the materiality of an error in the NAV calculation, the below-mentioned principles are applied. A calculation error is considered material when it exceeds a certain limit. In those situations where the limit for material error in the NAV calculation is exceeded, the internal instructions of the Management Company and the instructions given by the Financial Supervisory Authority are applied. The Management Company applies a minimum threshold of 5 euros when compensating for a loss to the unitholders. The funds are divided in four different categories on the basis of the fund-specific annual, VaR-equivalent volatility of the growth unit. Those funds for which volatility over the last calendar year is not available and which have started operations after the year end, have been classified under category 1 (volatility < 0.5).

Volatilities for 2023 used when determining the limits for a material error in the NAV calculation. Published on 19.4.2024.

Category	Volatility	Limit for materiality of NAV calculation errors
1	< 0.5	≥ 0.1
2	≥ 0.5 and < 5	≥ 0.2
3	≥ 5 and < 12	≥ 0.3
4	≥ 12	≥ 0.5

Information about possible errors in the net asset value (NAV) calculations of the funds registered in Finland and managed by Nordea Funds Ltd is available at Nordea Funds Ltd. The table lists the fund-specific limits for a material error as a percentage of the NAV of the fund.

Fund name and limit for a material error	Limit	Fund name and limit for a material error	Limit
<b>Nora-funds</b>		Nordea European Stars Fund	0.5%
Nora Fund Three (EUR)	0.3%	Nordea Finnish Passive Fund	0.5%
Nora Fund Four (EUR)	0.5%	Nordea Finnish Stars Fund	0.5%
Nora Fund Five (EUR)	0.5%	Nordea Fixed Income Credit Opportunity Fund	0.2%
Nora Fund Three (NOK)	0.3%	Nordea Focus Fixed Income Fund	0.2%
Nora Fund Four (NOK)	0.5%	Nordea FRN Kredit Fund <sup>(†)</sup>	0.2%
Nora Fund Two (SEK)	0.3%	Nordea FRN OMF Fund <sup>(†)</sup>	0.2%
Nora Fund Three (SEK)	0.3%	Nordea FRN Pensjon Fund <sup>(†)</sup>	0.2%
Nora Fund Four (SEK)	0.5%	Nordea Global Dividend Fund	0.5%
Nora Fund Five (SEK)	0.5%	Nordea Global Enhanced Fund	0.5%
Nora Fund Two Master	0.3%	Nordea Global Equity Allocation Fund	0.5%
Nora Fund Three Master	0.3%	Nordea Global High Yield Fund	0.3%
Nora Fund Four Master	0.5%	Nordea Global Passive Fund	0.5%
Nora Fund Five Master	0.5%	Nordea Global Statsobligasjon Fund <sup>(†)</sup>	0.2%
<b>Other Nordea funds</b>		Nordea Hållbarhetsfond Obligationer Global Fund	0.2%
Nordea Allokeringfond Fund	0.5%	Nordea India Fund	0.5%
Nordea Avkastning Fund <sup>(†)</sup>	0.5%	Nordea Innovation Stars Fund	0.5%
Nordea Bærekraftige Obligasjoner Global Fund	0.2%	Nordea Institutionella Småbolagsfonden Sverige Fund	0.5%
Nordea China Fund	0.5%	Nordea Japan Fund	0.5%
Nordea Conservative Yield Fund	0.1%	Nordea Kort Obligasjon Fund <sup>(*)</sup>	0.1%
Nordea Corporate Bond Fund	0.2%	Nordea Kort Obligasjon Pluss Fund <sup>(†)</sup>	0.1%
Nordea Defensive Fund	0.2%	Nordea Kredit Stars Fund	0.1%
Nordea Discretionary Asset Allocation Fund	0.5%	Nordea Moderate Yield Fund	0.1%
Nordea Discretionary Corporate Credit Fund	0.3%	Nordea Navigo <sup>*</sup>	0.3%
Nordea Discretionary Global Equity Fund	0.5%	Nordea Nordic Covered Bond Fund	0.1%
Nordea Discretionary Swedish Equity Fund	0.5%	Nordea Nordic Fund	0.5%
Nordea Emerging Europe Fund	0.5%	Nordea Nordic Small Cap Fund	0.5%
Nordea Emerging Market Bond Fund	0.3%	Nordea Norge Pluss Fund <sup>(†)</sup>	0.5%
Nordea Emerging Market Equities Fund	0.5%	Nordea Norge Verdi Fund <sup>(*)</sup>	0.5%
Nordea Equity Opportunities Fund	0.5%	Nordea North American Dividend Fund	0.5%
Nordea Euro Bond Fund	0.3%	Nordea North American Enhanced Fund	0.5%
Nordea Euro Medium Term Bond Fund	0.1%	Nordea Norwegian Passive Fund <sup>(†)</sup>	0.5%
Nordea European High Yield Fund	0.3%	Nordea Norwegian Stars Fund	0.5%
Nordea European Passive Fund	0.5%	Nordea Obligasjon II Fund <sup>(†)</sup>	0.2%
Nordea European Smaller Companies Fund	0.5%	Nordea Obligasjon III Fund <sup>(†)</sup>	0.2%
		Nordea Obligasjon Pluss Fund <sup>(†)</sup>	0.2%
		Nordea Plan Balansert Fund <sup>(†)</sup>	0.3%
		Nordea Plan Konservativ Fund <sup>(†)</sup>	0.2%
		Nordea Plan Moderat Fund <sup>(†)</sup>	0.2%
		Nordea Plan Offensiv Fund <sup>(†)</sup>	0.5%
		Nordea Plan Vektororientert Fund <sup>(†)</sup>	0.5%
		Nordea Premium AM Balanced Fund	0.3%
		Nordea Premium AM Conservative Fund	0.3%
		Nordea Premium AM Growth Fund	0.5%
		Nordea Premium AM Moderate Fund	0.3%
		Nordea Private Banking FRN Fund	0.1%
		Nordea Pro Euro Bond Fund	0.5%
		Nordea Pro Finland Fund	0.5%
		Nordea Pro Stable Return Fund	0.5%
		Nordea Savings 15 Fund	0.3%
		Nordea Savings 30 Fund	0.3%
		Nordea Savings 50 Fund	0.3%
		Nordea Savings 75 Fund	0.5%
		Nordea Savings Fixed Income Fund	0.2%
		Nordea Stabile Aksjer Global Fund <sup>(†)</sup>	0.5%
		Nordea Stabile Aksjer Global Valutasikret Fund <sup>(†)</sup>	0.5%
		Nordea Stable Return Fund	0.3%
		Nordea Stratega 90 Fund	0.5%
		Nordea Stratega Fixed Income Fund	0.2%
		Nordea Sustainable Equities Global Fund	0.5%
		Nordea Sustainable Fixed Income Global Fund	0.2%
		Nordea Sustainable Selection Balanced Fund	0.3%
		Nordea Sustainable Selection Balanced Fund (NOK)	0.3%
		Nordea Sustainable Selection Balanced Fund (SEK)	0.3%
		Nordea Sustainable Selection Growth Fund	0.5%
		Nordea Sustainable Selection Growth Fund (NOK)	0.5%
		Nordea Sustainable Selection Growth Fund (SEK)	0.5%
		Nordea Sustainable Selection Moderate Fund	0.3%
		Nordea Sustainable Selection Moderate Fund (NOK)	0.3%
		Nordea Sustainable Selection Moderate Fund (SEK)	0.3%
		Nordea Sustainable Selection Return Fund	0.5%
		Nordea Sustainable Selection Return Fund (NOK)	0.5%
		Nordea Sustainable Selection Return Fund (SEK)	0.5%
		Nordea SWE Inflation Linked Bond Fund	0.2%
		Nordea Swedish Ideas Equity Fund	0.5%
		Nordea Swedish Institutional Short Duration Bond Fund	0.1%

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Nordea Tactical Asset Allocation Fund	0.5%	Nordea World Passive Fund	0.5%	* Non-UCITS fund
Nordea World Fund	0.5%	Nordea Yield Fund	0.2%	

<sup>1)</sup> Since the fund started operating after the year end, the previous volatility of the merging fund has been used in the classification of the fund, as the merger does not affect the classification of the fund.

#### MSCI indices – disclaimer

This Fund (Nordea European Passive Fund, Nordea Global Passive Fund, Nordea World Passive Fund) is not sponsored, endorsed, sold or promoted by MSCI INC. (“MSCI”), any of its affiliates, any of its information providers or any other third party involved in, or related to, compiling, computing or creating any MSCI Index (Collectively, The (“MSCI PARTIES”). The MSCI Indexes are the exclusive property of MSCI. MSCI and the MSCI Index names are service mark(s) of MSCI or its affiliates and have been licensed for use for certain purposes by (licensee). None of the MSCI Parties makes any representation or warranty, express or implied, to the issuer or owners of this fund or any other person or entity regarding the advisability of investing in funds generally or in this Fund particularly or the ability of any MSCI Index to track corresponding stock market performance. MSCI or its affiliates are the licensors or certain trademarks, service marks and trade names and of the MSCI Indexes which are determined, composed and calculated by MSCI without regard to this fund or the issuer or owners of this Fund or any other person or entity. None of the MSCI Parties has any obligation to take the needs of the issuer or owners of this Fund or any other person or entity into consideration in determining, composing or calculating the MSCI Indexes. None of the MSCI Parties is responsible for or has participated in the determination of the timing of, prices at, or quantities of this Fund to be issued or in the determination or calculation of the equation by or the consideration into which this Fund is redeemable. Further, none of the MSCI Parties has any obligation or liability to the issuer or owners of this Fund or any other person or entity in connection with the administration, marketing or offering of this Fund.

Although MSCI shall obtain information for inclusion in or for use in the calculation of the MSCI Indexes from sources that MSCI considers reliable, none of the MSCI Parties warrants or guarantees the originality, accuracy and/or the completeness of any MSCI Index or any data included therein. None of the MSCI Parties makes any warranty, express or implied, as to results to be obtained by the issuer of the fund, owners of the fund, or any other person or entity, from the use of any MSCI Index or any data included therein. None of the MSCI Parties shall have any liability for any errors, omissions or interruptions of or in connection with any MSCI Index or any data included therein. Further, none of the MSCI Parties makes any express or implied warranties of any kind, and the MSCI Parties hereby expressly disclaim all warranties of merchantability and fitness for a particular purpose, with respect to each MSCI Index and any data included therein. Without limiting any of the foregoing, in no event shall any of the MSCI Parties have any liability for any direct, indirect, special, punitive, consequential or any other damages (including lost profits) even if notified of the possibility of such damages.

#### Nordea Finnish Passive Fund – disclaimer

The fund is tracking the OMX Helsinki Benchmark CAP GTR Index. However, the fund is not sponsored, endorsed or promoted by The NASDAQ OMX Group, Inc. or its affiliates (NASDAQ OMX, with its affiliates, are referred to as the “Corporations” in the following). The Corporations have not passed on the legality or suitability of, or the accuracy or adequacy of descriptions and disclosures relating to the fund. The Corporations make no representation or warranty, express or implied to the investors of the fund or any member of the public regarding the advisability of investing in securities generally or in the fund particularly, or the ability of the OMX Helsinki Benchmark CAP GTR Index to track general stock market performance. The Corporations’ only relationship to Nordea Funds Oy is in the licensing of the NASDAQ®, OMX®, NASDAQ OMX®, and OMX Helsinki Benchmark CAP GTR Index registered trademarks and certain trade names of the Corporation and the use of the OMX Helsinki Benchmark CAP GTR Index which is determined, composed and calculated by NASDAQ OMX without regard to Nordea Fund Oy’s funds. NASDAQ OMX has no obligation to take the needs of Nordea Fund Oy or the investors of the fund into consideration in determining, composing or calculating the OMX Helsinki Benchmark CAP GTR Index. The Corporations are not responsible for and have not participated in the determination of the timing or prices of the fund. The Corporations have no liability in connection with the administration, marketing or trading of the fund.

**The Corporations do not guarantee the accuracy and/or uninterrupted calculation of the OMX Helsinki Benchmark CAP GTR Index or any data included therein. The Corporations make no warranty, express or implied, as to results to be obtained by Nordea Funds Oy or the investors of the fund, or any other person or entity from the use of the OMX Helsinki Benchmark CAP GTR Index or any data included therein. The Corporations make no express or implied warranties, and expressly disclaim all warranties of merchantability or fitness for a particular purpose or use with respect to the OMX Helsinki Benchmark CAP GTR Index or any data included therein. Without limiting any of the foregoing, in no event shall the Corporations have any liability for any lost profits or special, incidental, punitive, indirect, or consequential damages, even if notified of the possibility of such damages.**

#### Nordea Norwegian Passive Fund – disclaimer

The fund is tracking the OBX ESG ex Oil and Gas Index. “OBX” is registered trademark of Euronext N.V. or its subsidiaries. Euronext N.V. or its subsidiaries holds all (intellectual) proprietary rights with respect to the Index. Euronext N.V. or its subsidiaries do not sponsor, endorse or have any other involvement in the issue and offering of the product. Euronext N.V. and its subsidiaries disclaim any liability for any inaccuracy in the data on which the Index is based, for any mistakes, errors, or omissions in the calculation and/or dissemination of the Index, or for the manner in which it is applied in connection with the issue and offering thereof.

#### Additional information for investors in Denmark

The following information is intended for investors subscribing for shares of the Funds in Denmark.

##### Taxation of Danish investors

The Fund Company is an investment company in accordance with section 19 of the Danish Act on taxation of gains on equities. Investors’ gains and losses are thus taxed on an annual basis according to the market-value principle. The market-value principle means that investors are subject to annual taxation on an on-going basis as the value of the shares is to be computed at the end of each year in such a way that gains and losses relative to the value at the end of the last income year – or relative to the purchase price if the shares have been purchased in the course of the income year – are to be included in the computation of the value at the end of the current year. In case of sale or redemption the computation is made relative to the value at the end of the most recent income year or the purchase price if the shares have been bought in the same year.

For natural persons gains and losses are included in the capital income, for companies in the company income and for institutional investors in the tax base according to the Danish Act on taxation of pensions.

Persons using the Danish scheme for tax treatment of enterprises may use assets comprised by this scheme to purchase shares. Pension assets may also be used to purchase shares.

#### Important information for investors residing in the US

Residents of or entities operating in the US are not permitted to subscribe for Nordea funds.

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**Important information for US Persons**

The services and products of Nordea Funds Ltd may not be directly or indirectly offered or sold in the United States of America. US Persons may not subscribe for units in the investment funds managed by Nordea Funds Ltd in any of the Nordic countries where the management company and its branches are located.

The term US Person, for the purpose of this prospectus, means "U.S. Person" as defined by Rule 902 of Regulation S, and does not include any "Non-United States person" as used in Rule 4.7 under the U.S. Commodity Exchange Act, as amended.

"U.S. Person" as defined by Rule 902 of Regulation S includes, but is not limited to: (i) any natural person resident in the United States of America; (ii) any partnership or corporation organised or incorporated under the laws of the United States of America; (iii) any estate of which any executor or administrator is a US Person; (iv) any trust of which any trustee is a US Person; (v) any agency or branch of a non-US entity located in the United States of America; (vi) any non-discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary for the benefit or account of a US Person; (vii) any discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary organised, incorporated, or (if an individual) resident in the United States of America; and (viii) any partnership or corporation if: (1) organised or incorporated under the laws of any foreign jurisdiction; and (2) formed by a US person principally for the purpose of investing in securities not registered under the Securities Act, unless it is organised or incorporated, and owned, by accredited investors (as defined under Rule 501a under the Securities Act) who are not natural persons, estates or trusts.

**Important information for persons and institutional investors intending to subscribe for units in the Nordea India Fund**

Due to Indian legislation, no single investor may hold more than 10% of the NAV of the Fund. Neither may non-resident Indians (means a person resident outside India who is a citizen of India or a person of Indian origin specified in the applicable law) hold more than 60% of the NAV of the Fund on an aggregate level.

*The Nordea funds' Key Information Documents (KIDs), fund prospectus, rules, annual and semi-annual reports are available free of charge at Nordea branches, on the Internet at [www.nordea.fi/funds](http://www.nordea.fi/funds) and at Nordea Funds Ltd.*

# **PROSPECTUS**

**Nordea Funds Ltd**

## **SFDR appendix I**

**This is an appendix to the prospectus with sustainability-related information in accordance with article 6 of the Sustainable Finance Disclosure Regulation (SFDR), EU regulation 2019/2088 on sustainability information in the financial services sector.**

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### Article 6 funds

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*The Key Information Documents (KIDs), fund prospectus, rules, annual and semi-annual reports of the Nordea funds registered in Finland are available free of charge at Nordea branches, on the Internet at [www.nordea.fi/funds](http://www.nordea.fi/funds) and at Nordea Funds Ltd.*

**Article 6 funds**

- Nora Fund Three (EUR)
- Nora Fund Four (EUR)
- Nora Fund Five (EUR)
- Nora Fund Three (NOK)
- Nora Fund Four (NOK)
- Nora Fund Two (SEK)
- Nora Fund Three (SEK)
- Nora Fund Four (SEK)
- Nora Fund Five (SEK)
- Nora Fund Two Master
- Nora Fund Three Master
- Nora Fund Four Master
- Nora Fund Five Master
- Nordea Allokeringfond Fund
- Nordea Conservative Yield Fund
- Nordea Discretionary Asset Allocation Fund
- Nordea Discretionary Corporate Credit Fund
- Nordea Discretionary Global Equity Fund
- Nordea Emerging Europe Fund
- Nordea European Passive Fund
- Nordea Finnish Passive Fund
- Nordea Global Enhanced Fund
- Nordea Global Passive Fund
- Nordea Navigo
- Nordea North American Enhanced Fund
- Nordea Premium Asset Management Balanced Fund
- Nordea Premium Asset Management Conservative Fund
- Nordea Premium Asset Management Growth Fund
- Nordea Premium Asset Management Moderate Fund
- Nordea Savings 15 Fund
- Nordea Savings 30 Fund
- Nordea Savings 50 Fund
- Nordea Savings 75 Fund
- Nordea Savings Fixed Income Fund
- Nordea Tactical Asset Allocation Fund

**Sustainability-related information**

*Sustainability-related information in accordance with article 6 of the Sustainable Finance Disclosure Regulation (SFDR), EU regulation 2019/2088 on sustainability information in the financial services sector.*

The funds listed above are classified as article 6 funds in accordance with the SFDR regulation.

**Sustainability risks****a. Integration of sustainability risks in the investment decisions**

Sustainability risks are included in the investment decision process together with traditional financial factors, such as risk and valuation metrics, when building and monitoring portfolios.

Exclusions of certain sectors and/or financial instruments from the investable universe are expected to reduce the sustainability risk of the fund. Conversely, such exclusions may increase the concentration risk of the fund which could – seen in isolation – result in higher volatility and a greater risk of loss.

[The Responsible Investment Policy](#) describing the exclusions applied by all the funds mentioned in this prospectus can be found on Nordea Funds' website at [www.nordeafunds.com/downloads](http://www.nordeafunds.com/downloads).

More information on the integration of sustainability risks is available in the prospectus and sections "Risks relating to fund investment" and "Sustainability risk".

**b. Potential impacts of sustainability risks on the return of the fund**

Taking sustainability factors into account in the fund's investment activities is expected to reduce the sustainability risk and thus also the overall risk of the fund's investments. The integration of sustainability risks in the fund's investment decisions is not expected to have a significant impact on the fund's long-term return potential.

Sustainability risk may significantly increase the volatility of the investment return of the fund.

**No sustainable investment objective**

The investments underlying this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

**Adverse sustainability impacts at financial product level**

The funds listed above do not consider principal adverse impacts on sustainability factors.



# PROSPECTUS

**Nordea Funds Ltd**

## **SFDR appendix II**

**This is an appendix to the prospectus with pre-contractual disclosure for financial products in accordance with article 8(1) of the Sustainable Finance Disclosure Regulation (SFDR) EU 2019/2088 on sustainability-related information in the financial services sector as well as in accordance with article 6 of the EU Taxonomy Regulation 2020/852 on the establishment of a framework to facilitate sustainable investment.**

## Contents 16.12.2024

### Article 8 funds

- Nordea Avkastning Fund
- Nordea Bærekraftige Obligasjoner Global Fund
- Nordea China Fund
- Nordea Corporate Bond Fund
- Nordea Defensive Fund
- Nordea Discretionary Swedish Equity Fund
- Nordea Emerging Market Bond Fund
- Nordea Emerging Market Equities Fund
- Nordea Equity Opportunities Fund
- Nordea Euro Bond Fund
- Nordea Euro Medium Term Bond Fund
- Nordea European High Yield Fund
- Nordea European Smaller Companies Fund
- Nordea European Stars Fund\*
- Nordea Finnish Stars Fund\*
- Nordea Fixed Income Credit Opportunities Fund
- Nordea Focus Fixed Income Fund
- Nordea FRN Kreditt Fund
- Nordea FRN OMF Fund
- Nordea FRN Pensjon Fund
- Nordea Global Dividend Fund
- Nordea Global Equity Allocation Fund
- Nordea Global High Yield Fund
- Nordea Global Statsobligasjon Fund
- Nordea Hållbarhetsfond Obligationer Global Fund
- Nordea India Fund
- Nordea Innovation Stars Fund
- Nordea Institutionella Småbolagsfonden Sverige Fund
- Nordea Japan Fund
- Nordea Kort Obligasjon Fund
- Nordea Kort Obligasjon Pluss Fund
- Nordea Kreditt Stars Fund\*
- Nordea Moderate Yield Fund
- Nordea Nordic Covered Bond Fund
- Nordea Nordic Fund
- Nordea Nordic Small Cap Fund
- Nordea Norge Pluss Fund
- Nordea Norge Verdi Fund
- Nordea North American Dividend Fund
- Nordea Norwegian Passive Fund
- Nordea Norwegian Stars Fund\*
- Nordea Obligasjon II Fund
- Nordea Obligasjon III Fund
- Nordea Obligasjon Stars Fund\*
- Nordea Plan Balansert Fund
- Nordea Plan Konservativ Fund
- Nordea Plan Moderat Fund
- Nordea Plan Offensiv Fund
- Nordea Plan Vekstorientert Fund
- Nordea Private Banking Norsk Aksje Portefølje
- Nordea Pro Euro Bond Fund
- Nordea Pro Finland Fund
- Nordea Pro Stable Return Fund
- Nordea Stable Return Fund
- Nordea Stabile Aksjer Global Fund
- Nordea Stabile Aksjer Global Valutasikret Fund
- Nordea Stratega 90 Fund
- Nordea Stratega Fixed Income Fund
- Nordea Sustainable Equities Global Fund
- Nordea Sustainable Fixed Income Global Fund
- Nordea Sustainable Selection Balanced Fund
- Nordea Sustainable Selection Balanced Fund (NOK)
- Nordea Sustainable Selection Balanced Fund (SEK)
- Nordea Sustainable Selection Growth Fund
- Nordea Sustainable Selection Growth Fund (NOK)
- Nordea Sustainable Selection Growth Fund (SEK)
- Nordea Sustainable Selection Moderate Fund
- Nordea Sustainable Selection Moderate Fund (NOK)
- Nordea Sustainable Selection Moderate Fund (SEK)
- Nordea Sustainable Selection Return Fund
- Nordea Sustainable Selection Return Fund (NOK)
- Nordea Sustainable Selection Return Fund (SEK)
- Nordea SWE Inflation Linked Bond Fund
- Nordea Swedish Ideas Equity Fund
- Nordea Swedish Institutional Short Duration Bond Fund
- Nordea World Fund
- Nordea World Passive Fund
- Nordea Yield Fund

### Sustainability-related information

*Sustainability-related information in accordance with article 8 of the Sustainable Finance Disclosure Regulation (SFDR), EU regulation 2019/2088 on sustainability information in the financial services sector.*

The funds listed above promote environmental and social characteristics as per Article 8 of the EU Sustainable Finance Disclosure Regulation (SFDR).

### Sustainability risks

#### a. Integration of sustainability risks in the investment decisions in the funds listed above

Sustainability risks are included in the investment decision process together with traditional financial factors, such as risk and valuation metrics, when building and monitoring portfolios.

Exclusions of certain sectors and/or financial instruments from the investable universe are expected to reduce the sustainability risk of the fund. Conversely, such exclusions may increase the concentration risk of the fund which could – seen in isolation – result in higher volatility and a greater risk of loss.

[The Responsible Investment Policy](#) describing the exclusions applied by all the funds mentioned in this prospectus can be found on Nordea Funds' website at [www.nordeafunds.com/downloads](http://www.nordeafunds.com/downloads).

Funds promoting environmental or social characteristics apply additional fund-specific exclusions. The fund-specific exclusions are described in "The fund-specific sustainability-related website disclosures as per article 10 of the SFDR" at [www.nordeafunds.com](http://www.nordeafunds.com).

Further, as for the Stars funds marked with \* above, an enhanced analysis on Environmental, Social and Governance (ESG) issues is performed on each financial instrument in the fund, and included in the investment decision process together with traditional financial factors, such as risk and valuation metrics, when building and monitoring portfolios. In addition, the sustainability risk profile of these funds benefit further from the application of specific, proprietary ESG analysis.

More information on the integration of sustainability risks is available in the prospectus and sections "Risks relating to fund investment" and "Sustainability risk".

#### b. Potential impacts of sustainability risks on the returns of the fund

Taking sustainability factors into account in the fund's investment activities is expected to reduce the sustainability risk and thus also the overall risk of the fund's investments. The integration of sustainability risks in the fund's investment decisions is not expected to have a significant impact on the fund's long-term return potential.

Sustainability risk may significantly increase the volatility of the investment return of the fund.

## NORDEA FUNDS LTD

Satamaradankatu 5, FI-00020 NORDEA

[www.nordea.fi/rahasto](http://www.nordea.fi/rahasto), [www.nordea.fi/funds](http://www.nordea.fi/funds), tel 0200 70000 (Nordea Customer Service)

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

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

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

**Product name:** Nordea Avkastning Fund

**Legal entity identifier:** 636700Z2TSPBLOFJCG26

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

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

### **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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

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



The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

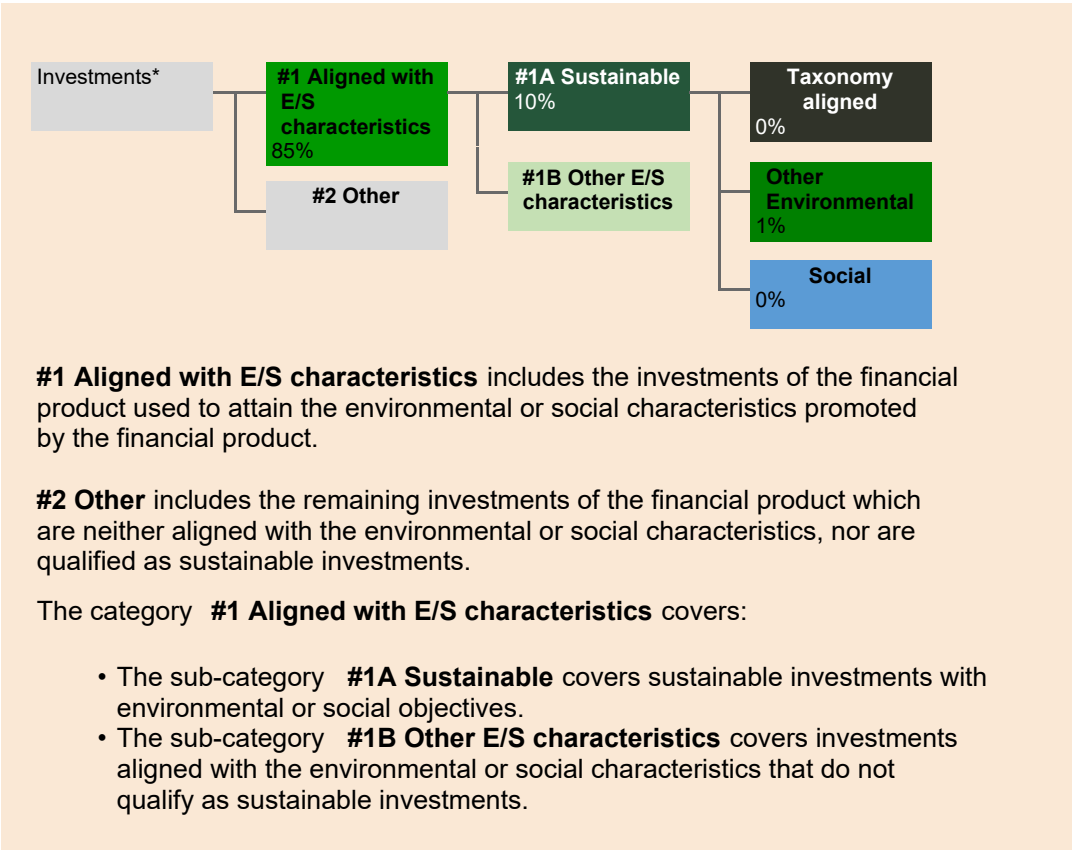
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

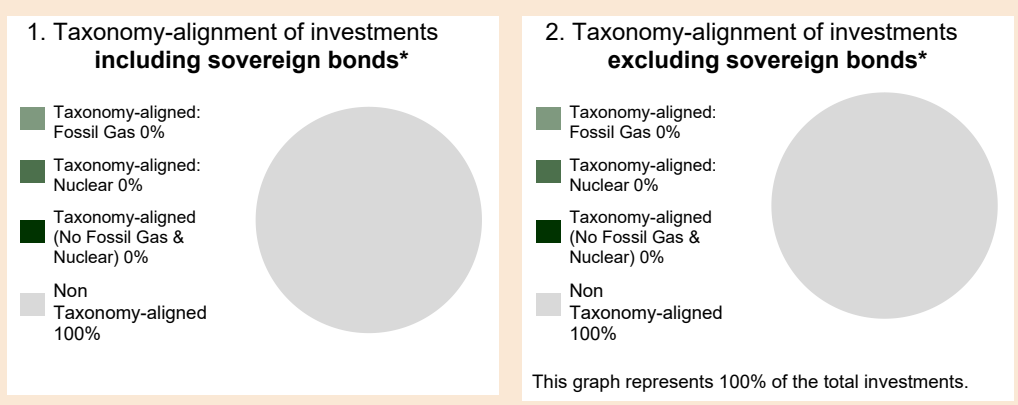
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

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

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

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

**Product name:** Nordea Bærekraftige Obligasjoner Global Fund

**Legal entity identifier:** 549300DRBP2V0PV11U23

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### **Sustainability indicators**

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

### **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.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

#### ● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

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

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

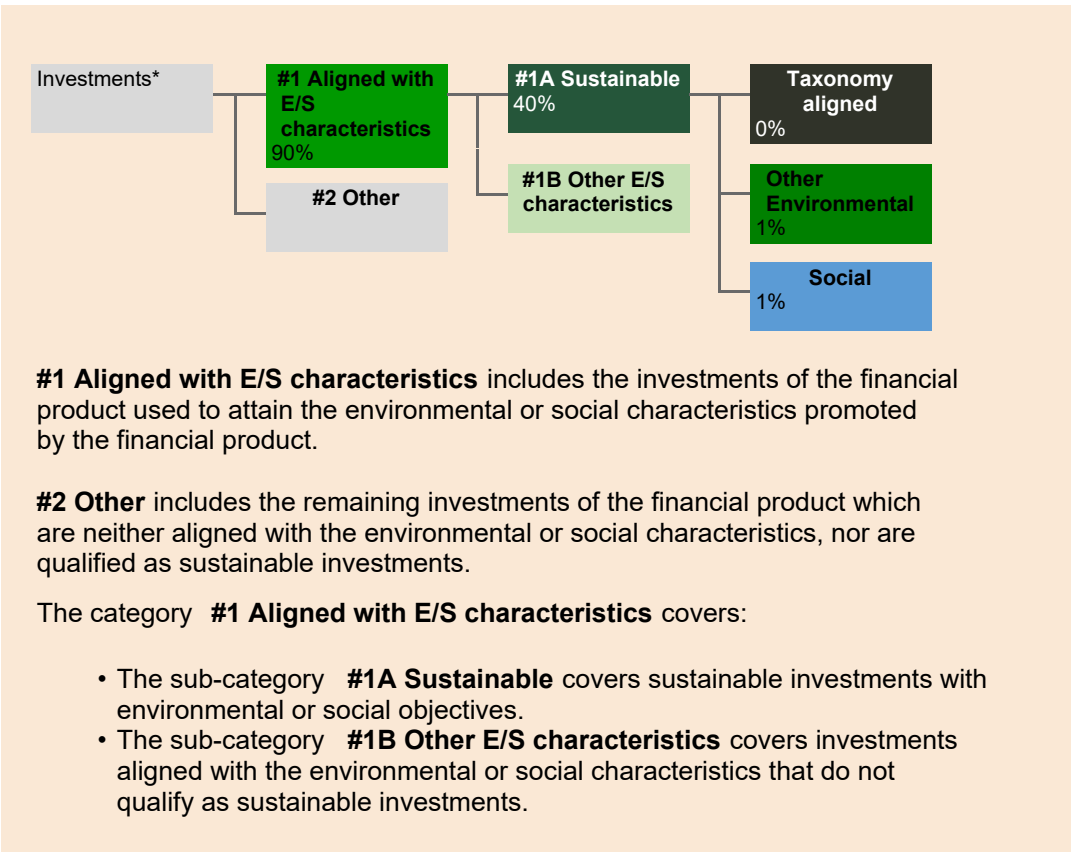
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

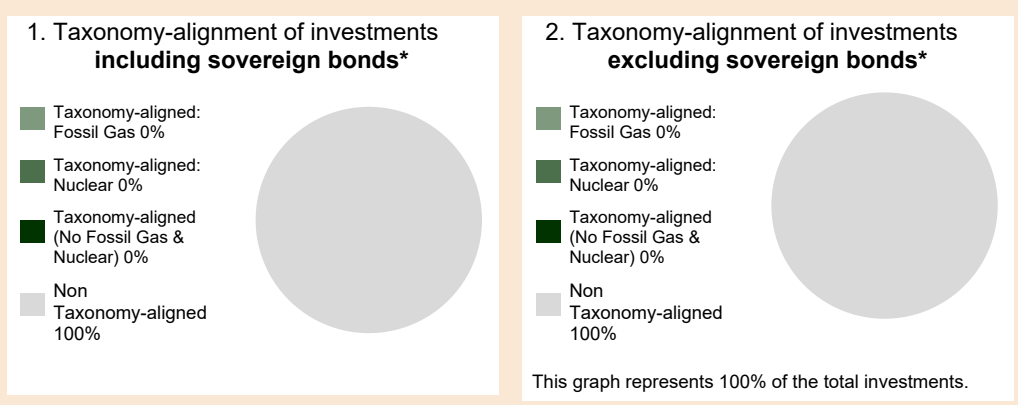
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

- [Responsible Investment Policy](#)
- [Exclusion list](#)
- [Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea China Fund

**Legal entity identifier:** 5493000012TZWJBWLB23

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

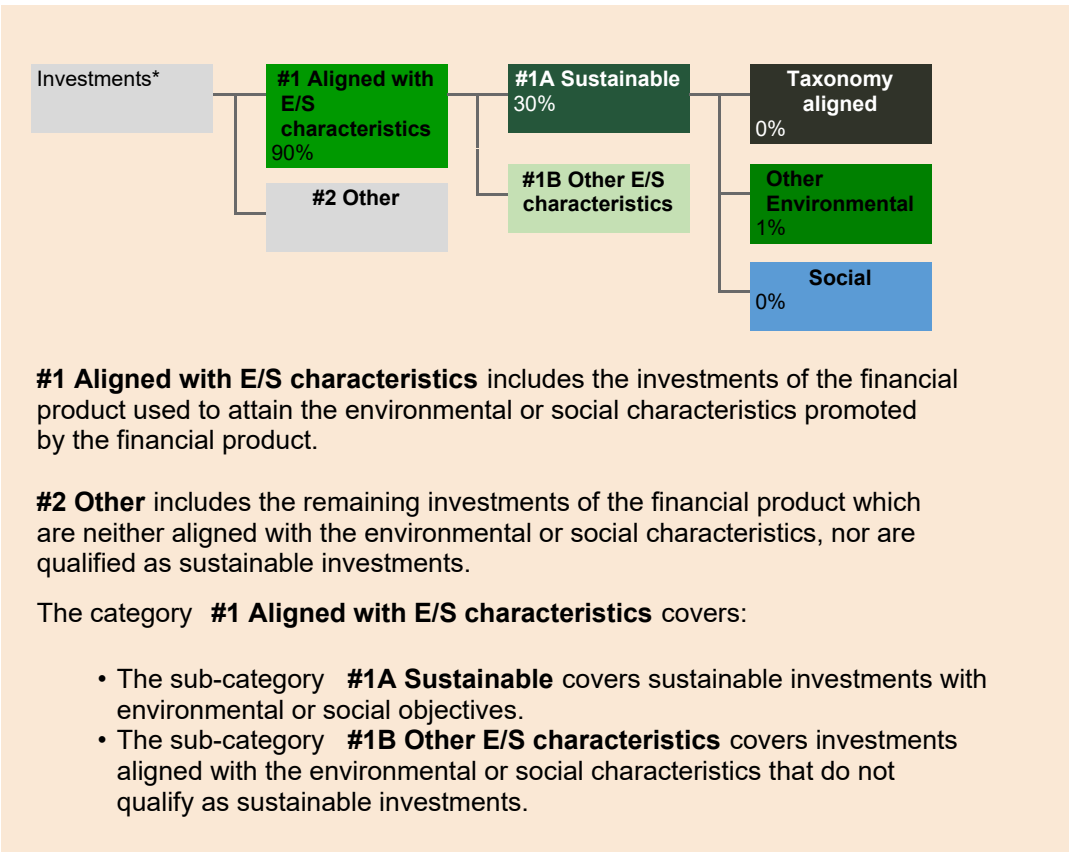
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

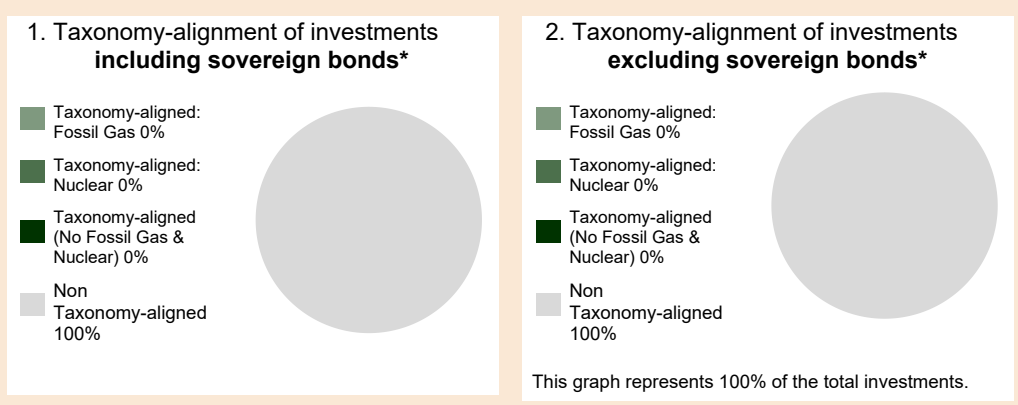
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea Corporate Bond Fund

**Legal entity identifier:** 5493003Q6Y1BFX0JUE45

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

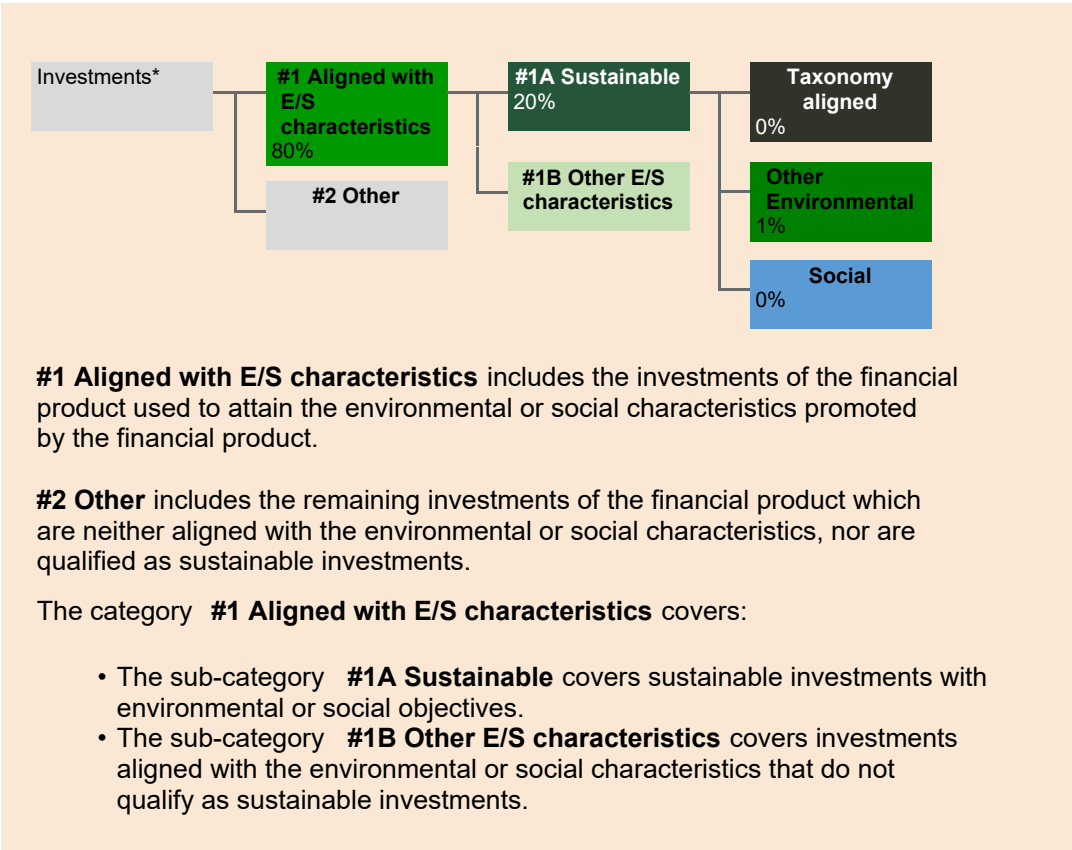
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

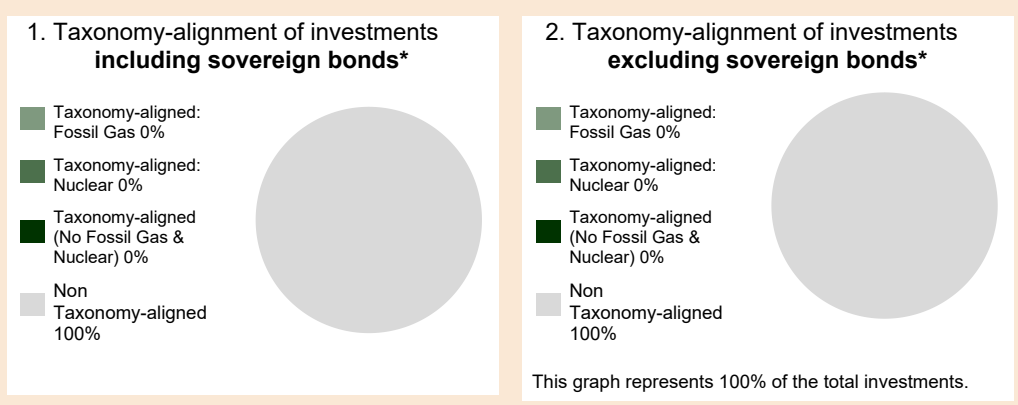
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Defensive Fund

**Legal entity identifier:** 549300VYS5QCUXWX7650

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

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

### **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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

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



The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

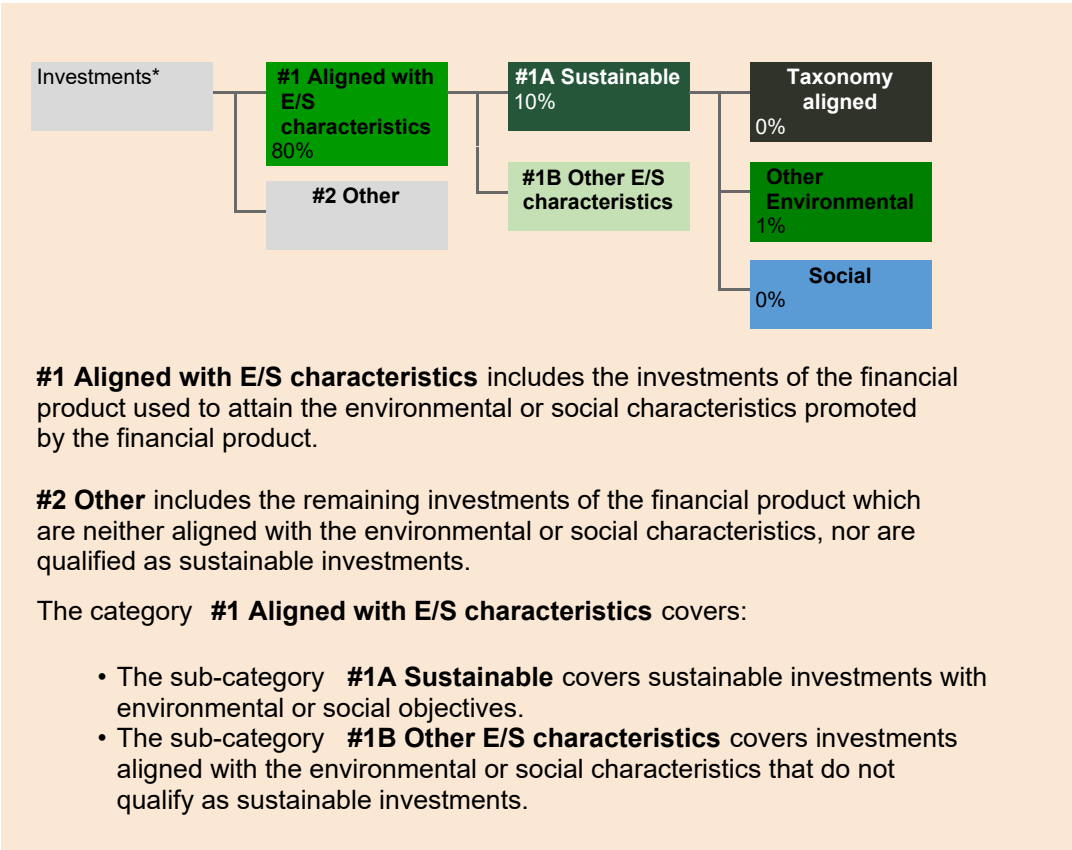
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

