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**Söderberg & Partners Funds**

*Société d'Investissement à Capital Variable*

**Prospectus**

**October 2023**

Söderberg & Partners Funds (the "**Company**") is registered under part I of the Luxembourg law of 17 December 2010 concerning undertakings for collective investment, as may be amended (the "**Law**"). The Company qualifies as an Undertaking for Collective Investment in Transferable Securities under the Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities ("**UCITS**"). The Company is managed by Söderberg & Partners Asset Management S.A. pursuant to chapter 15 of the Law.

The Shares have not been registered under the United States Securities Act of 1933 and may not be offered directly or indirectly in the United States of America (including its territories and possessions) to nationals or residents thereof or to persons normally resident therein, or to any partnership or persons connected thereto unless pursuant to any applicable statute, rule or interpretation available under United States law.

The distribution of this document in other jurisdictions may also be restricted; persons into whose possession this document comes are required to inform themselves about and to observe any such restrictions. This document does not constitute an offer by anyone in any jurisdiction in which such offer is not authorised or to any person to whom it is unlawful to make such offer.

Any information or representation given or made by any person which is not contained herein or in any other document which may be available for inspection by the public should be regarded as unauthorised and should accordingly not be relied upon. Neither the delivery of this Prospectus nor the offer, issue or sale of Shares in the Company shall under any circumstances constitute a representation that the information given in this Prospectus is correct as at any time subsequent to the date of this Prospectus.

All references herein to times and hours are to Luxembourg local time.

All references herein to EUR are to Euro.

All references herein to SEK are to Swedish Kronor.

### **Data Protection**

In accordance with the Data Protection Law, the Company, acting as data controller, hereby informs the investors and/or the prospective investors (or if the investor and/or the prospective investor is a legal person, informs the natural persons related to the investor and/or prospective investor, such as its contact persons, employees, agents, representatives, nominees and/or beneficial owners) that certain personal data, as provided to the Company by the investors and/or prospective investors, may be collected, recorded, stored, adapted, transferred or otherwise processed for the purposes set out below.

Such personal data includes (i) for individual Shareholders: the name, address (including postal and/or e-mail address), phone number, banking details, invested amount and holdings of each Shareholder; (ii) for corporate Shareholders: the name, address (including postal and/or e-mail address) and phone number of the natural persons related to the Shareholders ; and (iii) any personal data the processing of which is required in order to comply with regulatory requirements, including tax law and foreign laws (all the personal data mentioned above, collectively, the "**Personal Data**").

Natural persons mentioned above are hereinafter referred to as "**Data Subjects**".

Investors and/or prospective investors who are legal persons undertake and guarantee to process Personal Data and to supply such Personal Data to the Company in compliance with the Data Protection Law, including, where appropriate, informing the Data Subjects of the contents of the present section, in accordance with Articles 12, 13 and/or 14 of the GDPR.

Personal Data supplied by Shareholders is processed in order to enter into and execute the

subscription of Shares in the Company, to comply with the legal obligations imposed on the Company and for the legitimate interests of the Company, which should never override the interests and fundamental rights and freedoms of Data Subjects. In particular, the Personal Data supplied by Data Subjects is processed for the purpose of: (i) maintaining the register of Shareholders; (ii) processing subscriptions, redemptions and conversions of Shares and payments of dividends to Shareholders; (iii) maintaining controls in respect of late trading and market timing practices; (iv) complying with applicable anti-money laundering rules; (v) marketing and client-related services; (vi) distribution fee administration, (vii), tax identification under the EU Savings Directive, OECD Common Reporting Standard and FATCA. In addition, Personal Data may be processed for the purposes of marketing. Each Data Subject has the right to object to the use of his/her/its Personal Data for marketing purposes by writing to the Company.

The “legitimate interests” of the Company referred to above are: (a) the processing purposes described in points (i) to (vii) of the above paragraph of this clause; (b) meeting and complying with the Company’s accountability requirements and regulatory obligations globally; the provision of the proof, in the event of a dispute, of a transaction or any commercial communication; and (c) exercising the business of the Company in accordance with reasonable market standards.

