

SEB Nordenfond

Annual Report 2023

Administrator's Statement

The share value of class A shares increased by 14.3 per cent over the period. The performance of the Fund's other share classes is shown in the table entitled "Performance" on page 3. The benchmark index for the share class, including dividends, rose by 13.3 per cent.

Market Performance

When summarising 2023, we can see that inflation and interest rates were again two of the main topics of the year. Since the peak in inflation at the end of 2022, inflation declined markedly over the year but still remained at historically high levels at the end of the year. Across Europe and North America, central banks tried to slow down economies by raising key interest rates, which for example peaked at 4.0% in Sweden and 4.5% in Norway. The main market scenario during the year was that economic activity would soften, despite international banking concerns in the spring and increasing geopolitical conflicts. The concept of artificial intelligence made its way into popular speech and the market saw the effects of the wider introduction of the functionality, not least in the US, where seven large companies in the technology sector, also known as the "Magnificent 7", had an exceptionally strong stock market year. The Nordic markets also performed strongly and among the sectors that developed particularly well were consumer durables and health care, the latter of which was highlighted by the Danish giant Novo Nordisk's breakthrough in weight loss. The sectors that had a tougher time in 2023 included utilities and energy.

Performance of the Fund

The Fund developed positively and outperformed its benchmark index during the period. At the sector level, the healthcare and financial sectors made the most positive contributions to the Fund's relative performance, while the commodities and engineering sectors had the most negative impact. The largest positive contributors to the Fund's relative performance were the holdings in Volvo, Investor, Handelsbanken and Uponor, while Astra Zeneca, Boliden, Tomra and Fortum had the most negative impact on the Fund's relative performance. The largest net purchases were made in Astra Zeneca, Danske Bank, Industrivärden and Cargotec and the largest net sales were in Novo Nordisk, Volvo, Sectra and AddTech. During the period, Sampo, Maersk, Konecranes, Sparebank 1 SMN, Sparebank 1 Oestlandet, Topdanmark, Uponor, Embracer and Vimian were fully divested, while Handelsbanken, Swedbank and Traton were added as new holdings. During the year, the Swedish crown strengthened against the Norwegian crown, while it weakened against both the Danish krone and the Euro, which together had a positive effect on the Fund's performance expressed in Swedish krona.

Future Strategy

The Trust seeks to identify and invest in reasonably valued quality companies with growth potential that clearly integrate sustainability into their business model. We believe that over time the market underestimates the ability of good companies to continue to grow with good profitability, while in the short term the market tends to overestimate from time to time the ability of less good companies to start growing, achieve profitability and strengthen their market positions. We strive for our holdings to have strong market positions, good profitability, integrated sustainability work and a proven ability for profitable growth, as we believe that quality companies will perform better over time.

Other

On 12 June 2023, the Fund was the receiving fund in the merger with the Luxembourg-registered SEB Norway Focus Fund. The Fund has continued to have the same objectives and investment focus as before and the Fund's fees were not affected. The merger resulted in the creation of four new share classes in the Fund.

Fund Info	
Start year	1997
Starting rate (SEK)	10.00
Benchmark index	VINX Benchmark Cap Net Return Index
Morningstar Rating (total)*	★★★★
Fund manager	SEB Investment Management AB
Dividend	The Fund has a distributing share class and four non-distributing share classes
Administrator	Tommi Saukkoriipi
* Share class A	
The Fund complies with the "Swedish Code for Investment Funds"	
Costs	
Management fee, share class A (%)	1.30
Management fee, share class B (%)	1.30
Management fee, share class C (%)	1.30
Management fee, share class D (%)	0.95
Management fee, share class E (%)	0.60
Management fees and other administrative or operating costs (%)	
- share class A*	1.30
- share class B*	1.30
- share class C**	1.30
- share class D**	0.95
- share class E**	0.60
Deposit fee (%)	None
Withdrawal fee (%)	0.00
Transaction costs (TSEK)**	3,346.1
Transaction costs as % of sales of securities*	0.0
Management costs for one-off deposit of SEK 10,000 for one year (SEK)	
- share class A	141.14
- share class B	140.97
- share class C***	-
- share class D***	-
- share class E***	-
Management costs for recurring monthly saving of SEK 100 for one year (SEK)	
- share class A	8.68
- share class B	8.67
- share class C***	-
- share class D***	-
- share class E***	-
Turnover rate*	0.32
Turnover via affiliated institutions (%)***	33.6
Maximum possible management fee according to the Fund regulations (%)	1.30
* Based on a 12-month rolling basis	
** Estimated value	
*** Complete history for calculation is missing	
Sustainability information	
Information on the Fund company's sustainability work can be found at sebgroup.com/fondbolagethallbarhet . A link to the Fund price list, where you can read more about the sustainability information of each fund, can be found at https://seb.se/fondlistan under the tab "SEB Investment Management".	

Objectives and investment focus

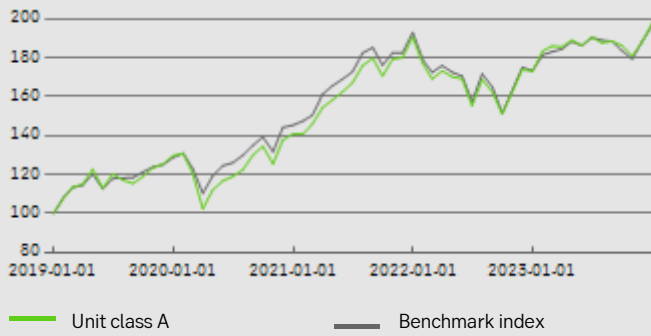
The Fund aims to increase the value of your investment over time and to outperform its benchmark index. The Fund is actively managed and invests in equities mainly in companies in the Nordic market. The Fund can also invest up to 10% outside the Nordic region, but in other EEA countries. Investment decisions are based on thorough (fundamental) analysis with a focus on finding reasonably valued quality companies that have a strong market position, good finances, clear sustainability work and a proven ability to achieve profitable growth. Derivative instruments may be used to achieve the investment objective and streamline management.* Derivatives are financial instruments whose value is determined by one or more underlying instruments. The Fund promotes sustainable characteristics and is therefore classified as Article 8 under the EU Regulation on sustainability-related disclosures (SFDR). The Fund complies with the Fund management company's sustainability policy which is available at www.seb.se/fondbolaget. The benchmark is the VINX Benchmark Cap Net Return Index. The majority of the Fund's holdings may be components of, but do not have the same weight as, the holdings of the Fund's benchmark index. The Fund's investment strategy does not aim to limit the extent to which the Fund's holdings deviate from its benchmark index. This fund may be suitable for those who plan to keep their investment for at least 5 years and who understand that the money invested in the Fund may increase or decrease in value.

* This option has not been exercised.

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Share value trends



Fund risk – Equity fund medium risk

Fund standard deviation (%)*	15.7
Benchmark index standard deviation (%)*	15.8
Active risk (%)	2.4
Active share (%)**	60.4

The sum of the underlying exposed values of the derivative instruments:	-
Highest level (%)	0.0
Lowest level (%)	0.0
Average level during the year (%)	0.0

* Calculated over 24 months.