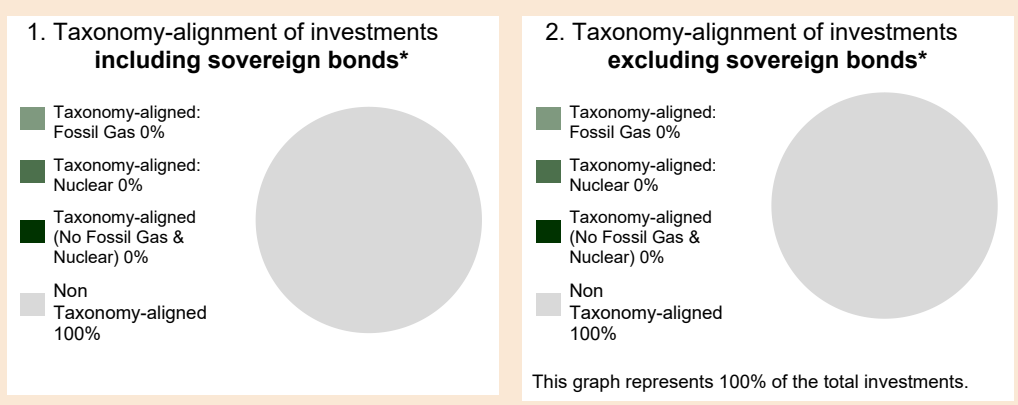
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

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

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

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

**Product name:** Nordea Discretionary Swedish Equity Fund

**Legal entity identifier:** 549300E5MKML6Z5U0690

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
  - 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

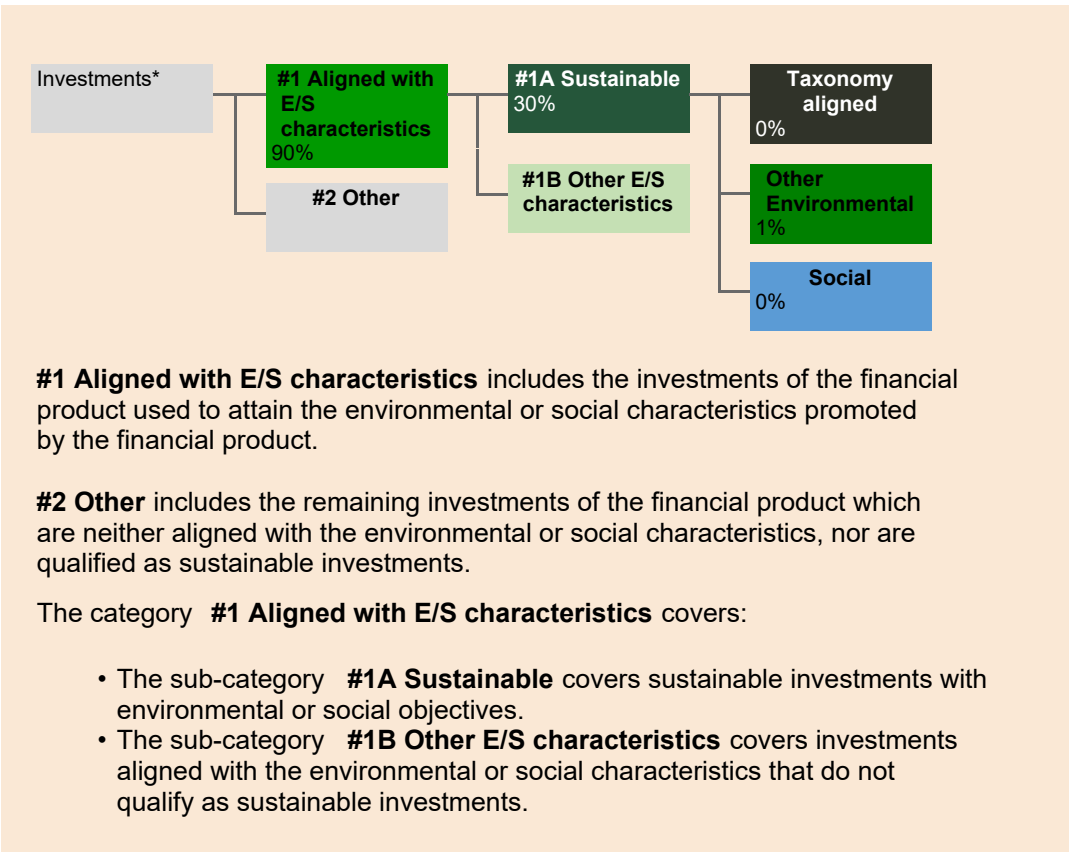
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

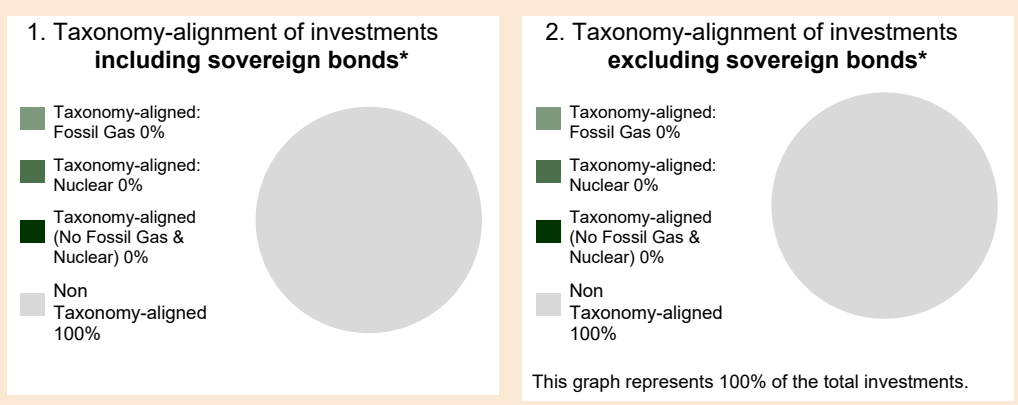
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Emerging Market Bond Fund

**Legal entity identifier:** 549300LB8K057AZBUI46

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalised scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

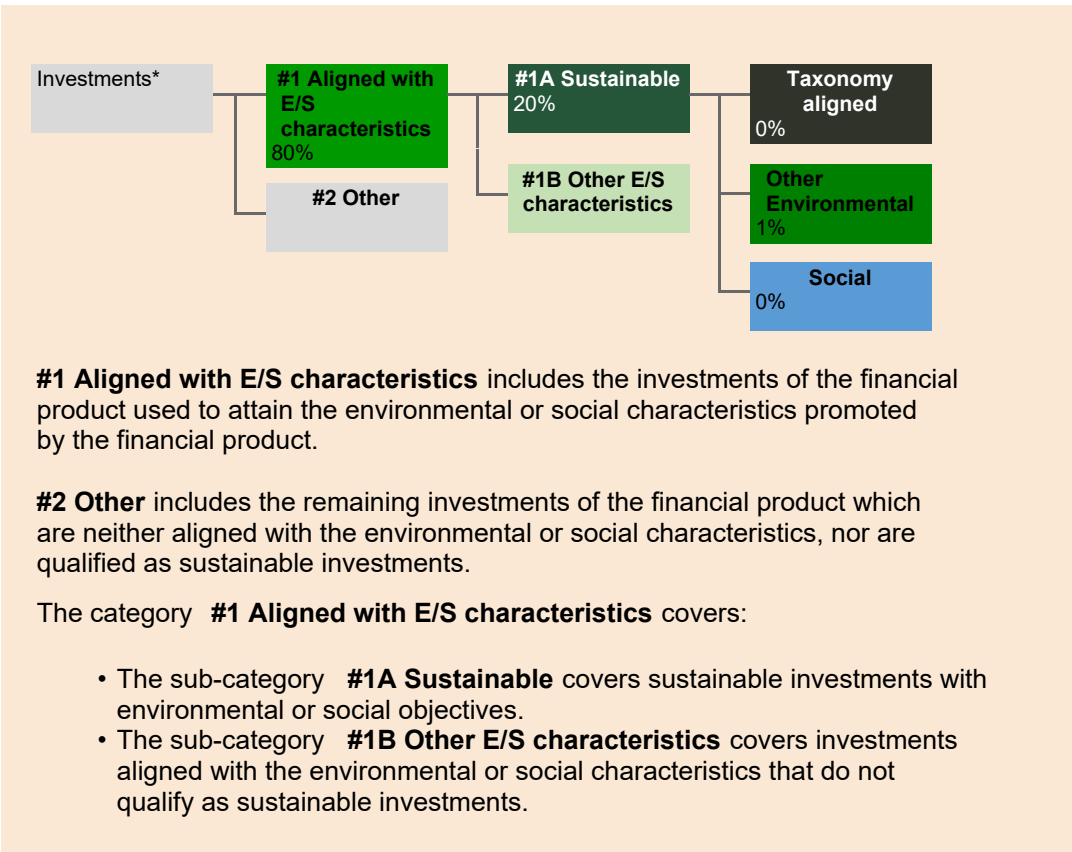
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

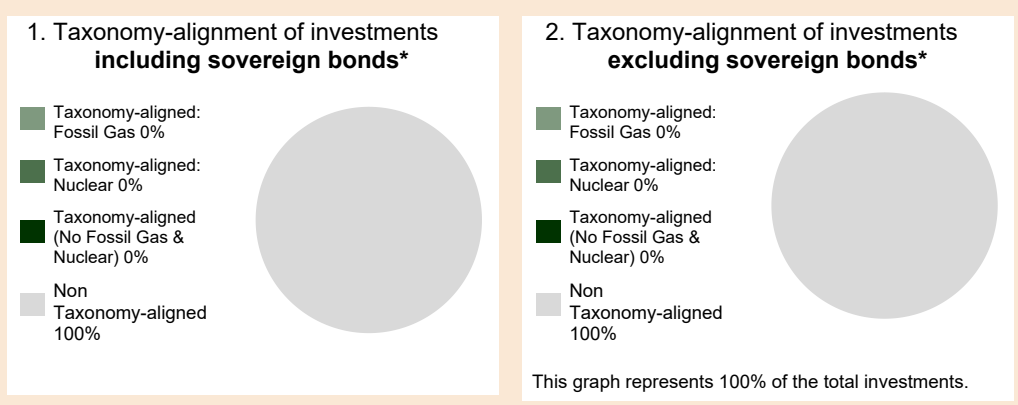
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

- [Responsible Investment Policy](#)
- [Exclusion list](#)
- [Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea Emerging Market Equities Fund

**Legal entity identifier:** 549300VPEUBMIBRX1Y59

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

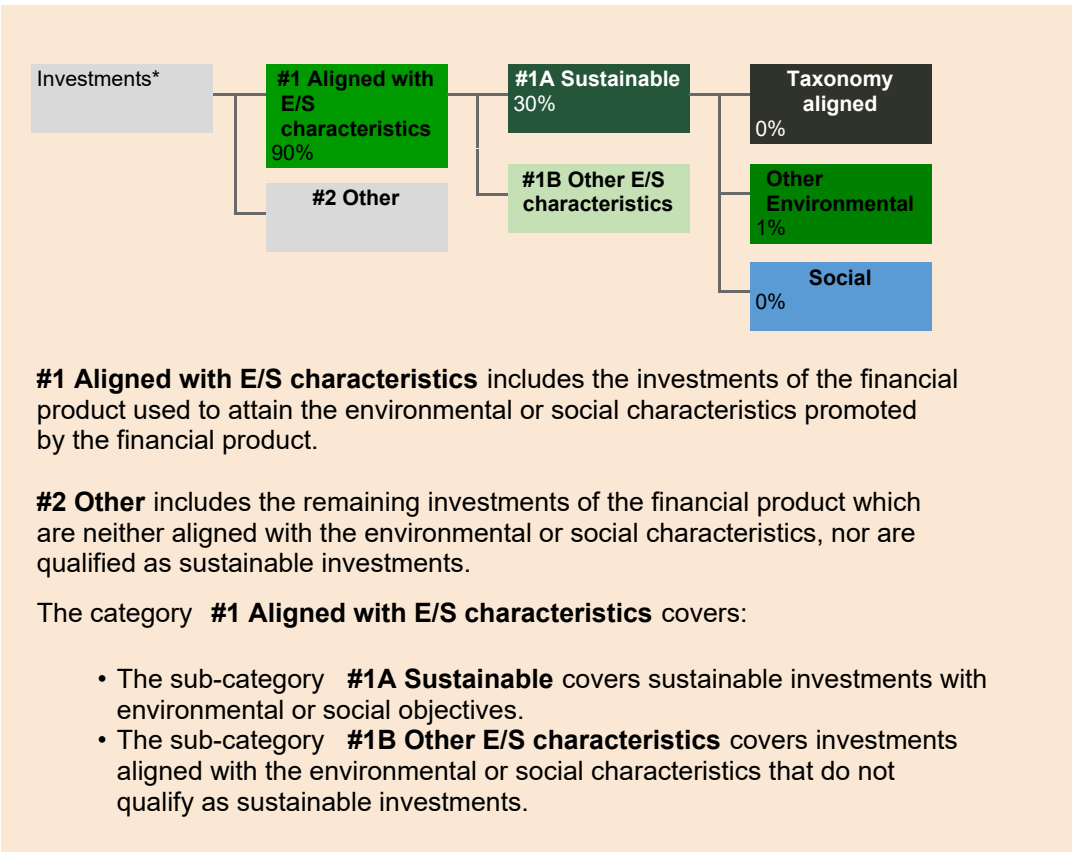
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

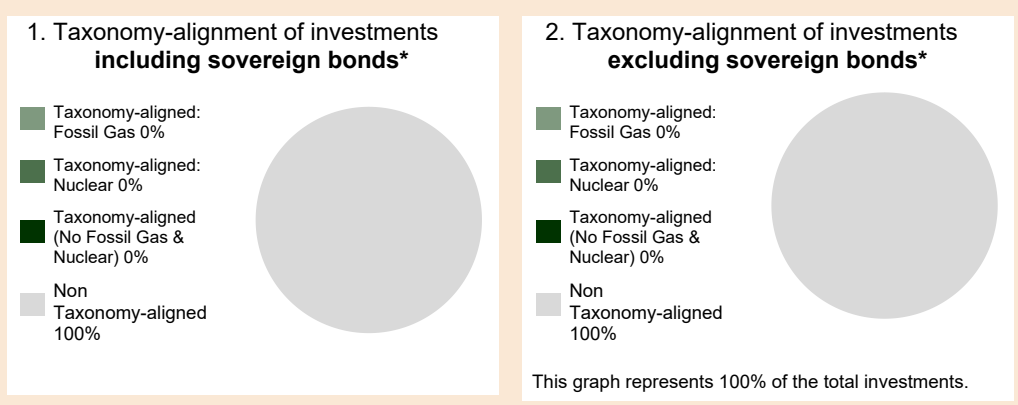
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Equity Opportunities Fund

**Legal entity identifier:** 5493005UW6HUK6IPK402

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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



information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

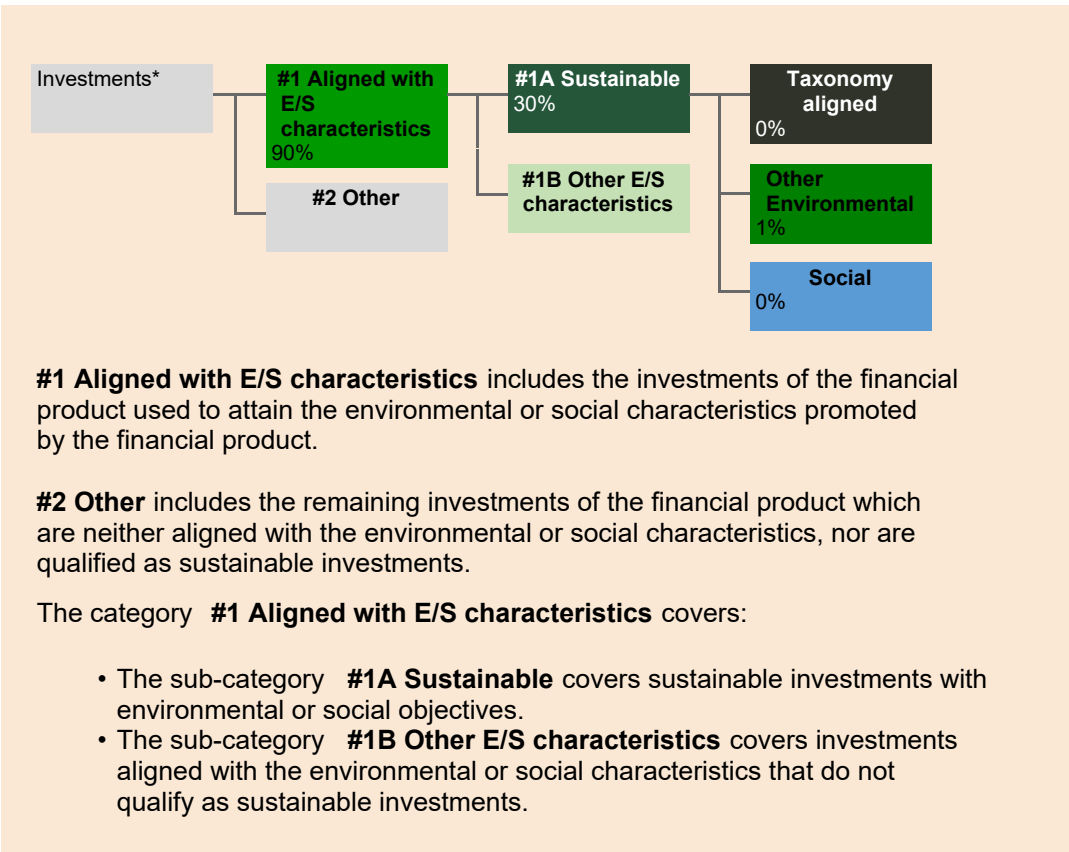
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

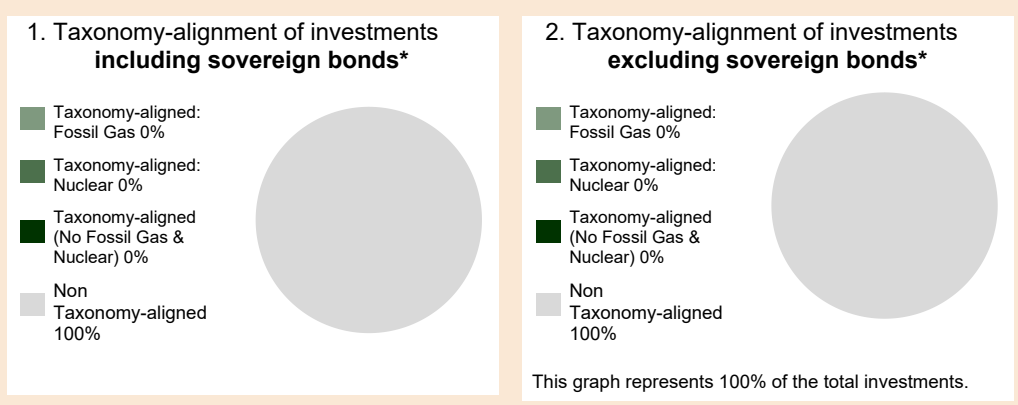
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Euro Bond Fund

**Legal entity identifier:** 549300QLN7702B3SSL35

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

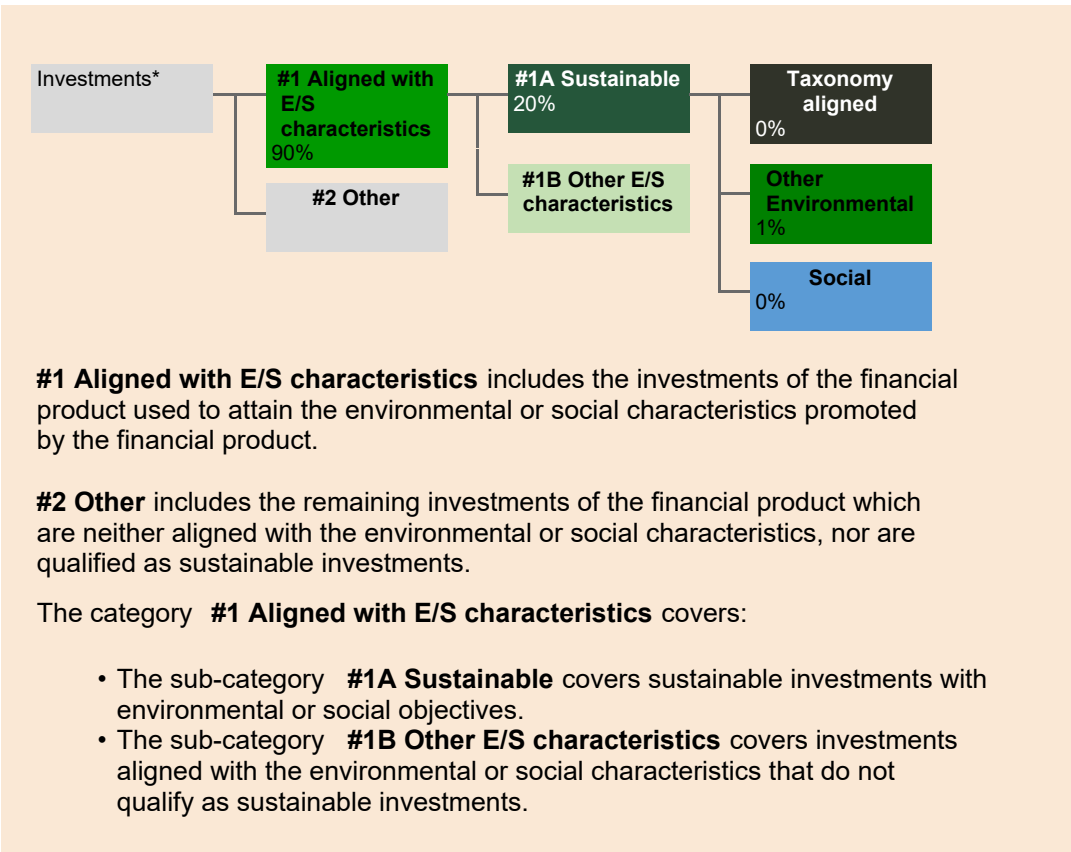
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

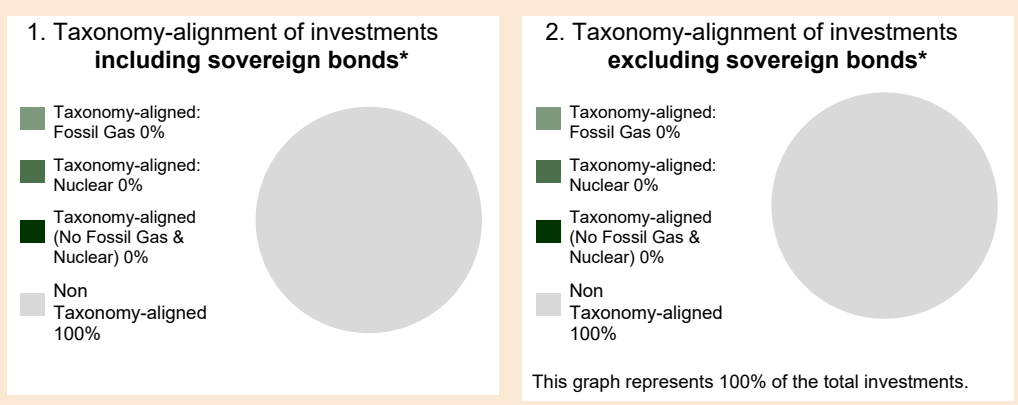
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Euro Medium Term Bond Fund

**Legal entity identifier:** 5493007TZYJRE6PKR62

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

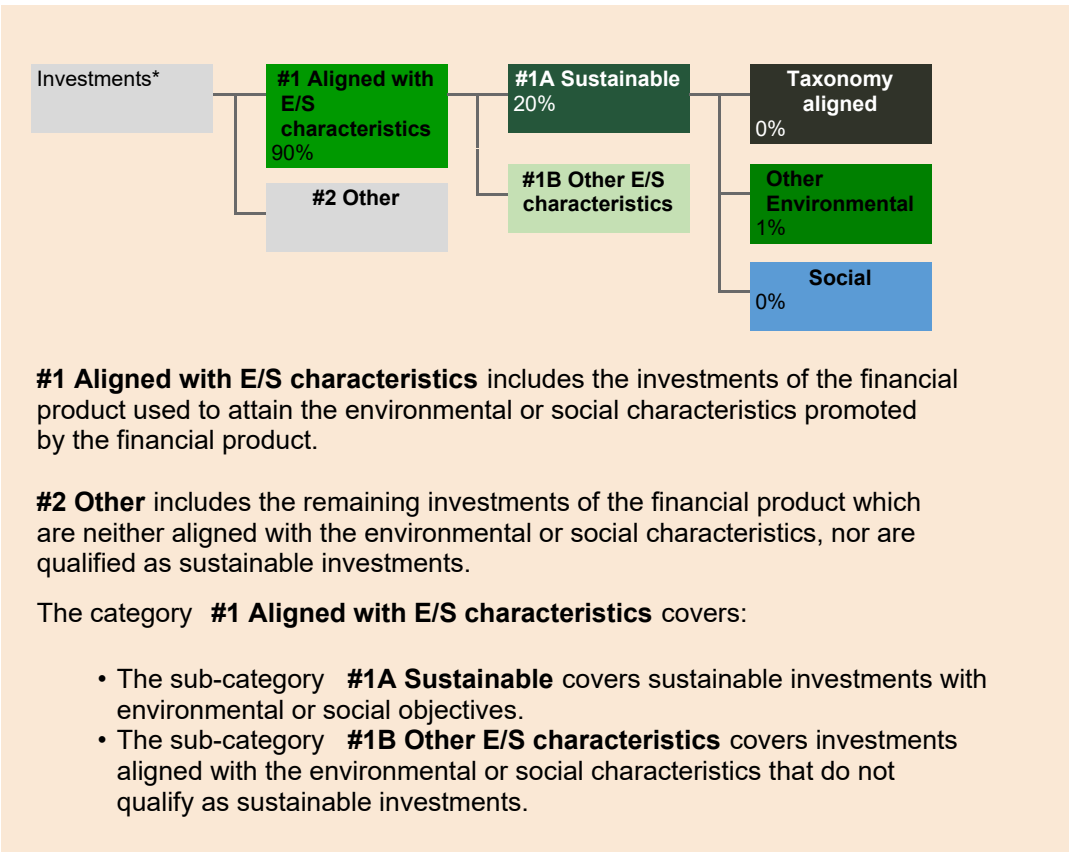
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

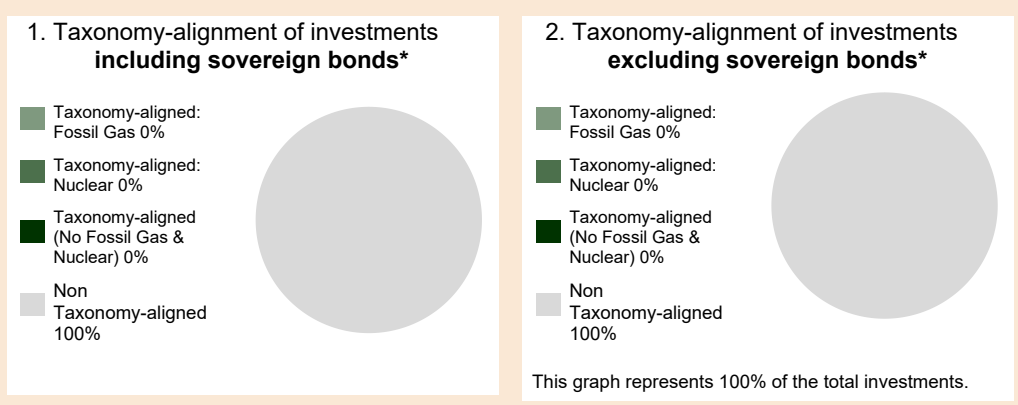
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea European High Yield Fund

**Legal entity identifier:** 549300E1MQ8IG1OUZO23

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

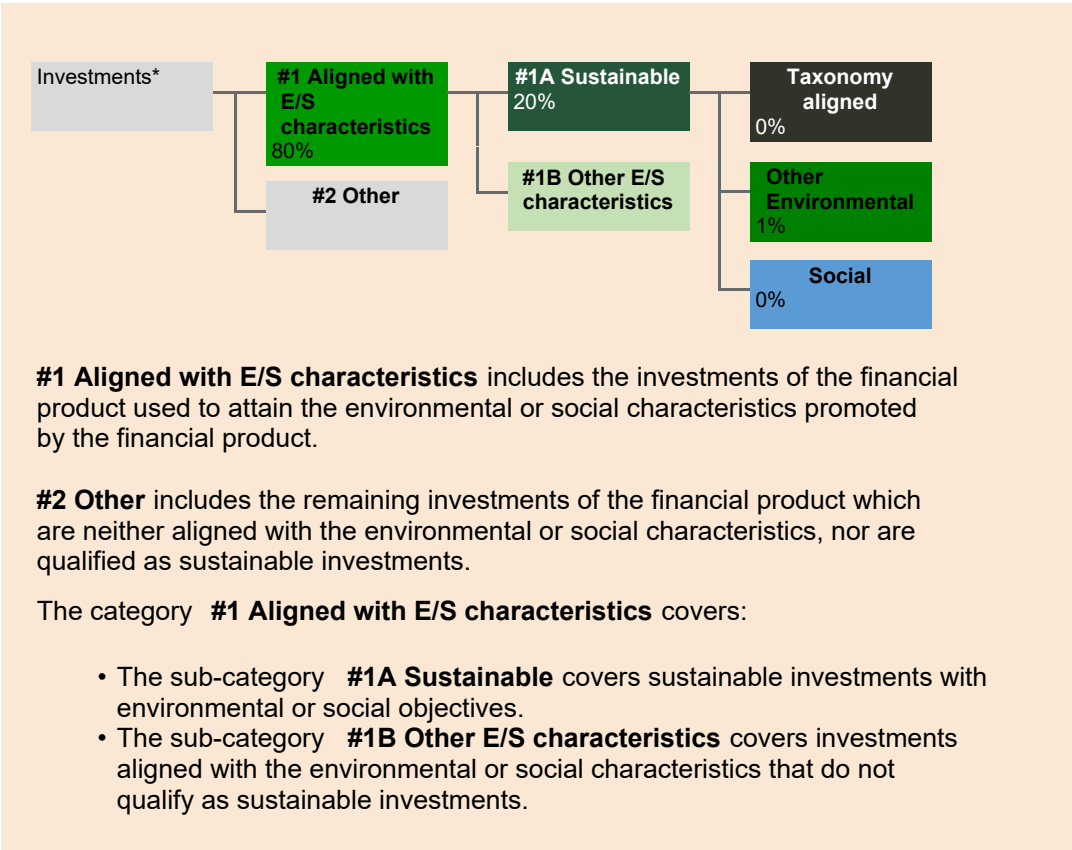
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

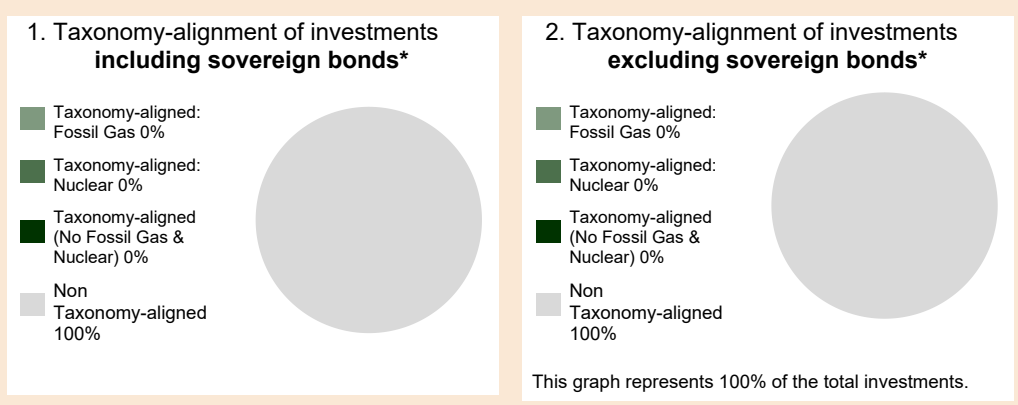
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea European Smaller Companies Fund

**Legal entity identifier:** 549300MRNBNSOWG13Z78

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
  - 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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



information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

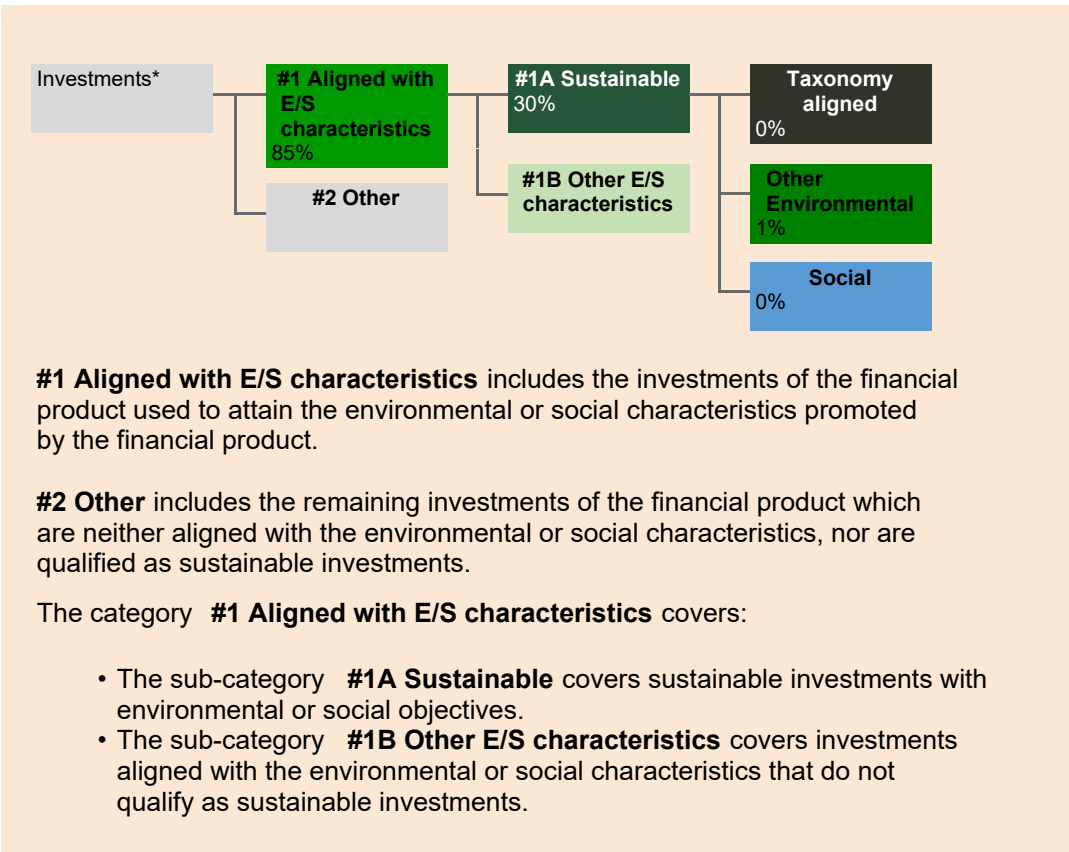
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

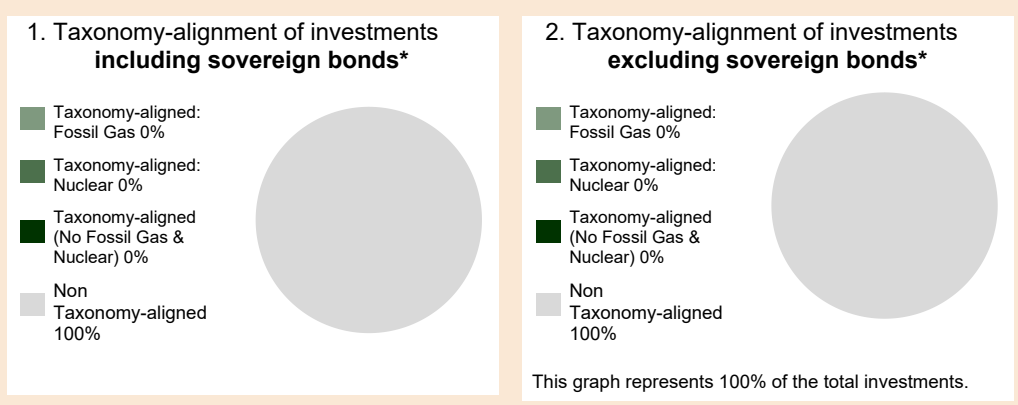
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea European Stars Fund

**Legal entity identifier:** 54930070IKWTBTWG2U46

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments

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



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

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Carbon footprint scope 1, 2 & 3 limit** The fund promotes E/S characteristics by maintaining the total carbon footprint of the fund's investments at least 20% below the total carbon footprint of the reference benchmark. The carbon footprint is measured by the scope 1, 2 and 3 greenhouse gas emissions. More information can be found in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

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

## 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.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy
- Relative carbon footprint scope 1, 2 and 3

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalised scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. Carbon footprint is managed below the reference benchmark level. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### **Engagement and stewardship**

On behalf of its clients, NAM undertakes a range of engagement activities with investee companies and corporate- and sovereign issuers in order to encourage them to improve their ESG practices, and promote a long-term approach to decision-making.

### ● **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?**

Minimum 50% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from

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

multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts where data is insufficient. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

The fund's carbon footprint, measured by the total scope 1, 2 and 3 greenhouse gas emissions of the underlying investments, must be at least 20% lower than the carbon footprint of the benchmark calculated on the same basis. Details on the fund's benchmark can be found in the specific fund section the prospectus. The carbon footprint is calculated as total greenhouse gas emissions (scope 1,2 and 3) for a portfolio, normalised by investee companies' enterprise value, measured in tons CO<sub>2</sub>e / M€ invested. The carbon footprint expresses the share of companies' and issuers' greenhouse gas emissions that is owned or funded by the fund's investments.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

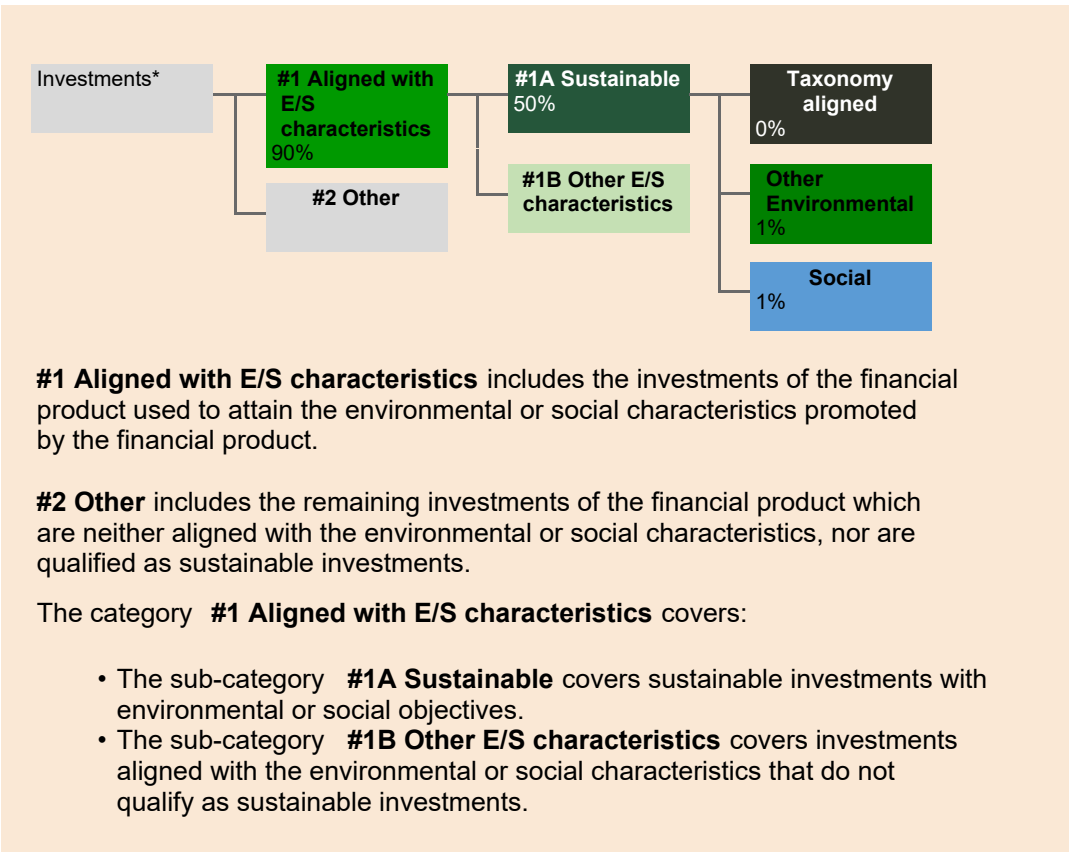
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

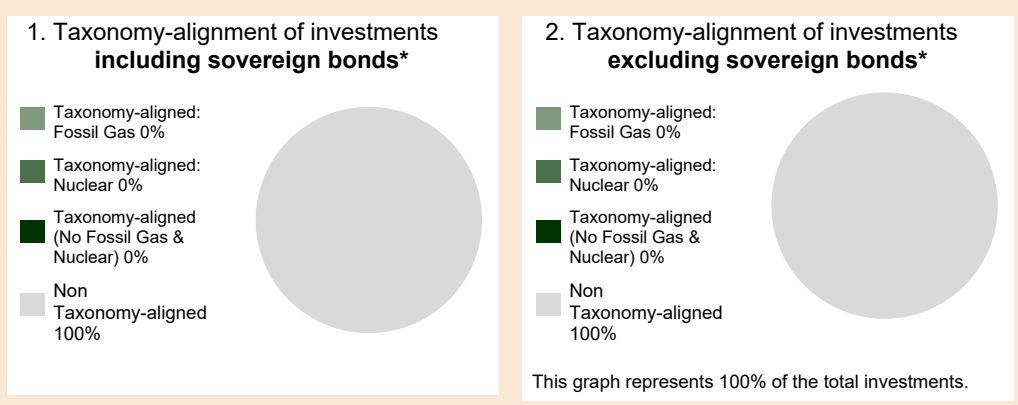
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.

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



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

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

There is no commitment to a minimum proportion of investments in transitional and enabling activities.

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

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

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

**Product name:** Nordea Finnish Stars Fund

**Legal entity identifier:** 549300MI2MQKPNCVIU88

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### **Engagement and stewardship**

On behalf of its clients, NAM undertakes a range of engagement activities with investee companies and corporate- and sovereign issuers in order to encourage them to improve their ESG practices, and promote a long-term approach to decision-making.