In the context of the above mentioned purposes, the Company may delegate the processing of the Personal Data, in compliance and within the limits of the applicable laws and regulations, to other data recipients which refer to, inter alia, the Management Company, the Investment Manager, the Central Administration and Registrar and Transfer Agent (the “Central Administration Agent”), the Depository the Auditor and the legal advisors of the Company and their service providers and delegates (the “**Recipients**”).

The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates (the “**Sub-Recipients**”), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to the Company and/or assisting the Recipients in fulfilling their own legal obligations. Recipients and Sub-Recipients may, as the case may be, process the Personal Data as data processors (when processing the Personal Data upon instructions of the Company), or as distinct data controllers (when processing the Personal Data for their own purposes or fulfilling their own legal obligations). The Personal Data may also be transferred to third-parties such as governmental or regulatory agencies, including tax authorities, in accordance with applicable laws and regulations. In particular, Personal Data may be disclosed to the Luxembourg tax authorities, which in turn may, acting as data controller, disclose the same to foreign tax authorities. The Recipients may be located either inside or outside the EU. Where the Recipients are located outside the EU in a country which does not ensure an adequate level of protection for Personal Data, the Company has entered into legally binding transfer agreements with the relevant Recipients in the form of the EU Commission approved model clauses. In this respect, the Data Subjects have a right to request copies of the relevant document for enabling the Personal Data transfer(s) towards such countries by writing to the Company.

The Central Administration Agent may engage affiliated and unaffiliated third parties to evaluate and comply with any anti-money laundering, regulatory, central administration (including data processing, including personal data processing, and storage), tax duties (including FATCA and CRS related obligations) and tasks applicable to the Company as determined is necessary or desirable by the Company and/or the Central Administration Agent. This will include the use of parties and IT infrastructure located outside of Luxembourg and the European Union, including the United States.

In accordance with the conditions laid down by the Data Protection Law, Data Subjects have the right to:

- request access to their Personal Data (i.e. the right to obtain from the Company confirmation as to whether or not Personal Data is being processed, to be provided with certain information about the Company’s processing of Personal Data, to access such data, and to obtain a copy of the Personal Data undergoing processing (subject to legal exceptions));
- request the correction of their Personal Data where it is inaccurate or incomplete (i.e. the right to require from the Company that inaccurate or incomplete Personal Data be updated or corrected accordingly);
- object to the processing of their Personal Data (i.e. the right to object, on grounds relating to their particular situation, to processing of Personal Data which is based on the performance of a task carried out in the public interest or the legitimate interests of the Company. The Company shall stop such processing unless it can either demonstrate compelling legitimate grounds for the processing that override their interests, rights and freedoms or that it needs to process the data for the establishment, exercise or defence of legal claims);
- request erasure of their Personal Data (i.e. the right to require that Personal Data be erased in certain circumstances, including where it is no longer necessary for the Company to process this data in relation to the purposes for which it collected or processed);
- request for restriction of the use of their Personal Data (i.e. the right to obtain that the processing of Personal Data should be restricted to storage of such data unless consent of the Data Subjects has been obtained); and
- request for Personal Data portability (i.e. the right to have the data transferred to them or another controller in a structured, commonly used and machine-readable format, where this is technically feasible).

Data Subjects may exercise the above rights by writing to the Company at the following address: 1 rue Louvigny, L-1946 Luxembourg, Grand-Duchy of Luxembourg.

Data Subjects must also be informed of the existence of their right to lodge a complaint with the National Commission for Data Protection (the “**CNPD**”) at the following address: 1, Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Grand Duchy of Luxembourg, or with any competent data protection supervisory authority.

The investors and/or prospective investors may, at its discretion, refuse to communicate Personal Data to the Company. In this event however the Company may reject the request for subscription for Shares. Personal Data shall not be retained for periods longer than those required for the purpose of its processing subject to any limitation periods imposed by applicable law.