** Active share indicates how much of the Fund's holdings deviate from its benchmark index.

The Fund uses the commitment method to calculate the aggregate exposures.

More information on risk can be found at <https://seb.se/privat/spara-och-placera/spara-i-fonder/risknivaer-for-fonder>



Performance	2023	2022	2021	2020	2019	2018	2017	2016	2015	2014
Fund assets (MSEK)	12,656	10,834	12,528	6,794	6,707	5,514	6,614	6,015	5,836	5,621
Share value, share class A (SEK)	52.5	45.9	50.6	37.4	34.4	26.5	29.3	25.5	23.3	20.7
Unit value, share class B (SEK)	25.9	23.5	26.7	20.3	19.4	15.4	17.6	15.8	14.8	13.5
Unit value, share class C (SEK)	222.9	-	-	-	-	-	-	-	-	-
Unit value, share class D (SEK)	232.4	-	-	-	-	-	-	-	-	-
Unit value, share class E (SEK)	239.5	-	-	-	-	-	-	-	-	-
Outstanding shares, share class A (1000s)	240,259	235,823	247,620	181,588	194,729	207,823	225,786	236,060	249,929	271,735
Outstanding shares, class B (1000s)	344	358	388	348	348	364	423	106	279	238
Outstanding shares, class C (1000s)	89	-	-	-	-	-	-	-	-	-
Outstanding shares, share class D (1000s)	96	-	-	-	-	-	-	-	-	-
Outstanding shares, share class E (1000s)	9	-	-	-	-	-	-	-	-	-
Price trend, share class A (%)*	14.3	-9.2	35.3	8.6	29.7	-9.4	14.9	9.2	12.9	21.1
Price trend, share class B (%)*	14.3	-9.2	35.3	8.6	29.8	-9.4	14.9	9.2	12.9	21.1
Price trend, share class C (%)**	2.4	-	-	-	-	-	-	-	-	-
Price trend, share class D (%)**	2.6	-	-	-	-	-	-	-	-	-
Price trend, share class E (%)**	2.8	-	-	-	-	-	-	-	-	-
Benchmark index incl. dividends, share class A (%)	13.3	-10.2	32.8	12.9	28.7	-3.5	13.3	7.7	11.6	17.3
Benchmark index incl. dividends, share class B (%)	13.3	-10.2	32.8	12.9	28.7	-3.5	13.3	7.7	11.6	17.3
Benchmark index incl. dividends, share class C (%)	2.6	-	-	-	-	-	-	-	-	-
Benchmark index incl. dividends, share class D (%)	2.6	-	-	-	-	-	-	-	-	-
Benchmark index incl. dividends, share class E (%)	2.6	-	-	-	-	-	-	-	-	-
Active risk (%)	2.4	2.6	4.9	5.5	4.7	3.8	3.6	3.4	2.1	2.0
Dividends in SEK/share	0.8	0.8	0.7	0.6	0.6	0.6	0.5	0.4	0.4	0.4

* The price trend is calculated with the dividend reinvested in relevant cases.

** Price trend from the start of the share class. The price trend is calculated with the dividend reinvested in relevant cases.

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Activity level

The Fund's activity level is described using the activity measure active risk, which shows how much the difference between the Fund's return and the return of the benchmark index has varied over time. The activity level is reported as a percentage and is calculated as the standard deviation, the average deviation from the mean deviation, of the difference between the Fund's performance and the benchmark index. The higher the activity level of the Fund, the higher the average deviation. The calculation does not take into account whether the deviation is positive or negative.

Over the past five years, the Fund has realised an active risk in the range of 2.4– 5.5, broadly in line with the Fund's long-term target range. The Fund's investment strategy focuses on long-term investments in companies that are deemed to have an attractive valuation and good opportunities for growth, which means that the active risk level will to some extent follow the underlying volatility in the market. The active risk in the Fund was driven up by the outbreak of the COVID pandemic, which generated increased market volatility, as the Fund also had large overweights in the industry and commodities sectors at the time, which were particularly negatively affected by the outbreak. The subsequent strong recovery in these sectors further contributed to the active risk. In 2023, the Fund reduced its exposure to the industrial sector and significantly increased its overweight in the financial sector, leading to lower active risk during the year, as the performance of the financial sector was less volatile than the Fund's benchmark.

Average performance during the year (%)	2 years	5 years
Fund*	1.9	14.6
Benchmark index	0.9	14.5

* Share class A

The Fund's Risk Profile

Saving in shares involves the risk of large price fluctuations (market risk). The investment approach means that the Fund's assets are exposed to risk mainly in the Nordic stock market and thus to a limited geographical market. Detta medför normalt att marknadsrisken blir högre än för en aktiefond som placerar på flera geografiska marknader. As the Fund invests outside Sweden, it is affected by changes in exchange rates (currency risk).

Other information

On 12 June 2023, the Fund was the receiving fund in the merger with the Luxembourg-registered SEB Norway Focus Fund. The Fund has continued to follow the same investment objectives and strategy as before and the Fund's fees were not affected. The merger resulted in the creation of four new share classes in the Fund.

The Fund's largest exposures

Financial instruments	Exposure (%)
Investor	9.8
Volvo	9.8
Novo Nordisk	8.8
AstraZeneca	7.2
Svenska Handelsbanken	4.9
Swedbank	4.8
Skandinaviska Enskilda Banken	4.8
Sandvik	4.8
Nordea Bank Finland Abp	4.7
Danske Bank	4.5

Currency exposure (%)

SEK	62.3	DKK	17.1	NOK	3.2
EUR	17.4				

Exposures through different types of financial assets to the same company or to companies in the same group.

Issuer	Exposure (%)
Skandinaviska Enskilda Banken AB	7.3

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Fund assets 31 December 2023			
Financial instruments	Number/Nom 1000	Market value 1000 SEK	Distribution (%)
Transferable securities on a regulated market or equivalent outside the EEA			
Shares etc.			
Electricity, gas and water companies			1.8
Fortum	1,569,492	228,622	1.8
Finance			37.1
Danske Bank	2,137,288	575,798	4.5
Industrivärden	1,045,586	343,684	2.7
Investor	5,316,953	1,241,243	9.8
Nordea Bank Finland Abp	4,759,241	596,782	4.7
Skandinaviska Enskilda Banken	4,375,271	608,600	4.8
Storebrand	1,017,162	90,883	0.7
Swedbank	3,017,128	613,684	4.8
Svenska Handelsbanken	5,688,907	622,935	4.9
Healthcare			16.6
AstraZeneca	672,675	912,484	7.2
Novo Nordisk	1,070,204	1,115,718	8.8
Sectra	392,623	70,774	0.6
Industry			28.3
AddTech	261,834	58,022	0.5
Beijer Ref	1,151,097	155,859	1.2
Bravida Holding	1,048,001	85,202	0.7
Cargotec	628,535	368,395	2.9
DSV	175,372	310,479	2.5
Nibe Industries	1,495,653	105,922	0.8
Permascand Top Holding AB	157,140	2,648	0.0
Sandvik	2,787,499	607,954	4.8
Tomra Systems	726,304	88,975	0.7
Volkswagen Truck & Bus GmbH	1,149,624	270,851	2.1
Valmet	695,272	202,323	1.6
Volvo	4,732,484	1,236,835	9.8
ÅF	645,452	90,621	0.7
Information technology			4.3
Hexagon	3,037,448	367,531	2.9
Nokia	5,343,033	181,712	1.4
Consumers – Groceries			1.3
Austevoll Seafood	760,321	55,946	0.4
Bakkafrost	208,450	110,045	0.9
Commodities			8.1
Alleima AB	1,249,353	96,025	0.8
Boliden	977,149	307,167	2.4
Stora Enso	623,564	86,945	0.7
UPM-Kymmene	1,421,744	540,186	4.3
Total Shares etc.		12,350,851	97.6
Total Financial Instruments		12,350,851	97.6