### ● **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?**

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from

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

multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

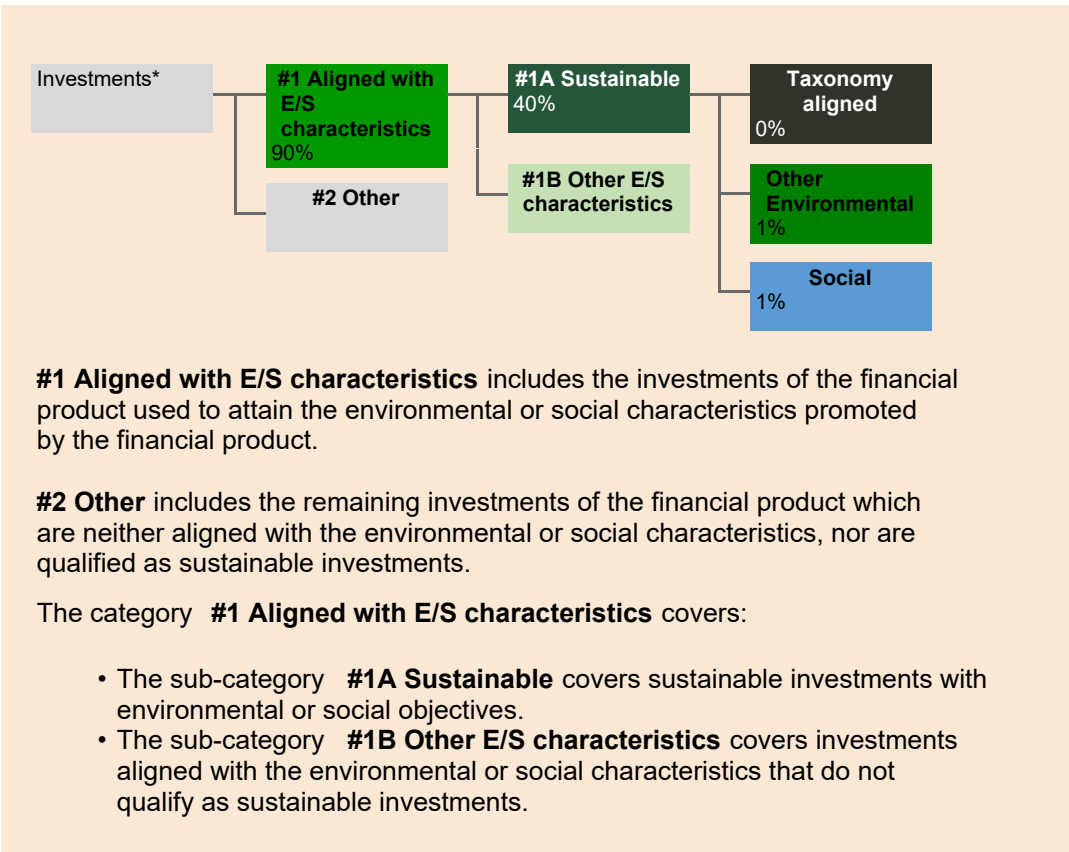
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

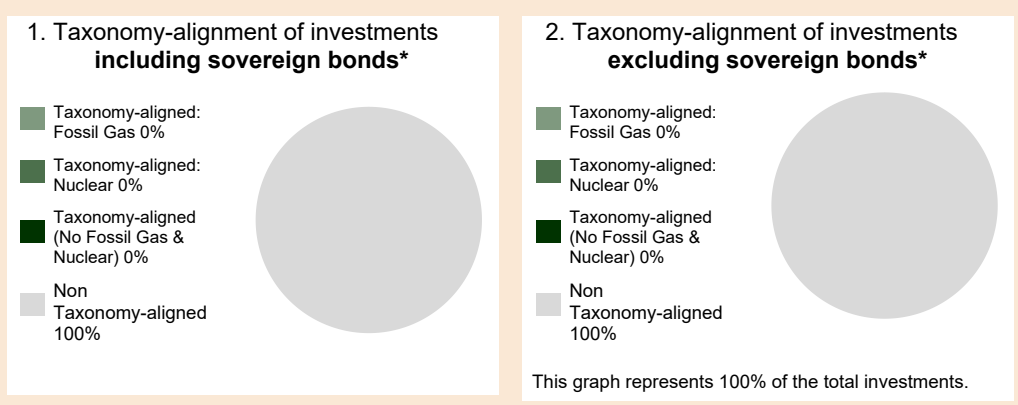
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea Fixed Income Credit Opportunities Fund

**Legal entity identifier:** 5493002WRE7NCMVYTS07

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

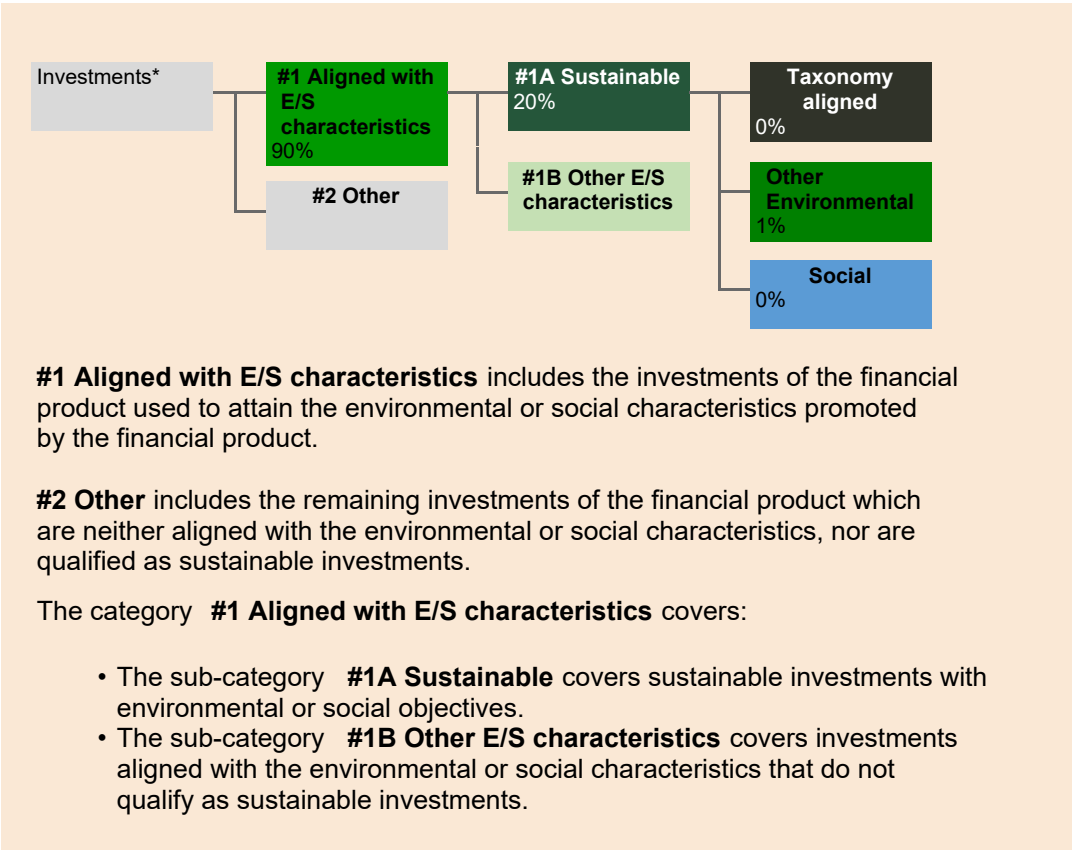
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

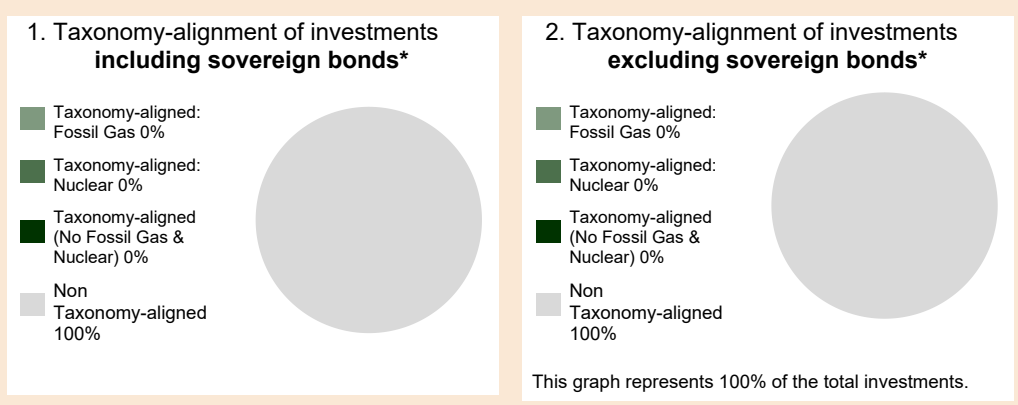
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Focus Fixed Income Fund

**Legal entity identifier:** 549300MHDH7HLCZ9RV68

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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



information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

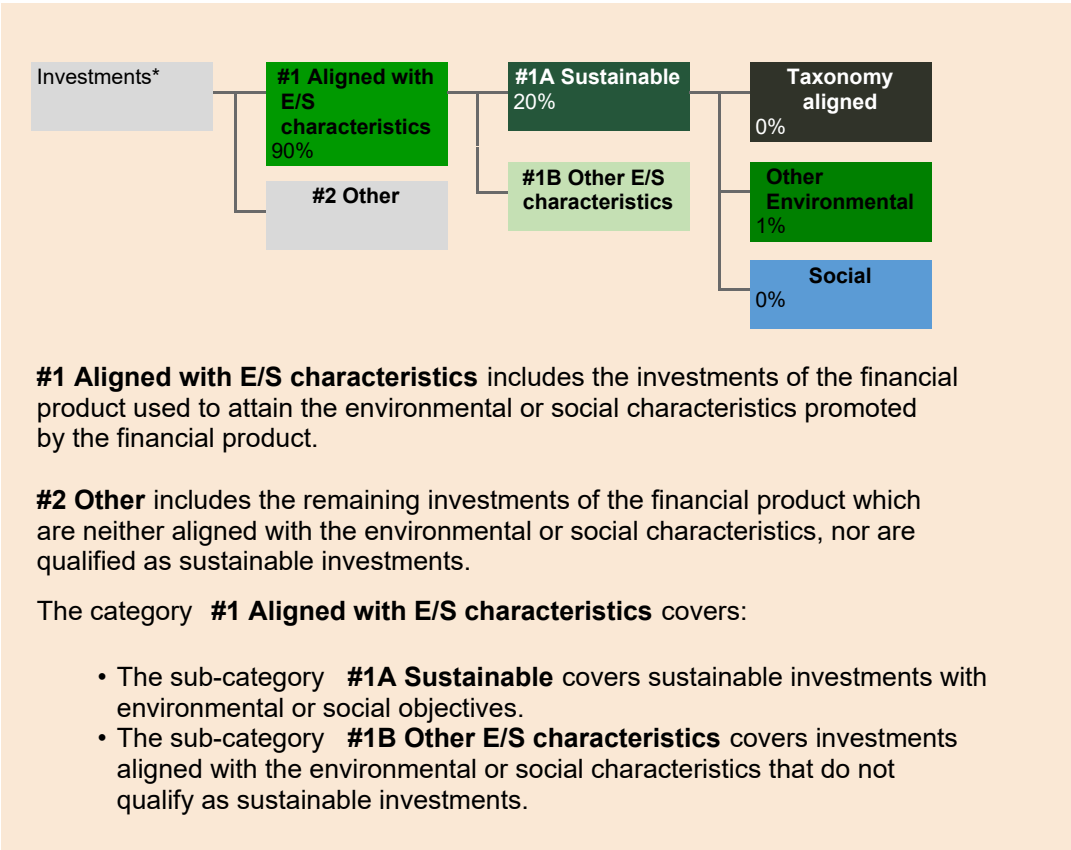
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

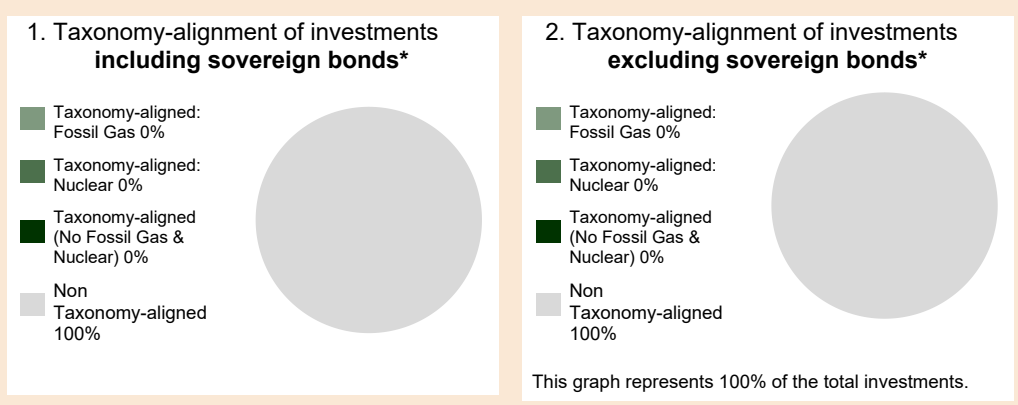
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea FRN Kreditt Fund

**Legal entity identifier:** 636700C7JDTLK9DYHV84

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

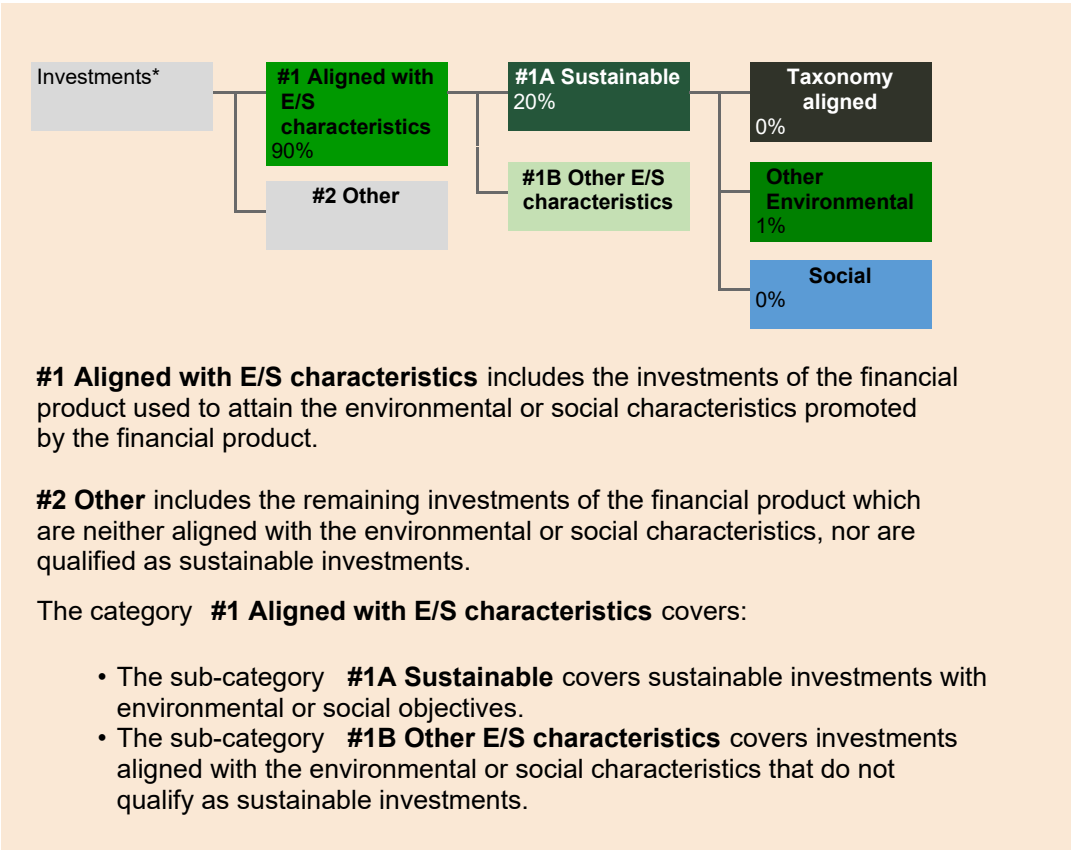
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

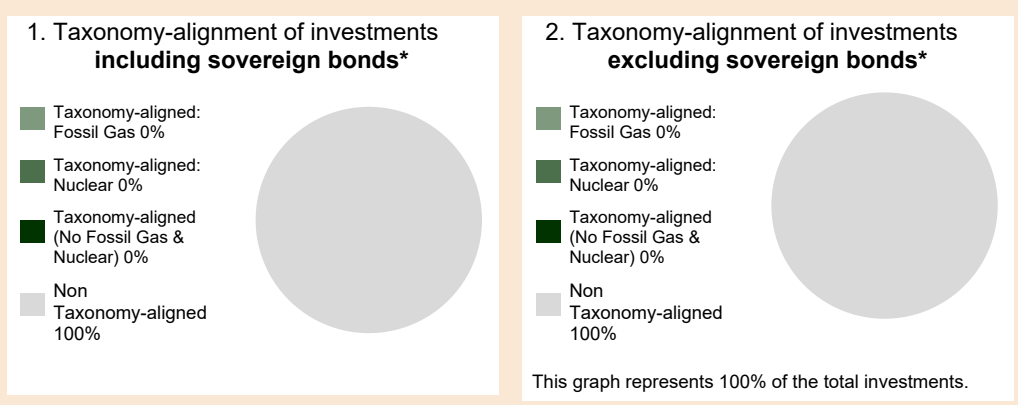
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea FRN OMF Fund

**Legal entity identifier:** 636700CM626XYPS0F093

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

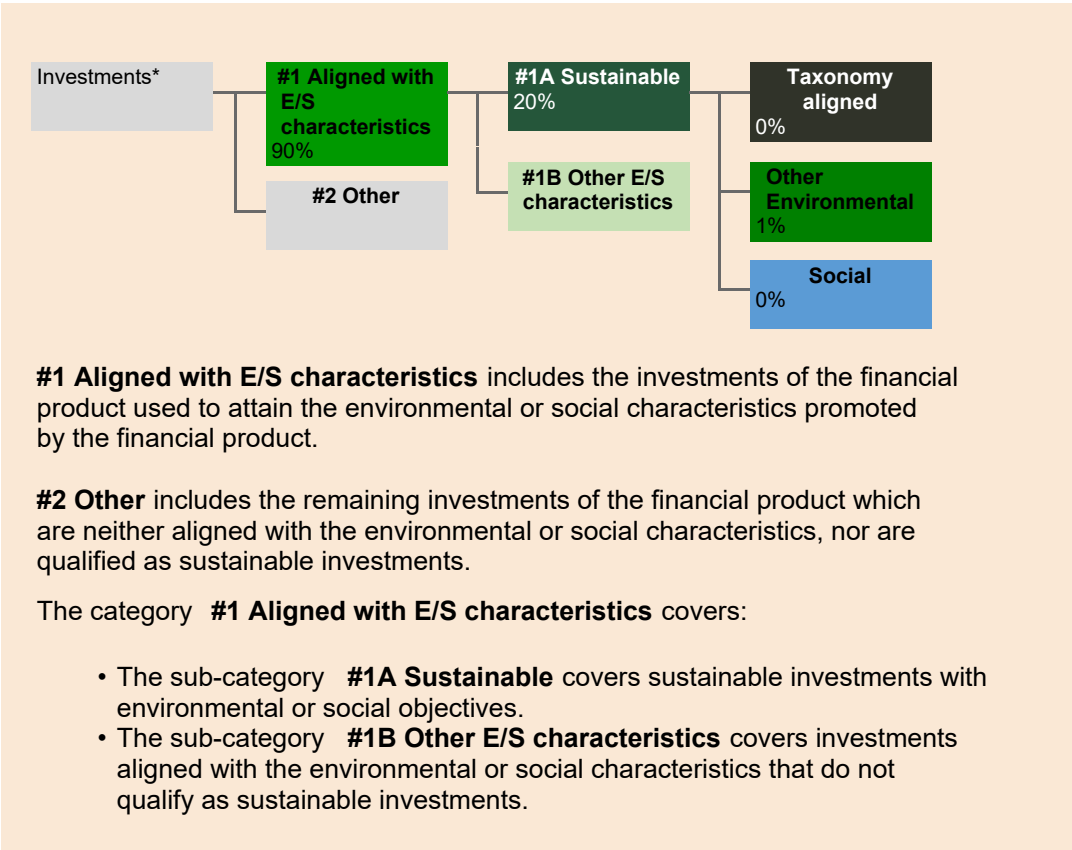
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

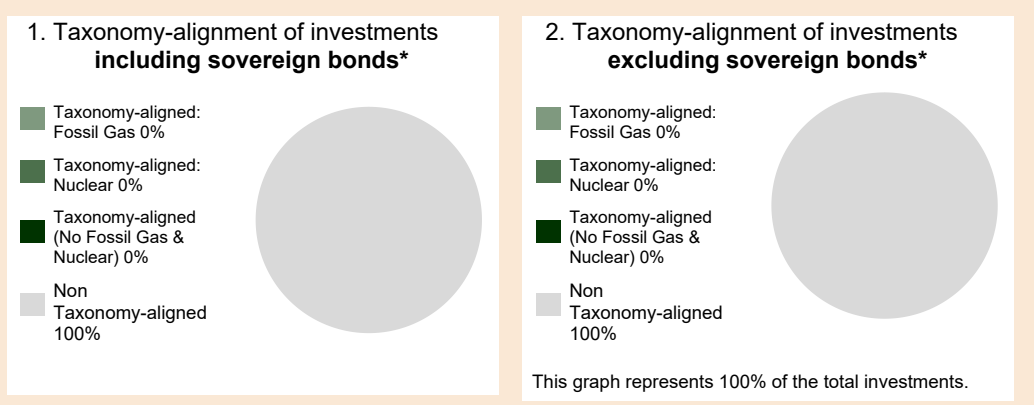
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea FRN Pensjon Fund

**Legal entity identifier:** 636700ST9P9GKUOH5S47

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

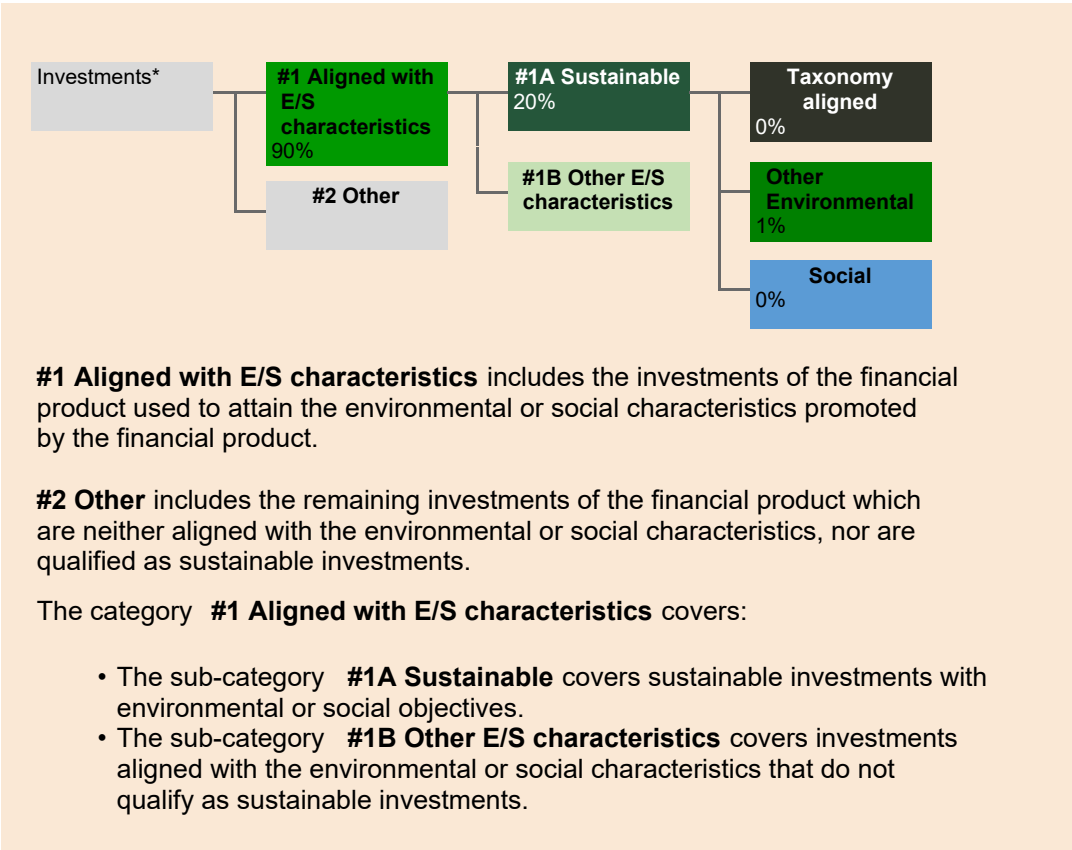
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

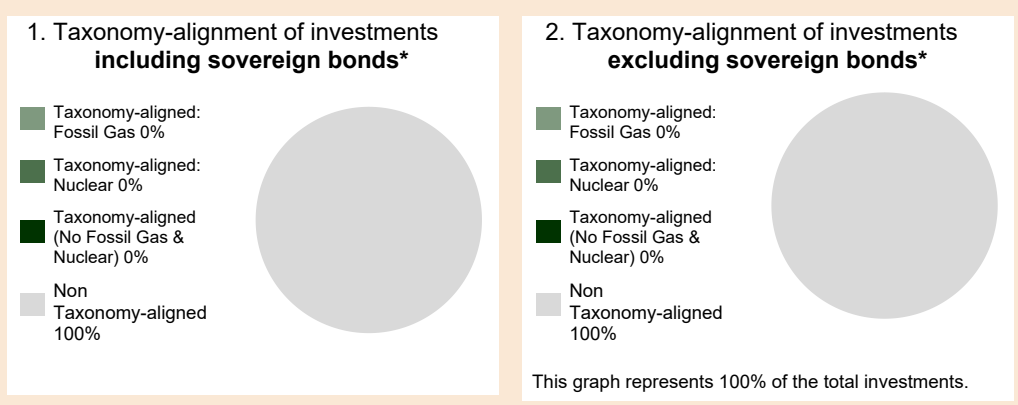
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Global Dividend Fund

**Legal entity identifier:** 549300PR3ETI85Y9Z253

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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



information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

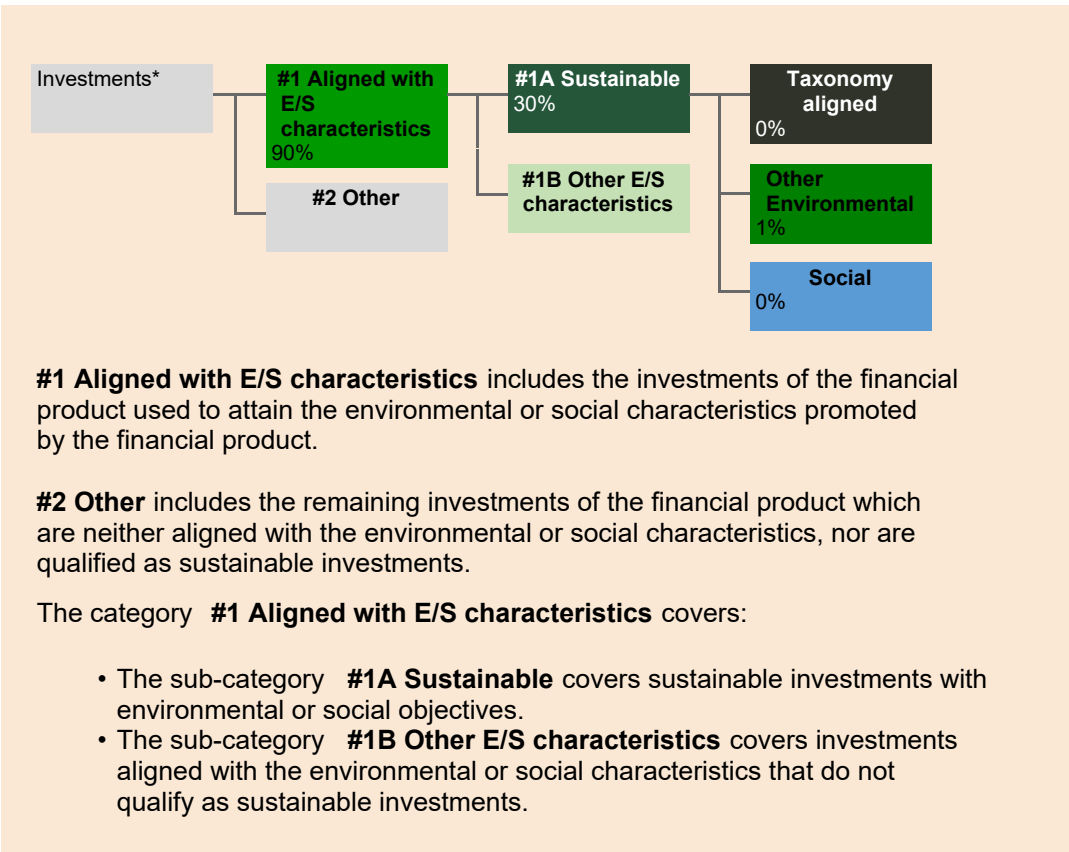
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

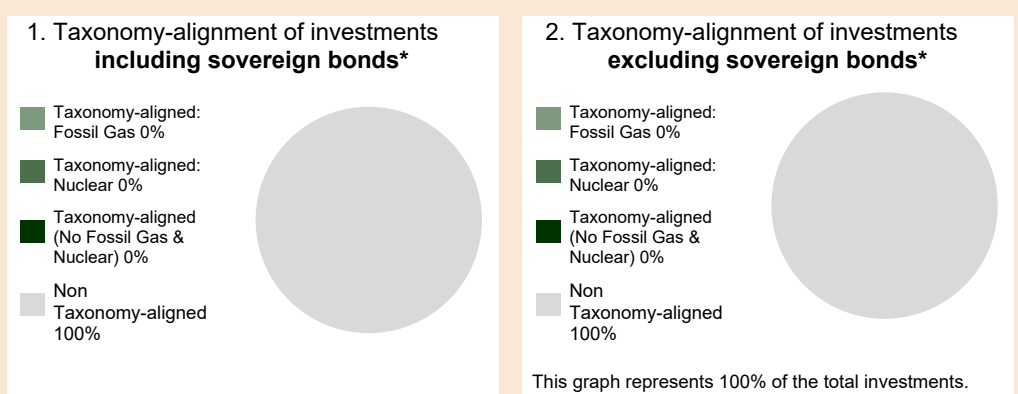
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Global Equity Allocation Fund

**Legal entity identifier:** 5493001BVGL3VI093S92

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

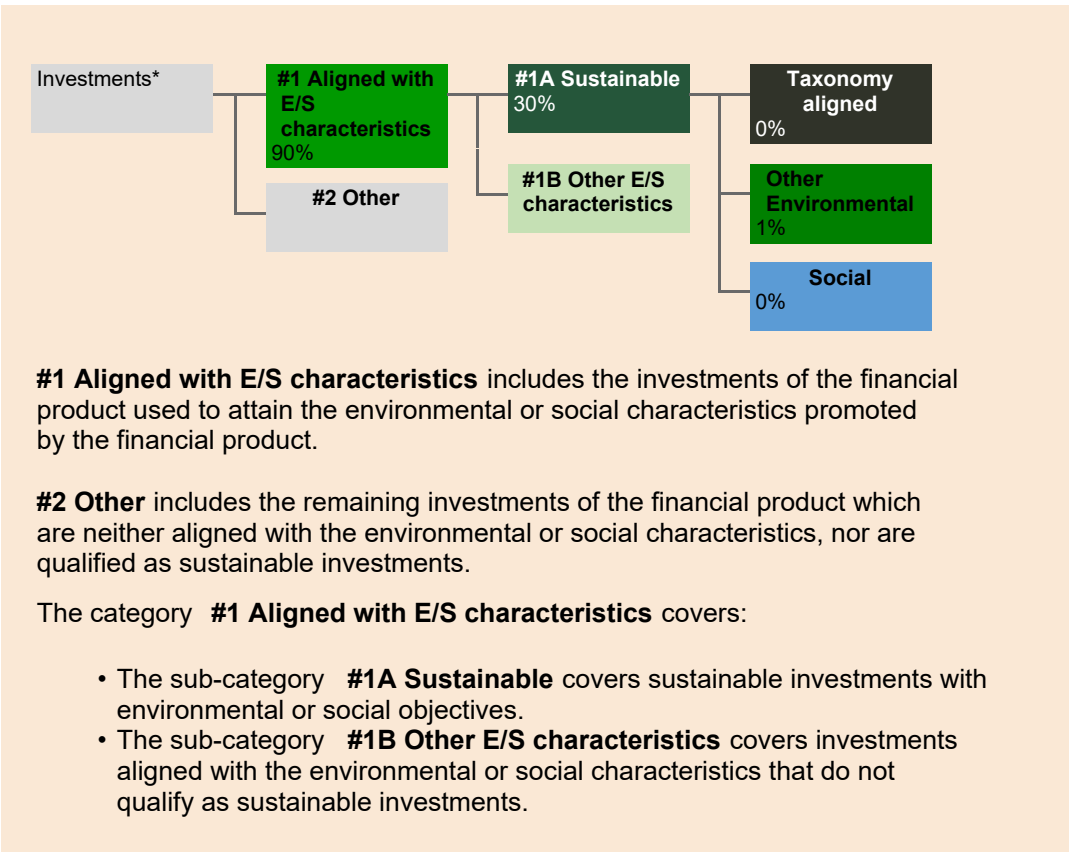
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

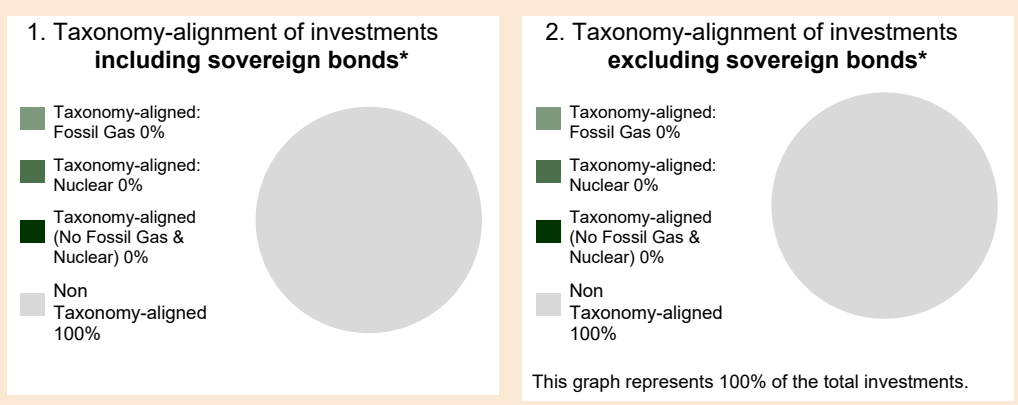
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Global High Yield Fund

**Legal entity identifier:** 54930077XBW3Y1KRFP97

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

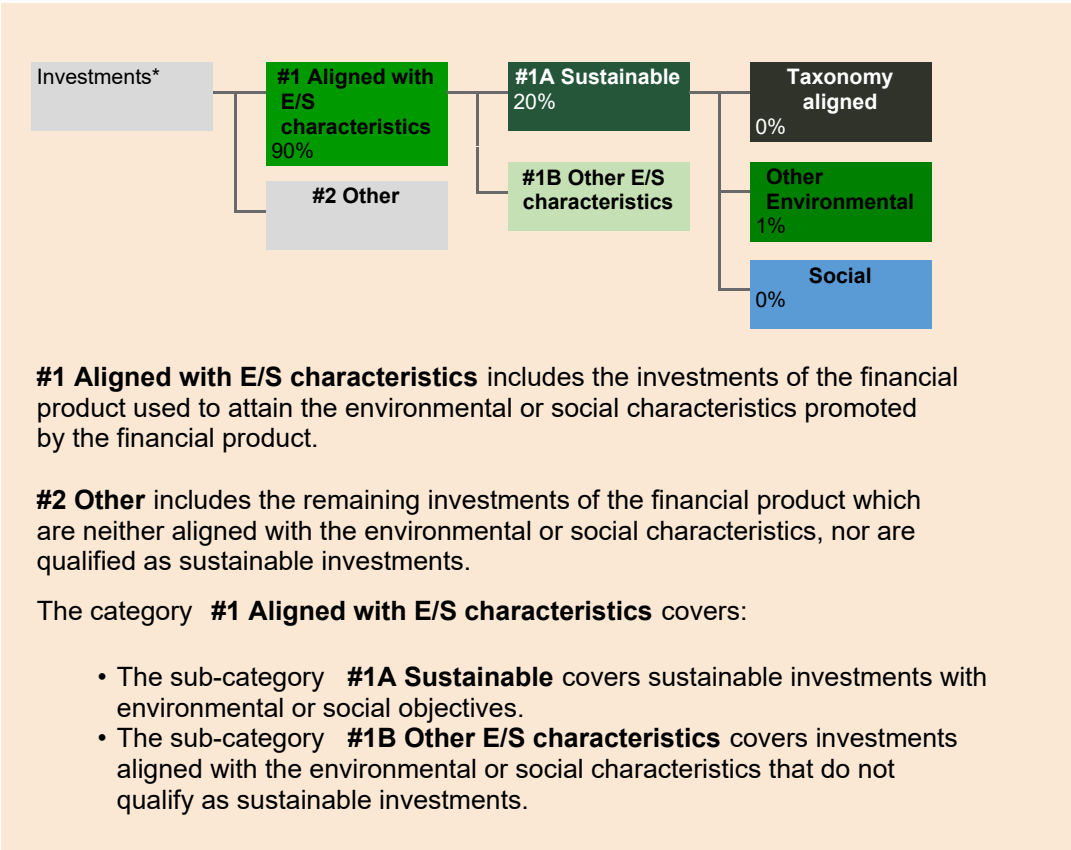
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

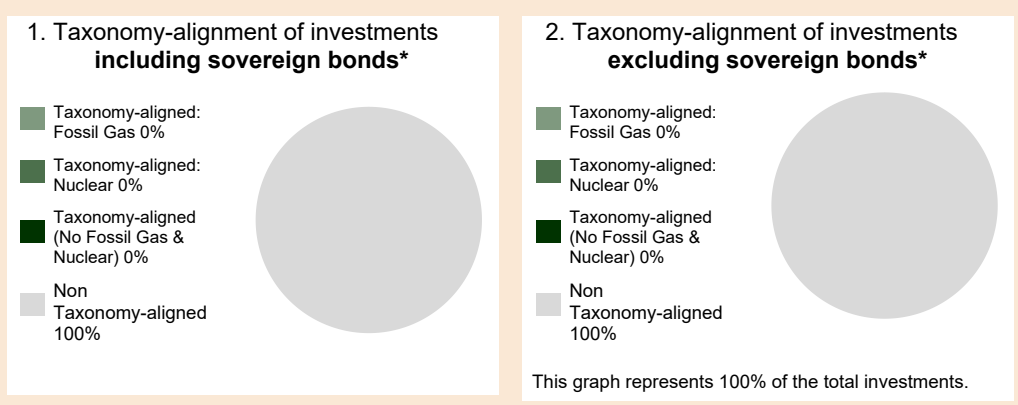
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea Global Statsobligasjon Fund

**Legal entity identifier:** 636700MY1K3CMF6G2H90

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
  - 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

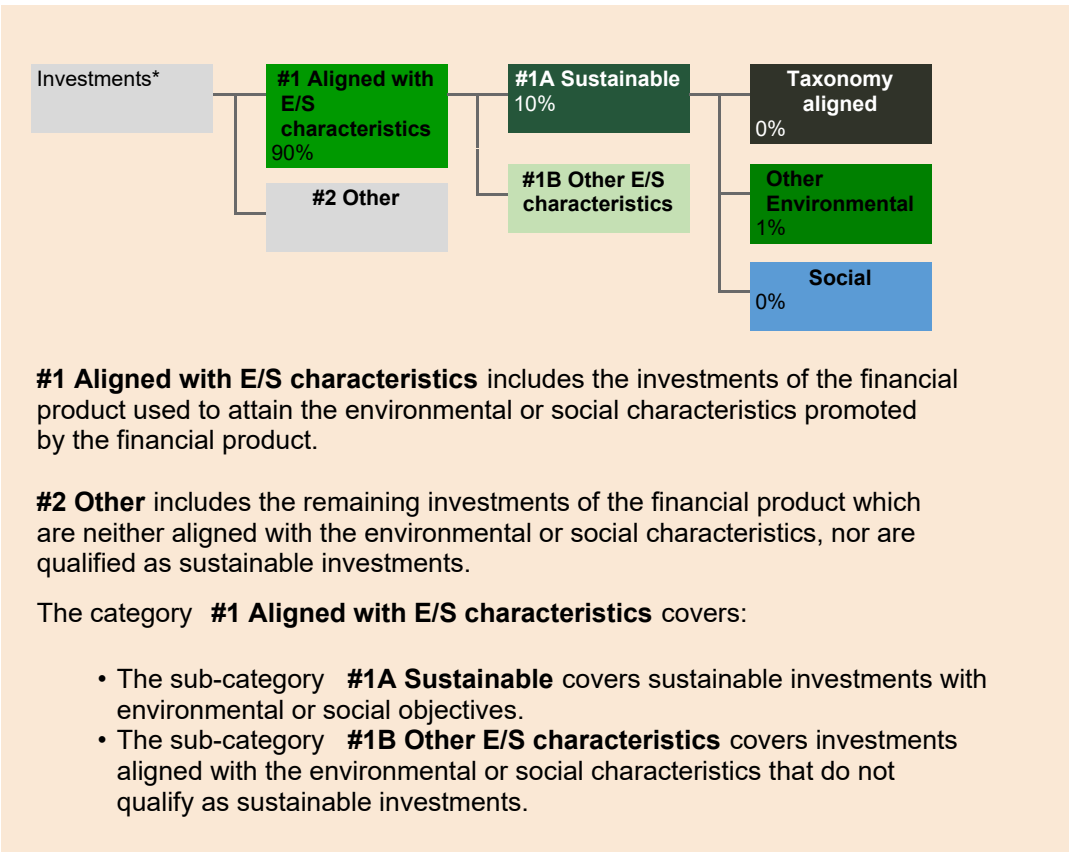
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

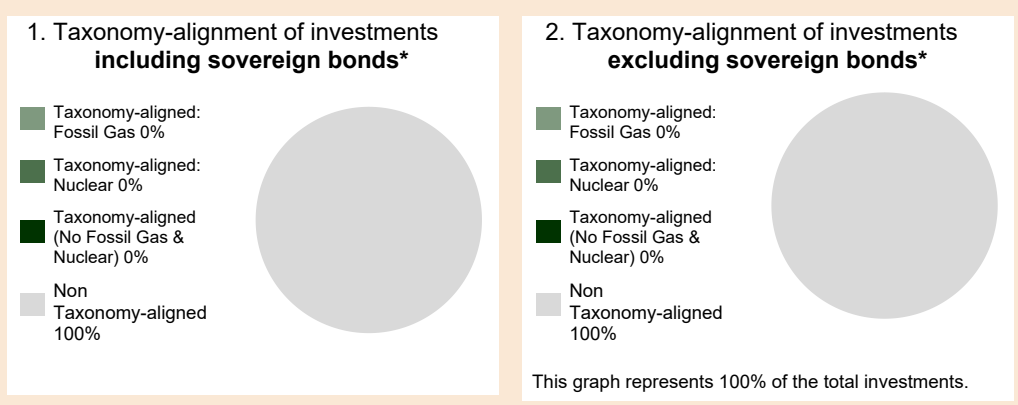
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Hållbarhetsfond Obligationer Global Fund

**Legal entity identifier:** 549300TJ314IHW1BOW85

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

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

## 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.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

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



relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

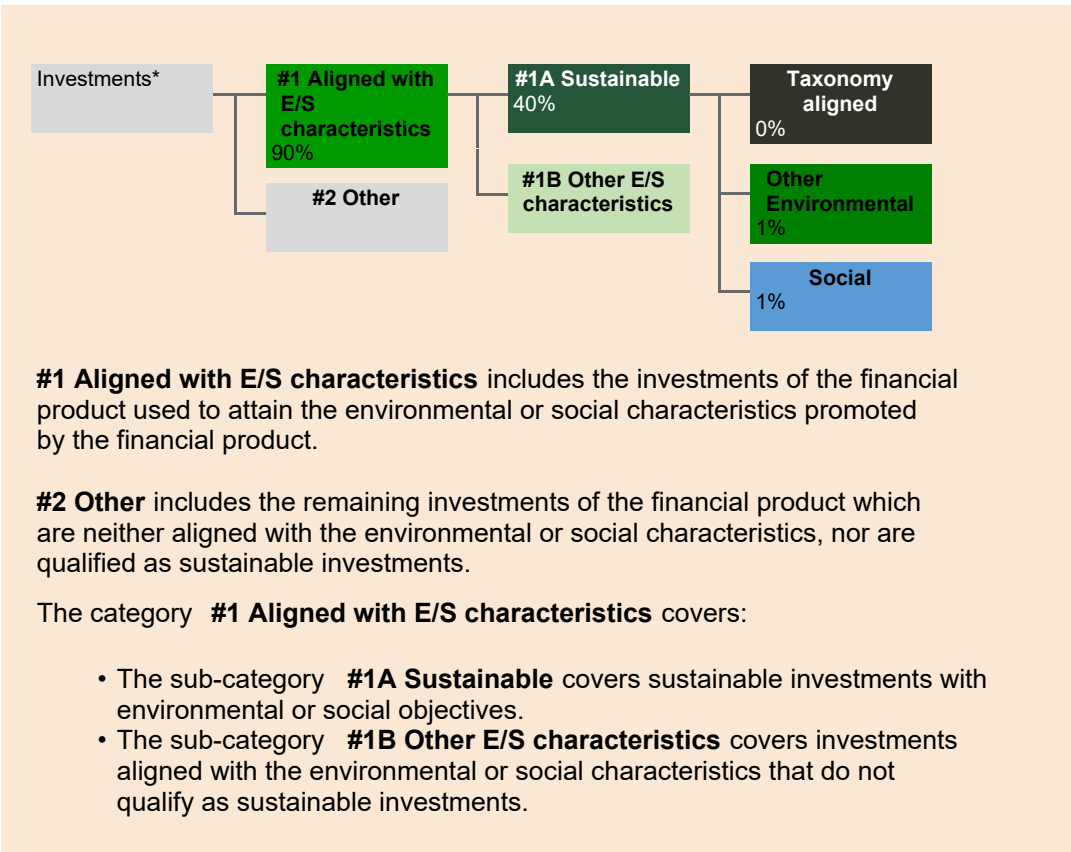
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

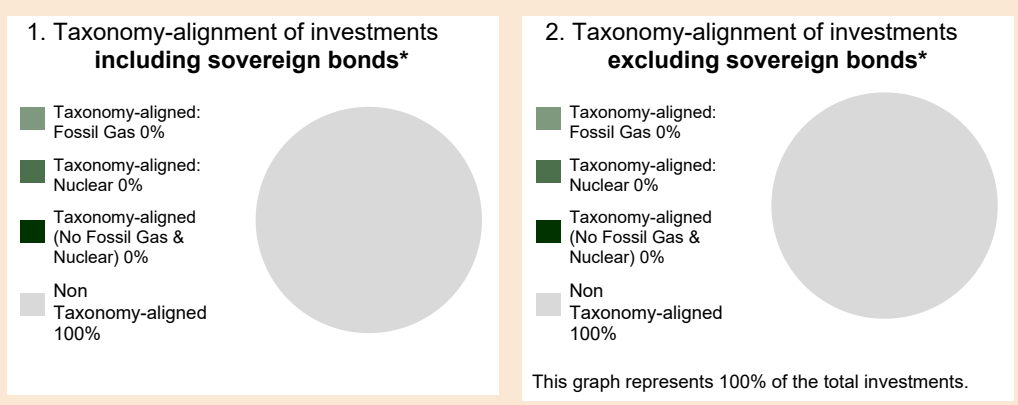
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea India Fund

**Legal entity identifier:** 549300Q64X96MTIMYC33

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
  - 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

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

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

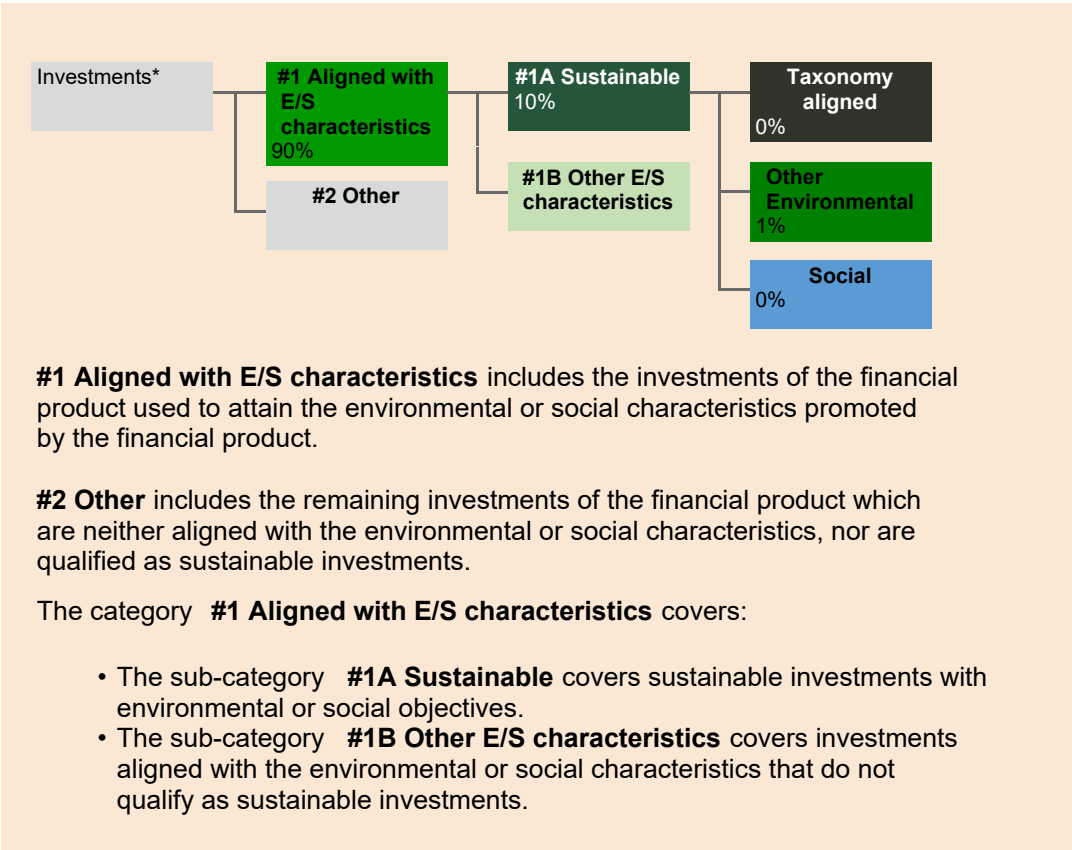
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

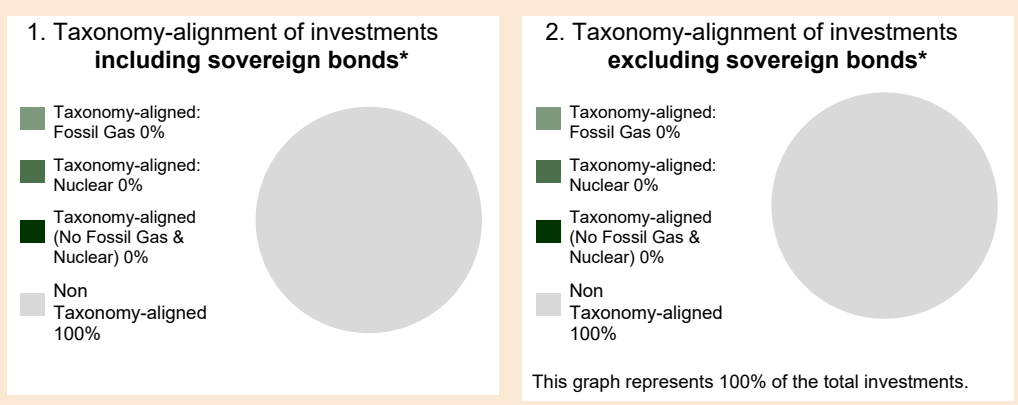
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

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

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

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

**Product name:** Nordea Innovation Stars Fund

**Legal entity identifier:** 5493003HVF4772ZX8M27

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### **Engagement and stewardship**

On behalf of its clients, NAM undertakes a range of engagement activities with investee companies and corporate- and sovereign issuers in order to encourage them to improve their ESG practices, and promote a long-term approach to decision-making.