## **Söderberg & Partners Funds**

*Société d'Investissement à Capital Variable*

*Registered office: 1 rue Louvigny, L-1946 Luxembourg, Grand-Duchy of Luxembourg  
R.C.S. Luxembourg B 165541*

### **Board of Directors**

#### Chairman

Carl-Adam Högberg, Employee at Söderberg & Partners Asset Management S.A.

#### Directors

Niklas Vesterlund, Employee at Söderberg & Partners Asset Management S.A.

Henri Stengård, M&A at PO Söderberg & Partner AB

### **Management Company**

#### **Söderberg & Partners Asset Management S.A.**

1, rue Louvigny

L-1946 Luxembourg

### **Board of Directors of the Management Company**

#### Chairman of Board of Directors of the Management Company

Claes-Johan Geijer, Independent Management Consultant

#### Directors of the Management Company

Gustaf Rentzhog, Chief Executive Officer, PO Söderberg & Partner AB

Samuel Kjellberg Lindfors, Head of M&A, PO Söderberg & Partner AB

Fredrik Wingren, Independent Director

#### Day-to-day Managers of the Management Company

Carl-Adam Högberg, Conducting Officer

Niklas Vesterlund, Conducting Officer

Patrik Ohlsson, Conducting Officer

### **Investment Manager**

Söderberg & Partners Asset Management S.A.

1, rue Louvigny

L-1946 Luxembourg

## **Depository and Paying Agent in Luxembourg**

### **Skandinaviska Enskilda Banken AB (publ), Luxembourg Branch**

4, rue Peternelchen  
L-2370 Howald  
Grand Duchy of Luxembourg

## **Central Administration Agent**

### **UI efa S.A.**

2, rue d'Alsace  
L-1122 Luxembourg  
Grand Duchy of Luxembourg

## **Auditors**

### **Deloitte Audit**

20, boulevard de Kockelscheuer  
L-1821 Luxembourg  
Grand Duchy of Luxembourg

## **Legal Advisors**

### **Arendt & Medernach**

41A, avenue J.F. Kennedy  
L-2082 Luxembourg  
Grand Duchy of Luxembourg

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## PRINCIPAL FEATURES

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The following summary is qualified in its entirety by reference to the more detailed information included elsewhere in this Prospectus.

<b>Articles</b>	The articles of incorporation of the Company.
<b>AML Regulations</b>	The Luxembourg law of 27 October 2010 relating to the fight against money-laundering and the financing of terrorism (as amended), the law of 19 February 1973 on the sale of medicinal substances and the fight against drug addiction (as amended), the law of 12 November 2004 on the fight against money laundering and terrorist financing (as amended), and associated Grand Ducal and Ministerial Regulations and the circulars of the CSSF applicable as amended from time to time.
<b>Appendix</b>	Each Appendix of this Prospectus and which sets out the specifications of each Compartment.
<b>Board of Directors</b>	The board of directors of the Company.
<b>Business Day</b>	Any day during which banks are open for normal banking business during the entire day (excluding Saturdays, Sundays, public holidays) in the Grand-Duchy of Luxembourg
<b>Central Administration Agent</b>	UI efa S.A.
<b>Class(es)</b>	Pursuant to the Articles, the Board of Directors may decide to issue, within each Compartment, separate classes of Shares whose assets will be commonly invested but where a specific sales or redemption charge structure, fee structure, minimum investment amount, taxation, distribution policy or other feature may be applied.
<b>Company</b>	The Company is an investment company organised under Luxembourg law as a <i>société anonyme</i> qualifying as a <i>société d'investissement à capital variable</i> ("SICAV"). It comprises several Compartments.
<b>Compartments</b>	<p>The Company offers investors, within the same investment vehicle, a choice between several Compartments which are distinguished mainly by their specific investment policy and/or by the currency in which they are denominated. The specifications of each Compartment are described in the Appendix to this Prospectus.</p> <p>The assets and liabilities of each Compartment, as further described under GENERAL INFORMATION, 5. "Allocation of Assets and Liabilities among the Compartments" shall be segregated from the assets and liabilities of those of the other Compartments, with creditors having recourse only to the assets of the Compartment</p>

concerned and where the liabilities cannot be satisfied out of the assets of another Compartment. As between the Shareholders and creditors, each Compartment will be deemed to be a separate entity.