Continued...

Financial instruments	Number/Nom 1000	Market value 1000 SEK	Distribution (%)
Other assets and liabilities			2.4
Cash and cash equivalents		318,601	2.5
Other assets and liabilities, net		- 13,762	-0.1
Fund assets		12,655,691	100.0

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Balance sheet		
	2023-12-31 SEK	2022-12-31 MSEK
Assets		
Transferable securities	12,350,851,288	10,744.2
Total financial instruments with positive market value	12,350,851,288	10,744.2
Total investments with positive market value	12,350,851,288	10,744.2
Cash at bank and in hand	318,601,093	100.4
Prepaid expenses and accrued revenues	-	0.3
Other assets	909,878	1.8
Total assets	12,670,362,259	10,846.7
Liabilities		
Accrued expenses and pre-paid revenues	- 14,092,377	- 12.5
Other liabilities	- 579,141	- 0.7
Total liabilities	- 14,671,517	- 13.2
Fund assets	12,655,690,741	10,833.5

Accounting and valuation principles

All accounts are in Swedish kronor (SEK) and after fees. The Fund applies the Swedish Investment Funds Act (SFS 2004:46), the Swedish Financial Supervisory Authority's regulations on investment funds (SFS 2013:9), guidelines issued by ESMA – the European Securities and Markets Authority – and follows the guidelines of the Swedish Investment Fund Association where applicable.

The Fund's assets and liabilities are valued at market value. If prices are not available or if, in the opinion of the UCITS, they are misleading, the valuation may be carried out on an objective basis in accordance with generally accepted valuation principles.

Changed tax rules

Due to EU tax developments, there is sometimes uncertainty as to which withholding tax is levied in different countries when Swedish funds receive dividends on foreign shares.

This implies that:

- some countries will contain more tax than before on dividends.
- other countries may have a lower tax on dividends than in the past.
- for countries where the tax is reduced directly when the dividend is paid, this is recognised in the Fund when the right to the dividend arises.
- for countries where the Fund has to apply for a refund of withholding tax (refund) on dividends, this is accounted for when any refund is received.

The changes may lead to both increased income and increased withholding tax costs for funds with foreign shareholdings.

Income statement		
	2023 SEK	2022 MSEK
Income statement	-	-
Revenue and change in value		
Change in value of transferable securities	1,293,167,442	- 1,385.0
Interest revenues	6,542,058	0.9
Dividends	429,948,689	377.9
Net foreign exchange gains and losses	- 10,101,420	- 1.0
Other revenues	6,080	0.0
Total, revenue and change in value	1,719,562,849	- 1,007.3
Costs		
Management costs:		
- Remuneration to the company operating the Fund	- 152,339,130	- 138.7
Interest expenses	- 81,677	- 0.4
Other expenses	- 3,346,161	- 2.0
Total costs	- 155,766,969	- 141.2
Year's profits	1,563,795,880	- 1,148.5

Specification of change in value

Specification of change in value

Specification of change in value

Specification of change in value

Specification of change in value

Transferable securities

Capital gains	968,319,618	563.5
Capital losses	- 226,813,864	- 287.7
Unrealised gains/losses	551,661,688	- 1,660.8
Total change in value	1,293,167,442	- 1,385.0

Change in fund assets		
	2023 SEK	2022 MSEK
Change in fund assets	-	-
Fund assets at the beginning of the year	10,833,526,691	12,527.7
Added on merger A) undistributed share class	31,430,648	-
Added on merger C) undistributed share class	21,409,616	-
Added on merger D) undistributed share class	26,056,617	-
Added on merger E) undistributed share class	2,164,575	-
Issuance of shares A) non-disseminated share class	1,041,939,207	716.3
Issuance of shares B) distributing share class	1,073,669	1.1
Share issuance C) unissued share class	2,621,887	-
Issuance of shares D) non-disseminated share class	6,459,256	-
Issuance of shares E) non-disseminated share class	8,194	-
Redemption of shares A) non-distributed share class	- 857,425,040	- 1,261.0
Share issuance B) distributing share class	- 1,370,747	- 1.8
Redemption of shares C) non-distributed share class	- 4,724,340	-
Redemption of shares D) non-distributed share class	- 10,958,017	-
Earnings according to income statement	1,563,795,880	- 1,148.5
Distributed to shareholders	- 317,356	- 0.3
Fund assets at the end of the year	12,655,690,741	10,833.5

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Remuneration Policy

SEB IM AB ("the Fund Company") wants to encourage its employees to good performance and behaviour, and to work towards achieving a balanced risk-taking that is in line with the interests of the Fund's shareholders.

The Fund company takes a long-term view of employee employment. The total remuneration shall contribute to the development of the Fund Company's competitiveness and profitability by enabling the Company to attract, retain, develop and reward competent employees. In order to achieve this, the Board of Directors of the Fund has adopted a remuneration policy based on Swedish and international regulations. The purpose of the remuneration policy is to ensure that the Fund has a remuneration system that is aligned with the long-term interests of the shareholders as well as the Fund's strategy and values. The remuneration policy is based on the remuneration model applied at Group level and is based on SEB's values. The remuneration policy of the Fund company is reviewed at least annually. The Fund's current remuneration policy is based on a risk analysis prepared by the Fund's risk control function.

The Fund company has decided on a remuneration structure based on three elements:

Fixed remuneration (basic salary)

Variable remuneration

Pensions and other benefits

The remuneration components are used to achieve a competitive individual remuneration with an appropriate balance between fixed and variable remuneration and between short and long-term remuneration.

The fixed remuneration is individually adjusted and based on predetermined internal and external starting points. The level of fixed remuneration is based on the employee's experience, long-term performance and behaviour.

All employees of the Fund Company are covered by SEB's collective profit-sharing scheme (SEB's profit-sharing), which has a predetermined maximum outcome. Remuneration is based on SEB's performance and customer satisfaction.