### ● ***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?***

Minimum 50% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from

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

multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

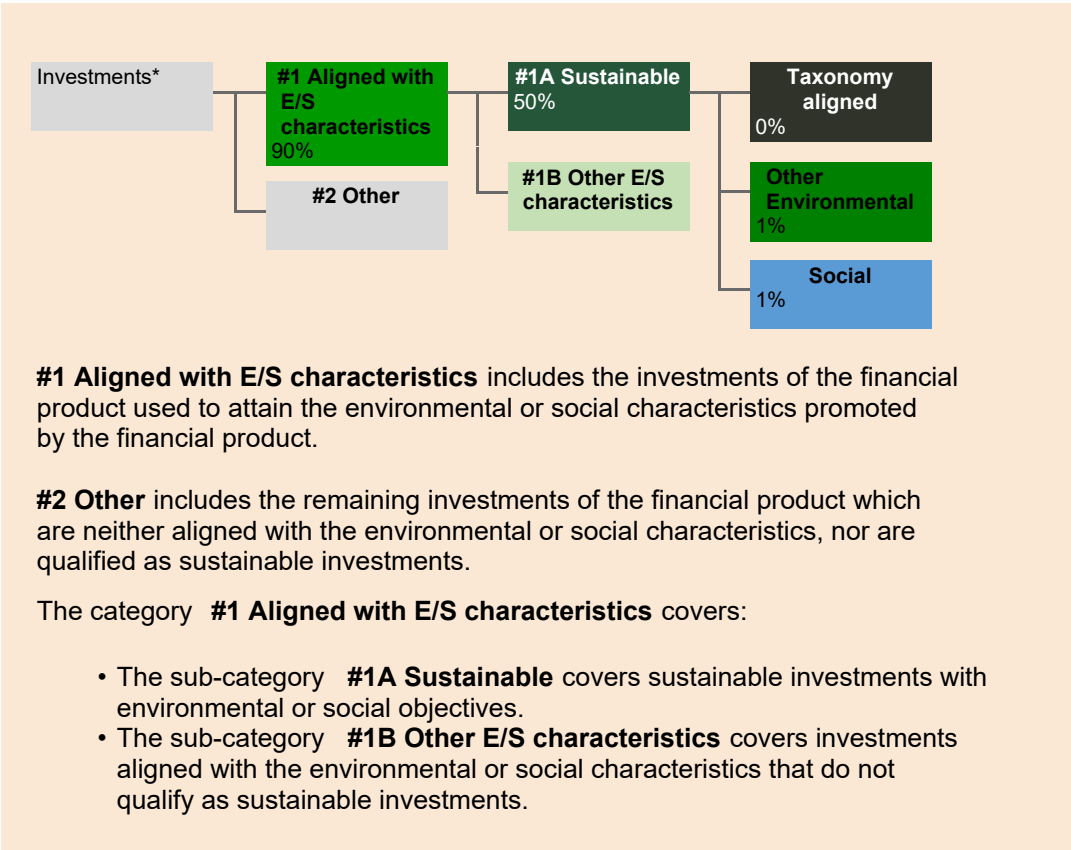
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

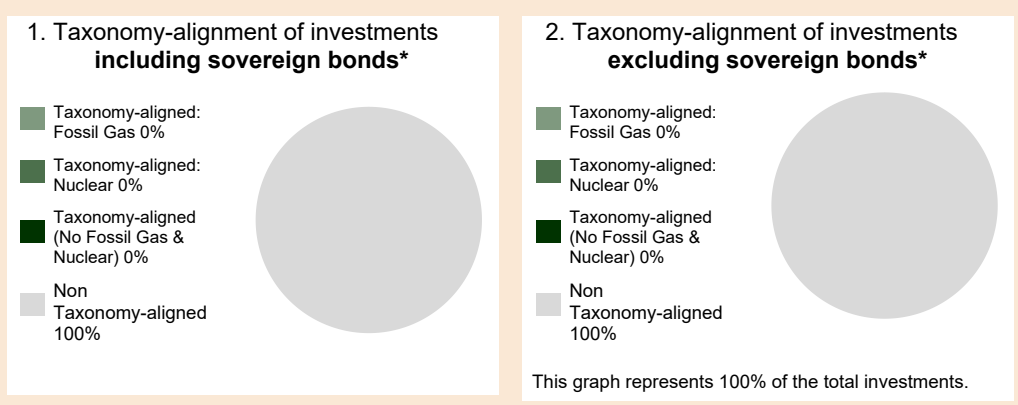
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea Institutionella Småbolagsfonden Sverige Fund

**Legal entity identifier:** 549300ZLGQXEJM8TQM79

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

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

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

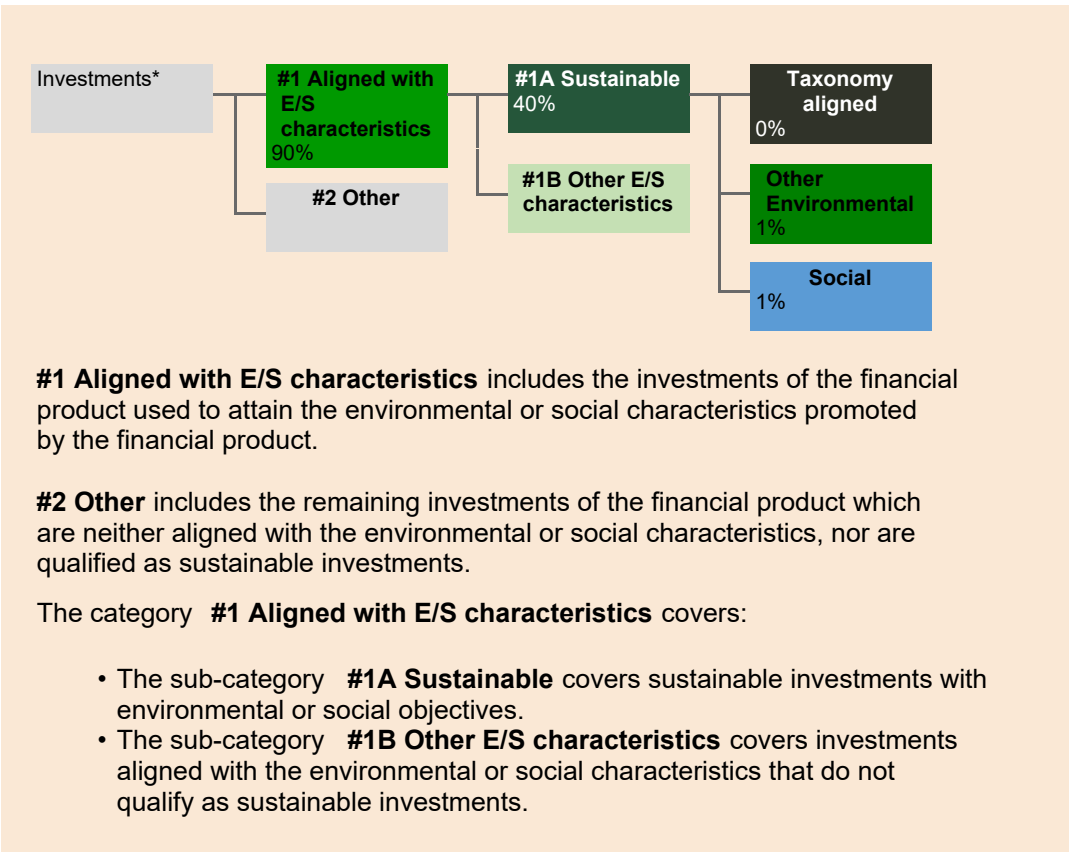
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

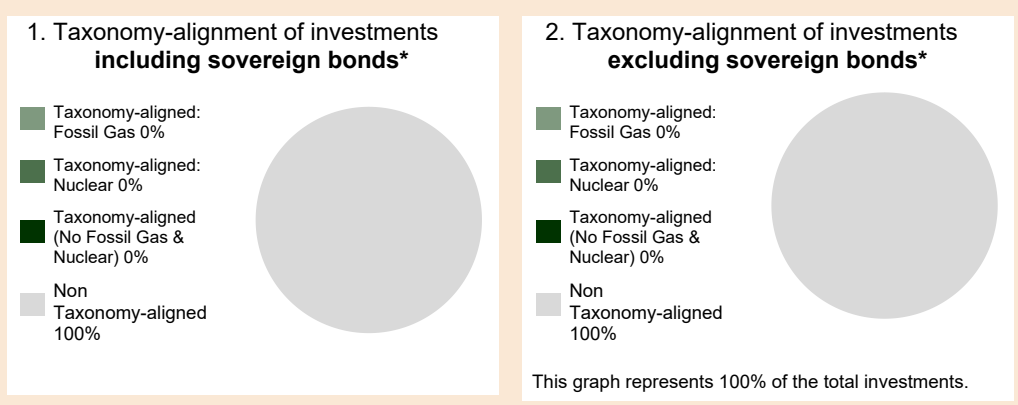
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Japan Fund

**Legal entity identifier:** 54930073UQYK5LTRL387

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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



information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

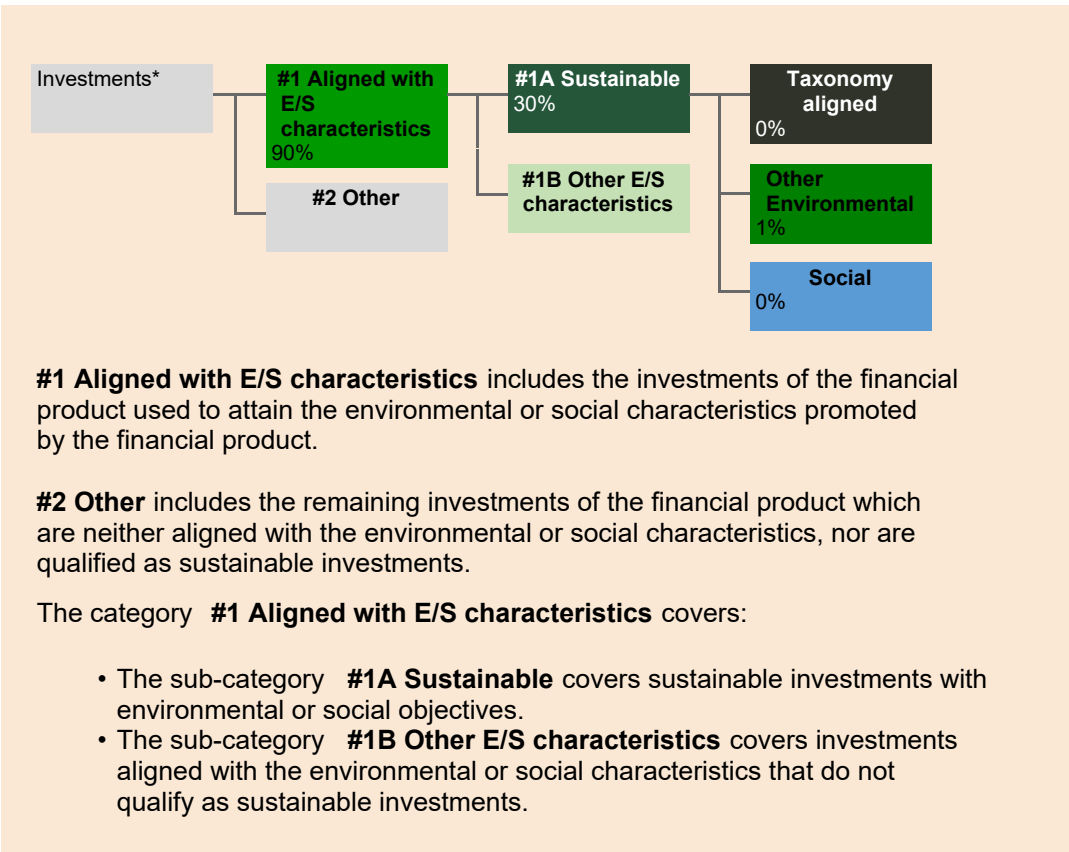
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

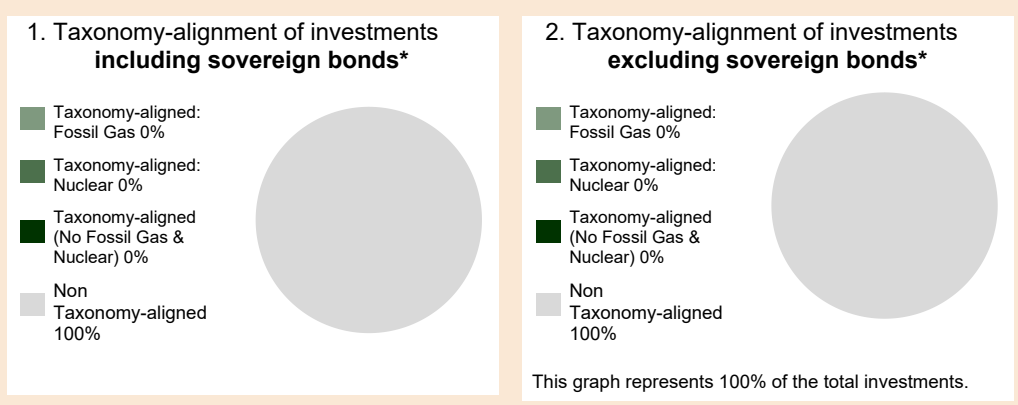
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Kort Obligasjon Fund

**Legal entity identifier:** 636700JJ3UJ3XZVHVX06

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

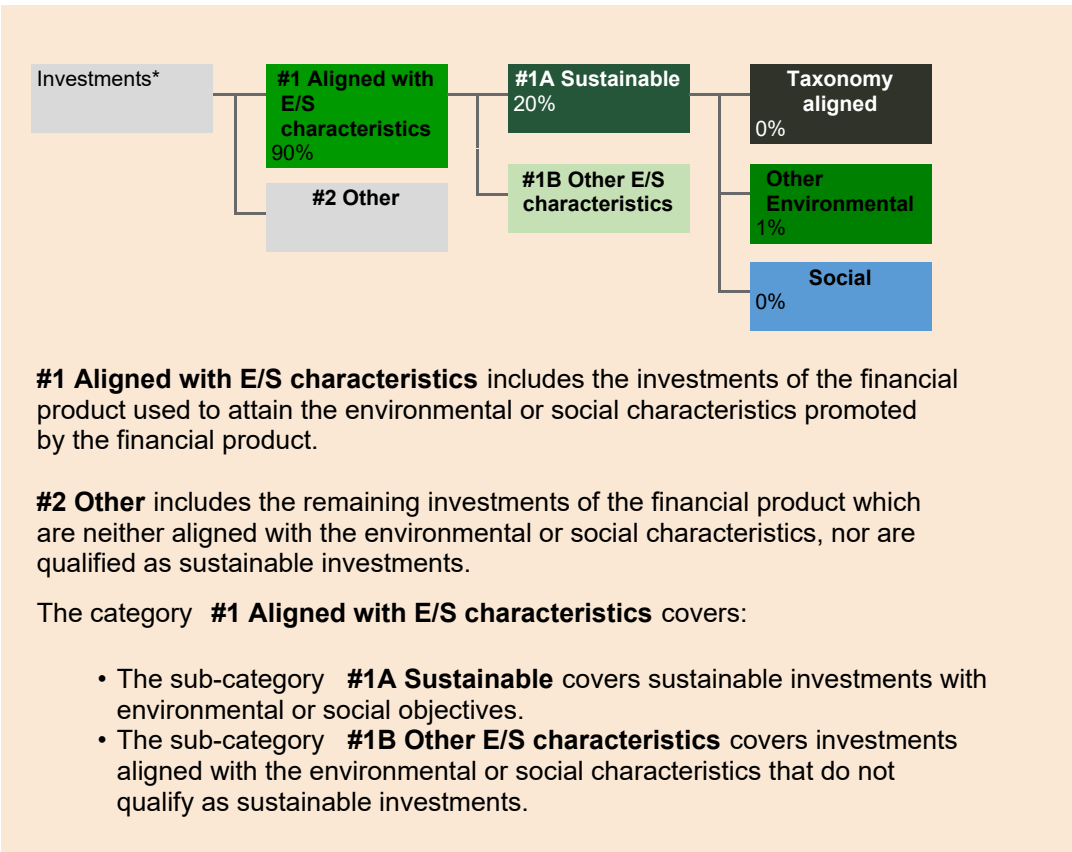
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

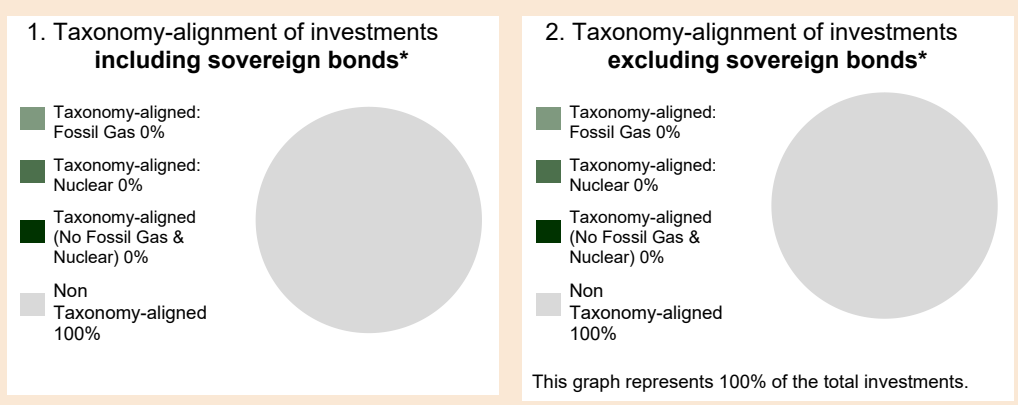
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Kort Obligasjon Pluss Fund

**Legal entity identifier:** 636700SONTGSXAF1N278

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

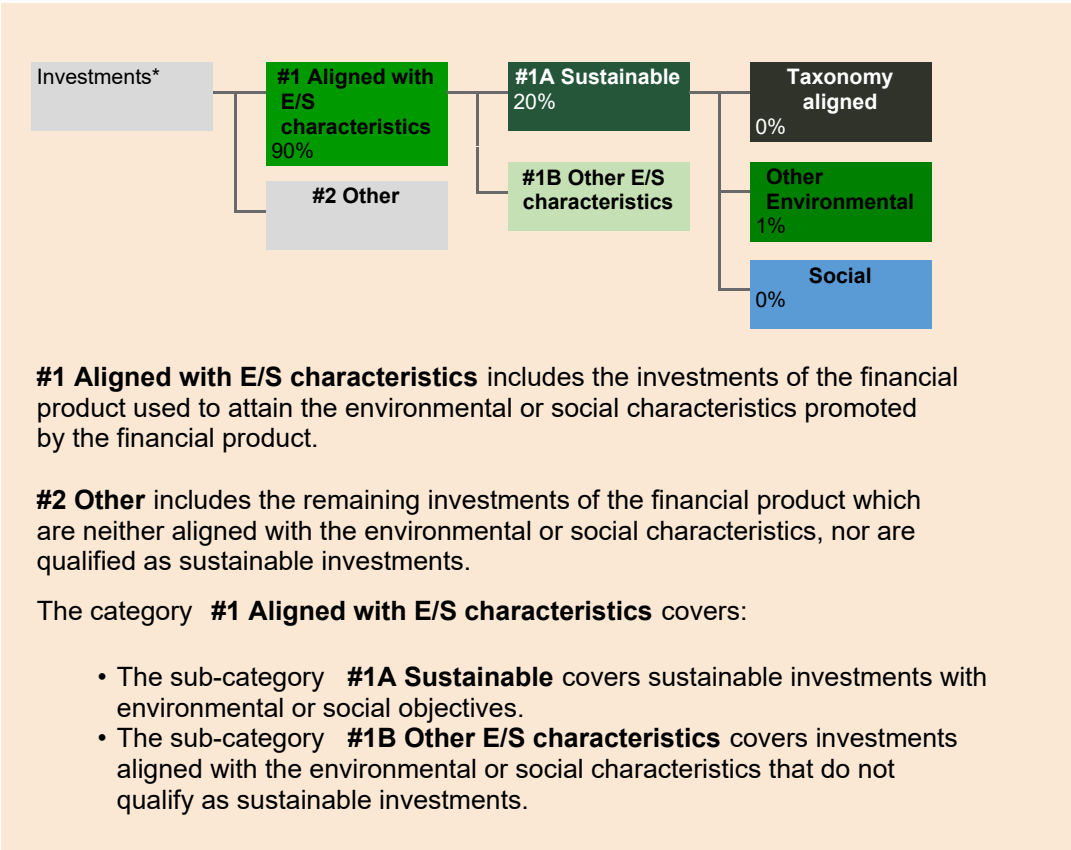
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

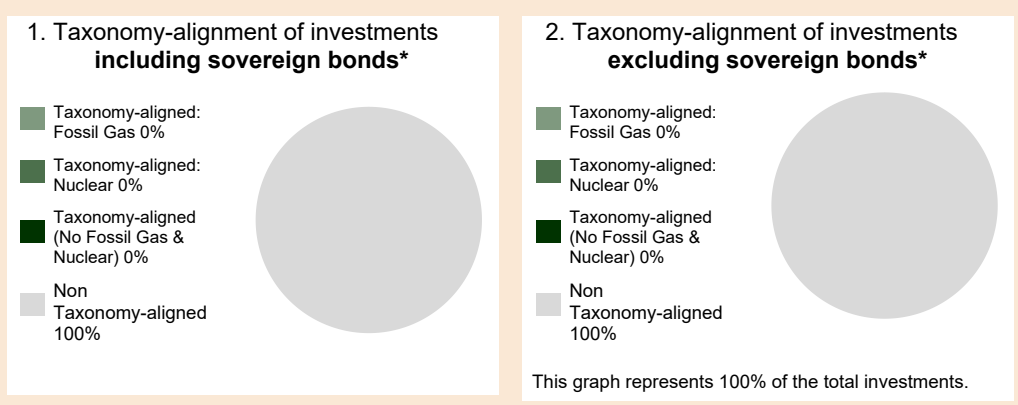
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section "What is the asset allocation planned for the financial product?".



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea Kreditt Stars Fund

**Legal entity identifier:** 5493000ZTSPIDSJE0Q50

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### **Engagement and stewardship**

On behalf of its clients, NAM undertakes a range of engagement activities with investee companies and corporate- and sovereign issuers in order to encourage them to improve their ESG practices, and promote a long-term approach to decision-making.

### ● **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?**

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from

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

multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

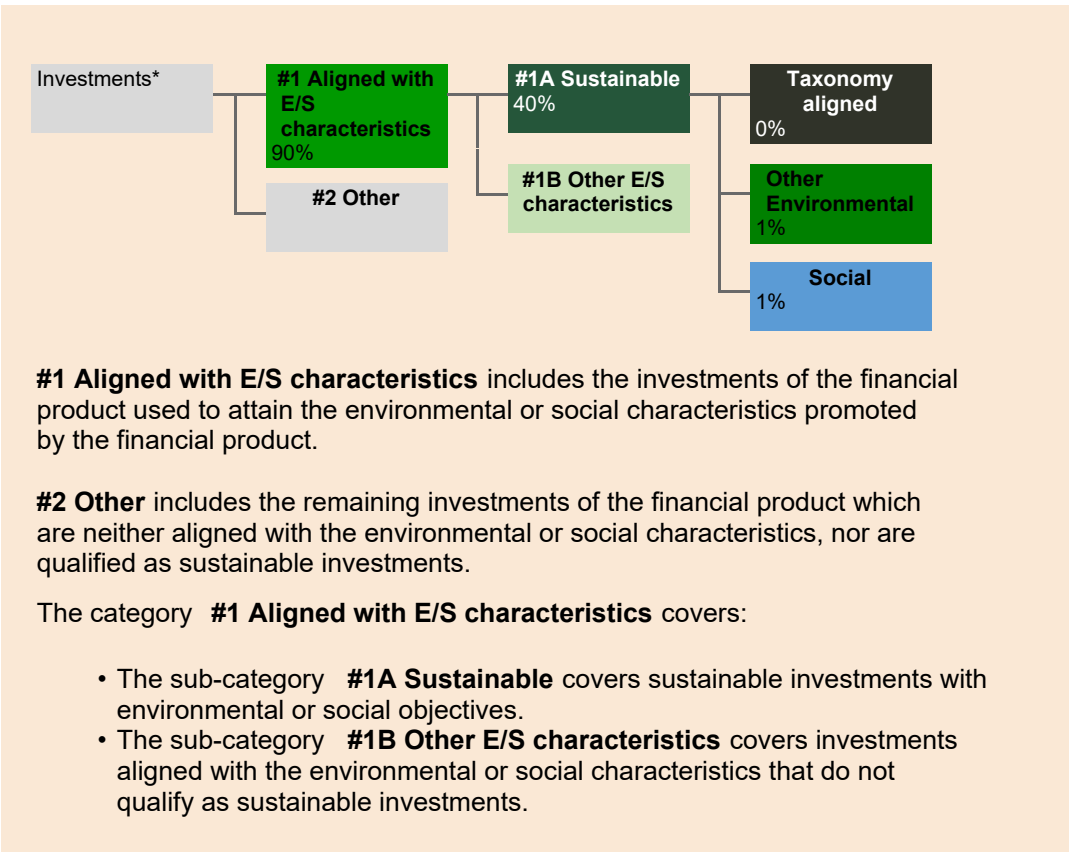
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

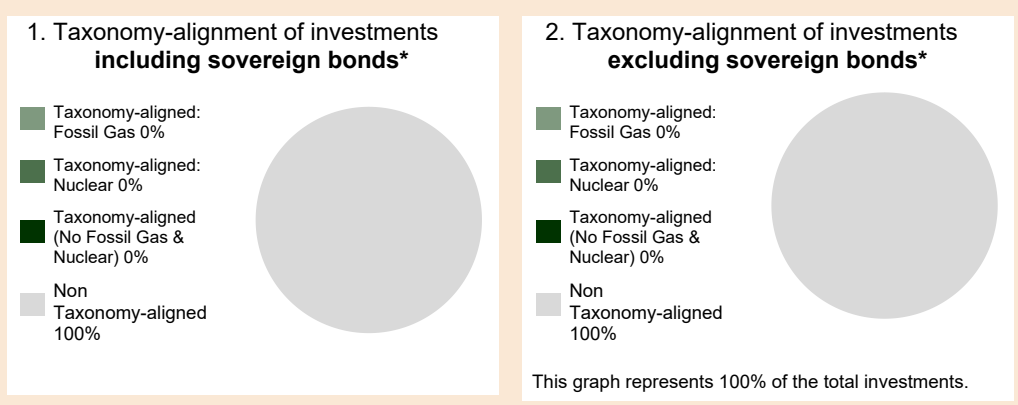
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Moderate Yield Fund

**Legal entity identifier:** 549300DJRJLFJJCXBO82

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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



information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

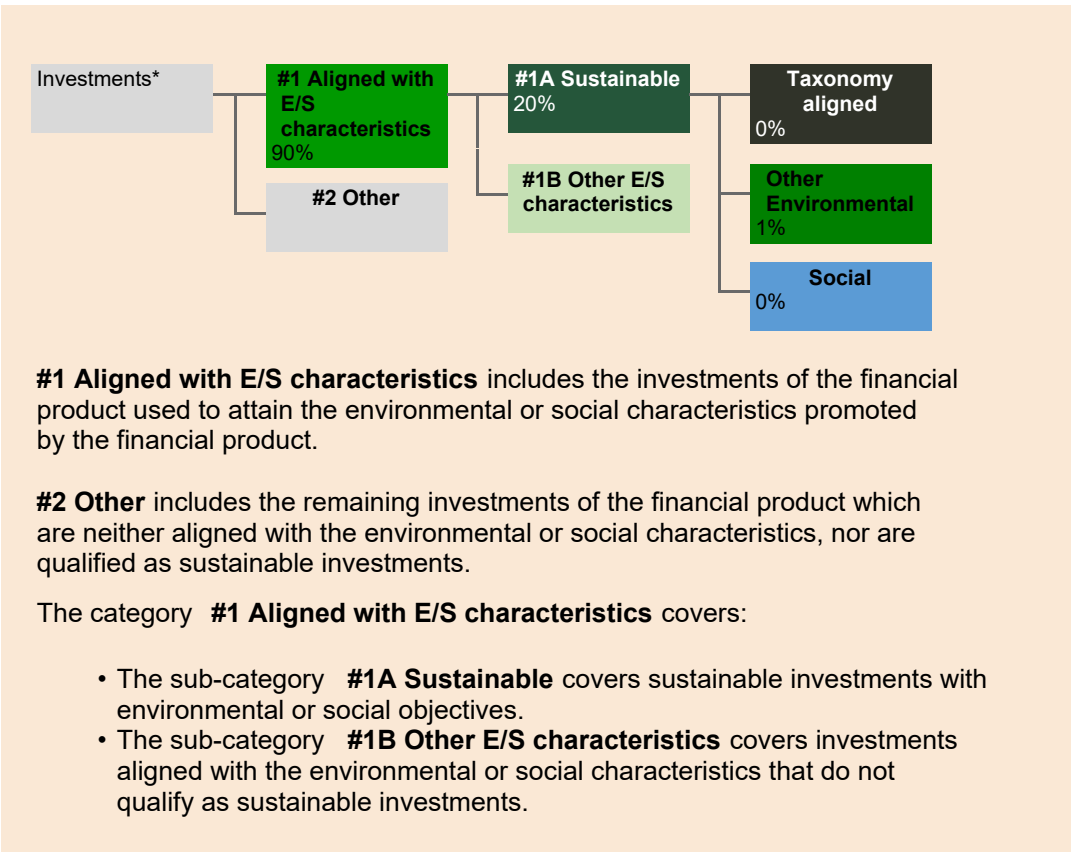
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

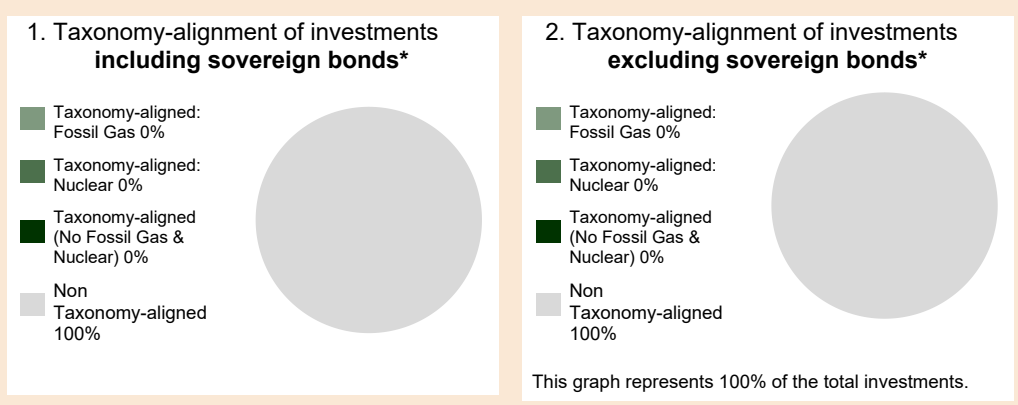
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Nordic Covered Bond Fund

**Legal entity identifier:** 549300Z5T2843VWFFI55

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

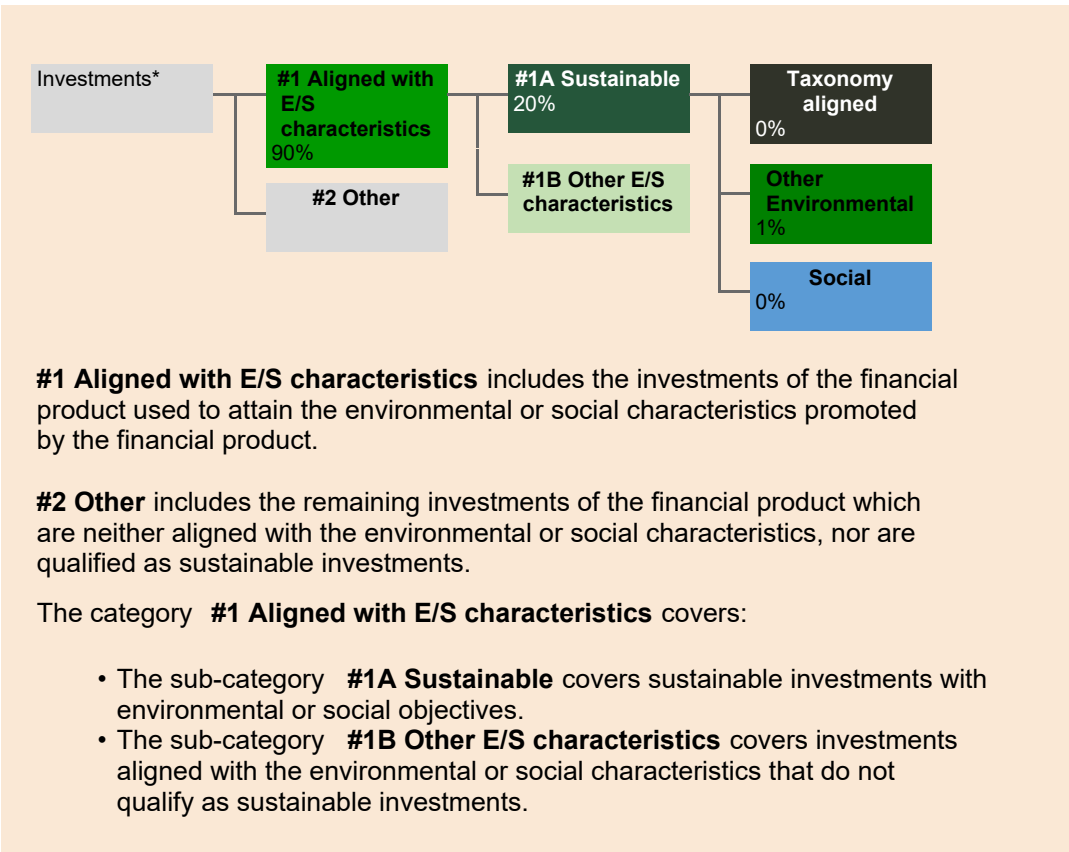
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

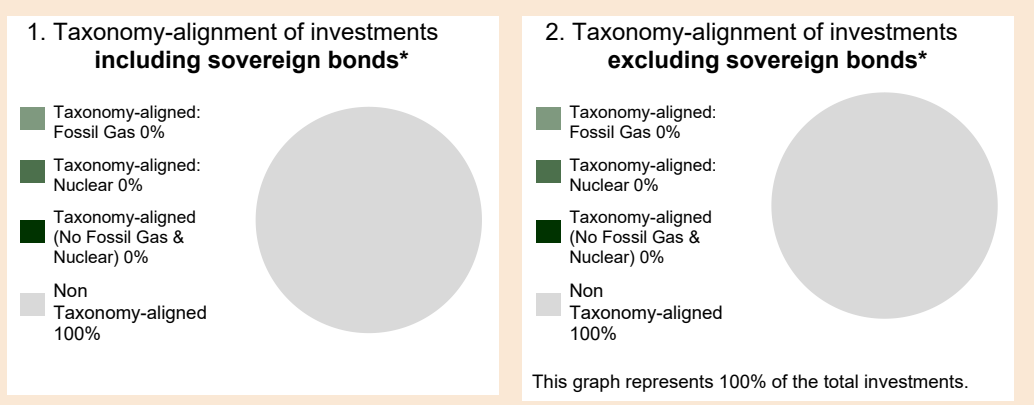
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Nordic Fund

**Legal entity identifier:** 549300UC4ZJ2O8SGHF58

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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



**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

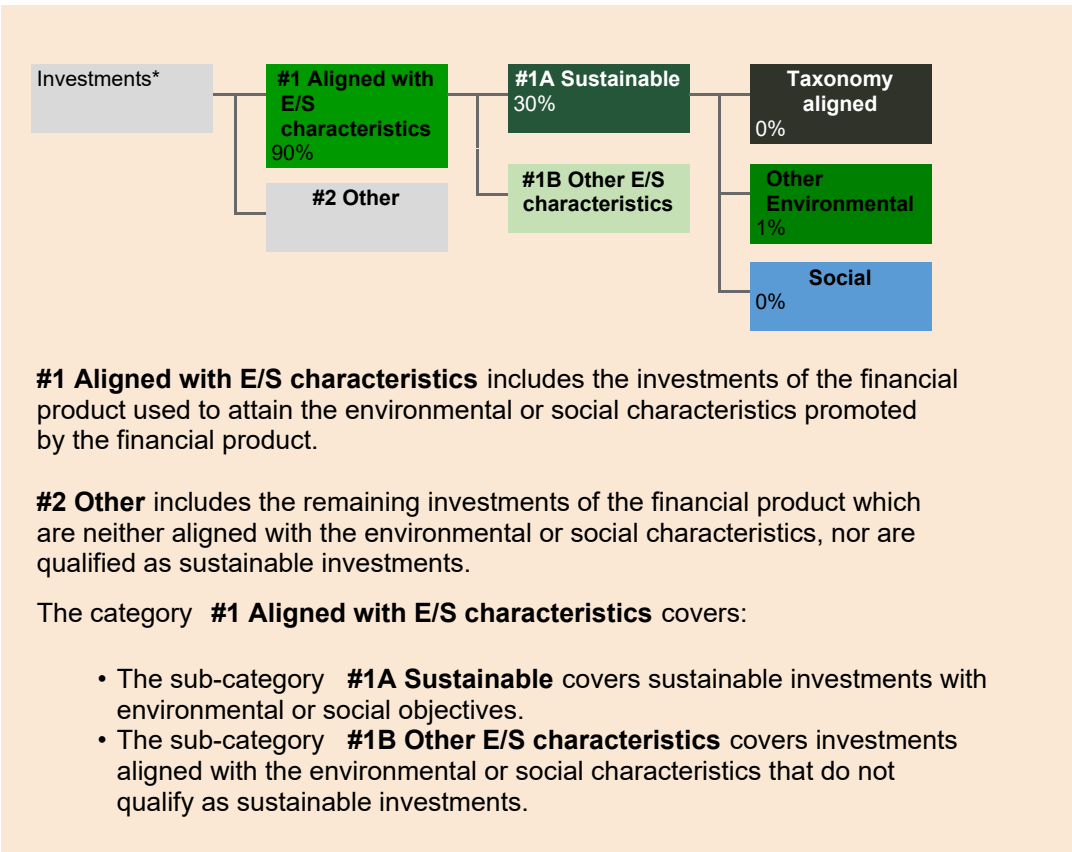
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

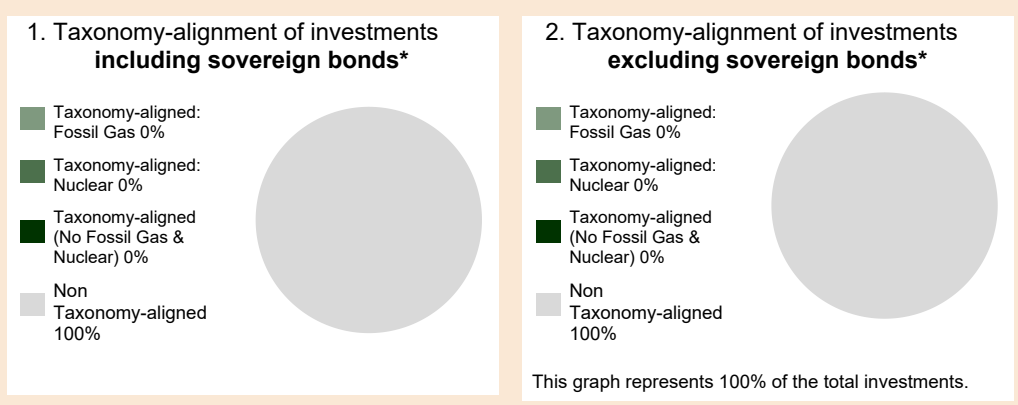
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)



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

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

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

**Product name:** Nordea Nordic Small Cap Fund

**Legal entity identifier:** 549300SO1LWCDV9C5D89

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

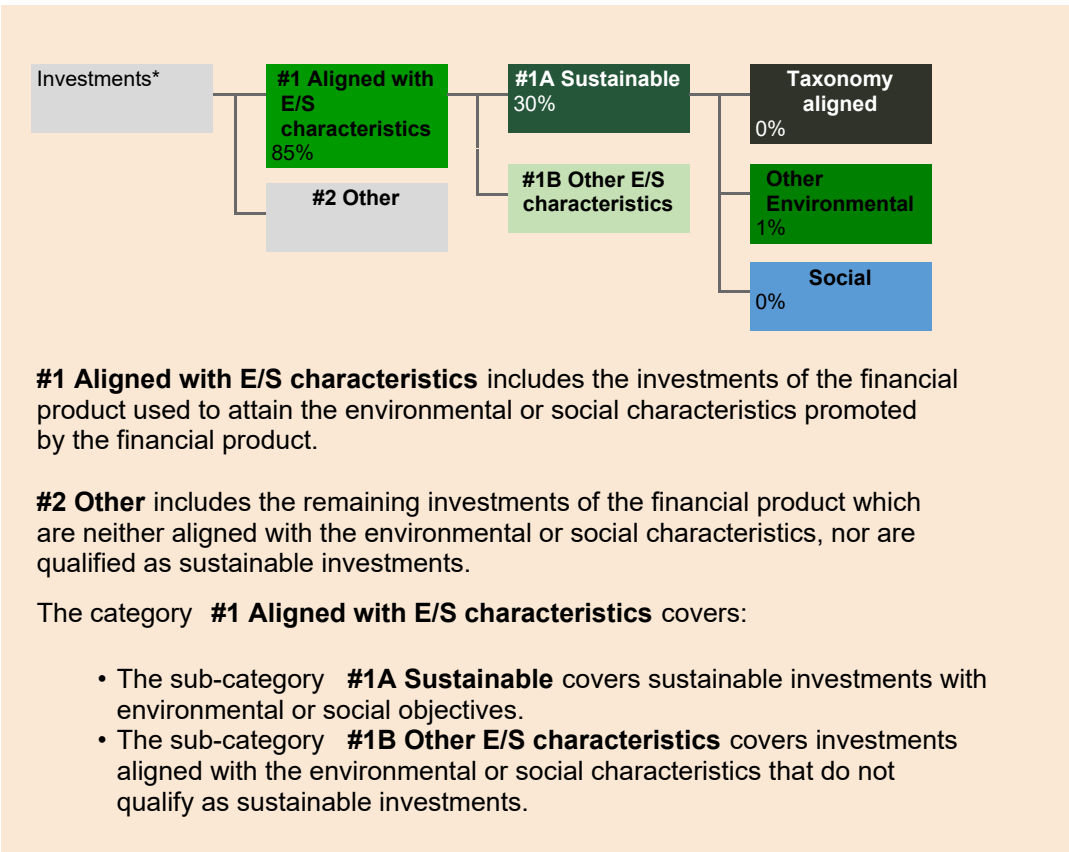
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

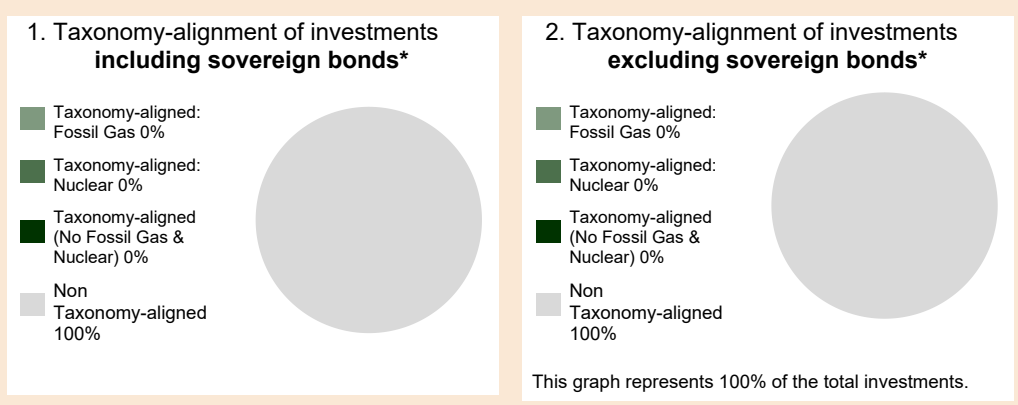
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Norge Pluss Fund

**Legal entity identifier:** 636700Z1ZVRNK5A84I76

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments

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

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

with a social objective

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section “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?”

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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.*

### **Sustainability indicators**

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

### **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.



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

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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 strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

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

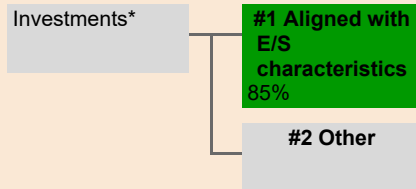
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#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.

\*Investments refer to the fund's NAV which is the total market value of the fund.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

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

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

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



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

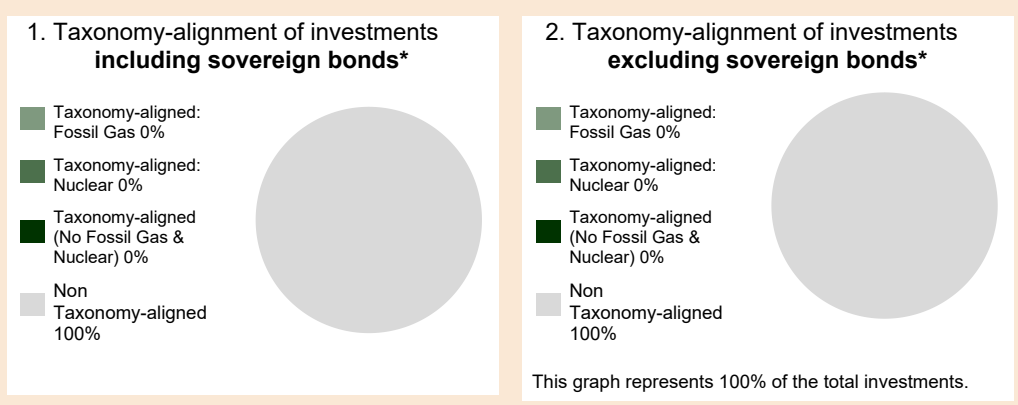
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.