The Board of Directors may, at any time, decide on the creation of further Compartments and in such case, the Appendix to this Prospectus will be updated. Each Compartment may have one or more classes of Shares.

***Controlling Persons***

Means the natural persons who exercise control over an Entity. In the case of a trust, such term means the settlor, the trustees, the protector (if any), the beneficiaries or class of beneficiaries, and any other natural person exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term “Controlling Persons” shall be interpreted in a manner consistent with the Financial Action Task Force Recommendations.

***Conversion of Shares***

Unless specifically indicated to the contrary for any Compartment and in compliance with eligibility conditions set forth for the Class in which conversion is to be made, Shareholders may at any time request conversion of their Shares into Shares of another Class within the same existing Compartment or of another Compartment on the basis of the net asset values of the Shares of both Classes concerned, determined on the common applicable Valuation Day.

***CSSF***

The *Commission de Surveillance du Secteur Financier*, the Luxembourg authority supervising the financial sector.

***Data Protection Law***

Means the data protection law applicable to the Grand Duchy of Luxembourg and the GDPR.

***Depositary***

Skandinaviska Enskilda Banken AB (publ), Luxembourg Branch, acting as depositary of the Company and having its place of business at 4, rue Peternelchen, L-2370 Howald, Grand Duchy of Luxembourg.

***Directive***

The Directive 2009/65/EC of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS), as amended from time to time.

***Eligible Market***

A Regulated Market in an Eligible State.

***Eligible State***

Any Member State or any other state in (Eastern and Western) Europe, Asia, Africa, Australia, North and South America and Oceania, as determined by the Board of Directors.

***Entity***

A legal person or a legal arrangement such as a trust.

***ESMA Guidelines 2014/937***

The guidelines on ETFs and other UCITS issues published on 1 August 2014 by ESMA and entered into force on 1 October 2014.

***EU***

The European Union.

<b><i>FATCA</i></b>	Means the provisions of the Hiring Incentives to Restore Employment (HIRE) Act of 18 March 2010 commonly referred to as the Foreign Account Tax Compliance Act (FATCA).
<b><i>FATF</i></b>	Financial Action Task Force (also referred to as <i>Groupe d'Action Financière</i> ).
<b><i>Financial Institution</i></b>	Means a custodial institution, a depository institution, an investment entity or a specified insurance company, as defined by the IGA.
<b><i>GDPR</i></b>	Means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.
<b><i>IGA</i></b>	Means the intergovernmental agreement concluded between the Grand-Duchy of Luxembourg and the United States of America in relation to FATCA on 28 March 2014.
<b><i>Investment Manager</i></b>	Söderberg & Partners Asset Management S.A.
<b><i>IRS</i></b>	Means the United States Internal Revenue Service.
<b><i>KID</i></b>	The key information document as defined by the Regulation (EU) No 1286/2014 and applicable laws and regulations.
<b><i>Law</i></b>	The law of 17 December 2010 concerning undertakings for collective investments, as amended from time to time.
<b><i>Listing and Clearing</i></b>	Shares of all Compartments may be listed on the Luxembourg Stock Exchange at the discretion of the Board of Directors and can be cleared through Clearstream Banking or Euroclear or other central depositories.
<b><i>Luxembourg Financial Institution</i></b>	Means (i) any Financial Institution resident in Luxembourg, but excluding any branch of such Financial Institution that is located outside Luxembourg and (ii) any branch of a Financial Institution not resident in Luxembourg, if such branch is located in Luxembourg.
<b><i>Management Company</i></b>	Söderberg & Partners Asset Management S.A., a Luxembourg public limited company appointed to act as the management company of the Company pursuant to Chapter 15 of the Law.
<b><i>Member State</i></b>	A member state as defined in the Law.
<b><i>NAV</i></b>	The net asset value of the Company, a Compartment or a Class of Shares, as the context may require, as calculated in accordance with the Articles.
<b><i>Non-US Entity</i></b>	Means an Entity that is not a US Person.
<b><i>PAI Indicator(s)</i></b>	The principal adverse impact indicators as listed in Annex I of the delegated regulation EU 2022/1288 supplementing SFDR.
<b><i>Principal Adverse Impact or PAI</i></b>	Negative, material, or potentially material effects on sustainability factors that result from, worsen, or are directly related to investment choices or advice performed by a legal entity.