Remuneration of employees in control functions (internal audit, risk control and compliance) is determined by the Board of Directors on the basis of proposals from the UCITS Remuneration Committee. Remuneration shall be based on objective grounds related to the role and function of the employees and shall be independent of the business unit which the control function is auditing. Employees in control functions shall not receive any other variable remuneration in addition to SEB's profit share.

The Fund applies the "grandfather principle" to all remuneration, which means that all decisions must be approved at least by the employee's line manager.

Variable remuneration

The Fund Company uses variable remuneration to develop and reward performance and behaviour that creates both short and long-term value for the Fund shareholders and the Fund Company. Variable remuneration is an important way of designing a flexible remuneration system. The variable remuneration is paid both in cash and in shares in investment funds or instruments achieving similar affinity to shares in the investment funds concerned.

The variable remuneration principles adopted by the Fund are designed to reflect the low risk tolerance of the Fund and to be consistent with the risk profiles, fund rules, discretionary mandates, internal and external regulations applicable to the Funds. The variable remuneration shall be based on the employee's performance and behaviour over a multi-year perspective and on the performance and financial outcome for the employee's team, the Fund Company and SEB as a whole. The employee's individual performance must reflect compliance with rules and policies for risk-taking in IM AB and the SEB Group, including sustainability risks, the code of conduct and the requirements for internal controls.

While achieving a sound balance between fixed and variable remuneration, the payment of variable remuneration shall be related to the Fund's risk policy and the creation of value for the Fund's shareholders. As a result, certain ceilings and deferrals apply to different categories of staff.

For employees in positions that have a material impact on the risk profile of the Fund management company or the funds under management, the maximum variable remuneration may not exceed 100% of the fixed remuneration. The variable remuneration is deferred by 40 to 60 percent for at least four years. At least 50% of the variable remuneration shall consist of shares in investment funds or instruments achieving similar affinity to shares in the investment funds concerned. Variable remuneration in the form of fund shares shall be subject to a retention policy of at least one year. The retention policy shall apply both to variable remuneration that is deferred and to variable remuneration that is not deferred.

The Fund management company also applies a special remuneration model for certain employees who manage funds and discretionary mandates. The remuneration model for these employees is based on a structure with clear rules on maximum remuneration, deferral of remuneration and rules on downward/upward adjustment of remuneration. Payment of deferred compensation shall only be made if justified by the financial situation of the Fund Company and the performance of the Fund Company, the relevant division and the employee. A cancellation or downward adjustment of deferred variable remuneration occurs if it becomes apparent that losses, increased risks and costs will occur during the deferral period, which includes, for example, a consideration of employee compliance with external and internal regulations. Cancellation or downward adjustment shall also be made if payment is deemed unjustifiable in view of the Fund Company's financial situation.

The variable remuneration scheme shall be kept under review to ensure that it does not create inappropriate behaviour and contribute to excessive risk-taking.

Remuneration Committee

The Fund Company has appointed a Remuneration Committee with the task of exercising an independent assessment of the remuneration policy. The Remuneration Committee is responsible for preparing decisions on remuneration to be taken by the Board of Directors and intervening if decisions may have an impact on the risks and risk management of the Fund. The Remuneration Committee is an independent function composed of two independent members of the Board.

Follow-up

It is the responsibility of the managing director, deputy managing director and the board of directors to ensure that the remuneration policy is applied within the business. The remuneration policy shall be reviewed annually by the internal control function or by an independent audit firm. In order to ensure that the remuneration system of the Fund Company is applied in accordance with the remuneration policy, the remuneration system and the payment of remuneration are audited annually by an internal or external auditor.

For 2023, the Fund company has commissioned an independent external control function to review the Fund company's remuneration system and payment of remuneration. The result of the review is that the Fund management company's remuneration system complies with the Fund management company's remuneration policy and that there have been no deviations from the remuneration policy.

Specially regulated staff

	Remuneration and benefits paid, 2023 (TSEK)
Employees in senior strategic positions	46,416
Employees responsible for control functions	2,059
Risk takers	129,056
Estimated remuneration to external managers*	38,495
All employees (fixed remuneration)	255,990
All employees (variable remuneration)	73,141
<i>Number of employees during the year</i>	209

**Includes all of SEB Investment Management's externally managed funds*

Product name: SEB Nordenfond

Legal entity identifier: 529900W81KB6B1YLDP42

Environmental and/or social characteristics

Sustainable investment: an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not cause significant harm to any other environmental or social objective and that the investment objects 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.

Did this financial product have a sustainable investment objective?

Yes

No

It made **sustainable investments with an environmental objective: ___%**

in economic activities that are considered environmentally sustainable according to the EU Taxonomy.

in economic activities that are not considered environmentally sustainable according to the EU Taxonomy.

It made **sustainable investments with a social objective: ___%**

It **promoted environmental and social characteristics** and, even if its primary objective was not sustainable investment, a share of **44.88%** of its investments were sustainable

with an environmental objective in economic activities that are considered environmentally sustainable according to the EU Taxonomy.

with an environmental objective in economic activities that are not considered environmentally sustainable under the EU Taxonomy

with a social objective

It promoted environmental and social characteristics, but **did not make sustainable investments**



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

During the 2023 reference period, the Fund has promoted environmental and social characteristics by considering sustainability risks and opportunities both before investing in an individual company and in the ongoing monitoring of the investment, and by investing in companies classified as sustainable investments. In our fundamental analysis process, we have conducted a sustainability assessment of, among other things, each company's products, services, operations and suppliers. As support in the work of assessing the companies' sustainability risks and opportunities, the Fund's managers use a quantitative tool in the form of the SEB Investment Management Sustainability Score, SIMS-S.

SIMS-S is our proprietary sustainability model that rates all companies in our investment universe based on multiple aspects of sustainability to create a comprehensive and unbiased picture.

The model consists of two main components: sustainability risks and sustainability opportunities. The model uses data from multiple data providers and is continuously modified as new data and insights become available.

The sustainability rating contains both a present value picture and a forward-looking perspective for the individual company. It allows portfolio managers to assess current and future sustainability factors that may affect long-term risk and return.

Sustainability risks refer to environmental, social or governance-related events or circumstances that, if they were to occur, would have an actual or potential significant negative impact on the value of the investment.

Sustainability opportunities refer to environmental, social or governance-related events or circumstances that, if they were to occur, would have an actual or potential significant positive impact on the value of the investment.

Read more about SIMS-S in: Sustainability work within SEB Investment Management | SEB (sebgroup.com)

The Fund has also promoted environmental and social characteristics through the continuous efforts to influence companies' business models in a more sustainable direction. The Fund company has influenced the companies on behalf of the Fund by voting at general meetings, through dialogues with management groups and boards and in cooperation with other asset managers or partners.

Furthermore, the Fund has promoted environmental and social characteristics during the reference period by applying the Fund company's exclusion criteria. The Fund has excluded investments in companies that are active in industries or areas of operation that are deemed to have major challenges regarding sustainability. Read more about SEB IM's exclusions in: SEB IM Sustainability Policy.