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



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

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

There is no commitment to a minimum proportion of investments in transitional and enabling activities.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



## **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

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

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

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

**Product name:** Nordea Norge Verdi Fund

**Legal entity identifier:** 636700SEREXREY5I6W14

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

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

### **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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

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



The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

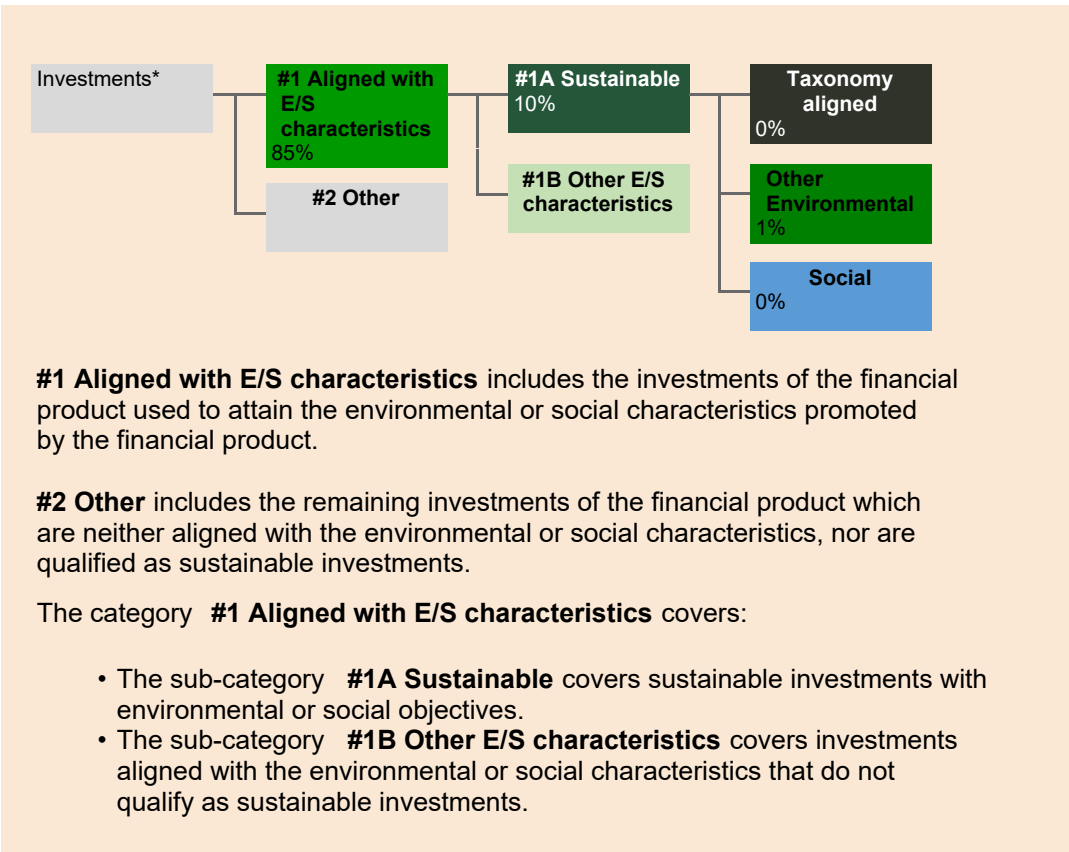
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

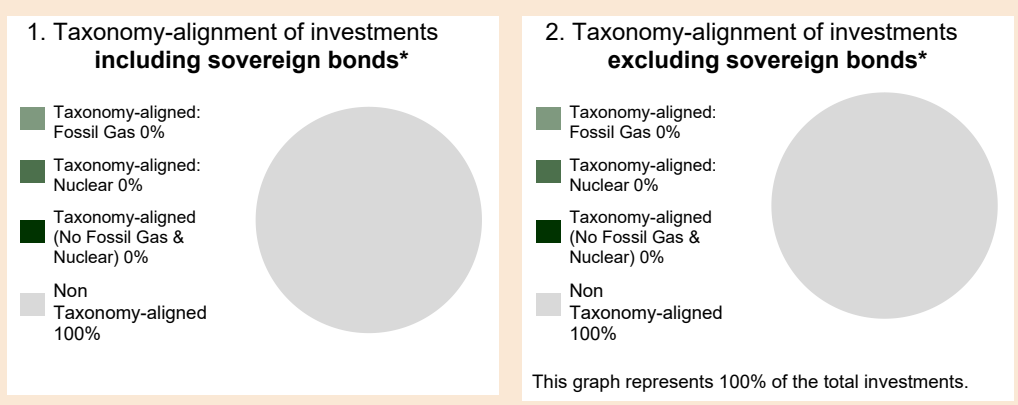
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

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

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

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

**Product name:** Nordea North American Dividend Fund

**Legal entity identifier:** 549300KP5KVQJDR7WD41

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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



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

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

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

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

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

**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.

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

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

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

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.



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

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

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

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

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

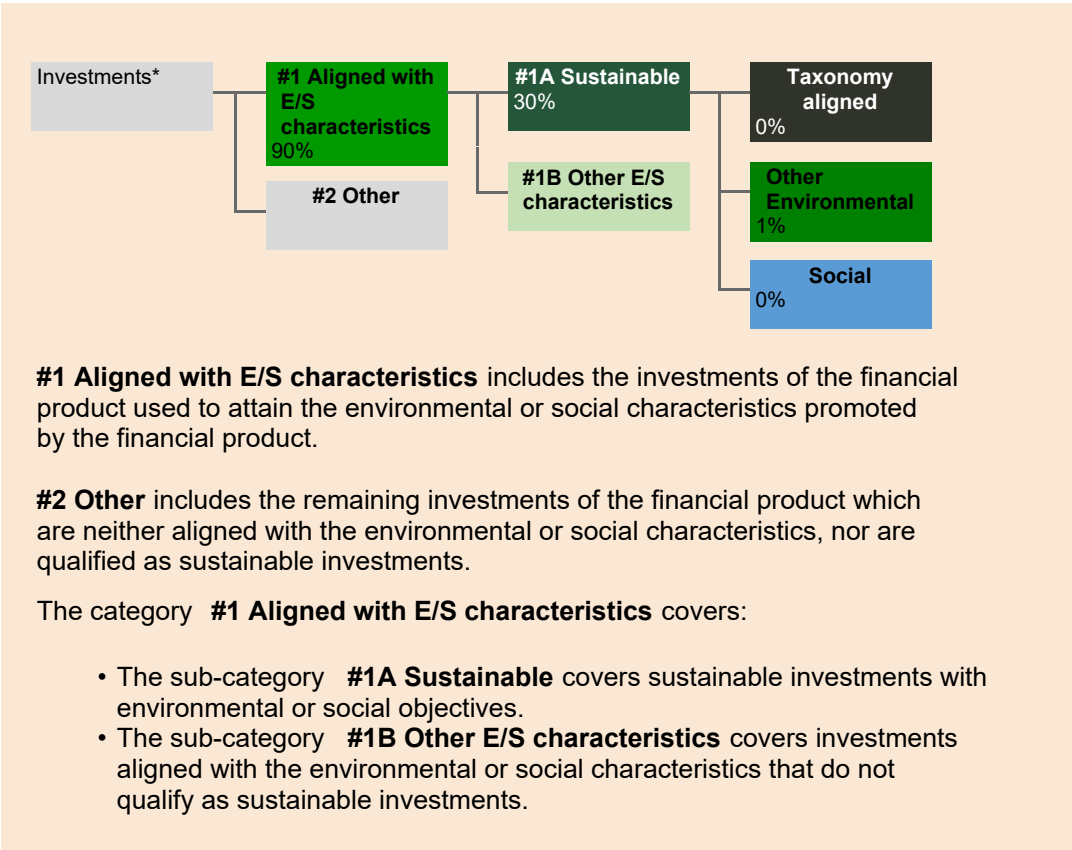
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



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

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

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

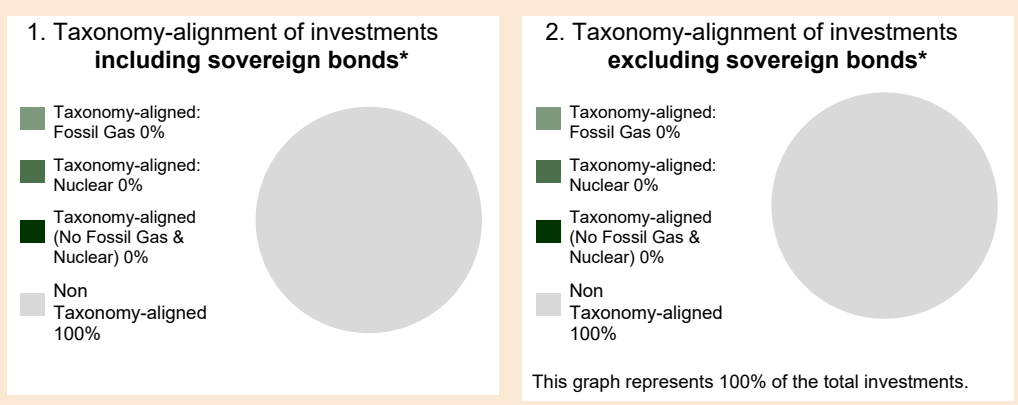
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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

- Yes
  - In fossil gas       In nuclear energy
- No

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.


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



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

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

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



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

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

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

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

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

**Product name:** Nordea Norwegian Passive Fund

**Legal entity identifier:** 636700X3LL2DJX0ZDS03

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Sector- and value-based exclusions** The fund promotes E/S characteristics by using a dedicated reference benchmark, which determines the fund's investment universe. The exclusions and screenings applied in the benchmark construction process will exclude investments in companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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 benchmark used by the fund has been designated as a reference benchmark for the purpose of attaining the E/S characteristics promoted by the fund. The fund is passively managed and the strategy aims to replicate the return of the benchmark.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of investments, aligned with the E/S characteristics, that do not comply with the sector restrictions of the fund's benchmark

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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.*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**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.





**Does this financial product consider principal adverse impacts on sustainability factors?**

- No, The fund aims to replicate the benchmark return and as a result there is no specific consideration of PAI on product level.
- Yes



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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 investment strategy aims at following the development of OBX ESG ex Oil and Gas. In addition to the exclusions that are applied to the reference benchmark, companies that are in Nordea's exclusion list are not investable. The link to the exclusion list is provided in the section "Where can I find more product specific information online?". Further, it is ensured that companies follow good governance using NAM's process as described in the section "What is the policy to assess good governance practices of the investee companies?".

The funds investments may deviate from the benchmark due to these additional measures.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Sector- or value-based exclusions: The OBX® ESG ex Oil and Gas Index replicated by the fund, excludes companies that are involved in controversial activities, tobacco, controversial weapons, oil and gas or assessed to be non-compliant with the UN Global Compact principles. More information on the exclusions that apply to the benchmark is available on the index providers website. The link is provided in the section "Where can the methodology used for the calculation of the designated index be found?" In addition to the exclusions criteria applicable to OBX® ESG ex Oil and Gas Index, the fund does not invest in companies that are on Nordea's exclusion list. Sector- or value-based exclusions prevent investments in companies that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

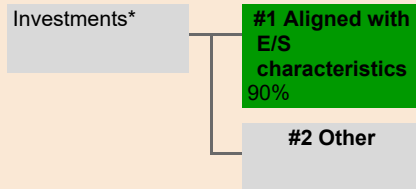
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#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.

\*Investments refer to the fund's NAV which is the total market value of the fund.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies

- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

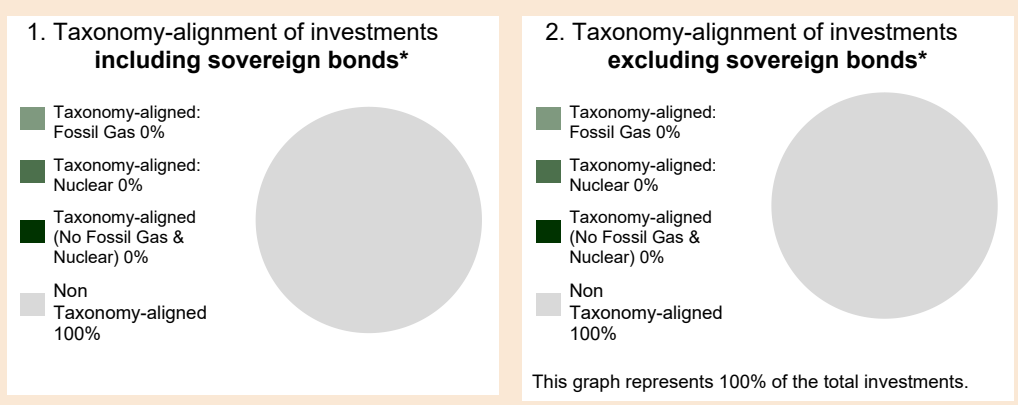
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion of investments in transitional and enabling activities.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund uses OBX ESG ex Oil and Gas index, which is aligned with the environmental and social characteristics of the financial product.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

The E/S characteristics that the fund promotes are attained by investing in Norwegian equities while refraining from exposure to fossil fuel activities and other activities that have been deselected based on ESG considerations. The benchmark is screened to identify and exclude companies that are materially involved in such activities.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

The fund applies a passive strategy that seeks to replicate the benchmark, and the alignment of the fund's investments with the benchmark composition is monitored on an ongoing basis. In addition to the exclusions criteria applicable to the index by Euronext, the product does not invest in companies that are on Nordea's exclusion list, due to violation of international norms and/or involvement in controversial business activities. Companies that do not pass NAM's good governance test are also excluded from the fund's investment universe.

- ***How does the designated index differ from a relevant broad market index?***

The fund's benchmark, OBX ESG ex Oil and Gas, is more concentrated than broad market index, as the index universe is limited by selecting top companies ranked on free float market cap. It differs from a broad market index also by its value-based exclusions as well as exclusions based on environmental considerations, and by using the ESG risk rating as assessed by Sustainalytics in the constituent selection process.

- ***Where can the methodology used for the calculation of the designated index be found?***

The benchmark is provided by Euronext, and the methodology for the calculation can be found on Euronext website [live.euronext.com/en/products-indices/index-rules](https://live.euronext.com/en/products-indices/index-rules).

## Where can I find more product specific information online?



More product-specific information can be found on [www.nordeafunds.com](https://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)  
[Exclusion list](#)

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Norwegian Stars Fund

**Legal entity identifier:** 549300R6FK8CCVQMSK36

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### **Engagement and stewardship**

On behalf of its clients, NAM undertakes a range of engagement activities with investee companies and corporate- and sovereign issuers in order to encourage them to improve their ESG practices, and promote a long-term approach to decision-making.

### ● ***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?***

Minimum 50% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

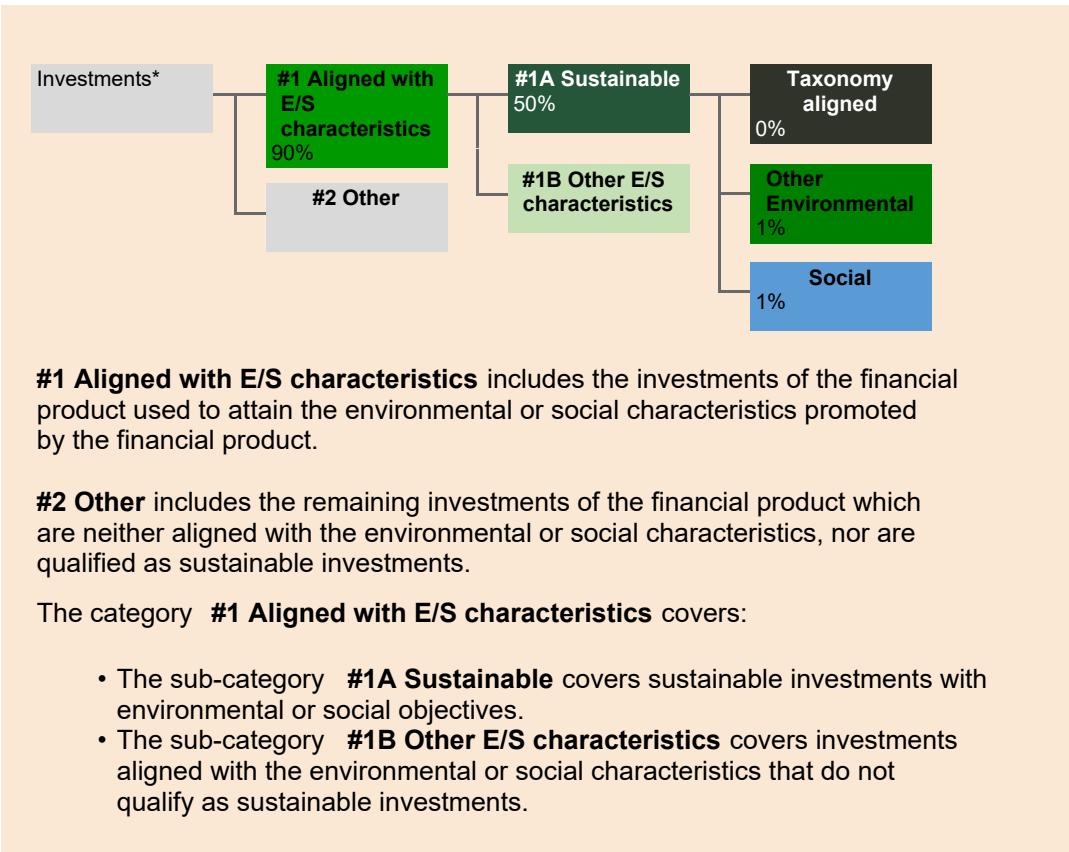
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

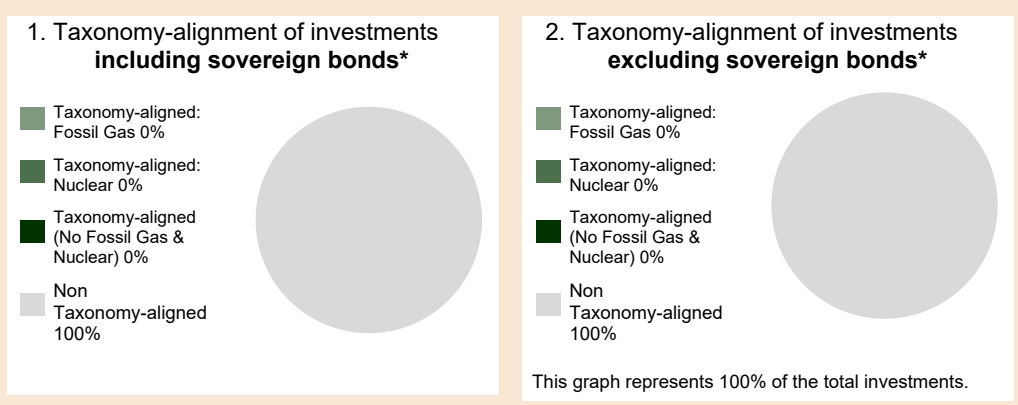
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



### **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Obligasjon II Fund

**Legal entity identifier:** 636700AQ0WXD4PE5KI86

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

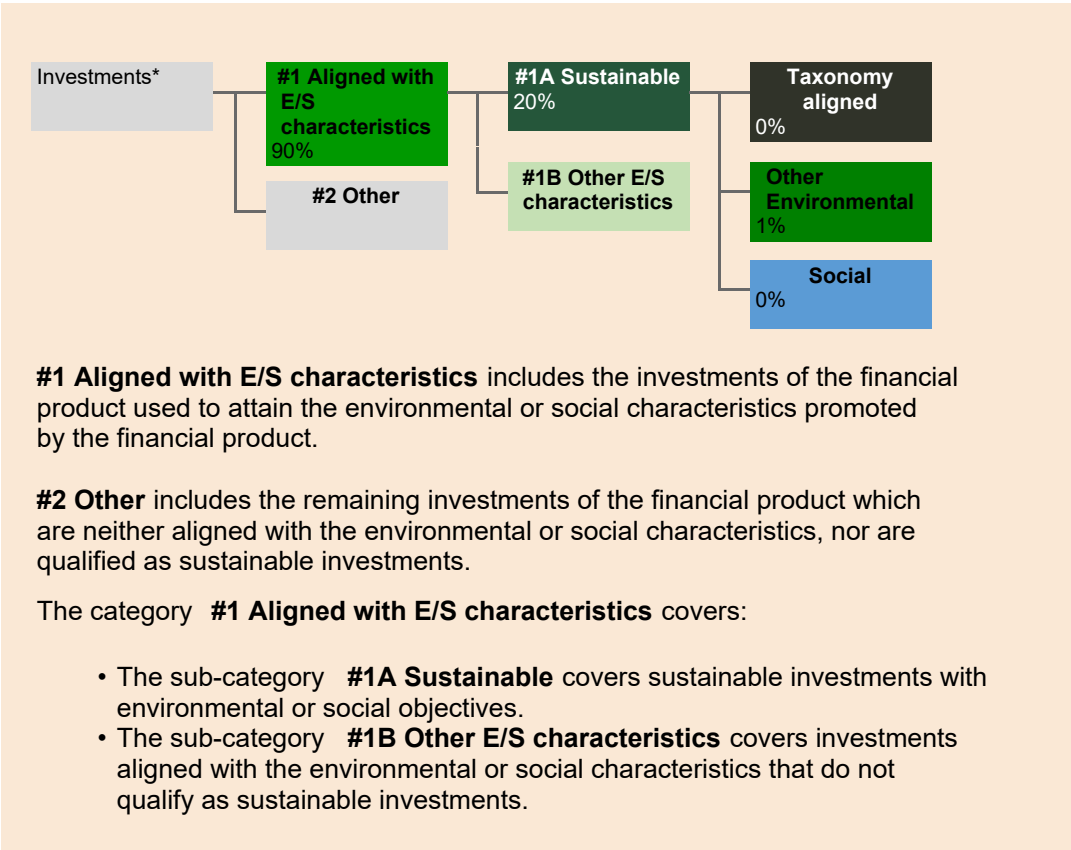
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

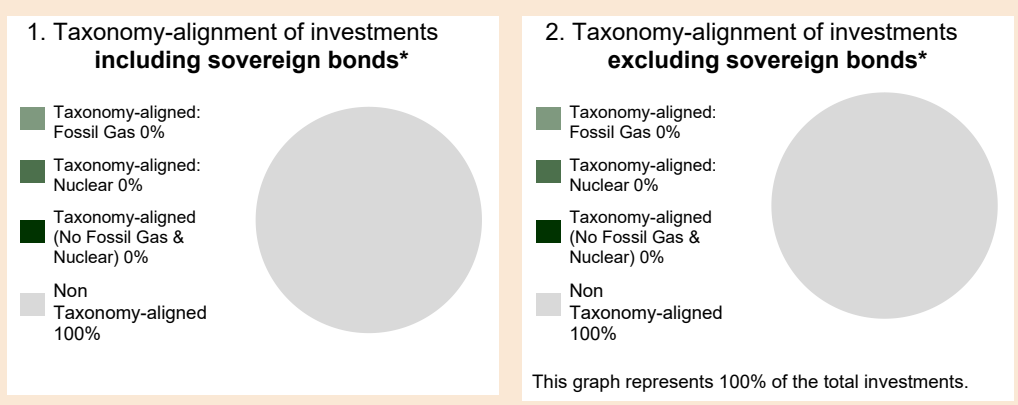
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



### **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Obligasjon III Fund

**Legal entity identifier:** 6367002TMKWOD9WO8N92

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section “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?”

**NAM’s Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section “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?”

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

The fund invests within an investment universe that generally exhibits a high level of ESG performance across constituents. Consequently, the screenings that apply to the strategy have limited impact on the investment universe and the actual investments of the fund, and only serve as an assurance that underlying investments consistently represent the expected ESG characteristics of the asset class.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM’s Paris-Aligned Fossil Fuel Policy

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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.*

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.



**Does this financial product consider principal adverse impacts on sustainability factors?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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 strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

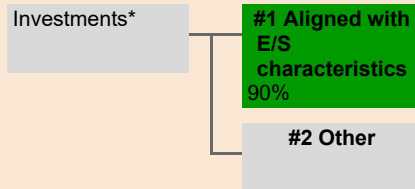
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#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.

\*Investments refer to the fund's NAV which is the total market value of the fund.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies

- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

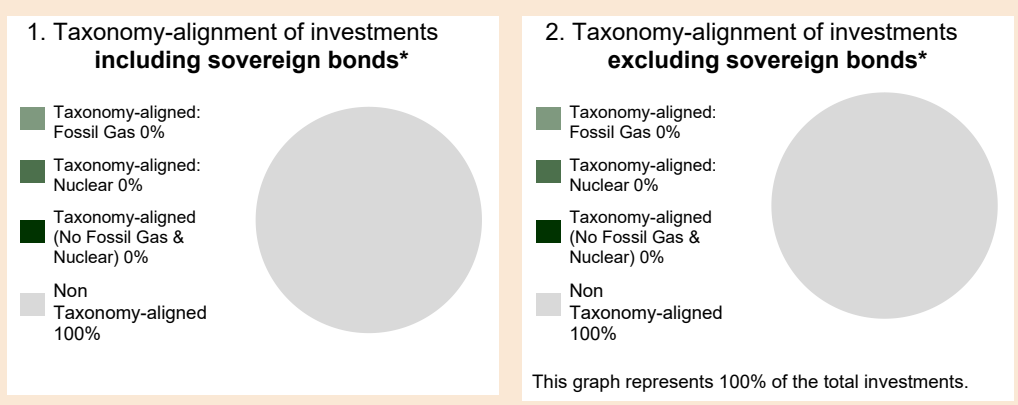
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion of investments in transitional and enabling activities.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



## **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Obligasjon Stars Fund

**Legal entity identifier:** 5493005ECUA2AOK5MT63

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### **Engagement and stewardship**

On behalf of its clients, NAM undertakes a range of engagement activities with investee companies and corporate- and sovereign issuers in order to encourage them to improve their ESG practices, and promote a long-term approach to decision-making.

### ● **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?**

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

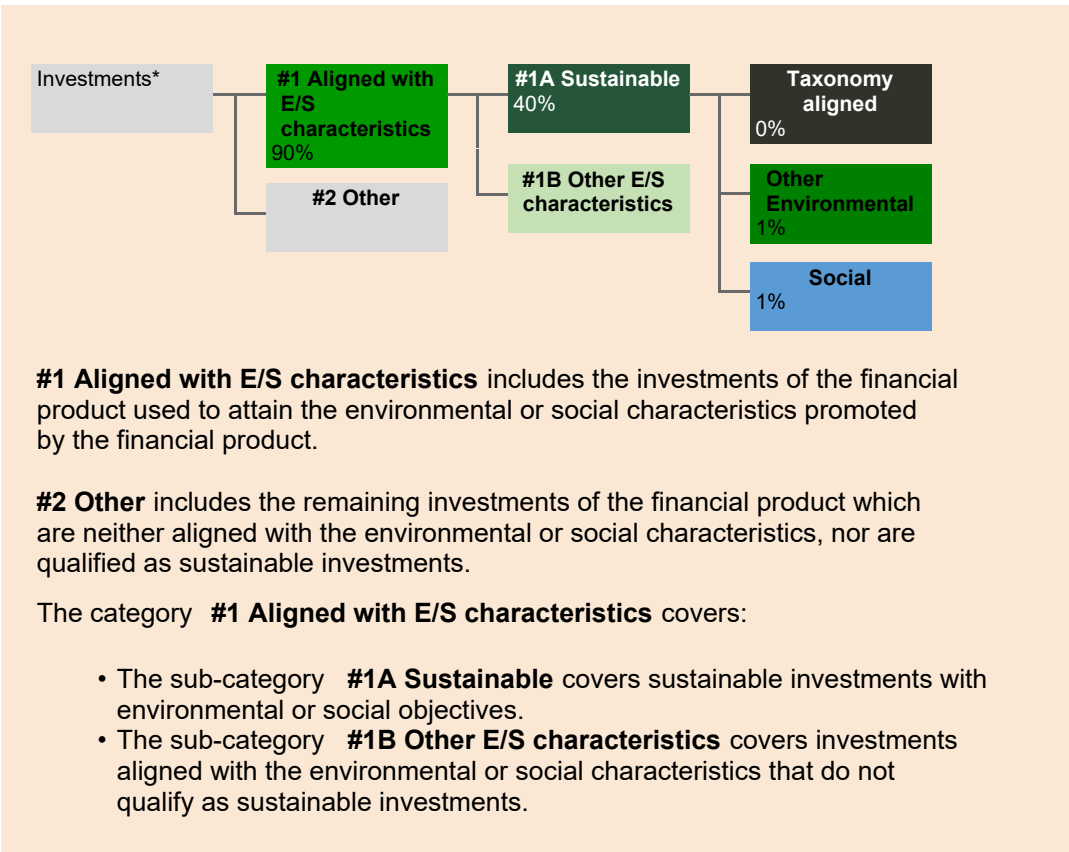
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

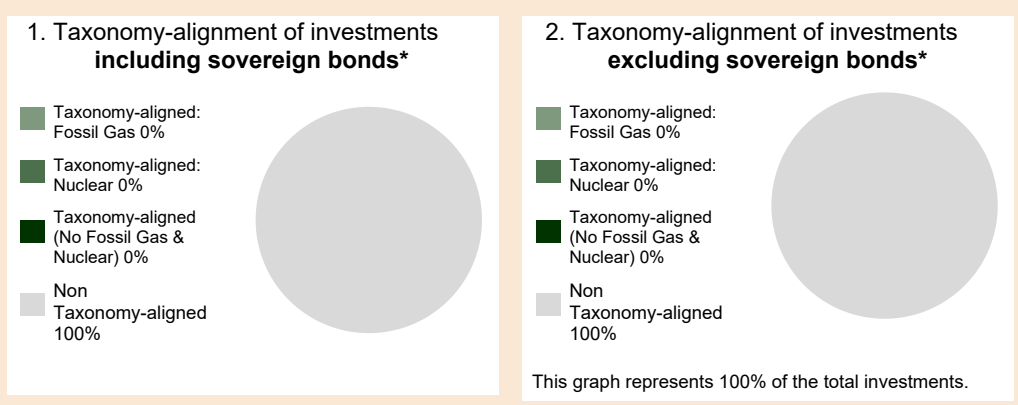
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Plan Balansert Fund

**Legal entity identifier:** 636700RQ64JA2XF35R32

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

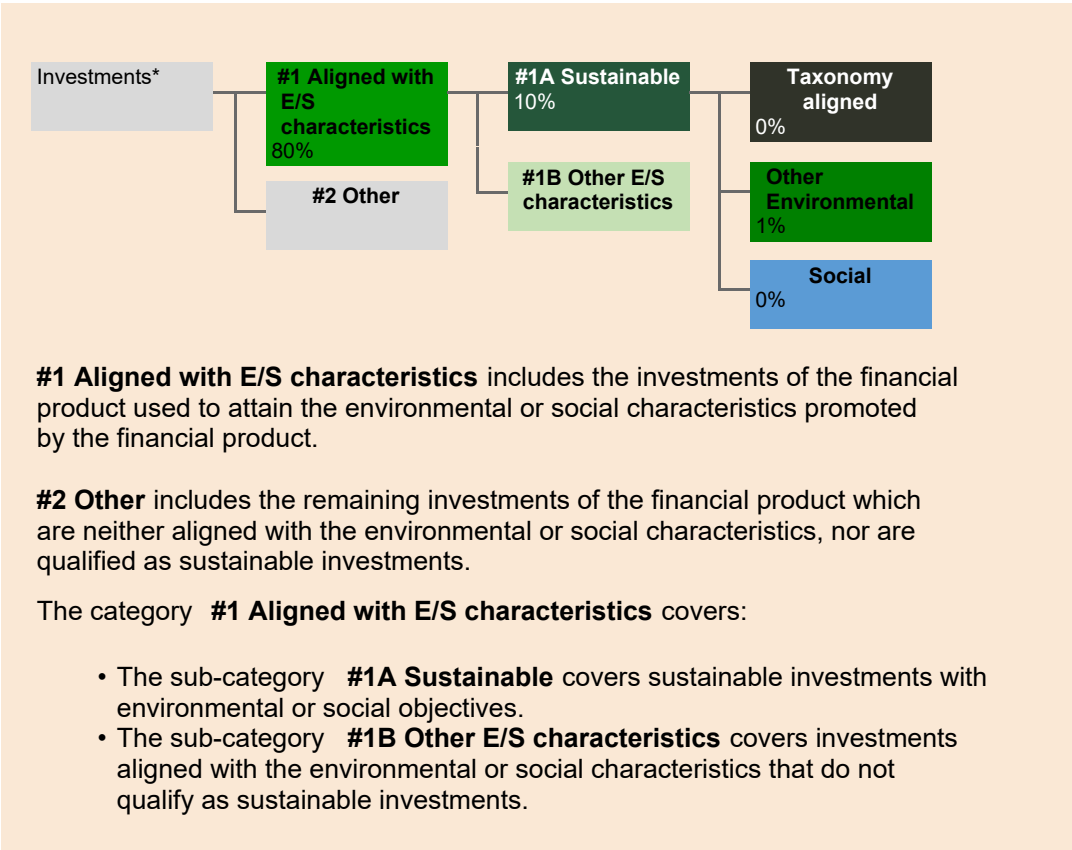
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

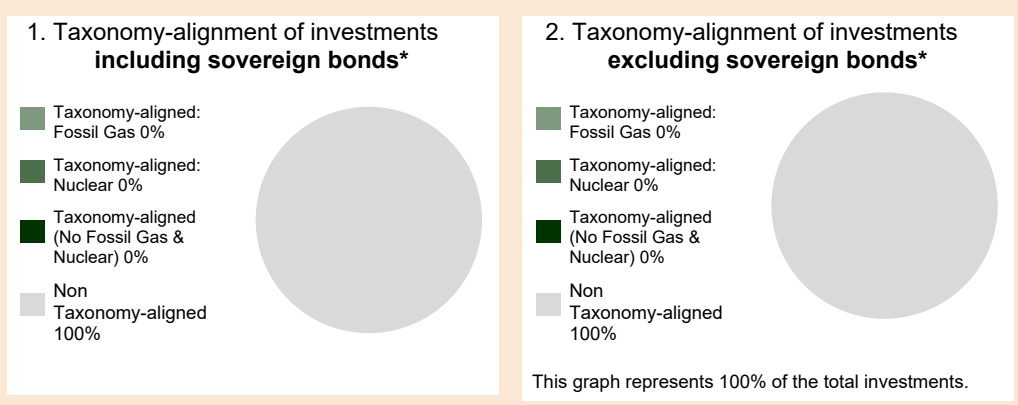
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Plan Konservativ Fund

**Legal entity identifier:** 636700L0WUAOK5CDLE48

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments
  - 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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

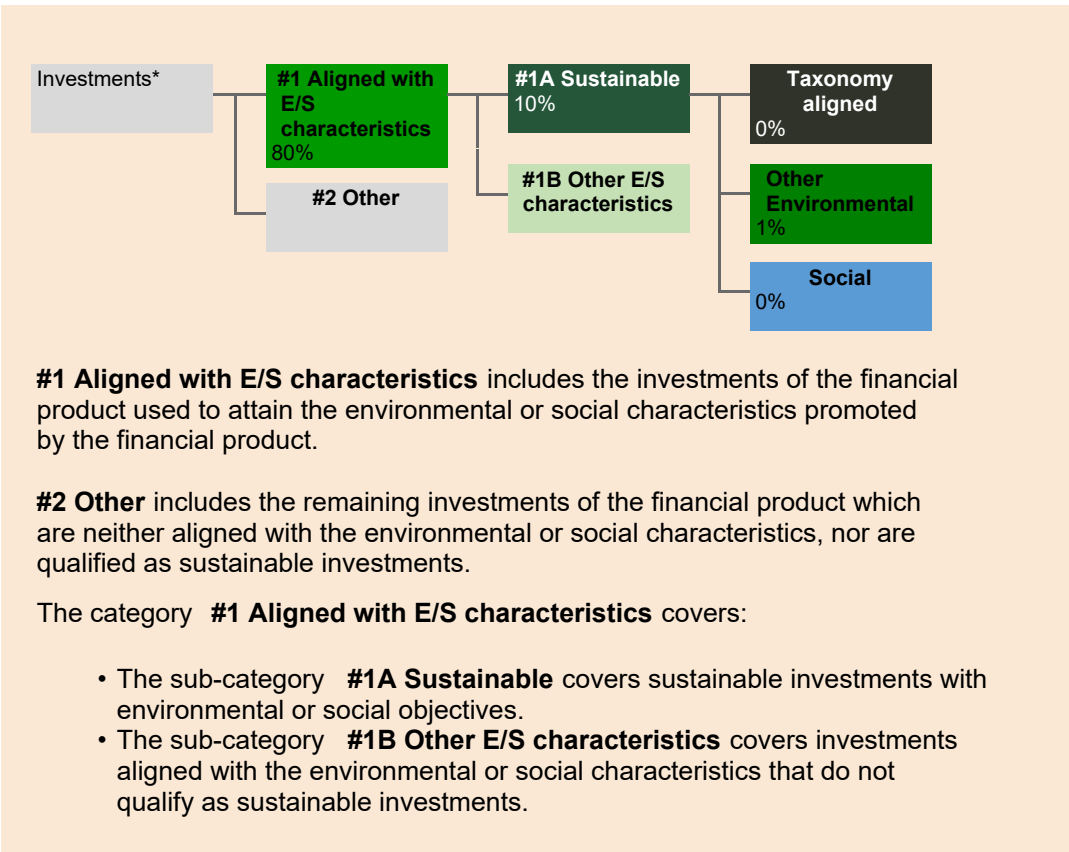
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

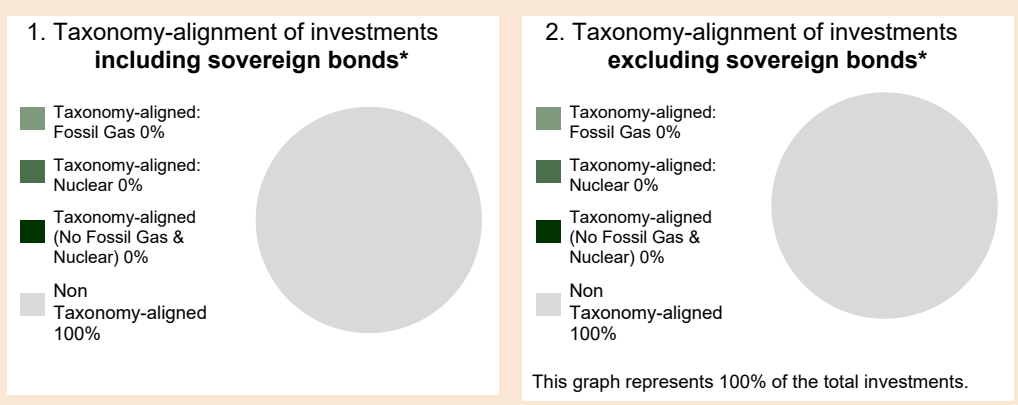
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Plan Moderat Fund

**Legal entity identifier:** 636700HVMG4UG3T4BN84

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

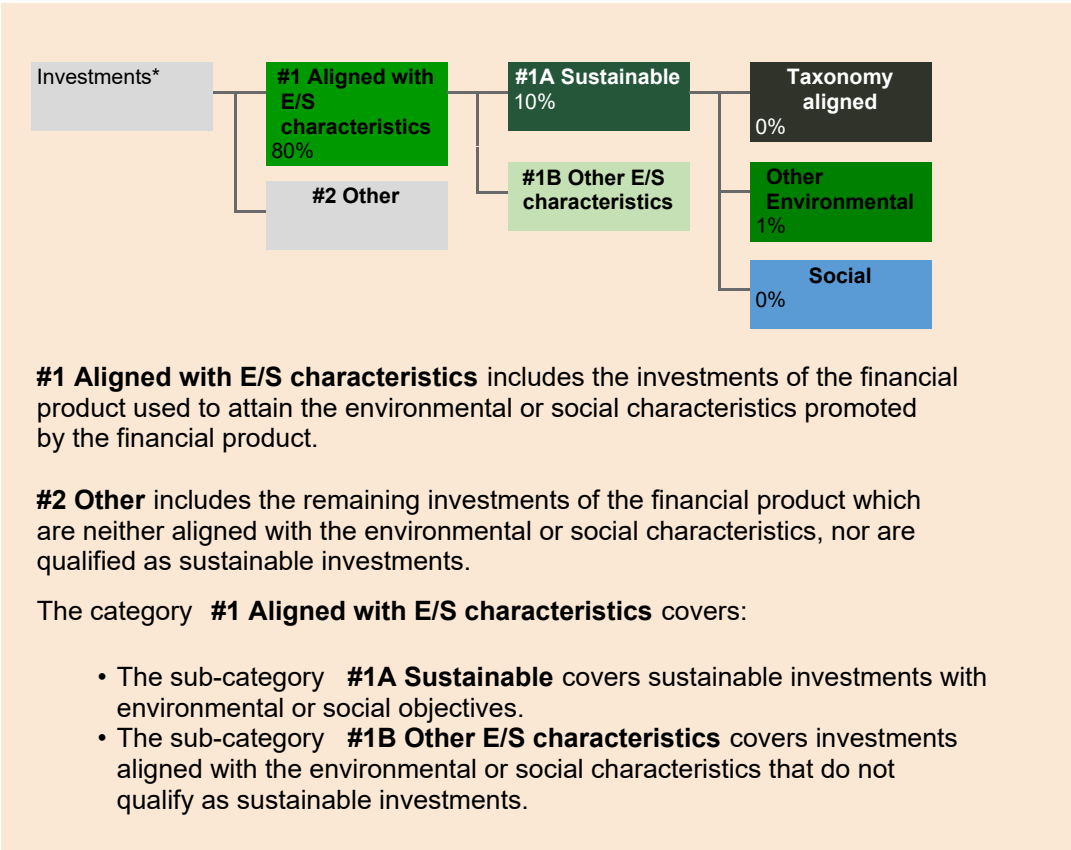
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

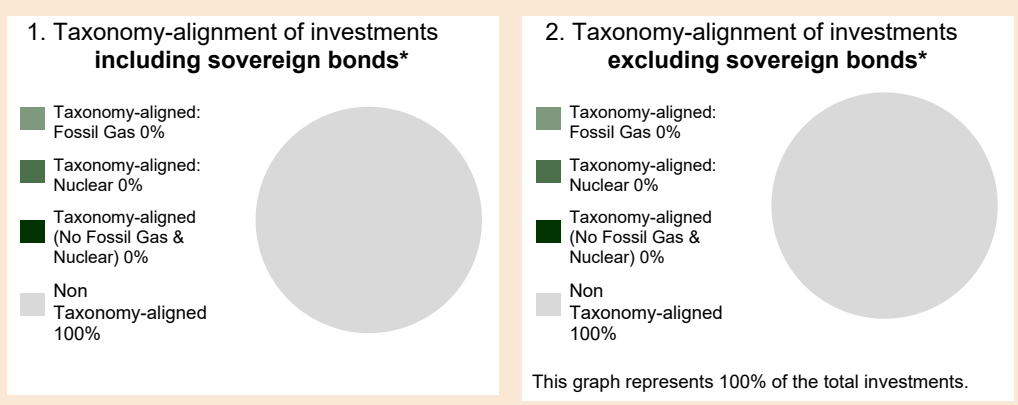
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Plan Offensiv Fund

**Legal entity identifier:** 636700AH757HLPFUND37

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

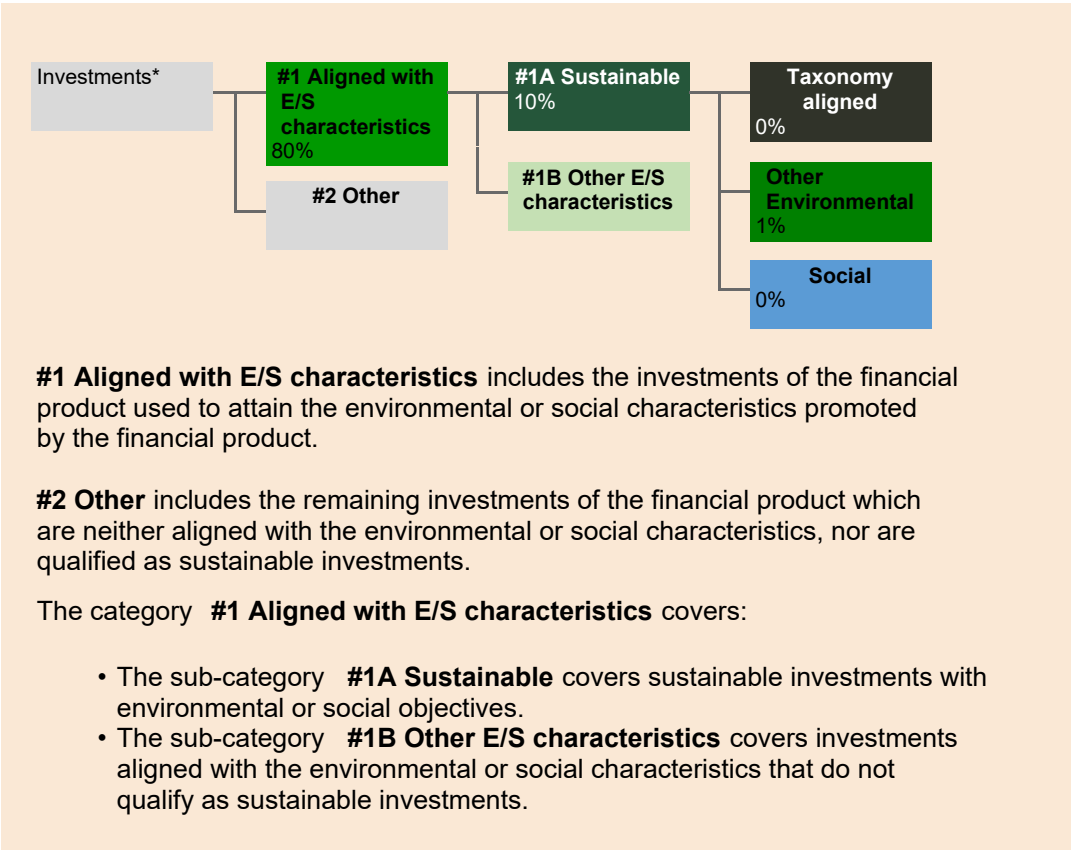
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

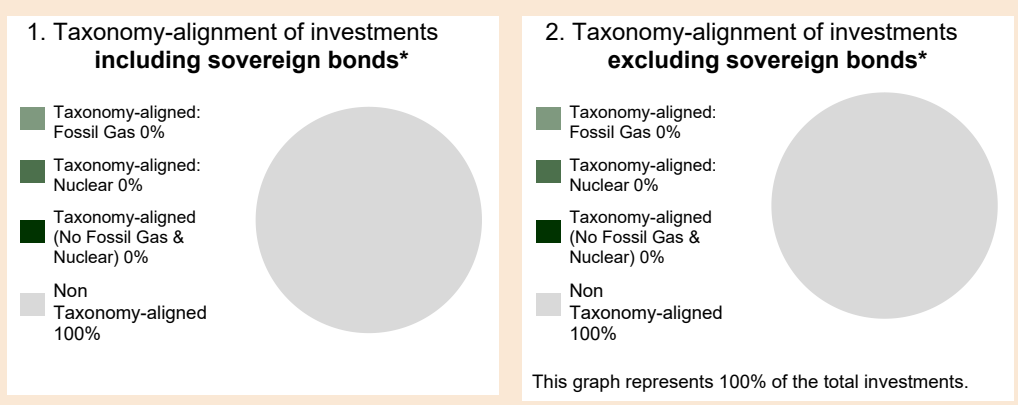
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Plan Vekstorientert Fund

**Legal entity identifier:** 63670057CACPWA6HCD77

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

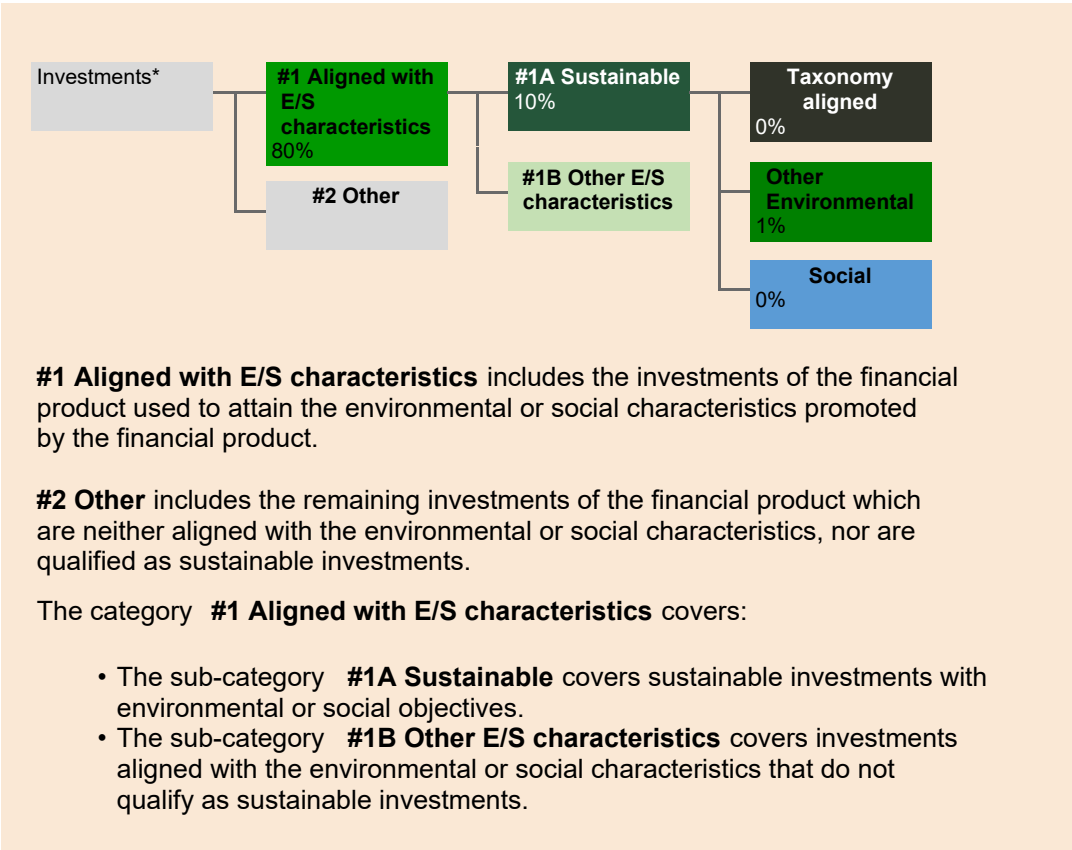
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

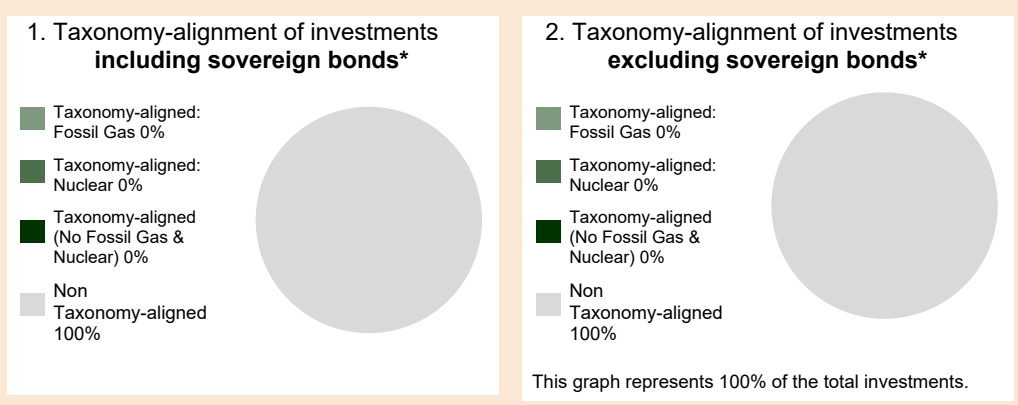
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Non-UCITS Nordea Private Banking Norsk Aksje Portefølje

**Legal entity identifier:** 54930069V895HKG1E87

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

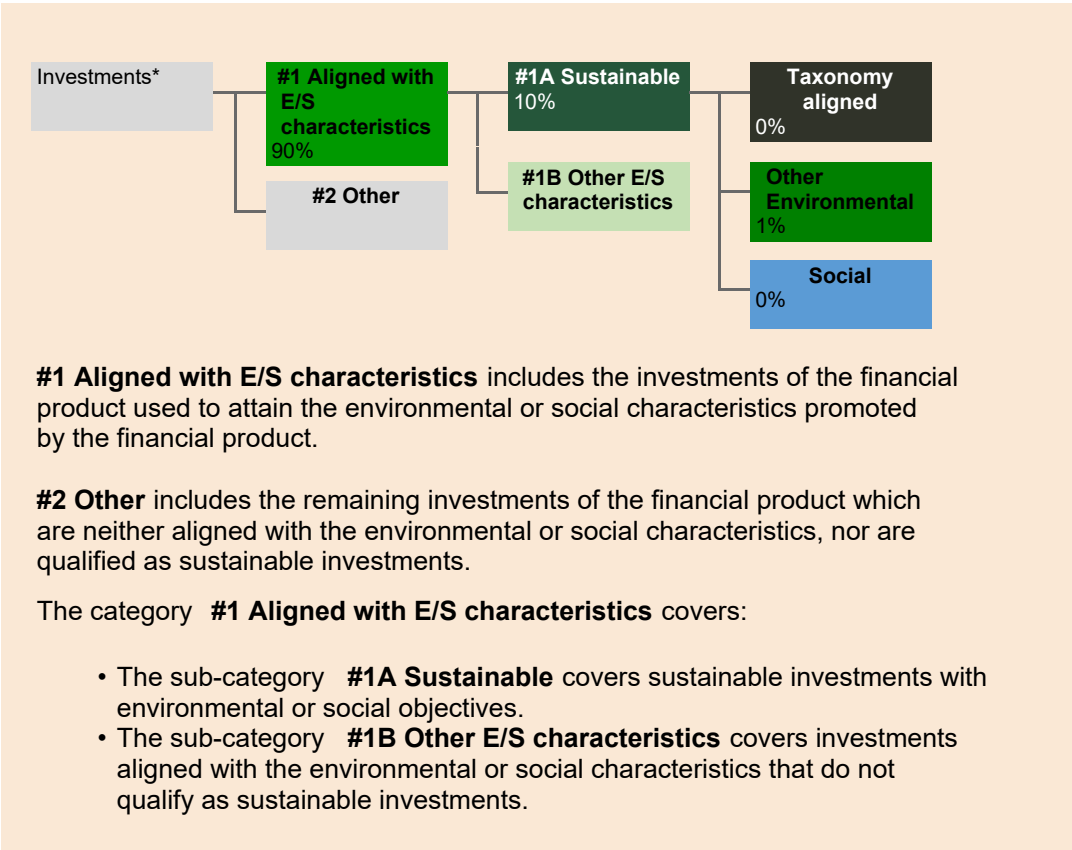
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

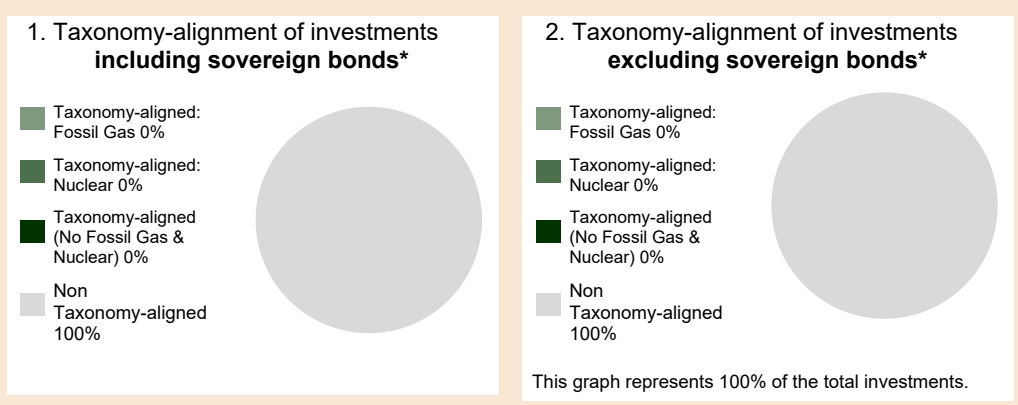
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Pro Euro Bond Fund

**Legal entity identifier:** 549300MSRXNT9GM6JF18

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

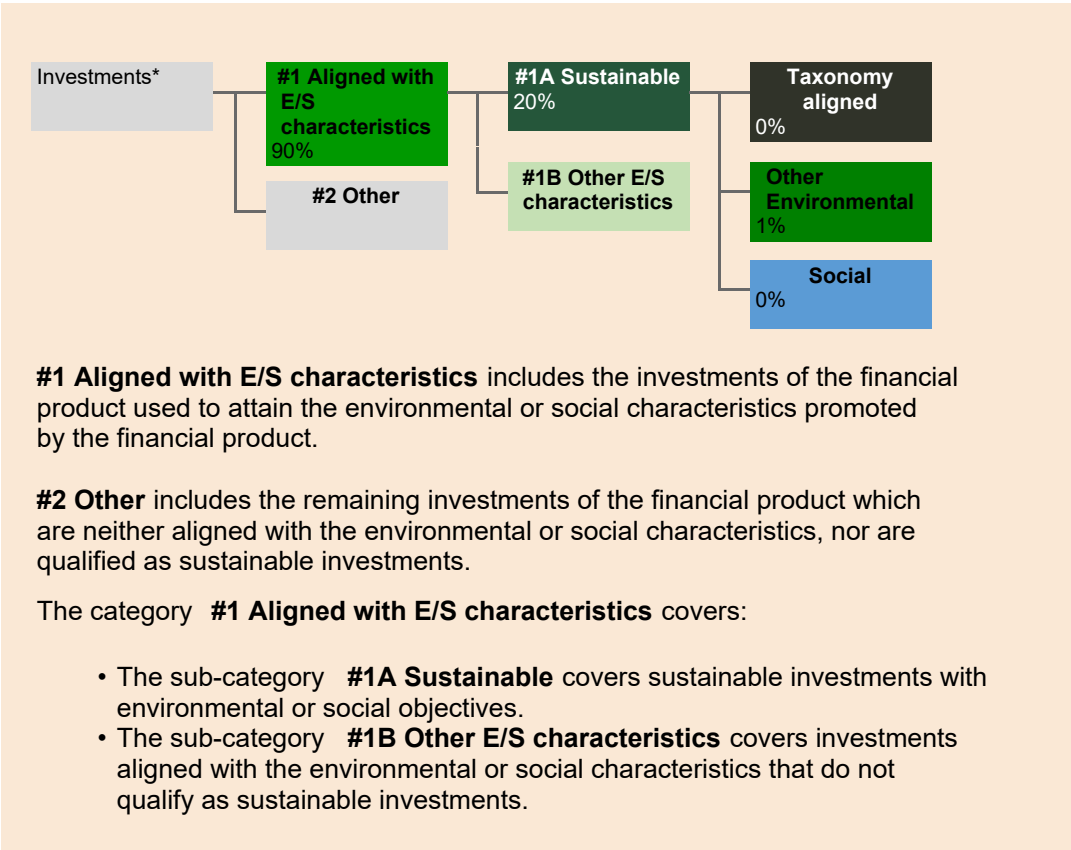
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

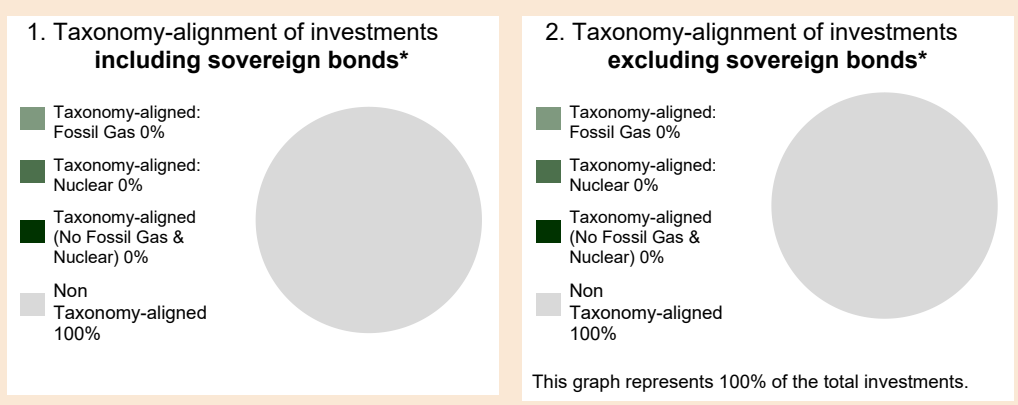
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Pro Finland Fund

**Legal entity identifier:** 549300IH6530YSK1ED94

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

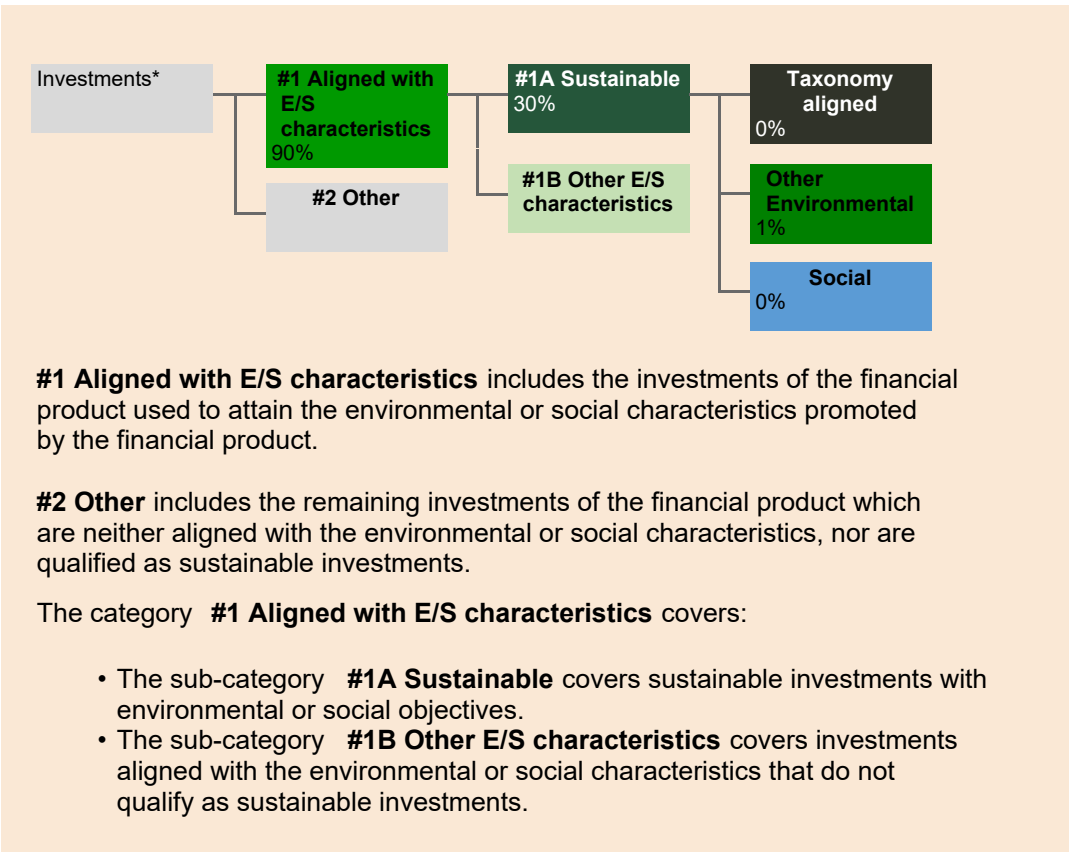
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

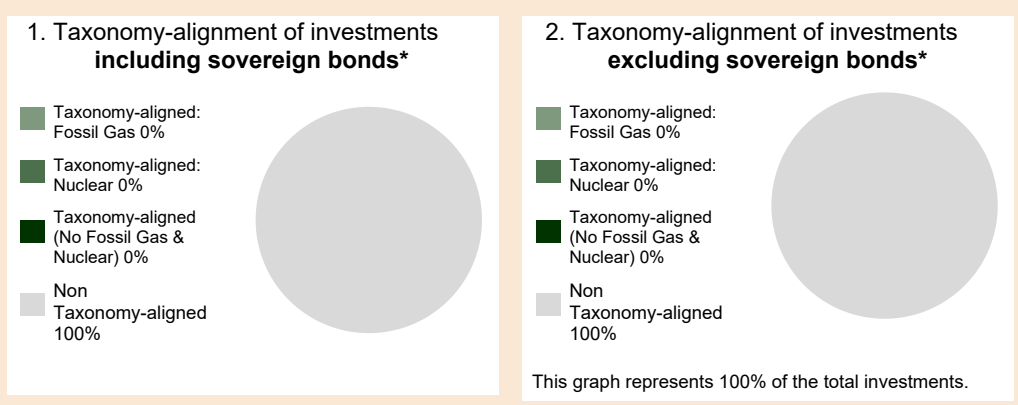
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Pro Stable Return Fund

**Legal entity identifier:** 5493007PR1VQ48112D46

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments
  - 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

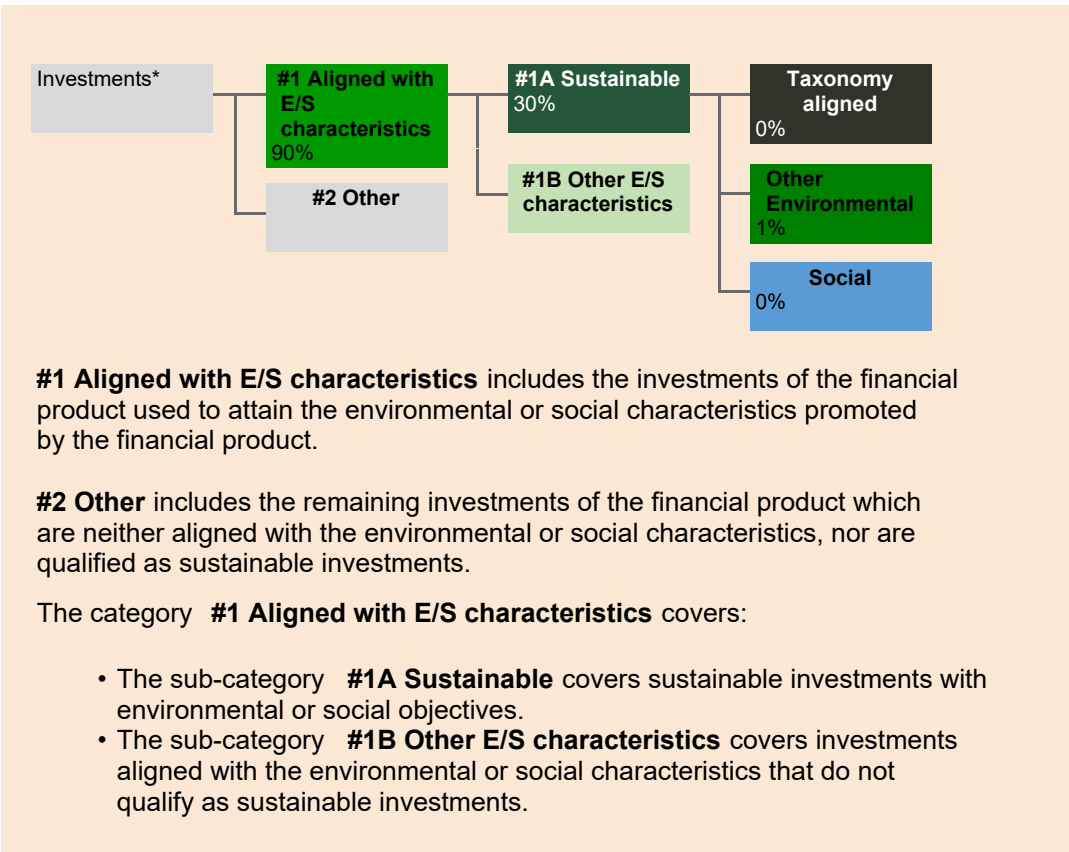
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

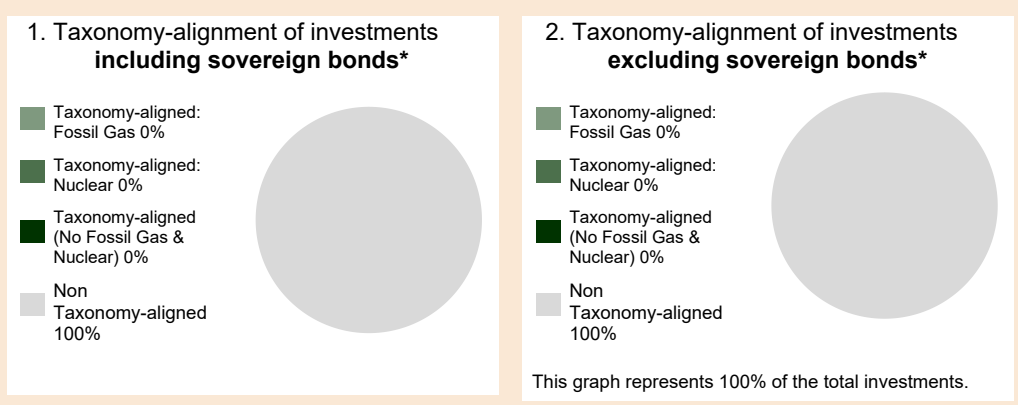
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Stable Return Fund

**Legal entity identifier:** 549300DMIXGESQ21W635

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 10% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

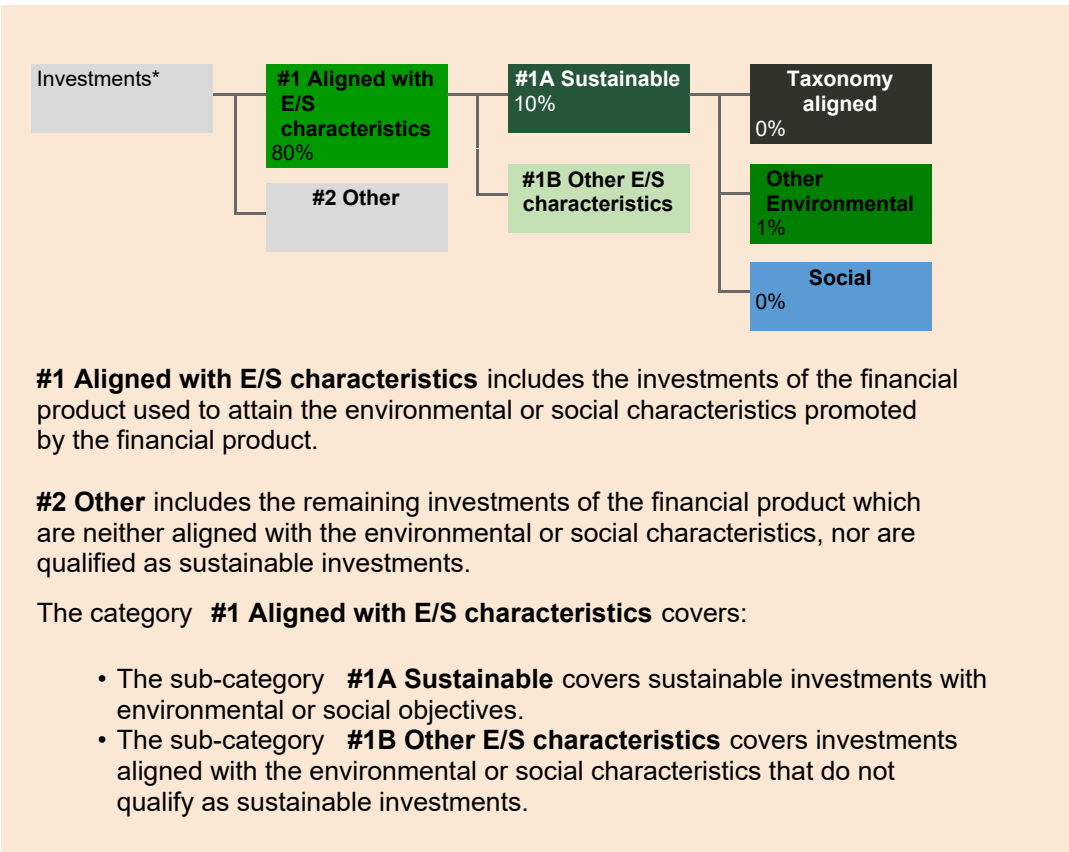
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

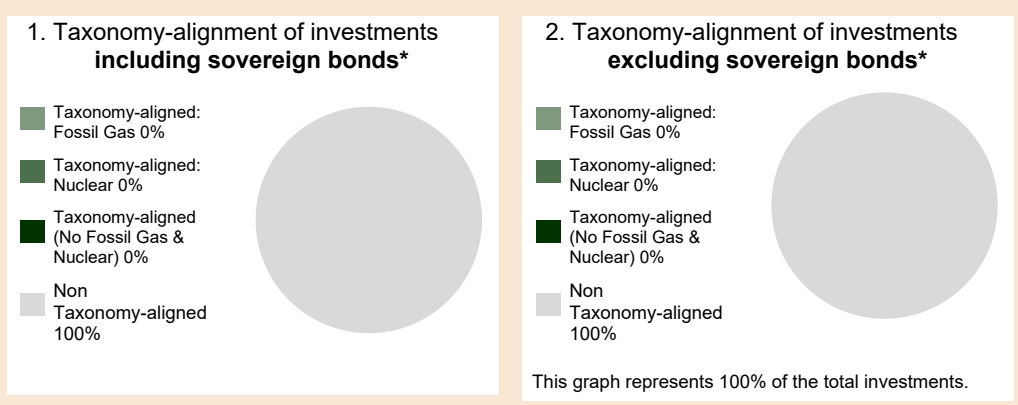
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



### **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Stabile Aksjer Global Fund

**Legal entity identifier:** 636700J6XT34BIJ6JW87

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section “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?”

**NAM’s Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section “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?”

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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.*

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.



**Does this financial product consider principal adverse impacts on sustainability factors?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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 strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

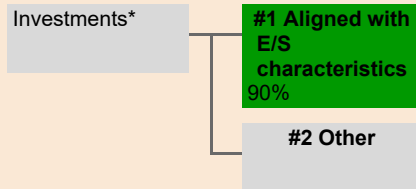
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#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.

\*Investments refer to the fund's NAV which is the total market value of the fund.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

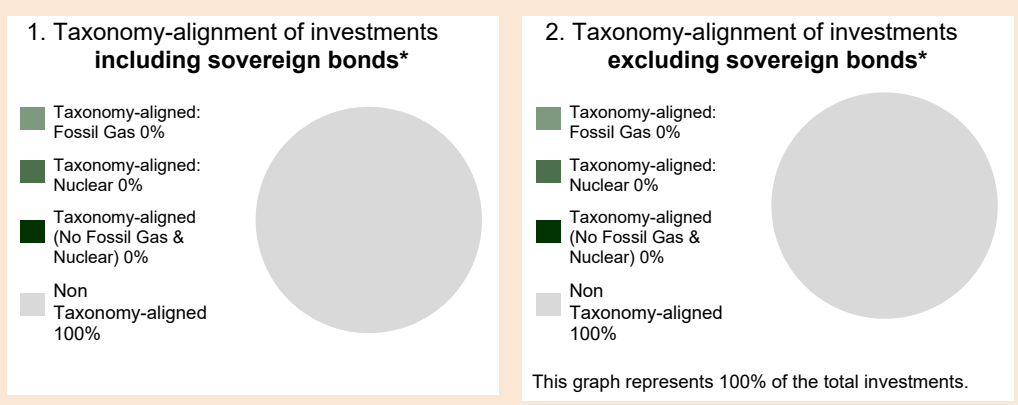
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion of investments in transitional and enabling activities.





## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



## **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Stabile Aksjer Global Valutasikret Fund

**Legal entity identifier:** 636700YBQRH6QSTX7Q85

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

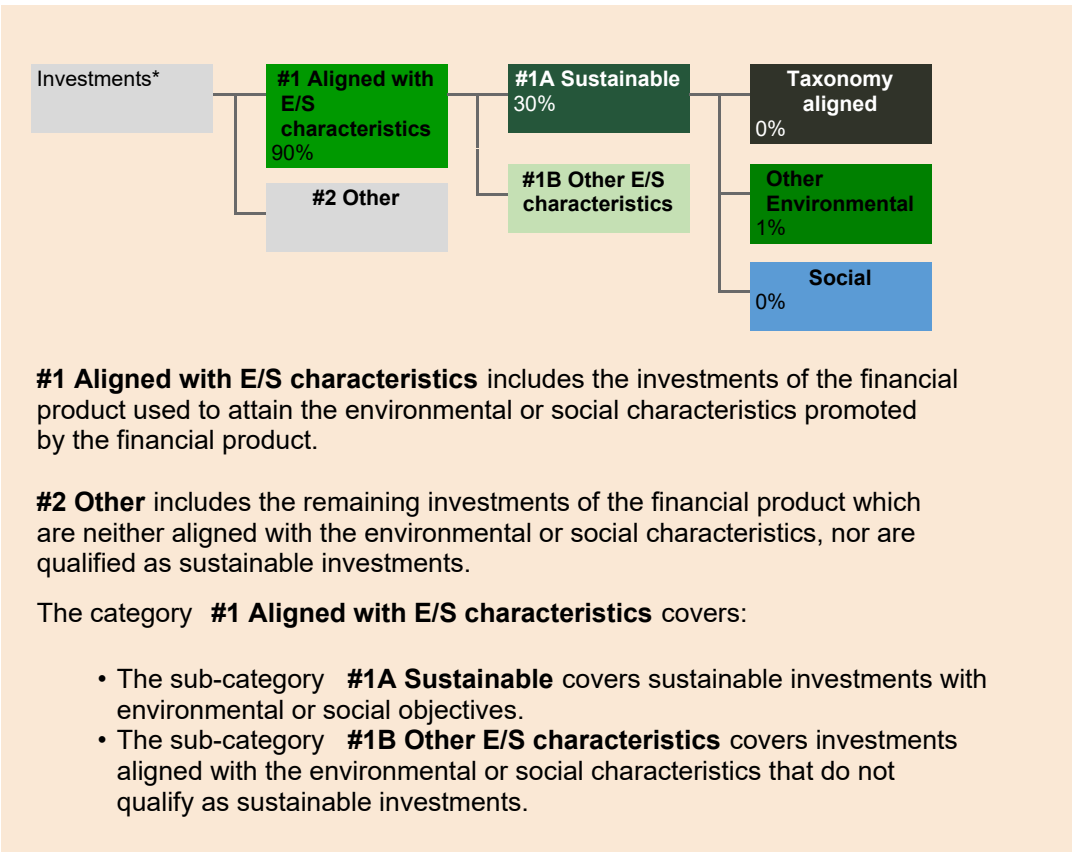
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

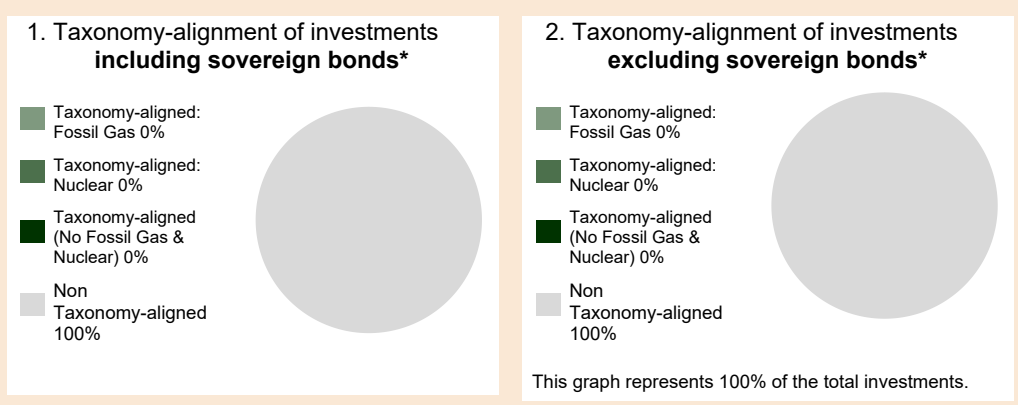
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Stratega 90 Fund

**Legal entity identifier:** 5493005SLZT3V312DZ67

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

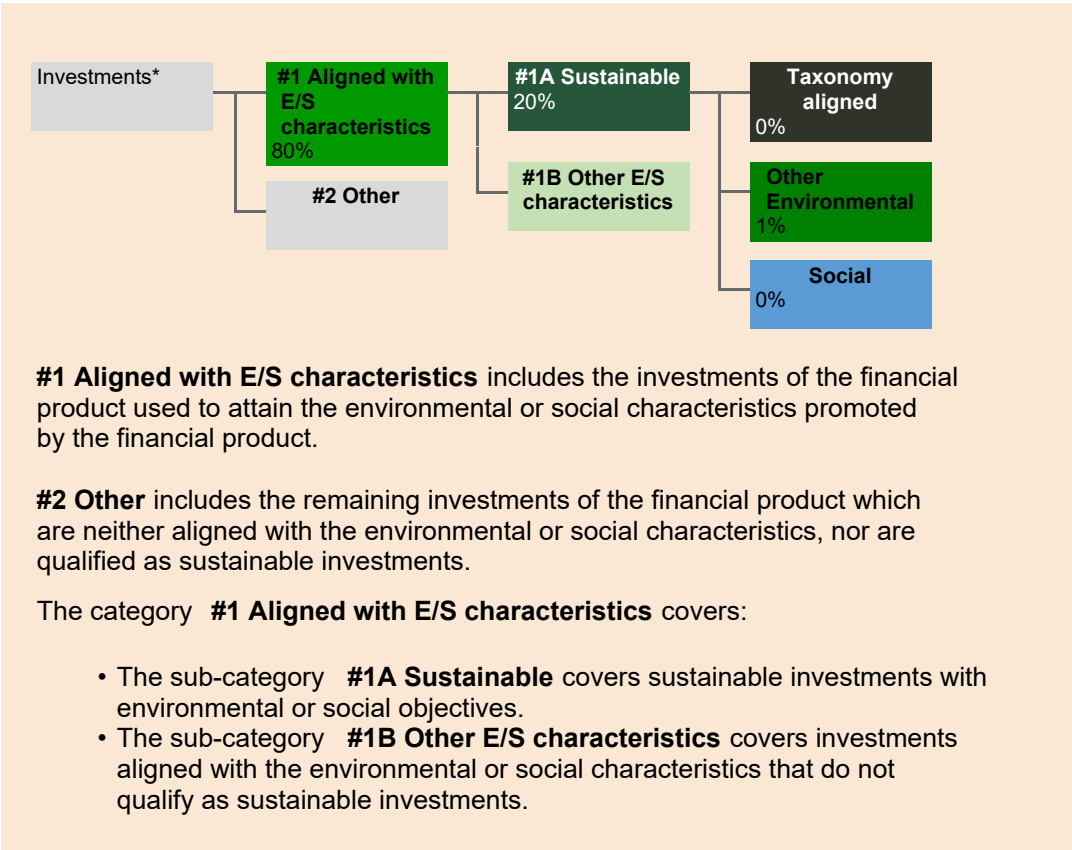
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

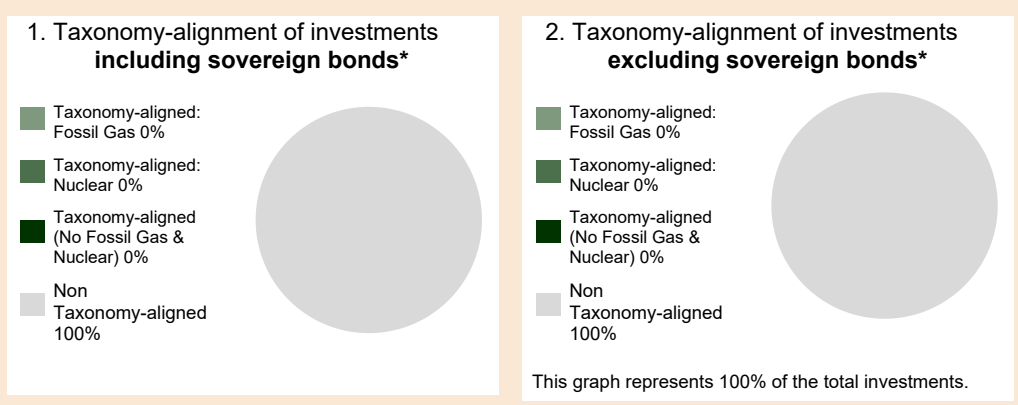
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Stratega Fixed Income Fund

**Legal entity identifier:** 549300QPSJY1NP48D415

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

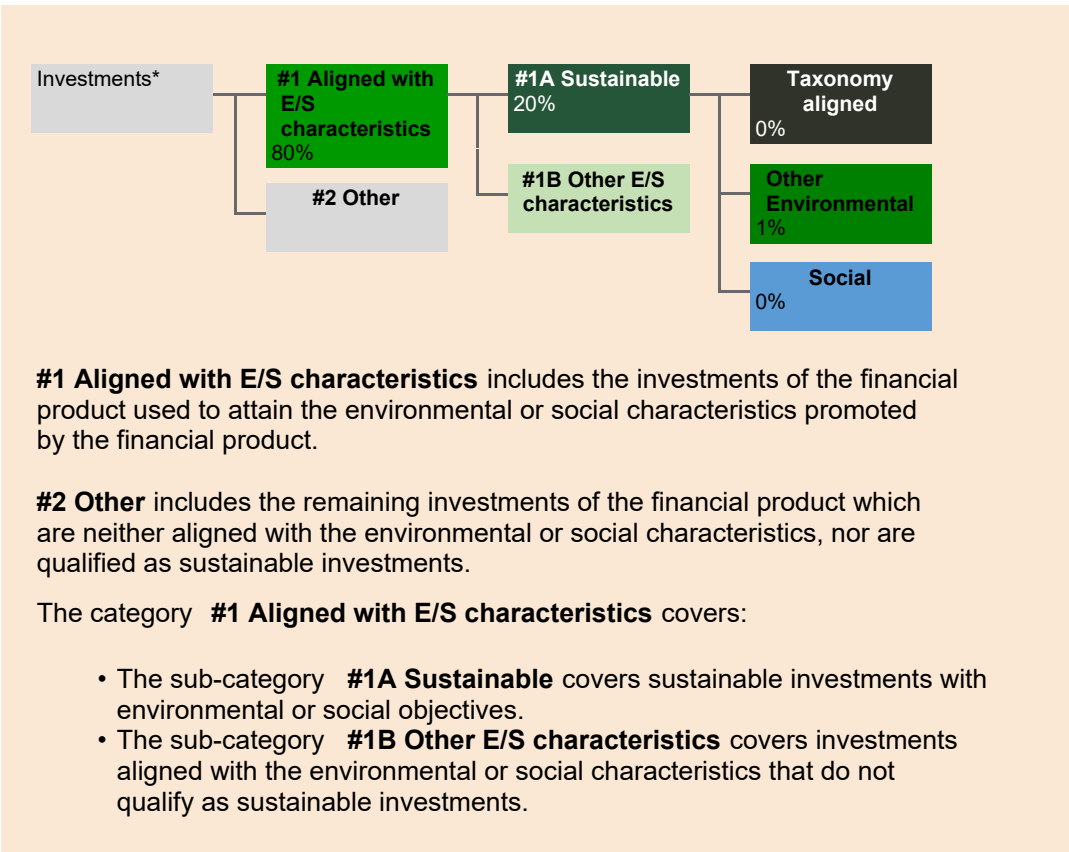
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

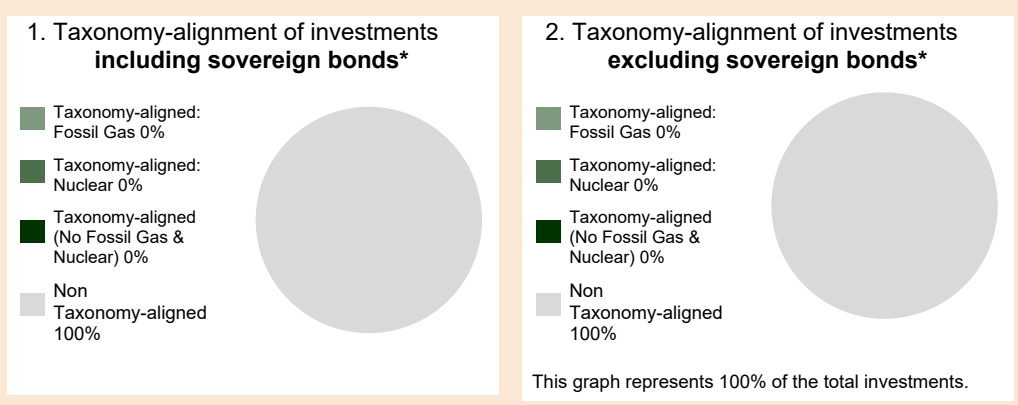
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that is not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

- [Responsible Investment Policy](#)
- [Exclusion list](#)
- [Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Equities Global Fund

**Legal entity identifier:** 549300884E63XAEKCZ79

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG rating** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG ratings. Investee companies or issuers have been rated by a selected external provider to ensure that only securities issued by companies that meet the minimum required ESG rating are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

**Carbon footprint scope 1 & 2 limit** The fund promotes E/S characteristics by maintaining the total carbon footprint of the fund's investments at least 25% below the total carbon footprint of the reference benchmark. The carbon footprint is measured by the scope 1 and 2 greenhouse gas emissions. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG rating that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy
- Relative carbon footprint scope 1 and 2

### ● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalised scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG ratings are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy. Carbon footprint is managed below the reference benchmark level.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 50% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG rating standard. ESG ratings are built upon different quantitative ESG factors that are relevant for the investments. Quantitative factors are weighed and compiled in ESG ratings that provide a measure of companies' exposure to ESG factors and their ability to manage such exposure. Leaders are rated AAA or AA while A, BBB and BB ratings denote the average levels and laggards are rated B or CCC. The fund only invests in companies and issuers with ESG ratings between BB and AAA, while laggards are excluded.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section “Where can I find more product specific information online?”. The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund’s investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section “Where can I find more product specific information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies’ exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The fund's carbon footprint, measured by the total scope 1 and 2 greenhouse gas emissions of the underlying investments, must be at least 25% lower than the carbon footprint of the benchmark calculated on the same basis. Details on the fund's benchmark can be found in the specific fund section the prospectus. The carbon footprint is calculated as total greenhouse gas emissions (scope 1 and 2) for a portfolio, normalised by investee companies' enterprise value, measured in tons CO<sub>2</sub>e / M€ invested. The carbon footprint expresses the share of companies’ and issuers’ greenhouse gas emissions that is owned or funded by the fund’s investments.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

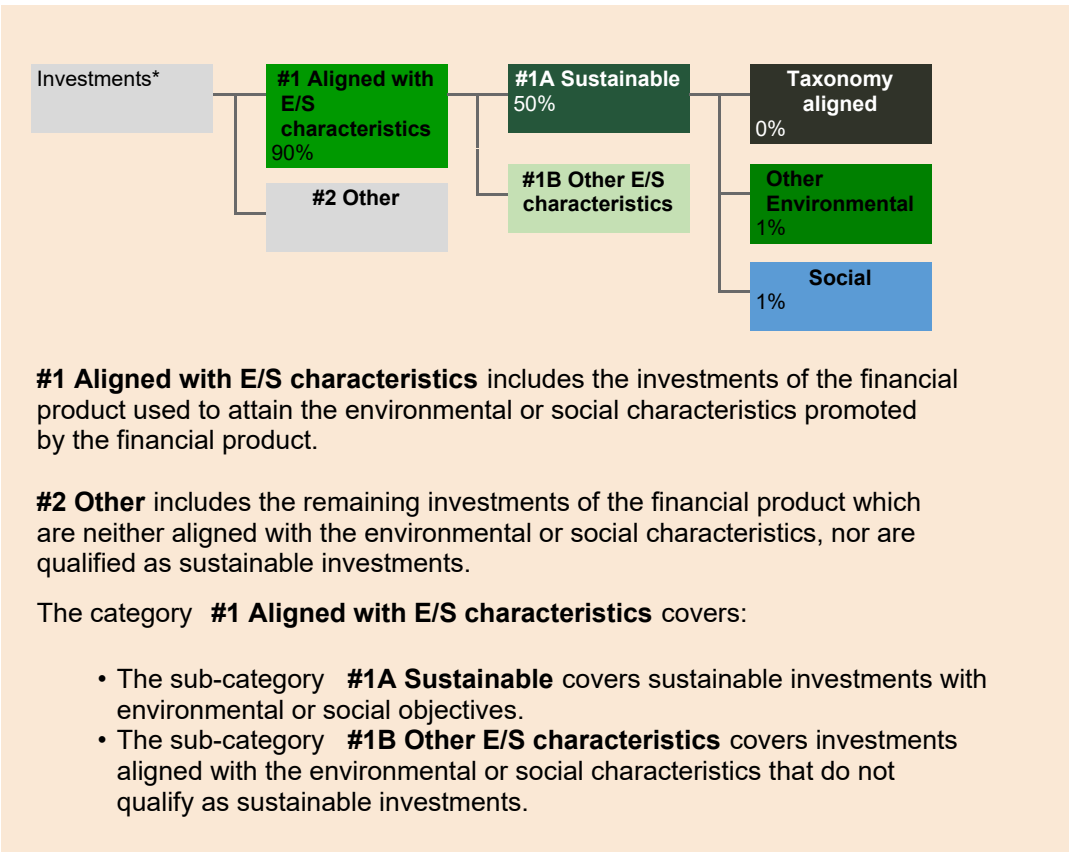
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