Sustainability indicators measure the attainment of the E/S characteristics that the financial product promotes.

□ What were the results of the sustainability indicators?

The Fund achieved a SIMS-S rating of 5.9 at the end of 2023, which was higher than the Fund's benchmark index of 5.8. The SIMS-S ratings are set on a scale of 1–10 with a normal distribution, which means that the normal outcome for a company is 5.0 and that most companies have a rating between 4.0–6.0.

Our objective was not to maximise the portfolio for a particular indicator, but rather to see the model as one of several tools that we used when we met with companies and had sustainability dialogues in order to achieve a greater understanding and get as complete a picture as possible of a company.

In 2023, the Fund participated in 32 company meetings and contributed to 72 sustainability dialogues. These dialogues differ in nature, with some being very detailed and time-consuming while others can be handled with limited time. This means that the number of dialogues is not directly linked to the amount of time and resources allocated to this area. The Fund also participated in 5 nomination committees. The Fund excluded 7.3% of the benchmark value because they either violated international norms, conventions and standards or operate in an industry that the Fund company has chosen not to invest in. From the total number of companies in the index of 181, 15 companies were excluded.

□ ...and compared to the previous periods?

In the previous period 2022, the Fund had a SIMS-S rating of 6.2 while the Fund's benchmark index was 6.2. The Fund had 35 sustainability dialogues and participated in 26 general meetings. The Fund participated in 8 nomination committees and the number of excluded companies was 12.

□ What were the objectives of the sustainable investments that the financial product partially made, and how did the sustainable investment contribute to these objectives?

During the 2023 reference period, the Fund is committed to making sustainable investments with a minimum rate of 20%.

During the period, the Fund owned one or more companies that can be classified as sustainable investments, whose economic activities are deemed to contribute to one or more of the following environmental and social objectives:

Social objectives:

- UN Social Sustainable Development Goals (UN SDGs); SDG 1: (No poverty), SDG 2: (No hunger), SDG 3: (Good health and well-being), SDG 4: (Quality education), SDG 5: (Gender equality), SDG 6: (Clean water and sanitation), SDG 8: (Decent work and economic growth), SDG 10: (Reduced inequalities), SDG 11: (Sustainable cities and communities), SDG 16: (Peace, justice and strong institutions)

- Other social sustainability objectives such as Gender equality, social inclusion and diversity. Environmental objectives that are considered environmentally sustainable according to the EU Taxonomy.

- The six objectives defined by the EU's Green Taxonomy; climate change mitigation, climate change adaptation, sustainable use and protection of water and marine resources, transition to a circular economy, pollution prevention and control, protection and restoration of biodiversity and ecosystems.

Environmental objectives not considered aligned with EU Taxonomy

- UN environment-related Sustainable Development Goals (UN SDGs); SDG 6: (Clean water and sanitation), SDG 7: (Affordable and clean energy), SDG 9: (Sustainable industry, innovation and infrastructure), SDG 11: (Sustainable cities and communities), SDG 12: (Responsible consumption and production), SDG 13: (Climate action), SDG 14: (Life below water), SDG 15: (Life on land)

- Operational resource efficiency in key areas for the environment such as carbon emissions, water use or raw material use.

The sustainability objectives that are included in the SEB Investment Management's definition of sustainable investments and quantitative threshold values are:

Environmental objectives

- 10% of the company's revenue, capital expenditure or operating costs have been classified by estimation or reporting as significantly contributing to the six objectives of the EU Taxonomy.

- 20% of the company's revenues have been assessed as contributing to other global environmental objectives, directly or indirectly linked to the UN SDGs.

- The company outperforms its sector and region in terms of emission factors according to quantitative data.

- The company outperforms its sector and region in other resource efficiency areas, such as water use, raw material consumption or waste generation, according to quantitative data.

- The company has been fundamentally analysed and assessed as having a high contribution and exposure to environmental objectives.

Social objectives

- 20% of the company's revenues have been assessed as contributing to other global social objectives, directly or indirectly linked to the UN SDGs.

- The company outperforms its region in terms of gender equality factors, according to quantitative data.

- The company has been fundamentally analysed and assessed as having a high contribution and exposure to social objectives.

The Fund company applies a "pass/fail" methodology, where an entire investment is classified and reported as sustainable if the requirements for contributing, not causing significant damage and good corporate governance are met.

Other fund companies may use a different methodology and other criteria to classify an investment as sustainable. Therefore, the levels of sustainable investments may differ between different fund companies depending on the methodologies, criteria and data providers used, and not only on the levels of sustainability within the funds.

□ How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social objective of the sustainable investments?

In order to ensure that no sustainable investment has caused significant damage to any environmental or social sustainability objective, the Fund has worked according to the following principles during the reference period:

- Excluded companies that do not comply with international norms and standards.
- Excluded companies that operate in controversial sectors and business areas.
- Excluded companies that have exposure to fossil fuels or other activities with negative environmental-.
- Excluded companies that are not considered to fulfil the levels of minimum social protection measures defined by the EU Taxonomy.
- Used an external analysis partner's assessment of the companies' governance structure, employment relations, tax compliance and compensation.

□ How were the negative impact indicators for sustainability factors taken into account?

During the reference period, the Fund company's model for detecting companies with outliers among the indicators for negative consequences has been used to avoid investing in companies that have caused significant harm. The negative impact indicators for sustainability factors used are those described in Annex I of the Disclosure Regulation's technical standard (CDR 2022/1288), as well as the relevant indicators in Tables 2 and 3 of Annex 1 of CDR 2022/1288. However, the indicators are dependent on the current availability of data, but where sufficient coverage has been available, companies with negative performance in a geographical and sectoral context have not been accepted as sustainable investments.

Some indicators have been taken into account through the exclusions described in the Fund company's sustainability policy:

- Companies with activities in the fossil fuel sector
- Companies with sites/projects located in or near biodiversity-sensitive areas, where the activities of these companies adversely affect these areas
- Companies that do not follow international norms and standards, such as the UN Global Compact and the Organization for Economic Co-operation and Development (OECD) guidelines for multinational companies
- Companies involved in the manufacture or sale of controversial weapons (landmines, cluster bombs, chemical and biological weapons)
- Companies whose activities affect endangered species

□ Were the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights? Details:

During the reference period, the Fund's investments were aligned with the OECD's guidelines for multinational companies and the UN's guidelines for companies and human rights through the norm-based exclusion criteria specified in the Fund company's sustainability policy.

Norm-based exclusions mean that the Fund company expects the holding companies to comply with international laws and conventions, such as:

- UN Principles for Responsible Investment
- UN Global Compact
- OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, and the Universal Declaration of Human Rights

Companies with verified violations have been excluded and thus cannot be considered sustainable investments.

The EU Taxonomy establishes a principle of no significant harm, according to which Taxonomy-aligned investments must not cause significant harm to the objectives of the EU Taxonomy, 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 remaining part of this financial product has underlying investments that do not respect the EU criteria for environmentally sustainable economic activities.