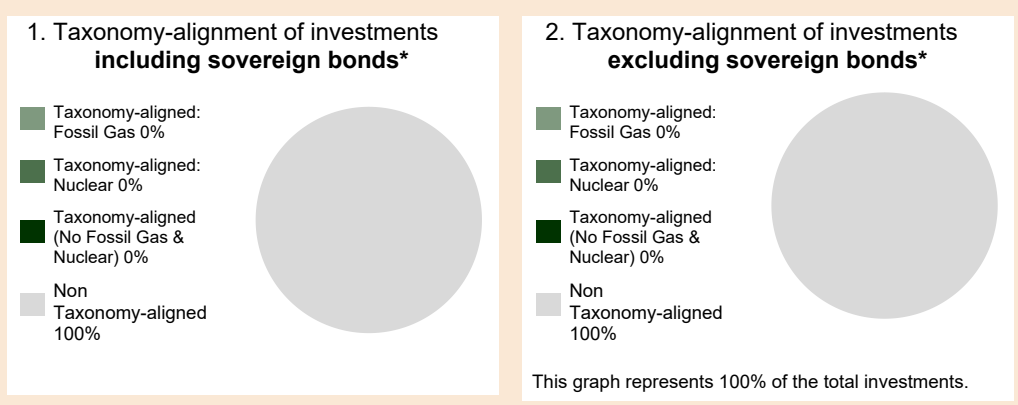
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Fixed Income Global Fund

**Legal entity identifier:** 549300ZXFH50WOIVRU97

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

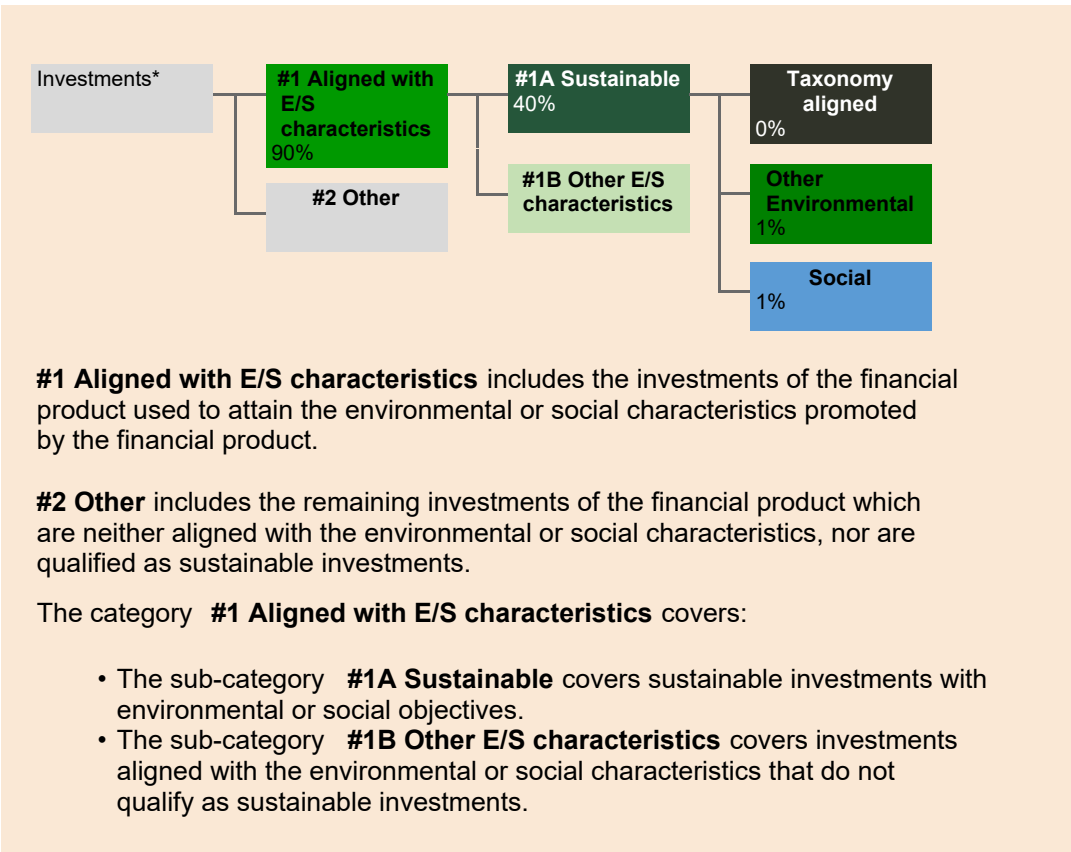
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

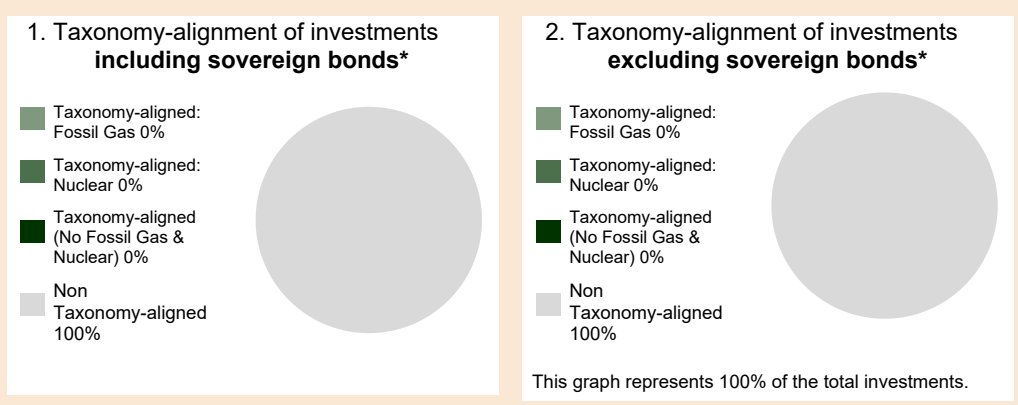
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Balanced Fund

**Legal entity identifier:** 5493004KN0VPUS35KM57

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

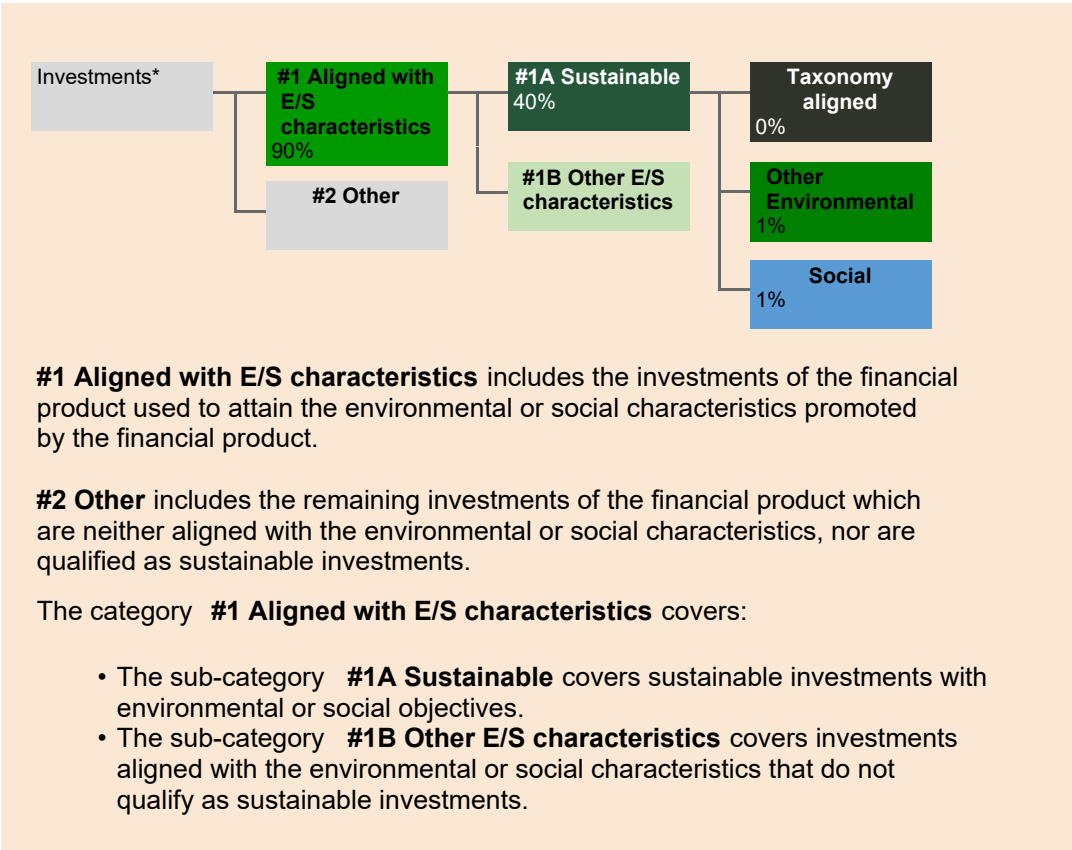
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

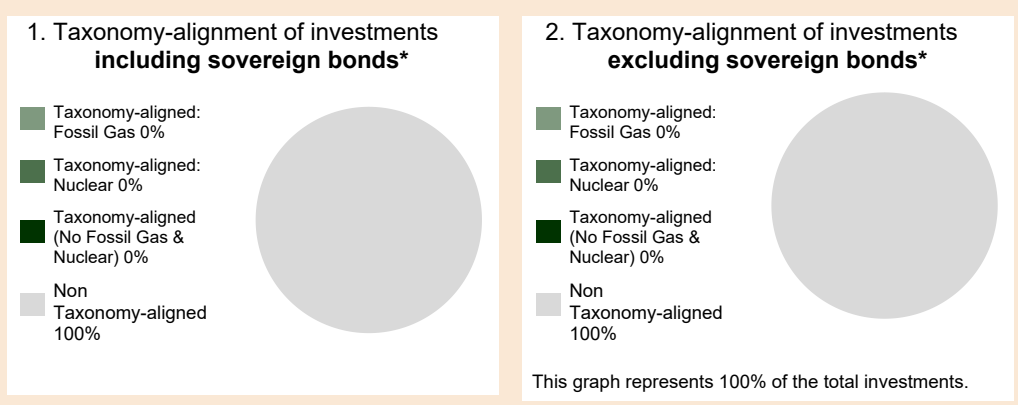
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Balanced Fund (NOK)

**Legal entity identifier:** 549300DDIRYIH6T55H79

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

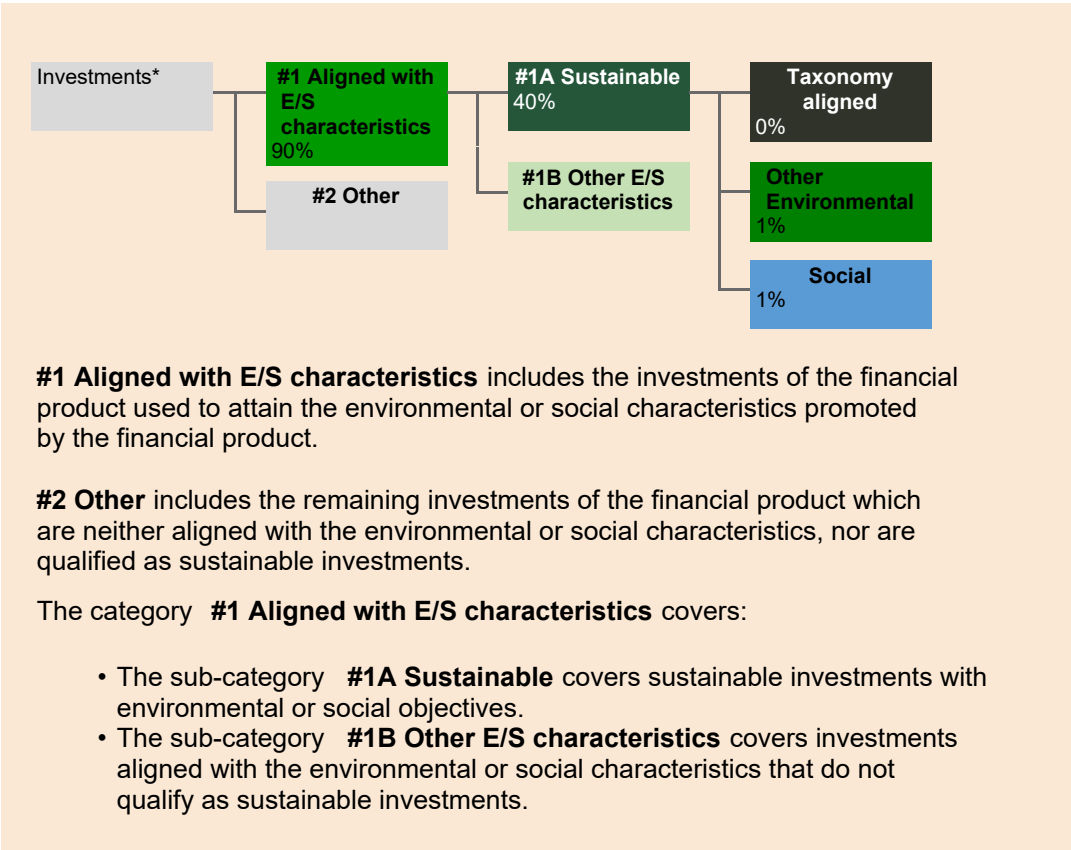
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

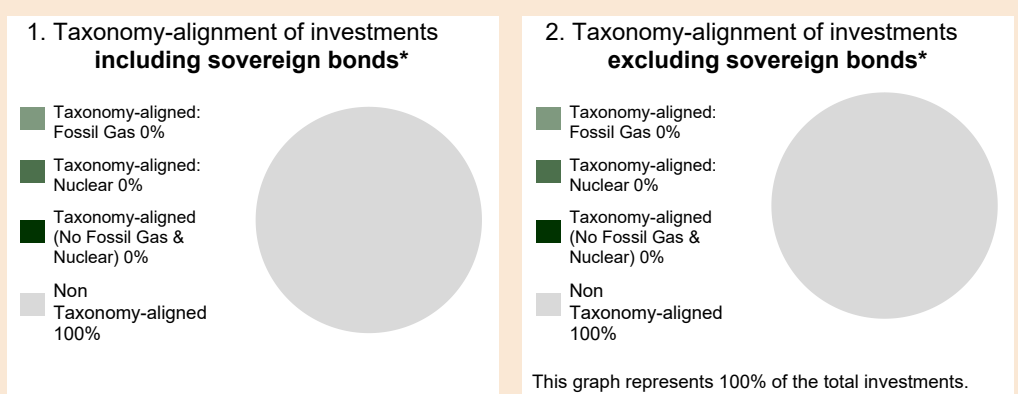
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Balanced Fund (SEK)

**Legal entity identifier:** 549300JTDIKITPJOLJ76

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

## **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.

### ● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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.*

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*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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

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## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

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As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

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Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

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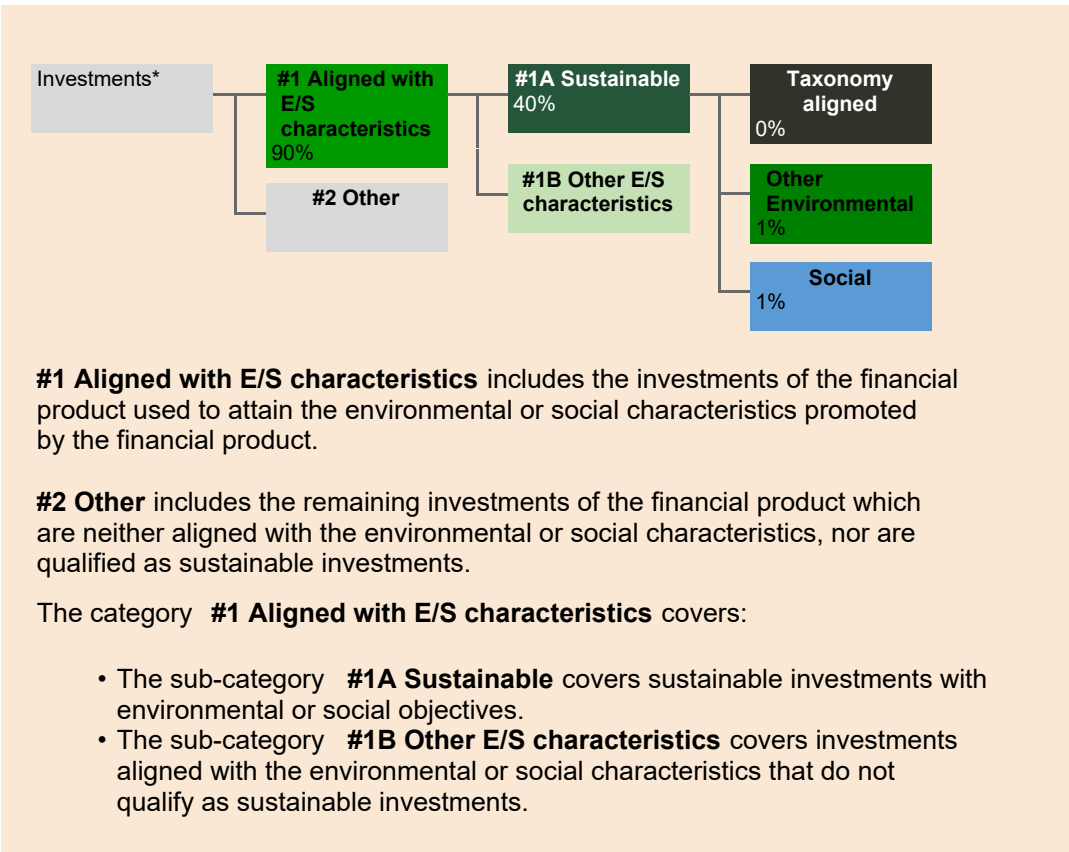
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

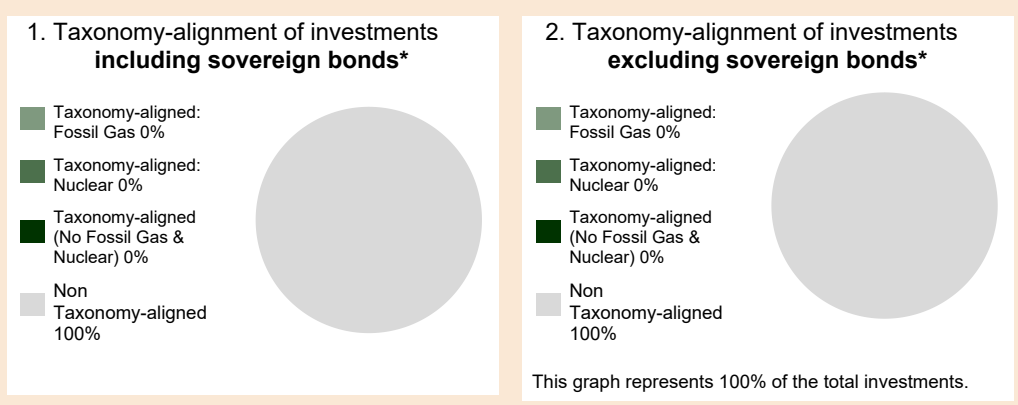
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Growth Fund

**Legal entity identifier:** 549300DEN4ZLW33T4067

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

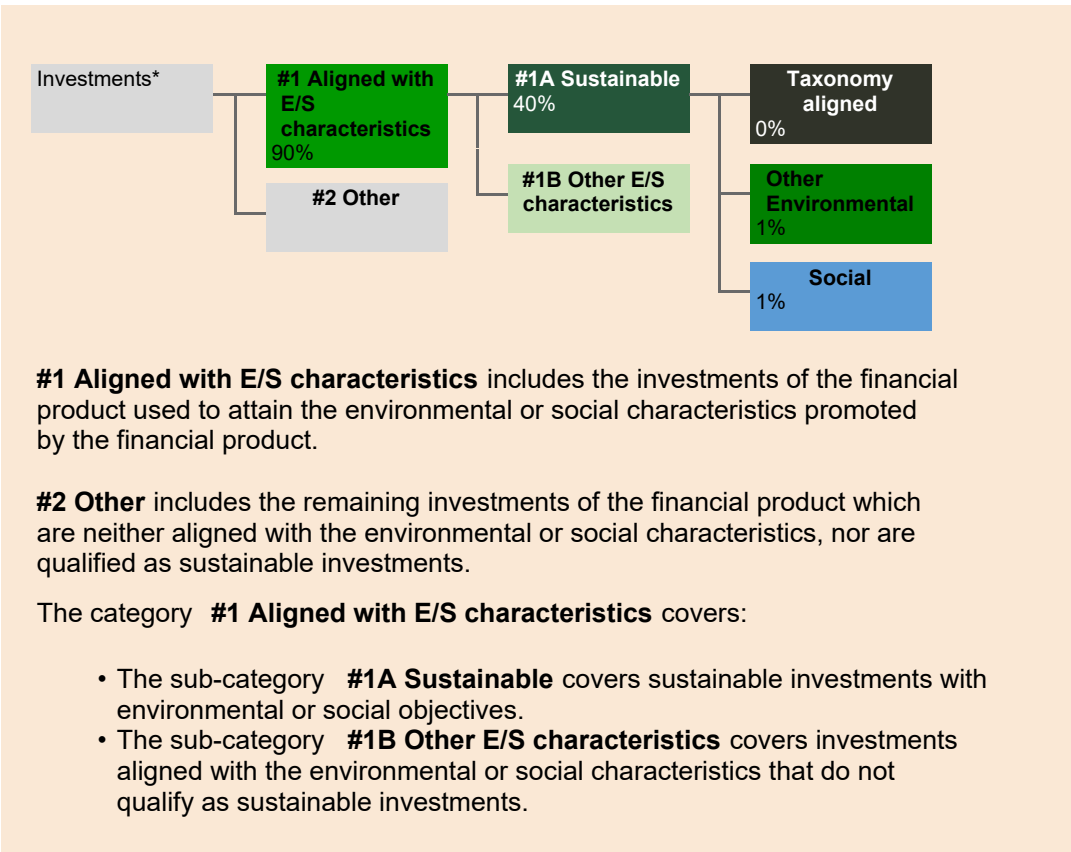
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

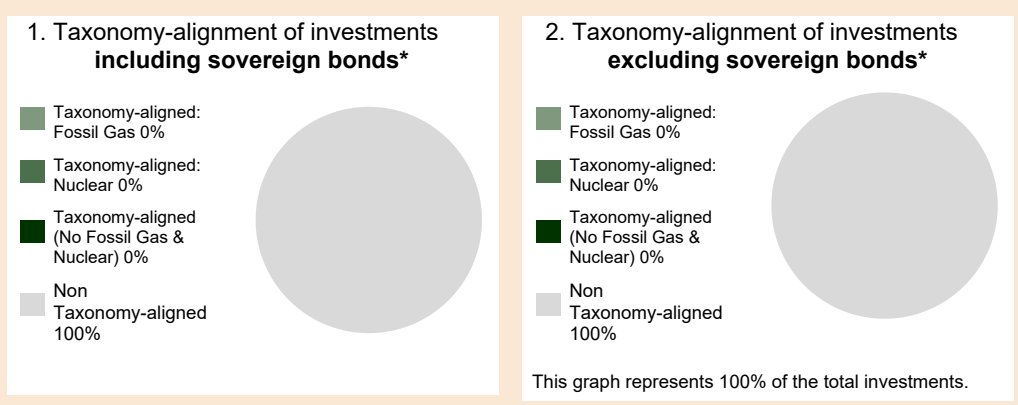
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas
  - In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

- Additional information as referenced in the above sections is available here:
- [Responsible Investment Policy](#)
  - [Exclusion list](#)
  - [Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Growth Fund (NOK)

**Legal entity identifier:** 54930052AMBY5S0HMA76

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

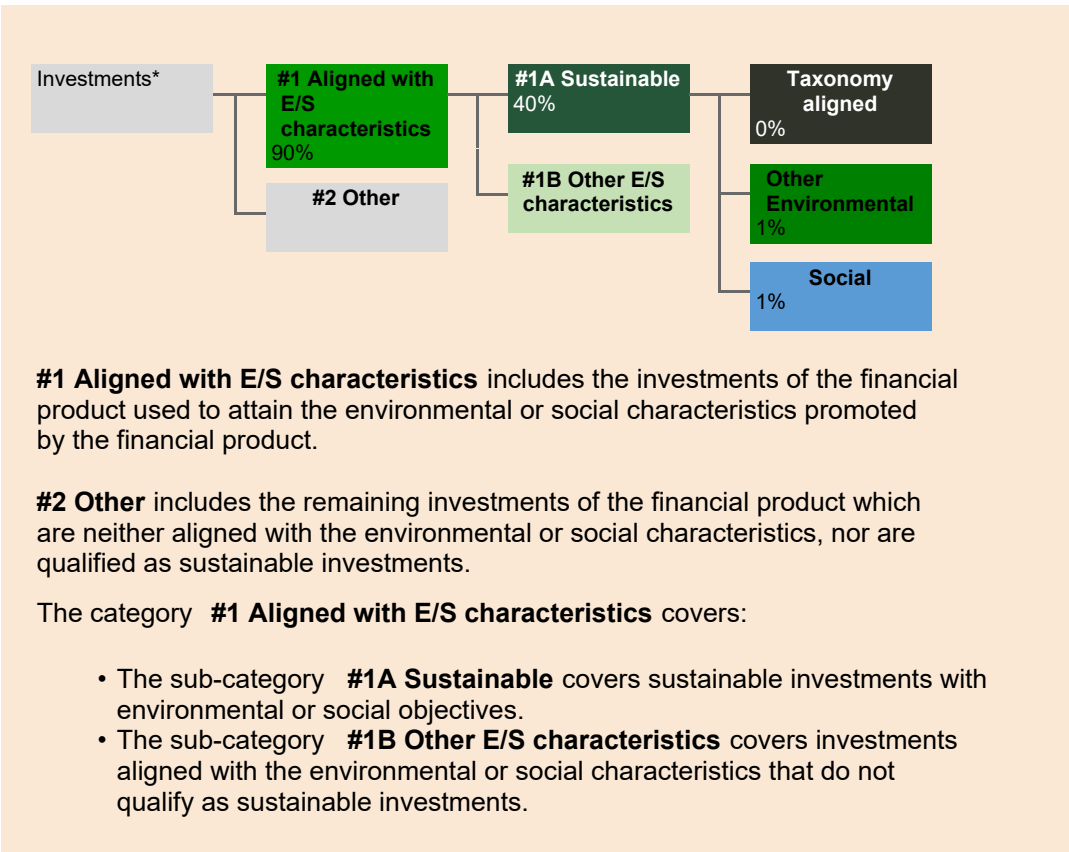
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

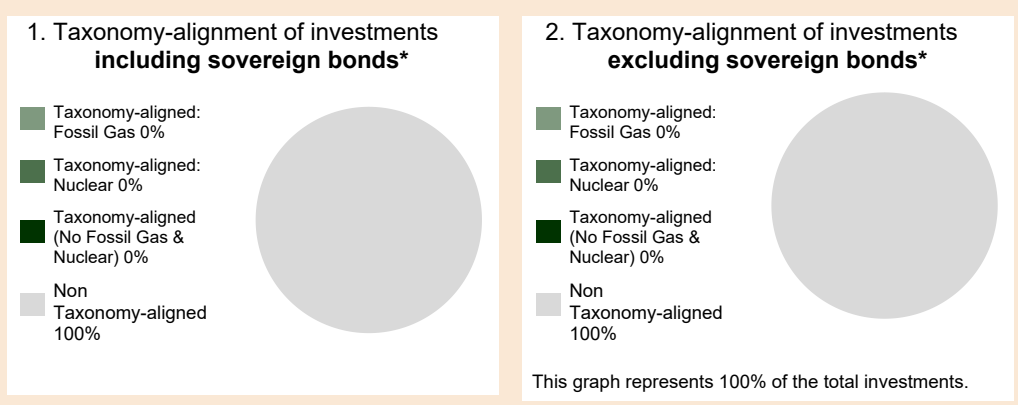
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Growth Fund (SEK)

**Legal entity identifier:** 5493003WE527W7V5Y298

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

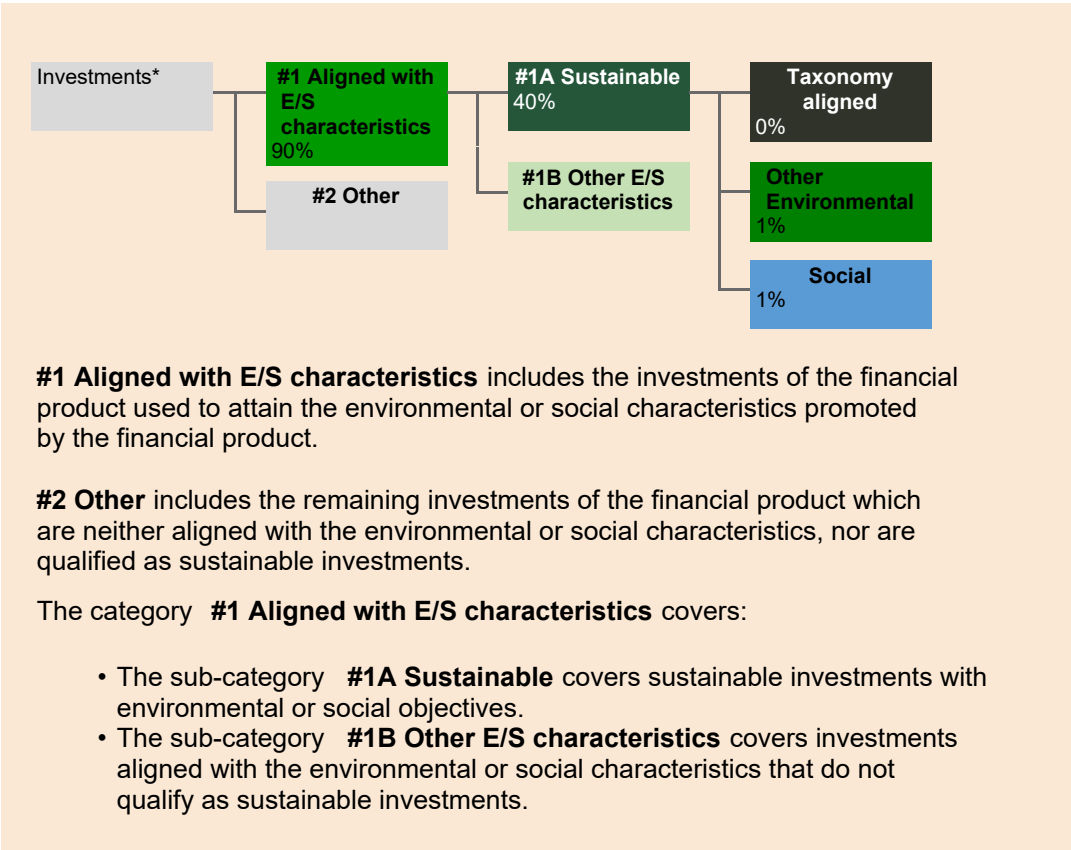
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

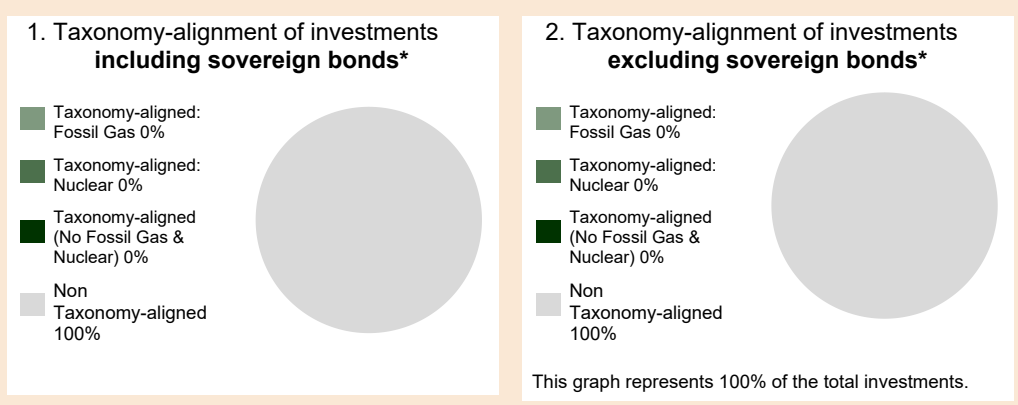
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
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**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Moderate Fund

**Legal entity identifier:** 549300A6GDX4W1YQBT24

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

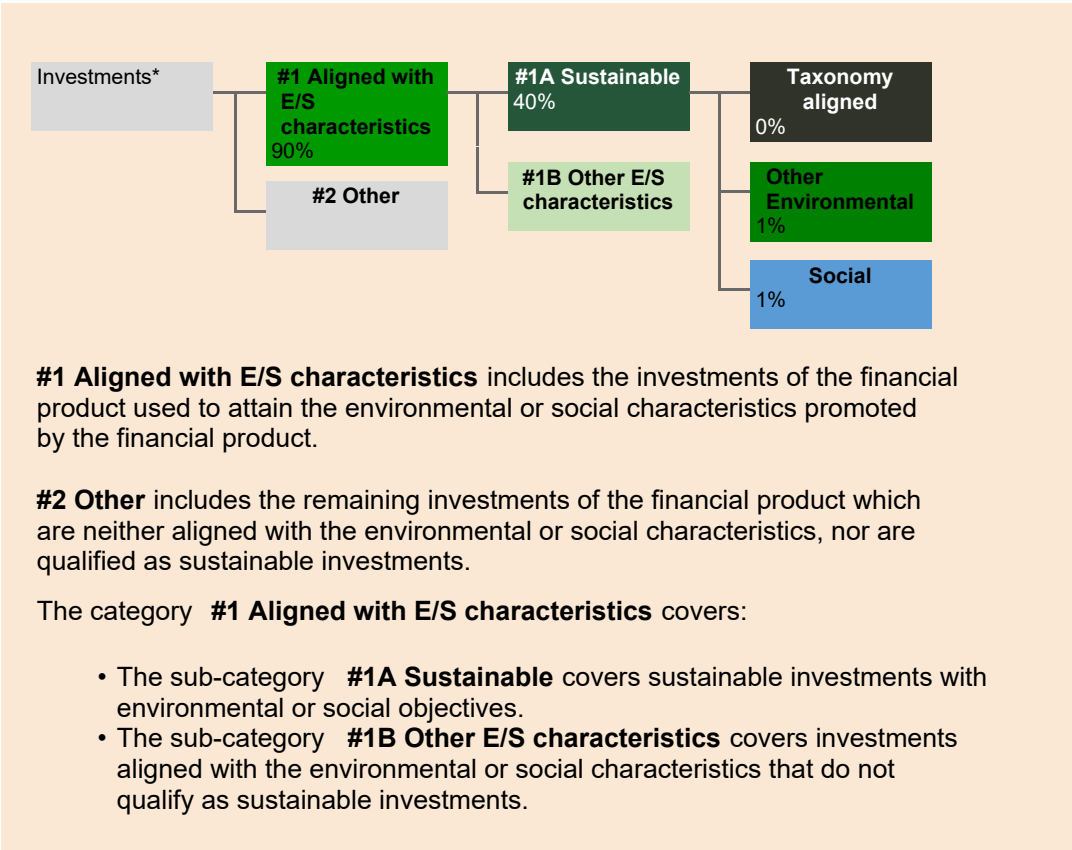
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

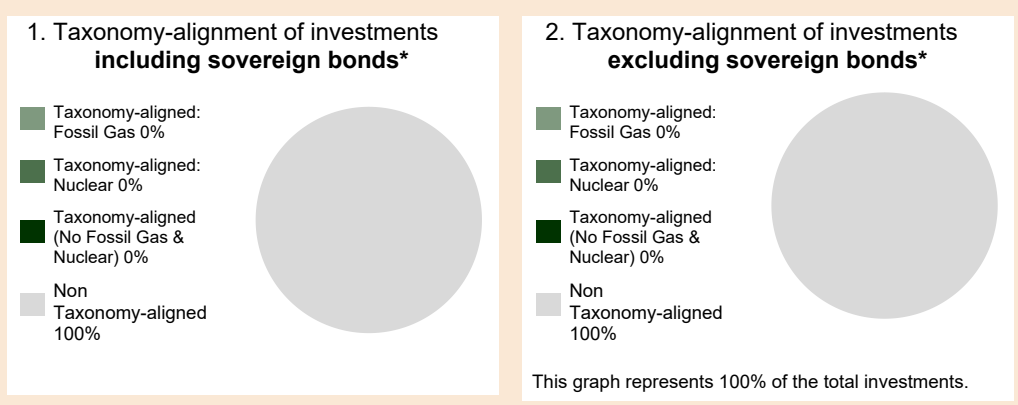
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Moderate Fund (NOK)

**Legal entity identifier:** 549300WXAN7F7VRL6V22

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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.*

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*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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

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## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

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**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

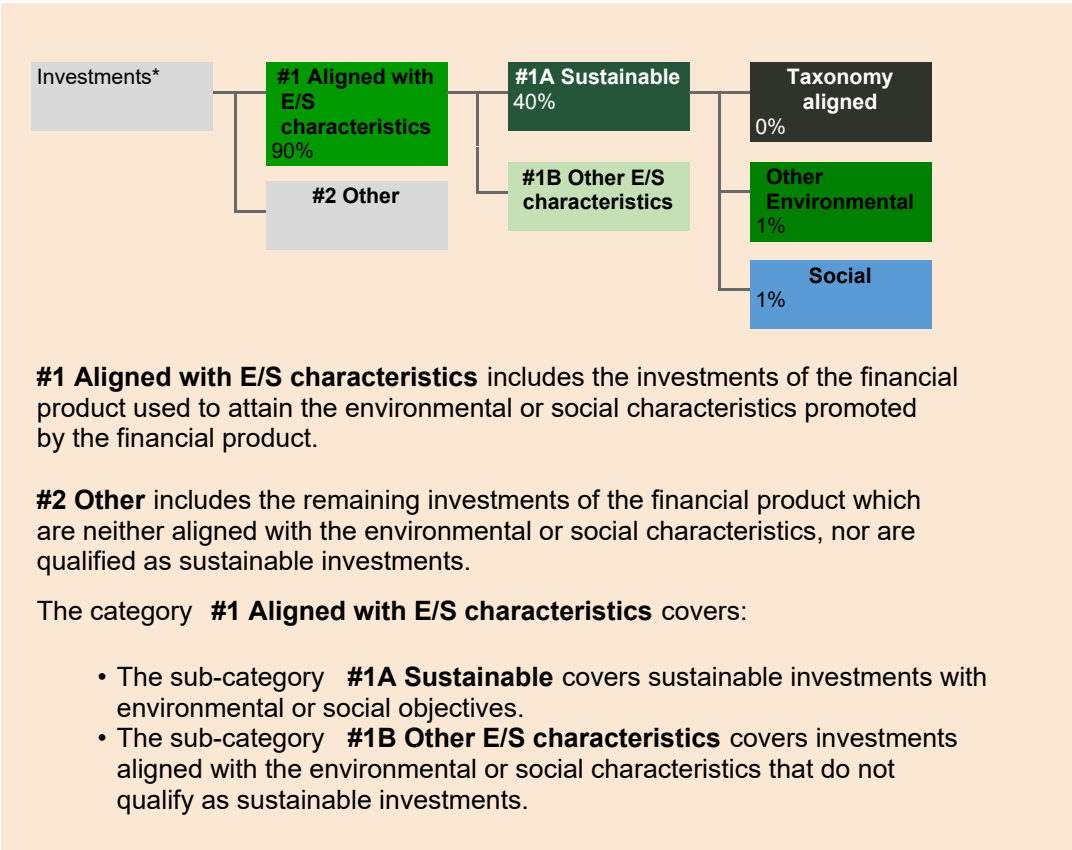
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

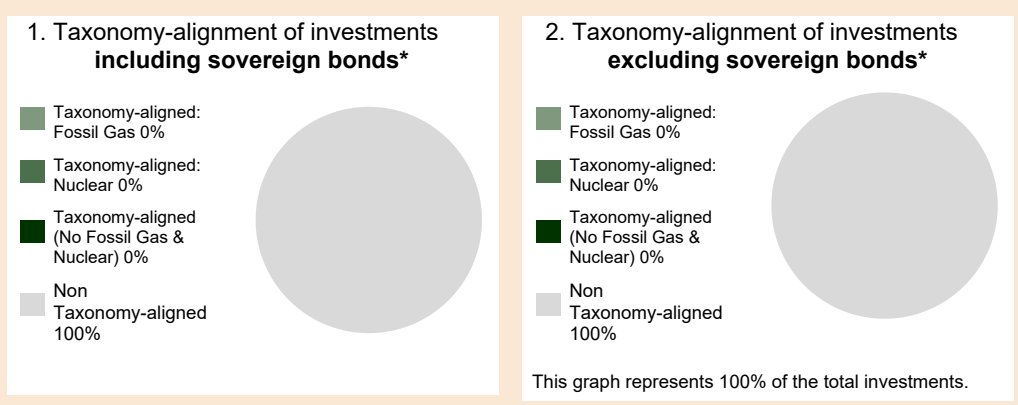
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Moderate Fund (SEK)

**Legal entity identifier:** 549300S5BYWNDDMOPA16

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

- No
- Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

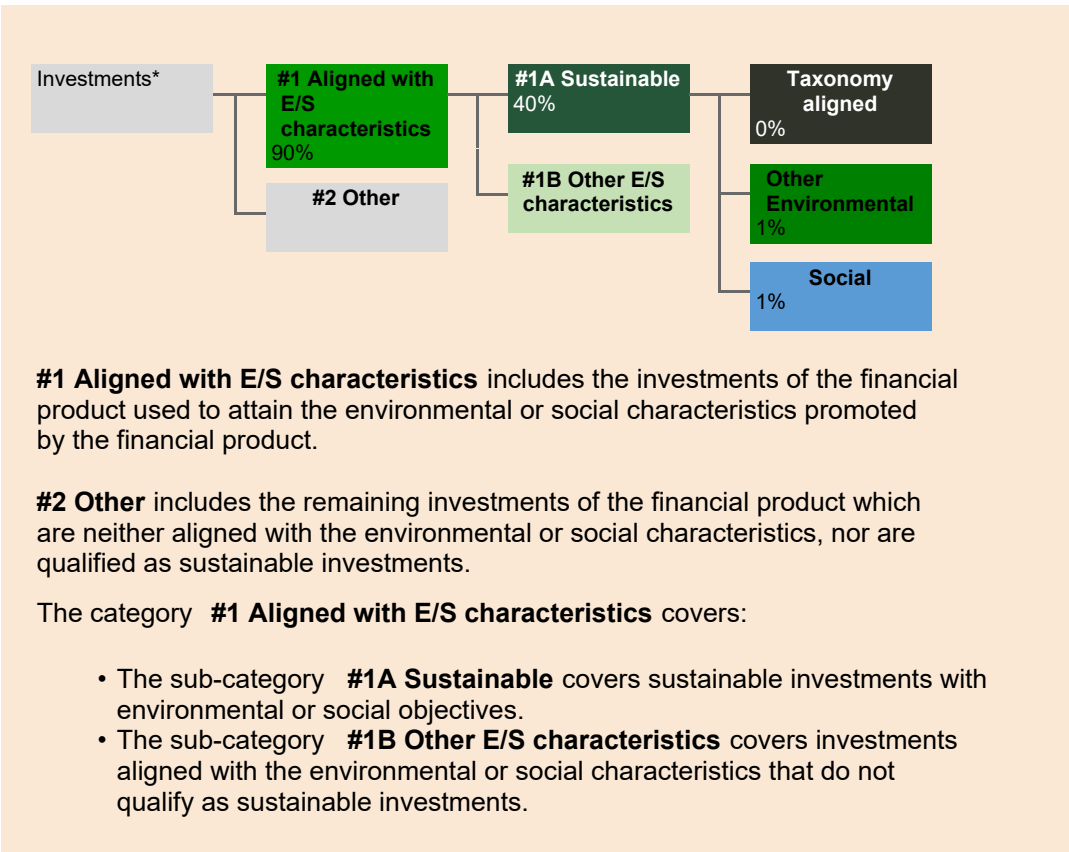
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

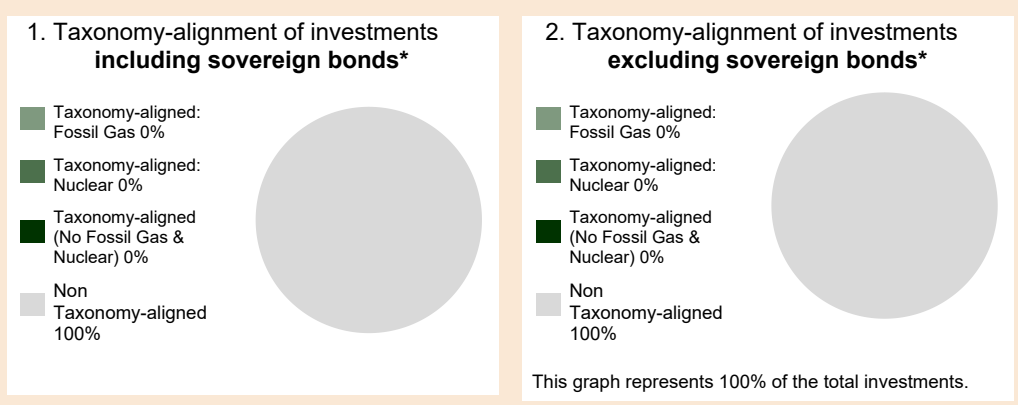
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Return Fund

**Legal entity identifier:** 5493009PS3FSWJ57AR54

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

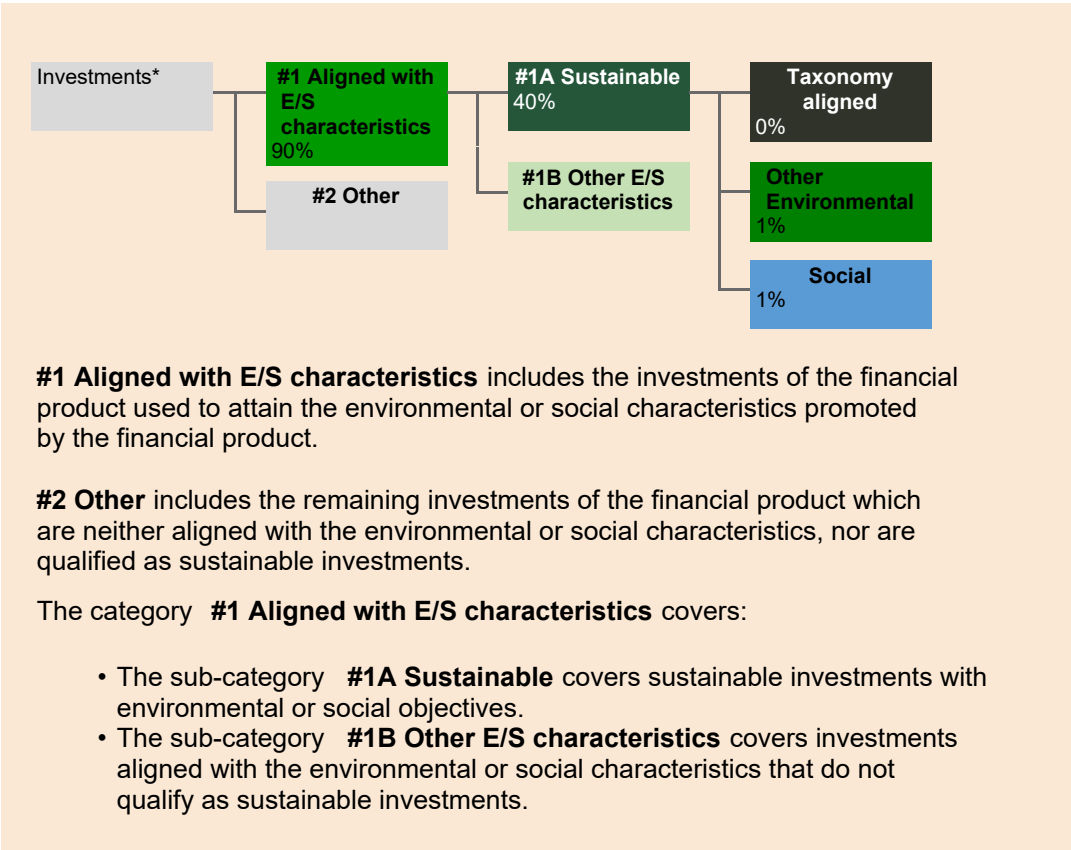
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