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

Principal adverse impacts are the most negative impacts of investment decisions on sustainability factors related to the environment, social and labour issues, respect for human rights, and anti-corruption and anti-bribery issues.



How did this financial product consider the principal adverse impacts for sustainability factors?

During the reference period, the Fund considered the principal adverse impacts for sustainability factors through the exclusions described in the Fund company's sustainability policy, where the following companies are excluded:

- Companies with activities in the fossil fuel sector
- Companies with facilities/activities located in or near biodiversity-sensitive areas, where the activities of these companies adversely affect these areas
- Companies that do not follow international norms and standards, such as the UN Global Compact principles and the Organization for Economic Co-operation and Development (OECD) guidelines for multinational companies
- Companies involved in the manufacture or sale of controversial weapons (landmines, cluster bombs, chemical and biological weapons)
- Companies whose activities affect endangered species

In our fundamental analysis process, we have conducted a sustainability assessment of, among other things, each company's products, services, operations and suppliers. As support in the work of assessing the companies' sustainability risks and opportunities, the Fund's managers use a quantitative tool in the form of the SEB Investment Management Sustainability Score, SIMS-S.

Through the use of our proprietary sustainability model, SIMS-S, the following indicators are taken into account for negative impacts:

- Greenhouse gas emissions from the companies in which we invest
- The carbon footprint of the companies in which we invest
- The greenhouse gas intensity of the companies in which we invest
- The proportion of companies active in the fossil fuel sector
- Energy consumption intensity per sector with a large climate impact, for the companies in which we invest
- If the companies in which we invest have sites/projects located in or near biodiversity-sensitive areas, where the activities of these companies adversely affect these areas
- Emissions to water generated by the companies in which we invest
- The amount of hazardous waste generated by the companies in which we invest
- Whether the companies in which we invest lack processes and compliance mechanisms to monitor compliance with the UN Global Compact and OECD Guidelines for Multinational Enterprises
- The unadjusted gender pay gap in the companies in which we invest
- Gender balance on the boards of the companies in which we invest
- Whether the companies in which we invest have initiatives to reduce carbon emissions with the aim of aligning with the Paris Agreement
- Whether the companies in which we invest have a supplier code of conduct (against unsafe working conditions, precarious work, child labour and forced labour)



What were the most important investments of the financial product?

The list contains the investments that represent the **greatest proportion of investments** of the financial product during the reference period, which is the following: 31 December 2023

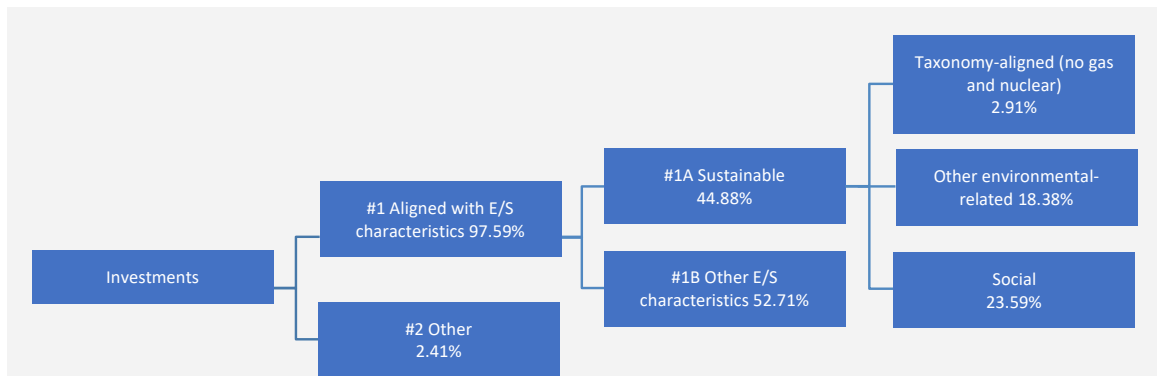
Largest investments	Sector	% of assets	Country
Volvo AB	Industry	10.09	Sweden
Investor AB	Finance	10.02	Sweden
Novo Nordisk A/S	Healthcare	9.30	Denmark
AstraZeneca PLC	Healthcare	6.25	United Kingdom
Sandvik AB	Industry	5.02	Sweden
Skandinaviska Enskilda Banken AB	Finance	4.57	Sweden
Nordea Bank Abp	Finance	4.21	Finland
Danske Bank A/S	Finance	4.14	Denmark



What was the share of sustainability-related investments?

What was the asset allocation?

Asset allocation describes the proportion of investment in specific assets.



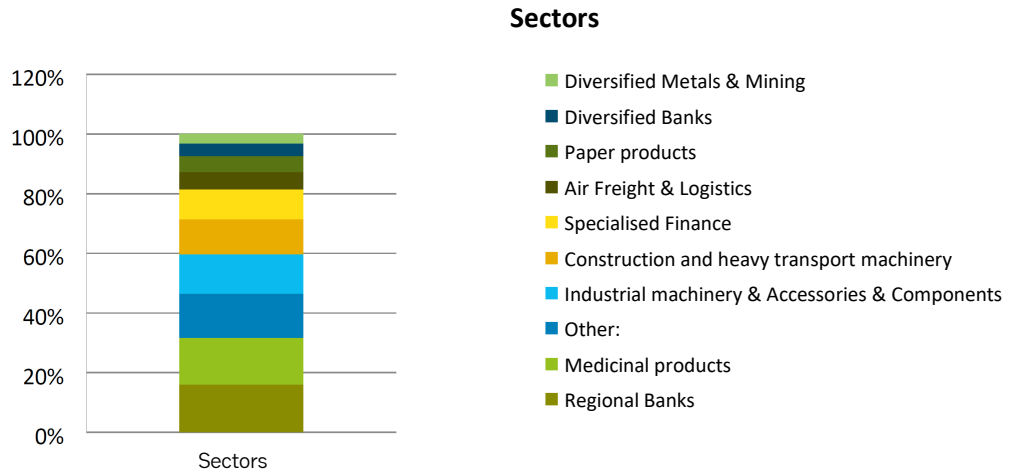
#1 Aligned with E/S characteristics includes the investments of the financial product used to attain the E/S characteristics promoted by the financial product.

#2 Other covers the remaining investments of the financial product that are neither aligned to the E/S characteristics nor considered as sustainable investments.

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

- The subcategory **#1A Sustainable** covers environmentally and socially sustainable investments.
- The subcategory **#1B Other E/S characteristics** covers investments aligned to those E/S characteristics that are not considered sustainable investments.

In which economic sectors were the investments made?



To what extent did the sustainable investments with an environmental objective comply with the EU Taxonomy?