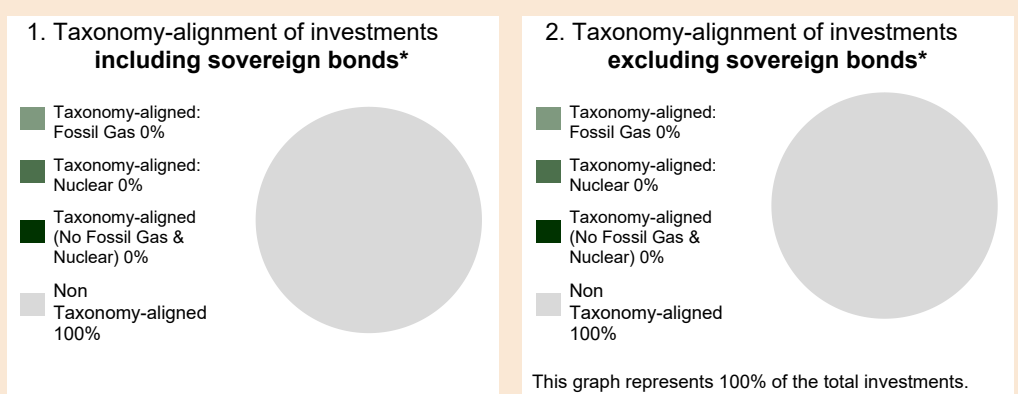
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Return Fund (NOK)

**Legal entity identifier:** 5493002CIPYJ14WUEK44

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● **What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?**

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● **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?**

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

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The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

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**Does this financial product consider principal adverse impacts on sustainability factors?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

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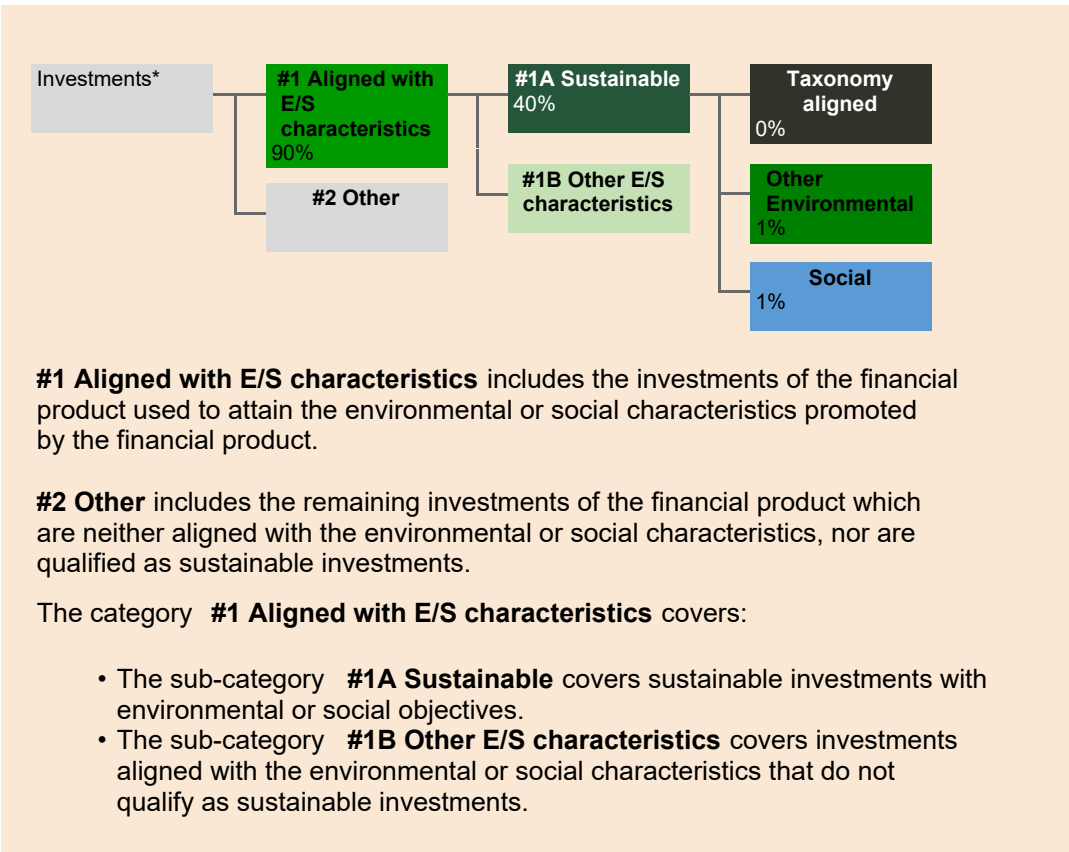
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Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

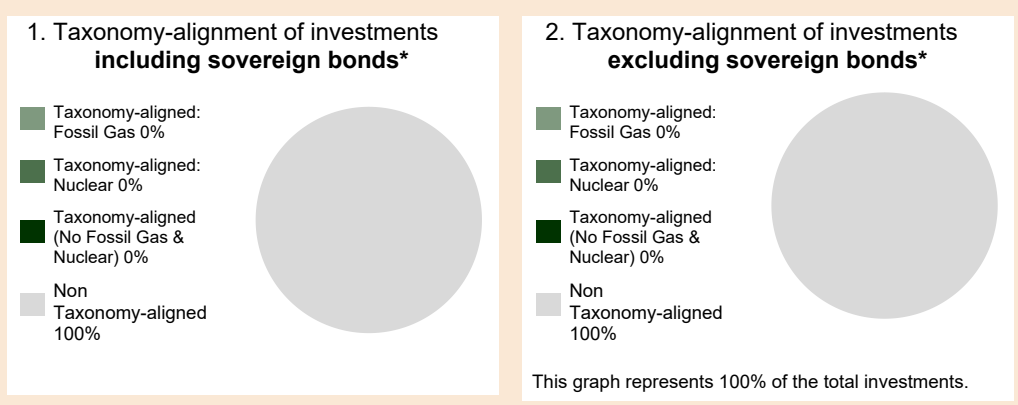
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.




\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



**What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

- [Responsible Investment Policy](#)
- [Exclusion list](#)
- [Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Sustainable Selection Return Fund (SEK)

**Legal entity identifier:** 549300MPFQKI6DS32K18

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The fund is a feeder fund that seeks to invest all of its assets (minimum 85%) in the master fund. A maximum of 15% of its assets can be invested in liquid assets and/or in derivatives contracts that can only be used for hedging purposes. By investing in the master fund, the feeder fund promotes the environmental and/or social characteristics of the master fund. Information disclosed for the feeder fund in this template is a replicate of what is presented in the master fund's template.

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**ESG scoring** The fund promotes E/S characteristics by investing in companies or issuers with favourable ESG scores. Investee companies or issuers have been analysed and scored by NAM or by an external provider to ensure that only securities issued by companies that meet the minimum required ESG score are eligible for inclusion and that ESG laggards are excluded. The binding measures and thresholds are further described in section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

## Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

## 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.

### ● ***What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?***

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of Investments, aligned with the E/S characteristics, with an ESG score that does not meet the minimum threshold
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

### ● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

### ● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. ESG laggards are avoided as ESG scores are taken into consideration as part of the security selection. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 40% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Direct investments made by the fund must meet a minimum ESG score standard. The materiality and relevance of ESG factors vary between sectors and asset classes, and scoring methods are adapted to capture the most relevant ESG factors depending on the nature of the investments. The ESG score set by NAM uses the Sustainability Accounting Standards Board (SASB) materiality map to identify relevant ESG factors. ESG factors may include various indicators related to environmental- or social-impact, business model and governance. ESG factors can have a positive or negative impact on the analysis, depending on the product/services and how the company conducts its business. Social factors may include considerations related to indigenous people, human rights and labour rights and environmental factors may include carbon emission, science-based targets or impact of policy measures. Quantitative input based on data from multiple sources, is analysed and translated into a score of A, B or C (or equivalent if using external ESG ratings) with A being the highest score. The scores are a measure of companies' exposure to certain ESG factors and their ability to manage such exposure. Supplementary manual assessments are made by analysts both where data is insufficient and where additional

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

relevant qualitative information is available that can improve the quality of the scoring. Numerical ratings for certain assets may be provided by external data vendors and validated by NAM. The fund only invests in companies and issuers with ESG scores in the A and B range, or equivalent if using external ESG ratings, while investments with C scores are excluded. The fund may invest based on a preliminary internal assessment of the ESG profile until a formal score is assigned.

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

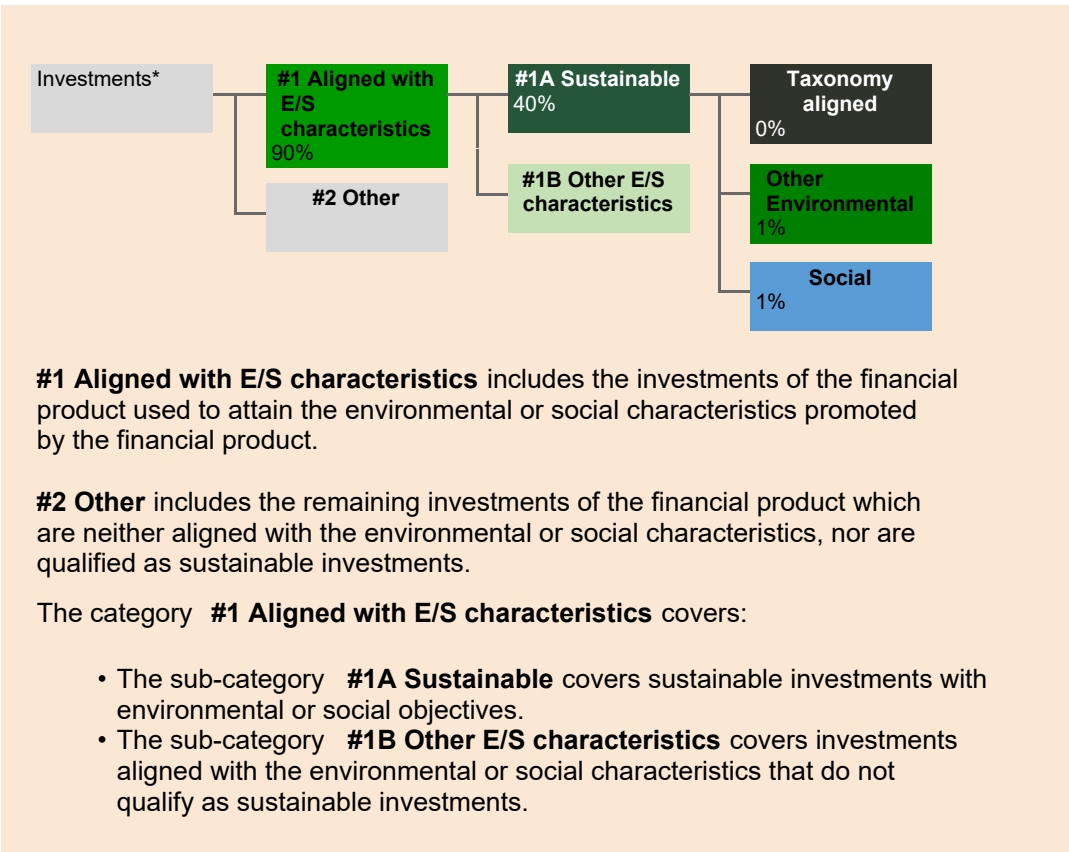
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

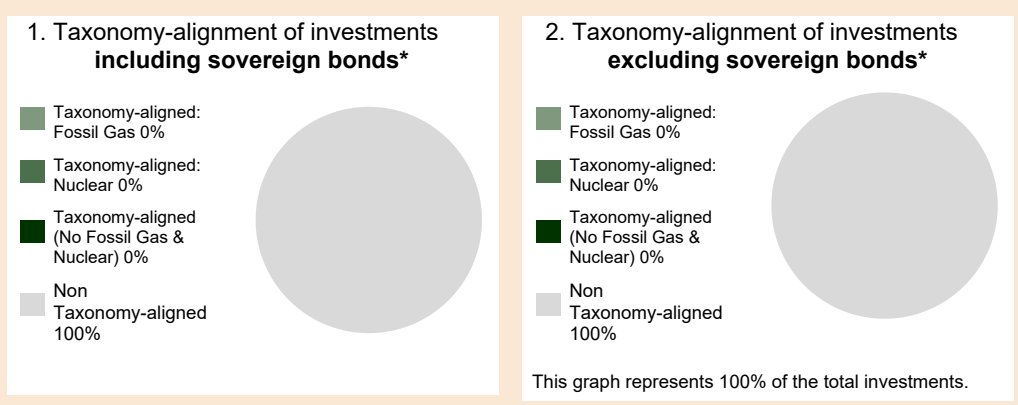
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 1%.



### **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea SWE Inflation Linked Bond Fund

**Legal entity identifier:** 5493008X62OV3LG0EM72

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section “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?”

**NAM’s Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section “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?”

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

The fund invests within an investment universe that generally exhibits a high level of ESG performance across constituents. Consequently, the screenings that apply to the strategy have limited impact on the investment universe and the actual investments of the fund, and only serve as an assurance that underlying investments consistently represent the expected ESG characteristics of the asset class.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM’s Paris-Aligned Fossil Fuel Policy

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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.*

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.



**Does this financial product consider principal adverse impacts on sustainability factors?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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 strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**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?***

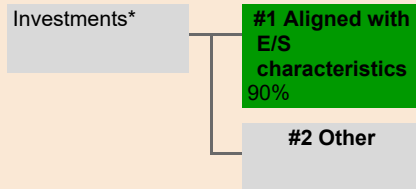
Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.





## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#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.

\*Investments refer to the fund's NAV which is the total market value of the fund.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies

- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

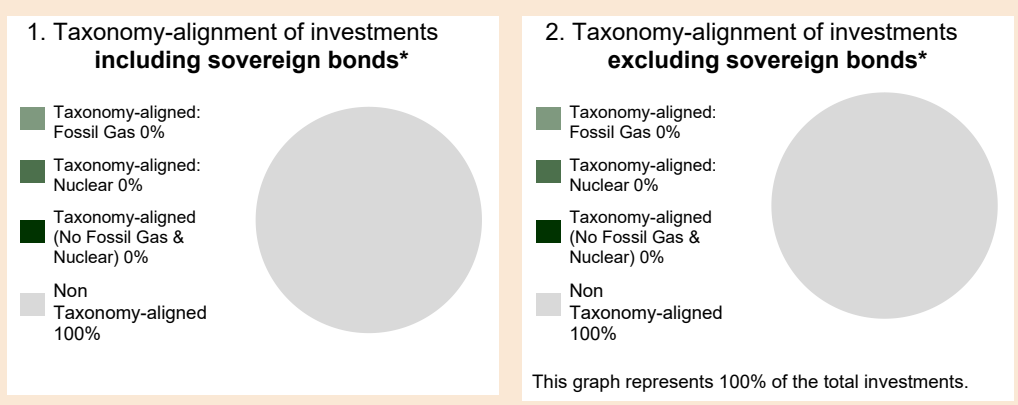
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion of investments in transitional and enabling activities.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



## **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Swedish Ideas Equity Fund

**Legal entity identifier:** 549300IHYK1G12PQD303

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

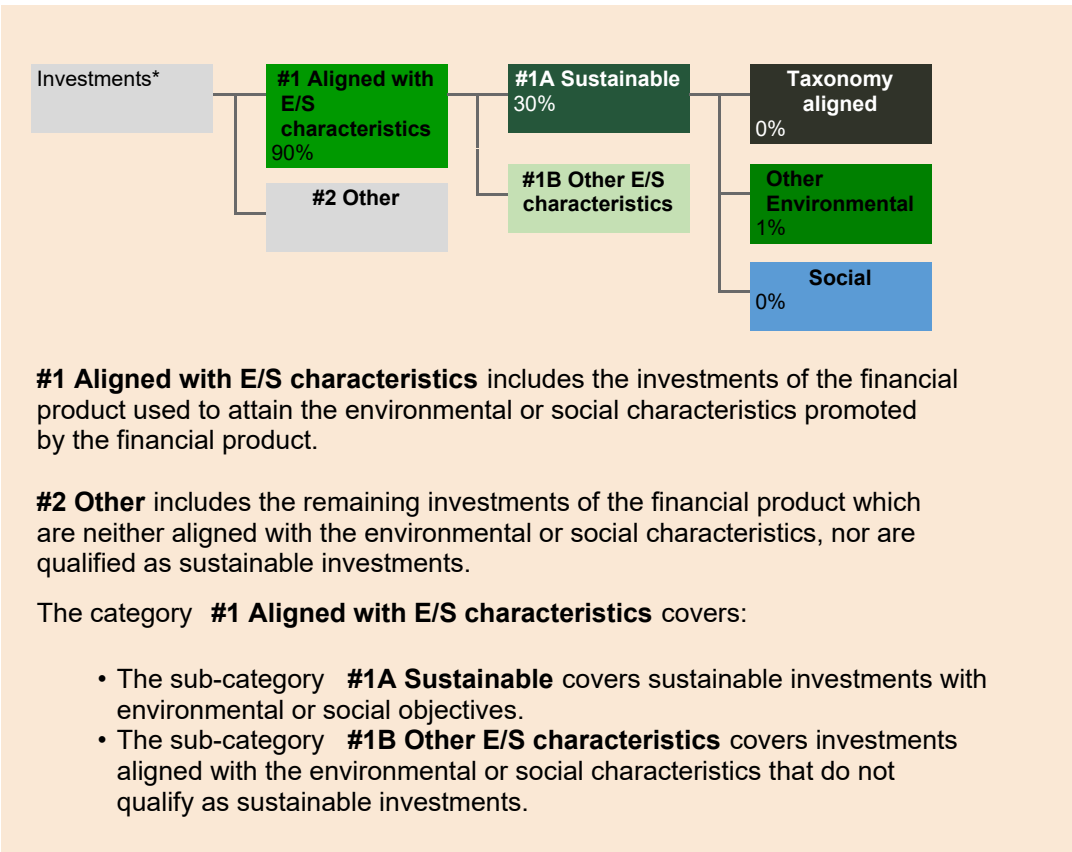
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

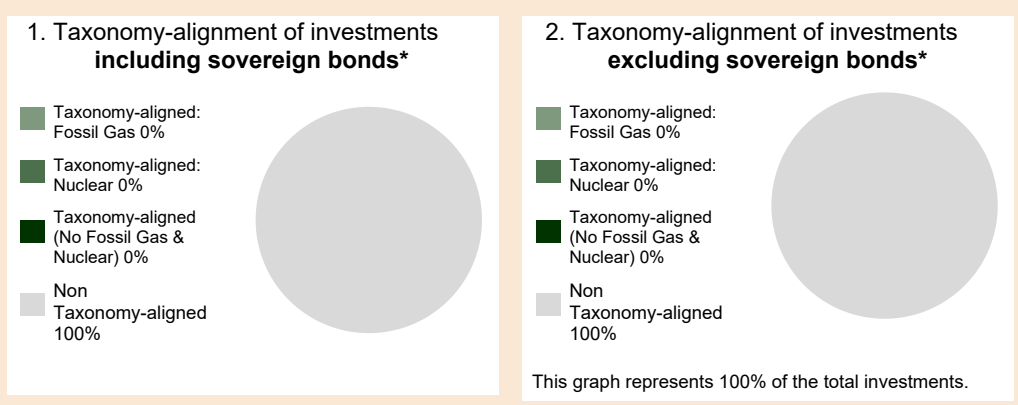
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:  
[Responsible Investment Policy](#)  
[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Swedish Institutional Short Duration Bond Fund

**Legal entity identifier:** 549300SZVW17ROZPY480

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section “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?”

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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.*

### **Sustainability indicators**

measure how the environmental or social characteristics promoted by the financial product are attained.

### **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.



**Does this financial product consider principal adverse impacts on sustainability factors?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).





## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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 strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?".

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

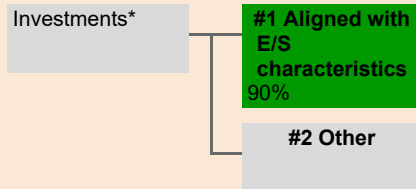
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Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#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.

\*Investments refer to the fund's NAV which is the total market value of the fund.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies

- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

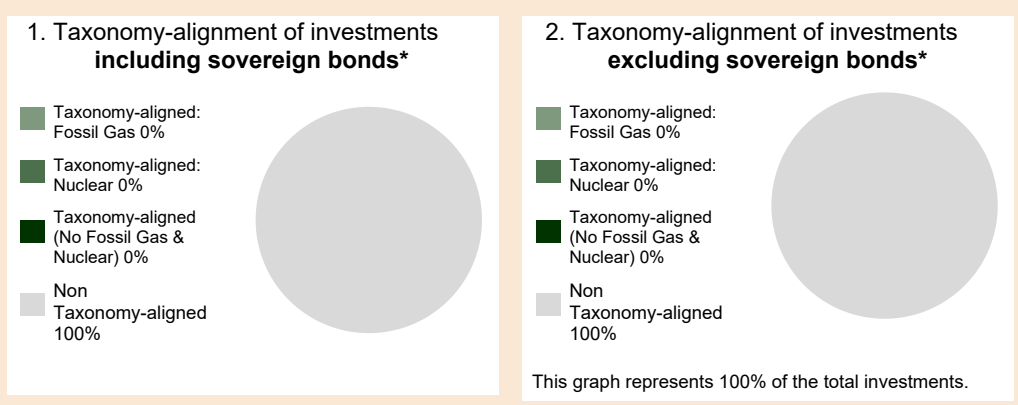
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion of investments in transitional and enabling activities.



## **What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



## **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea World Fund

**Legal entity identifier:** 5493000JFKWXSJ8BVE93

## 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 qualify as environmentally sustainable under the EU Taxonomy

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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30% of sustainable investments

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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.



***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalised scale values (e.g. based on NAM’s proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● ***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?***

Minimum 30% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant.

The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or

society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section "Where can I find more product specific information online?".

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

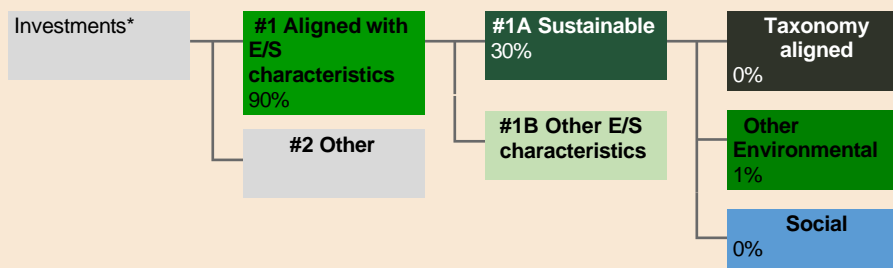
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#1 Aligned with E/S characteristics** includes the investments of the financial product used to attain the environmental or social characteristics promoted by the financial product.

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

The category **#1 Aligned with E/S characteristics** covers:

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

\*Investments refer to the fund's NAV which is the total market value of the fund.

## ● How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?

Derivatives are not used to attain the environmental or social characteristics promoted by the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

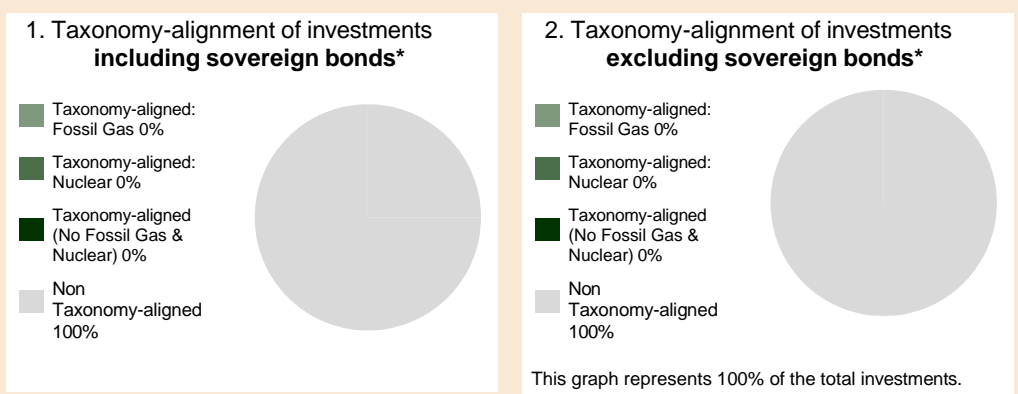
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund commits to a minimum proportion of sustainable investment with an environmental objective aligned with the SFDR and as displayed in '#1A Sustainable' in the graph in the section "What is the asset allocation planned for the financial product?". These investments could be aligned with the EU Taxonomy. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund.



### **What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



### **What investments are included under "#2 Other", what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



### **Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)

[Exclusion list](#)

[Paris-Aligned Fossil Fuel Policy](#)

**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea World Passive Fund

**Legal entity identifier:** 549300B3ENDTJUGFXQ77

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of \_\_\_\_% of sustainable investments
  - with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
  - with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
  - with a social objective
- It promotes E/S characteristics, but **will not make any sustainable investments**





## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Sector- and value-based exclusions** The fund promotes E/S characteristics by using a dedicated reference benchmark, which determines the fund's investment universe. The exclusions and screenings applied in the benchmark construction process will exclude investments in companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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 benchmark used by the fund has been designated as a reference benchmark for the purpose of attaining the E/S characteristics promoted by the fund. The fund is passively managed and the strategy aims to replicate the return of the benchmark.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of investments, aligned with the E/S characteristics, that do not comply with the sector restrictions of the fund's benchmark

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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.*

**Sustainability indicators** measure how the environmental or social characteristics promoted by the financial product are attained.

**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.



**Does this financial product consider principal adverse impacts on sustainability factors?**

- No, The fund aims to replicate the benchmark return and as a result there is no specific consideration of PAI on product level.
- Yes



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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 investment strategy aims at following the development of MSCI World ex Business Involvement and Fossil Fuel Screened Select Index. In addition to the exclusions that are applied to the reference benchmark, companies that are in Nordea's or Norwegian Government Pension Fund's exclusion list are not investable. The link to Nordea's exclusion list is provided in the section "Where can I find more product specific information online?". Further, it is ensured that companies follow good governance using NAM's process as described in the section "What is the policy to assess good governance practices of the investee companies?".

The funds investments may deviate from the benchmark due to these additional measures.

### ● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

Sector- or value-based exclusions: The MSCI World ex Business Involvement and Fossil Fuel Screened Select Index replicated by the fund, excludes companies that are associated with controversial business activities; involved in unconventional oil and gas extraction, fossil fuel-related activities (thermal coal mining or oil and gas value chain), thermal coal-based power generation, or ownership of metallurgical coal reserves; fail to comply with the United Nations Global Compact principles; or are assessed as having very severe controversies. More information on the exclusions that apply to the benchmark is available on the index providers website. The link is provided in the section "Where can the methodology used for the calculation of the designated index be found?". In addition to the exclusions criteria applicable to MSCI World ex Business Involvement and Fossil Fuel Screened Select Index, the fund does not invest in companies that are on Nordea's exclusion list. Sector- or value-based exclusions prevent investments in companies that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?".

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

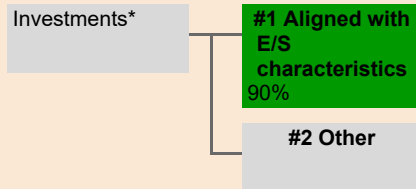
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



**#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.

\*Investments refer to the fund's NAV which is the total market value of the fund.

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies

- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.

- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.

To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

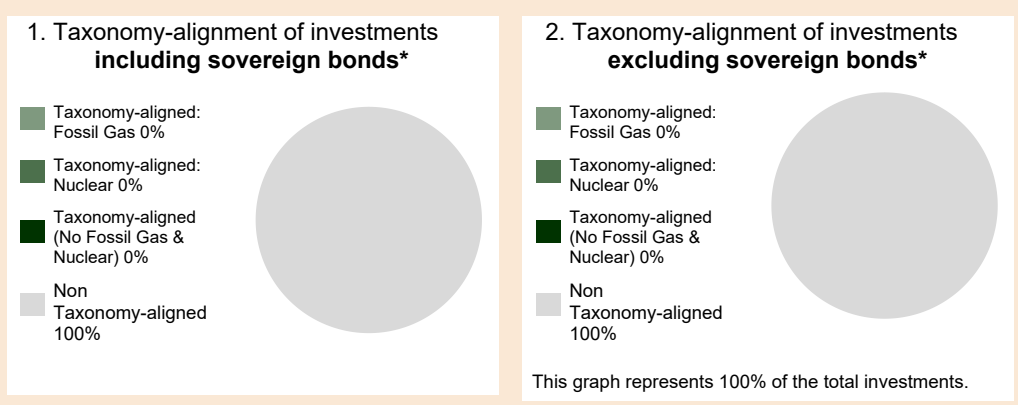
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.

The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion of investments in transitional and enabling activities.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund uses MSCI World ex Business Involvement and Fossil Fuel Screened Select Index, which is aligned with the environmental and social characteristics of the financial product.

- ***How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?***

The E/S characteristics that the fund promotes, are attained by investing in global equities while refraining from exposure to fossil fuel activities and other activities that have been deselected based on ESG considerations. The benchmark is screened to identify and exclude companies that are materially involved in such activities.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

The fund applies a passive strategy that seeks to replicate the benchmark, and the alignment of the fund's investments with the benchmark composition is monitored on an ongoing basis. In addition to the exclusions criteria applicable to the index by MSCI, the product does not invest in companies that are on Nordea's exclusion list, due to violation of international norms and/or involvement in controversial business activities. Companies that do not pass NAM's good governance test are also excluded from the fund's investment universe.

- ***How does the designated index differ from a relevant broad market index?***

The fund's benchmark, MSCI World ex Business Involvement and Fossil Fuel Screened Select Index, is based on the broad MSCI World Index. It includes large and midcap securities across developed markets countries. The index differs from a broad market index by its value-based exclusions as well as exclusions based on environmental considerations.

- ***Where can the methodology used for the calculation of the designated index be found?***

The benchmark is provided by MSCI, and the methodology for the calculation can be found on MSCI's website [www.msci.com/index-methodology](http://www.msci.com/index-methodology).

## Where can I find more product specific information online?



More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

Sustainability-related website disclosure for the fund can be found through the link for product-specific information provided above.

Additional information as referenced in the above sections is available here:

[Responsible Investment Policy](#)  
[Exclusion list](#)

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Nordea Yield Fund

**Legal entity identifier:** 549300DNLSOLVCAFQT35

## 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 qualify as environmentally sustainable under the EU Taxonomy
  - 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 **promotes Environmental/Social (E/S) characteristics** and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20% 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 promotes E/S characteristics, but **will not make any sustainable investments**



## What environmental and/or social characteristics are promoted by this financial product?

The E/S characteristics promoted can be environmental and/or social and include the following features:

**Minimum proportion of sustainable investments** The fund promotes E/S characteristics by partially investing in companies and issuers involved in activities that contribute to an environmental or social objective as outlined in UN Sustainable Development Goals (SDGs) and/or the EU Taxonomy, while not significantly harming any other environmental or social objectives and following good governance practices. The process applied to identify sustainable investments is further described below in the section "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?"

**Sector- and value-based exclusions** The fund promotes E/S characteristics by excluding companies that are deemed to be inappropriate based on their business activities or corporate behaviour. The exclusion criteria are further described in the section "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?"

**NAM's Paris-Aligned Fossil Fuel Policy** The fund promotes E/S characteristics by refraining from investing in companies that have significant exposure to fossil fuels unless they have a credible transition strategy. More information can be found in the section "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?"

There is no reference benchmark designated for the purpose of attaining the E/S characteristics of the fund.

### ● **What sustainability indicators are used to measure the attainment of each of the environmental or social characteristics promoted by this financial product?**

To measure the attainment of the environmental or social characteristics, the investment manager will use the following indicators:

- % of sustainable investments
- % of investments, aligned with the E/S characteristics, that do not comply with sector and value based exclusions
- % of investments, aligned with the E/S characteristics, that do not comply with NAM's Paris-Aligned Fossil Fuel Policy

#### Sustainability indicators

measure how the environmental or social characteristics promoted by the financial product are attained.

**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.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The objective of the sustainable investments that the fund partially intends to make, is to contribute to one or several of the UN SDGs or alternatively be involved in Taxonomy-aligned activities. Sustainable investments contribute to the objectives through the fund's investments in companies where a minimum of 20% of their activity can be linked to economic activities supporting an environmentally-sustainable objective defined in the EU Taxonomy, or an environmental or social objective belonging to the list of UN SDGs. The definition of sustainable investments is further detailed in the section "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 UN SDGs are a set of 17 Sustainable Development Goals adopted by the United Nations in 2015 as a call for action to end poverty, protect the planet, and ensure peace and prosperity by 2030. For further details, see the link to sustainability related information below under the headline "Where can I find more product specific information online?".

The EU Taxonomy provides a framework for assessment of environmentally sustainable economic activities and lists economic activities that are considered environmentally sustainable in the context of the European Green Deal.

● ***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?***

As part of the process to identify sustainable investments, companies are screened to ensure that they do not significantly harm (DNSH test) any other social or environmental objectives. The DNSH test uses PAI indicators, as described below, to identify and exclude companies that do not pass the thresholds.

### ***How have the indicators for adverse impacts on sustainability factors been taken into account?***

The DNSH test, as part of the methodology to identify sustainable investments, identifies negative outliers and poor performance related to PAI indicators. The investment manager will consider the PAI indicators that are listed in the regulatory technical standards Table 1, annex 1 of the Sustainable Finance Disclosure Regulation. Currently data is mainly available for the use of the indicators listed below. As data quality and availability evolves, additional indicators will be included.

Climate and other environment related indicators:

- Greenhouse Gas emissions
- Biodiversity impact
- Emissions to water
- Hazardous waste

Indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters:

- Violations of the UNGC and OECD principles
- Board gender diversity
- Exposure to controversial weapons
- Severe human rights issues and incidents

Companies that do not pass the thresholds that are defined by the investment manager, will not qualify as a sustainable investment. This includes companies that are involved in severe human rights incidents, severe controversies related to biodiversity or violations of the UNGC and OECD principles. In certain cases where a company does not pass the test on one or more of the above PAI indicators, use-of-proceeds securities issued by such company may be considered sustainable if the proceeds from the issuance of the securities is dedicated to the funding of activities that mitigate the reasons for the company not passing the test.

Companies also fail the DNSH test if they are among the worst performers on emissions to water, hazardous waste or Greenhouse Gas emissions. In addition, companies that derive more than 0% of revenue from unconventional fossil fuel fail the DNSH test, and companies that derive more than 5% from conventional fossil fuel or more than 50% from services specific to the fossil fuel industry will only pass the DNSH test if they are below the climate related exclusions criteria of the EU Paris Aligned Benchmark with revenue thresholds of 1% for coal, 10% for oil, 50% for natural gas and 50% for fossil fuel based electricity generation, and have a climate transition plan. Our Paris Aligned Fossil Fuel Policy describes the criteria used to identify companies with credible transition plans. It can be found via the link provided below in the section "Where can I find more product specific information online?".

Additional exclusions to further limit negative externalities are applied to the investment universe of the fund, to avoid investment in companies that are involved in thermal coal or production of fossil fuels from oil sands and arctic drilling, as well as controversial weapons, and pornography. The fund's exclusion policy is described in the section "What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?"

The data on PAI indicators needed for the DNSH test is sourced from third party data providers.

***How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?***

Alignment of the sustainable investments with the OECD guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights is confirmed as part of the process to identify sustainable investments using the Violations of the UNGC and OECD principles indicator.

*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 fund that take into account the EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this fund 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?**

No

Yes, Investment teams have access to absolute PAI metrics and/or normalized scale values (e.g. based on NAM's proprietary PAI tool) across multiple PAI indicators, allowing them to identify outliers and adjust their view of investee companies and issuers accordingly. The specific PAI indicators that are taken into consideration are subject to data quality and availability.

Information on PAI on sustainability factors is available in the annual report to be disclosed pursuant to SFDR Article 11(2).



## What investment strategy does this financial product follow?

The general investment policy of the fund, including investment universe and benchmark, is further detailed in the KID for the fund.

The E/S characteristics that are promoted by the fund, are integrated in the investment process on a binding basis as described in the section "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?".

Investments are partly dedicated to sustainable investments. The strategy applies sector and value-based exclusions and the fund does not invest in companies that are on Nordea's exclusion list based on their business activities or conduct as further detailed in NAM's Responsible Investment Policy available via the link provided in the section "Where can I find more product specific information online?". Exposure to companies involved in fossil fuel related activities is restricted through NAM's Paris aligned Fossil Fuel Policy.

As part of the investment process, companies are screened to ensure that they follow good governance practices.

### ● **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?**

Minimum 20% of the fund is in investments that are sustainable as per SFDR article 2 (17). Investments are classified as sustainable, using NAM's proprietary methodology. The classification is mainly based on contribution to one or more of the UN SDGs or one or more of the environmental objectives in the EU Taxonomy. However, for certain asset types like covered bonds and use-of-proceeds bonds, other measures are relevant. The process also tests good governance as described in the section "What is the policy to assess good governance practices of the investee companies?" and that the companies' activities do no significant harm to other objectives as described in the section "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?".

Sector- or value-based exclusions prevent investments in companies and issuers that are involved in serious breaches of international norms where engagement is deemed not to be possible or effective. Companies engaging in certain activities that are deemed to have significant negative climate or environmental impact, like thermal coal or production of fossil fuels from oil sands and arctic drilling, are also excluded, as well as companies active in the production of controversial weapons and companies involved in pornography. Companies' exposure to certain activities may be measured on production, distribution or revenue contribution depending on the nature of the activity, and thresholds may apply for the purpose of exclusions. A link to the list of excluded companies, as well as the Responsible Investment Policy further detailing the process, is provided below in the section "Where can I find more product specific information online?". The investments in the fund are also subject to specific exclusions that limit exposure to certain activities that are incompatible with the fund's investment profile or deemed to be detrimental to the environment or society at large. The specific additional exclusions that apply to the fund can be found in the sustainability-related website disclosures through the link provided below in the section "Where can I find more product specific

**The investment strategy** guides investment decisions based on factors such as investment objectives and risk tolerance.

information online?”.

The fund adheres to NAM's Paris-Aligned Fossil Fuel Policy that sets thresholds for companies' exposure to fossil fuel production, distribution and services. This means that the fund will not invest in companies with material involvement in fossil fuel production, distribution or services if they do not have a documented transition strategy that aligns with the Paris Agreement. A link to a description of NAM's Paris-Aligned Fossil Fuel Policy is provided below in the section “Where can I find more product specific information online?”.

The binding elements are documented and monitored on an ongoing basis by NAM. Separately, Nordea Funds has risk management processes in place to control financial and regulatory risk and ensure appropriate escalation of any potential issues within a clear governance structure.

NAM conducts a thorough due diligence on external data vendors to clarify applied methodologies and verify data quality. However, as the regulation and standards of non-financial reporting is rapidly developing, data quality, coverage and accessibility remains challenging, especially for smaller companies and less developed markets.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

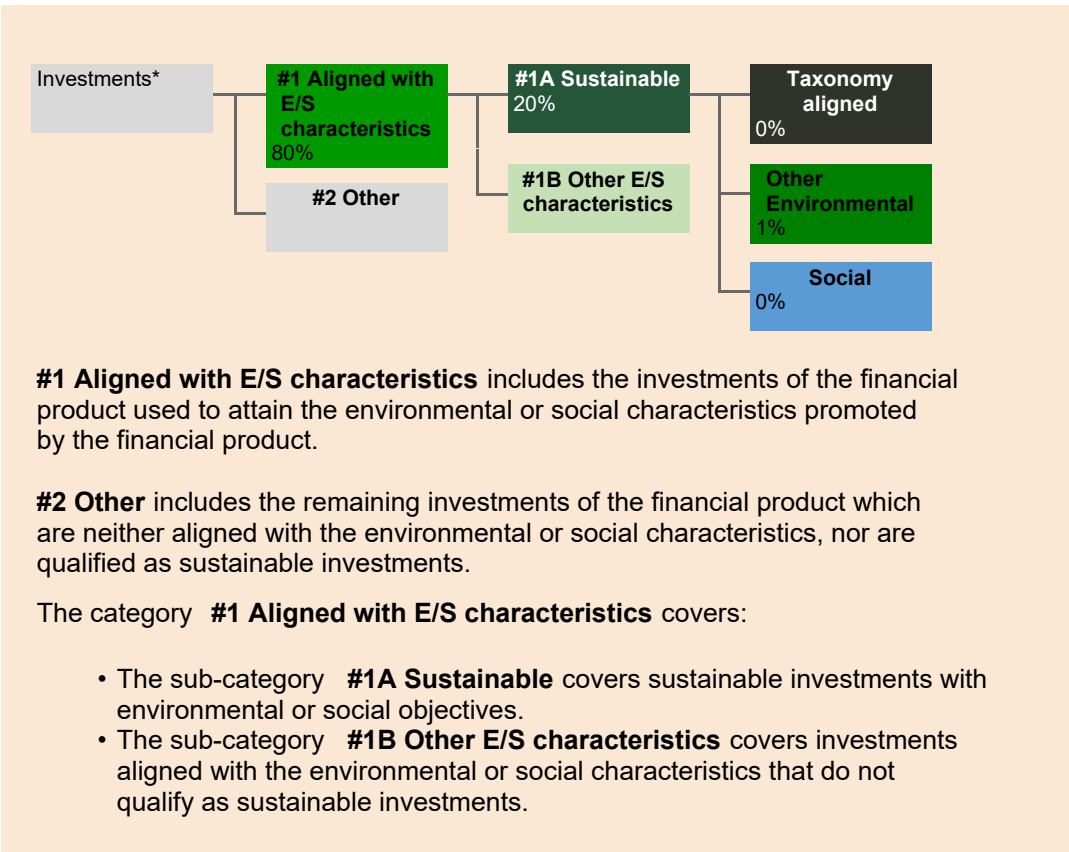
● ***What is the policy to assess good governance practices of the investee companies?***

Good governance practices of investee companies are addressed in various layers of the security selection process of direct investments. Companies are screened for good governance by assessing, among other elements, their employee relations, pay practices, management structures and tax compliance.



## What is the asset allocation planned for the financial product?

The fund commits to minimum proportion of investments as illustrated below. Where no percentage proportion or 0% is displayed, such investments may be relevant for the strategy but the fund is not committed to holding a specific proportion at all times, and the proportion of such investments may be as low as 0% at the investment manager's discretion.



\*Investments refer to the fund's NAV which is the total market value of the fund.



## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

The minimum proportion of investments that are aligned with the EU Taxonomy is 0%. Sufficiently reliable data on Taxonomy-alignment is scarce and the data coverage remains too low to support a meaningful commitment to a minimum proportion of Taxonomy-aligned investments in this fund. It cannot be excluded that some of the fund's holdings qualify as Taxonomy-aligned investments. Disclosures and reporting on Taxonomy-alignment will develop as the EU framework evolves and data is made available by companies.



To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

**Enabling activities** directly enable other activities to make a substantial contribution to an environmental objective.

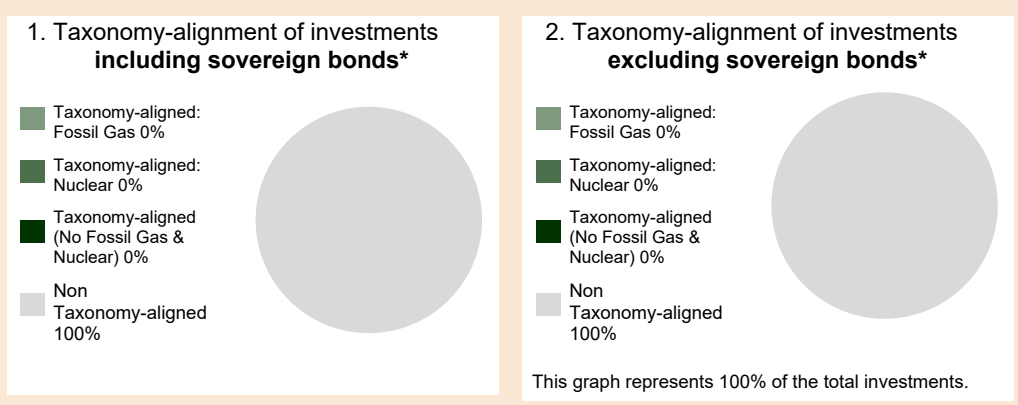
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes
  - In fossil gas       In nuclear energy
- No

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.


The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy-alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only in relation to the investments of the financial product other than sovereign bonds.



\* For the purpose of these graphs, ‘sovereign bonds’ consist of all sovereign exposures

● **What is the minimum share of investments in transitional and enabling activities?**

There is no commitment to a minimum proportion 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 minimum share of investments with an environmental objective that are not aligned with the EU Taxonomy is 1%. The fund will make a minimum sustainable investment with an environmental objective as displayed in the graph in the section “What is the asset allocation planned for the financial product?”.



**What is the minimum share of socially sustainable investments?**

The minimum share of sustainable investments with a social objective is 0%.



**What investments are included under “#2 Other”, what is their purpose and are there any minimum environmental or social safeguards?**

Cash may be held as ancillary liquidity or for risk balancing purposes. The fund may use derivatives and other techniques for the purposes described in the KID for the fund. This category may also include securities for which relevant data is not available. Minimum environmental or social safeguards are not applicable for these investments. The fund may also include exposure to portfolios that as a minimum apply good governance screenings as ESG safeguards and where part of the holdings may not be aligned with the E/S characteristics of the fund.



**Where can I find more product specific information online?**

More product-specific information can be found on [www.nordeafunds.com](http://www.nordeafunds.com)

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[Exclusion list](#)  
[Paris-Aligned Fossil Fuel Policy](#)