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

- Yes
- In fossil gas In nuclear energy
- No

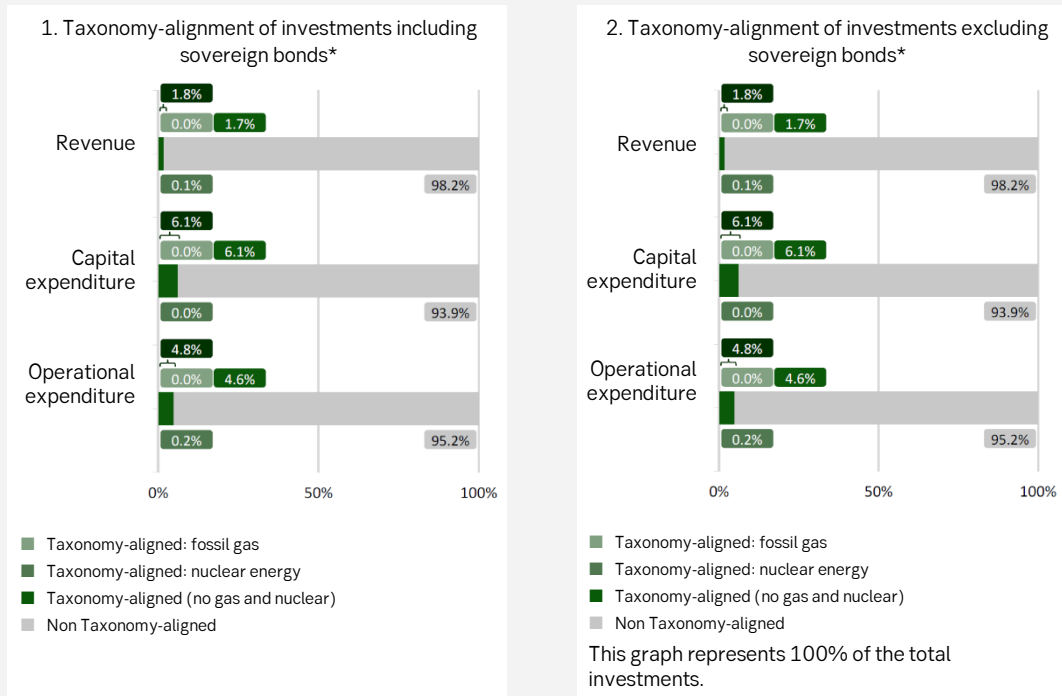
To comply with the EU Taxonomy, the criteria for **fossil gas** include limiting emissions and switching to fully renewable energy or low-carbon fuels by the end of 2035. In the case of **nuclear energy**, the criteria include comprehensive safety and waste management rules.

¹ Fossil gas and/or nuclear energy related activities will only comply with the EU Taxonomy if they contribute to climate change mitigation ("climate change mitigation") and do not cause significant harm to any of the objectives of the EU Taxonomy – see explanatory note in the left margin. The full criteria for fossil gas and nuclear energy economic activities meeting the EU Taxonomy are set out in Commission Delegated Regulation (EU) 2022/1214.

Activities aligned with the Taxonomy are expressed as a proportion of the following:

- **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**, which reflects the investee's green operational activities.

The charts below show in green the percentage of investments that were compliant with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy alignment of government bonds*, the first chart shows the Taxonomy alignment with respect to all investments of the financial product, including government bonds, while the second chart shows the Taxonomy alignment only with respect to the investments of the financial product that are not government bonds.



* In these diagrams, "government bonds" refers to all exposures in government securities

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

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.

What was the share of investments made in transition and enabling activities?

In 2023, the share of investments in transition activities was 0.1%. The share for enabling activities was 0.6%.

What was the percentage of investments compliant with the EU Taxonomy compared to previous reference periods?

For the previous reference period in 2022, the share of investments whose income was compliant with the EU Taxonomy was 1.1%. Compliant capital expenditure was 0.5% and Operational expenditure 0.0%.



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

At the end of 2023, the Fund had investments equivalent to 18.4% that were classified as sustainable investments with environmental objectives but not compliant with the EU Taxonomy.

The EU Taxonomy does not cover all economic sectors that are relevant for the Fund to invest in. There are companies in economic sectors that are not covered by the EU Taxonomy but that contribute to environmental sustainability objectives. There are also relatively few companies that report in accordance with the EU Taxonomy. This may be due to both the size of the companies and their geographical location.

The Fund company uses an internal process to define contributions to environmental objectives and classification of sustainable investments. The environmental objectives outside the Taxonomy that are included in the SEB Investment Management's definition of sustainable investments and quantitative threshold values are:

- 20% of the company's revenues have been assessed as contributing to other global environmental objectives, directly or indirectly linked to the UN SDGs.
- The company outperforms its sector and region in terms of emission factors according to quantitative data.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.

- The company outperforms its sector and region in other resource efficiency areas, such as water use, raw material consumption or waste generation, according to quantitative data.
- The company has been fundamentally analysed and assessed as having a high contribution and exposure to environmental objectives.

The Fund company applies a "pass/fail" methodology, where an investment is classified and reported as contributing if the investment meets one or more of the above criteria.



What was the share of socially responsible investments?

At the end of 2023, the Fund had investments corresponding to 23.6% that were classified as socially sustainable investments. The Fund company uses an internal process to define the contribution to social objectives and classification of sustainable investments. The social objectives that are included in the SEB Investment Management's definition of sustainable investments and quantitative threshold values are:

- 20% of the company's revenues have been assessed as contributing to other global social objectives, directly or indirectly linked to the UN SDGs.
- The company outperforms its region in terms of gender equality factors, according to quantitative data.
- The company has been fundamentally analysed and assessed as having a high contribution and exposure to social objectives.

The Fund company applies a "pass/fail" methodology, where an investment is classified and reported as contributing if the investment meets one or more of the above criteria.



Which investments were included in the 'other' category, what was their purpose and were there any environmental or social minimum safeguards?

During the period, the Fund used liquid assets in order to manage liquidity and flows. During the reference period, the Fund has not considered that any minimum environmental or social protection measures have been deemed necessary for these investments.



What measures have been taken to meet the E/S characteristics during the reference period?

Sustainability is one of several important quality aspects that the Fund took into account in the investment process during the reference period, where our ambition is to invest in companies that clearly integrate sustainability into their business model. Holdings that the Fund previously selected against this background include Beijer Ref and Nibe, which help with the transition from fossil fuels to more environmentally friendly and sustainable alternatives, which also contributes to lower greenhouse gas emissions. Tomra is another such company that, with its global solutions in recycling and sorting and far-reaching internal climate ambitions, contributes to the circular economy and reduced environmental impact. The Fund excludes companies that do not meet the Fund company's sustainability criteria. For example, companies active in commercial gambling activities where more than 5% of their turnover is derived from the production, distribution or servicing of commercial gambling are excluded. One such company is Evolution. Similarly, Aker BP is excluded because of its activities in the oil and gas industry. During the reference period, the Fund had several sustainability dialogues with Boliden, Stora Enso and UPM, among others. These dialogues can be proactive in order to improve the overall sustainability efforts, or reactive, to try to influence a particular issue where it is possible that the company is not compliant with international rules and guidelines. The dialogue with Boliden concerned the company's workplace safety in light of the fire at their copper smelter in Rönnskär in 2023. With Stora Enso, we discussed their progress in the transition to materials for sustainable buildings and a follow-up meeting was held with UPM--Kymmene to see how the company worked and responded to the leak at their site in Paso de los Toros in Uruguay. Sustainability linked to supply chains, the link between sustainability and remuneration and incentive schemes, and corporate transparency around sustainability reporting have been in particular focus during the period.

Through our corporate governance work, the Fund company also influences companies through participation in nomination committees and votes at general meetings where we are a major owner or where our management has a significant investment. During the reference period, SEB Investment Management has also updated its sustainability policy with a clear position on biological diversity. Nature is the foundation of societies and economies and there is a growing understanding of the need to include nature and biodiversity in investment decisions. SEB Investment Management does not invest in companies that have verified violations of biodiversity-related standards. The Fund company also excludes companies that have negative impacts on endangered species or bio-sensitive areas, including Arctic drilling.

Furthermore, we monitor the companies that have the greatest influence on and exposure to deforestation of tropical forests and strive to set zero-tolerance objectives for deforestation as the global data quality regarding deforestation improves. Since 2023, SEB Investment Management has been a member of the Taskforce for Nature-related Financial Disclosures Forum, and has signed the Finance for Biodiversity Pledge. We also work independently to increase the quality and coverage of biodiversity data through collaborations with various actors within or close to the scientific community.



Reference benchmarks are indexes to measure whether the financial product attains the E/S characteristics that they promote.

What was the performance of this financial product compared to the benchmark?

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

The Fund does not use a benchmark index to achieve its promotion of environmental and social characteristics.

□ **What was the performance of this financial product in terms of the sustainability indicators to determine the alignment of the benchmark with the E/S characteristics being promoted?**

The Fund does not use a benchmark index to achieve its promotion of environmental and social characteristics.

□ **What was the performance of this financial product compared to the reference benchmark?**

The Fund does not use a benchmark index to achieve its promotion of environmental and social characteristics.

□ **What was the performance of this financial product compared to the broad market index?**

The Fund does not use a benchmark index to achieve its promotion of environmental and social characteristics.

Luxembourg Paying Agent In accordance with the requirements of Luxembourg law, Société Générale Luxembourg, with its registered office at 11 avenue Emile Reuter L-2420 Luxembourg, Grand Duchy of Luxembourg, was appointed as paying agent (the "Paying Agent") of the Company in Luxembourg

SEB Nordenfond

Stockholm, 27 March 2024
SEB Investment Management AB

Johan Wigh
Chairman of the Board

Louise Hedberg
Board member

Mikael Huldt
Board member

Javiera Ragnartz
Managing director

Our audit report was submitted on 27 March 2024
Ernst and Young AB

Carl Rudin
Certified public accountant

Auditor's Report

To the shareholders of the SEB Nordenfond mutual fund, reg. no. 504400-8802.

Report on the annual report

Statement

As auditors of the Fund company SEB Investment Management AB (the Fund company), corporate identity number 556197-3719, we have audited the annual report for the investment fund SEB Nordenfond for 2023 with the exception of the sustainability information on pages 11-18 (the "sustainability information").

In our opinion, the annual report has been prepared in accordance with the Swedish Investment Funds Act and the Swedish Financial Supervisory Authority's regulations on investment funds and presents in all material respects a true and fair view of the financial position of the SEB Nordenfond investment fund as of 31 December 2023, and of its financial performance for the year in accordance with the Swedish Investment Funds Act and the Swedish Financial Supervisory Authority's regulations on investment funds. Our statements do not cover the sustainability information on pages 11-18.

Basis for the statement

We conducted our audit in accordance with International Standards on Auditing (ISA) and generally accepted auditing standards in Sweden. Our responsibility according to these standards is described in more detail in the section on Auditors' responsibility. We are independent in relation to the Fund company in accordance with good auditing practice in Sweden and have otherwise fulfilled our professional responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Information other than the annual report

This document also contains information other than the annual report. The second piece of information consists of the sustainability information on pages 11-18 ('the sustainability information'). The Fund management company is responsible for this other information.

Our opinion on the annual report does not cover this information and we do not express an assurance opinion on this other information.

In connection with our audit of the annual report, our responsibility is to read the information identified above and consider whether the information is materially inconsistent with the annual report. In this review, we also consider the knowledge we have otherwise obtained during the audit and assess whether the information otherwise appears to be materially misstated.

If, based on the work carried out on this information, we conclude that the other information contains a material misstatement, we are required to report this. We have nothing to report in this regard.

Responsibility of the Fund management company

It is the responsibility of the Fund company to ensure that the annual report is drawn up and that it gives a true and fair view in accordance with the Investment Funds Act and the Swedish Financial Supervisory Authority's regulations on investment funds. The Fund company is also responsible for such internal control as it determines is necessary to enable it to prepare financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's responsibilities

Our objectives are to obtain reasonable assurance about whether the Annual Report as a whole is free from material misstatement, whether due to fraud or error, and to provide an audit report that includes our opinions. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit performed in accordance with ISAs and generally accepted auditing standards in Sweden will always detect a material misstatement if one exists. Misstatements may arise from irregularities or errors and are considered material if, individually or in combination, they could reasonably be expected to influence the financial decisions made by users based on the annual report.

As part of an ISA audit, we use professional judgment and maintain a professional sceptical attitude throughout the audit. In addition:

- We identify and assess the risks of material misstatement in the annual report, whether due to irregularities or mistakes, and we design and perform audit measures, including based on these risks, and we obtain audit evidence that is sufficient and appropriate to form the basis for our statements. The risk of not detecting a material misstatement due to an irregularity is higher than for a material misstatement due to error, as irregularities may include collusion, falsification, deliberate omissions, misrepresentation or breach of internal control.
- Obtain an understanding of the Fund management company's internal control relevant to our audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of internal control.
- evaluate the appropriateness of the accounting policies used and the reasonableness of the Fund management company's accounting estimates and related disclosures.
- We evaluate the overall presentation, structure and content of the annual report, including the disclosures, and whether the annual report fairly presents the underlying transactions and events.

We must inform the Fund company of, among other things, the planned scope and focus of the audit and the timing of the audit. We must also disclose significant observations made during the audit, including any significant deficiencies in internal control that we have identified.



The auditor's statement regarding the statutory sustainability information

The Fund company is responsible for the sustainability information on pages 11-18 and for ensuring that it is prepared in accordance with the Swedish Investment Fund Act.

Our review of the sustainability information for the Fund has been conducted in accordance with FAR's recommendation RevR 12 The auditor's opinion on the statutory sustainability report. This means that our audit of the sustainability information has a different focus and a significantly smaller scope compared to the focus and scope of an audit conducted in accordance with International Standards on Auditing and generally accepted auditing standards in Sweden. We believe that this review provides a reasonable basis for our opinion.

Sustainability information has been provided in the Annual Report.

Stockholm, 27 March 2024
Ernst and Young AB

Carl Rudin
Certified public accountant