<b><i>Prospectus</i></b>	The prospectus of the Company.
<b><i>Redemption of Shares</i></b>	Shareholders may at any time request redemption of their shares, at a price equal to the net asset value per Share of the Compartment concerned, determined on the applicable Valuation Day, less the applicable redemption charge.
<b><i>Reference Currency</i></b>	The currency specified as such in the relevant Appendix to the Prospectus.
<b><i>Regulated Market</i></b>	A market within the meaning of Article 4(1)21 of Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments amending Directive 2002/92/EC and Directive 2011/61/EU and any other market which is regulated, operates regularly and is recognised and open to the public.
<b><i>Söderberg Group</i></b>	Any entities (in)directly held by Söderberg & Partners Holding AB .
<b><i>Shares</i></b>	Shares of each Compartment are offered in registered form only and all Shares must be fully paid for. Fractions of Shares will be issued up to 2 decimals. In the absence of a request for Shares to be issued in any particular form, Shareholders will be deemed to have requested that their Shares be held in registered form without certificates.
<b><i>Shareholders</i></b>	Holders of Shares.
<b><i>Specified US Person</i></b>	Means a US Person, other than: (i) a corporation the stock of which is regularly traded on one or more established securities market; (ii) any corporation that is a member of the same expanded affiliated group, as defined in section 1471(e)(2) of the US Internal Revenue Code, as a corporation described in clause (i); (iii) the United States or any wholly owned agency or instrumentality thereof ; (iv) any States of the United States, any US Territory, any political subdivision of any of the foregoing, or any wholly owned agency or instrumentality of any one or more of the foregoing; (v) any organization exempt from taxation under section 501(a) of the US Internal Revenue Code or an individual retirement plan as defined in section 7701(a)(37) of the US Internal Revenue Code; (vi) any bank as defined in section 581 of the US Internal Revenue Code; (vii) any real estate investment trust as defined in section 856 of the US Internal Revenue Code; (viii) any regulated investment company as defined in section 851 of the US Internal Revenue Code or any entity registered with the US Securities and Exchange Commission under the Investment Company Act of 1940 (15 U.S.C. 80a-64); (ix) any common trust fund as defined in section 584(a) of the US Internal Revenue Code; (x) any trust that is exempt from tax under section 664(c) of the US Internal Revenue Code or that is described in section 4947(a)(1) of the US Internal Revenue Code; (xi) a dealer in securities, commodities, or derivative financial instruments (including notional principal contracts, futures, forwards, and options) that is registered as such under the laws of the United States or any State;

	(xii) a broker as defined in section 6045(c) of the US Internal Revenue Code; or (xiii) any tax-exempt trust under a plan that is described in section 403(b) or section 457(g) of the US Internal Revenue Code.
<b><i>Sustainable Finance Disclosures Regulation or SFDR</i></b>	Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability - related disclosures in the financial services sector as amended from time to time.
<b><i>Sustainable Investment(s)</i></b>	Investment(s) determined as sustainable under Article 2 (17) SFDR.
<b><i>Total Expense Ratio or TER</i></b>	Ratio of the gross amount of the expenses of the relevant Compartment to their average net assets.
<b><i>UCI</i></b>	An undertaking for collective investment within the meaning of the first and second indent of Article 1 (2) of the Directive, whether situated in a Member State or not.
<b><i>UCITS</i></b>	An undertaking for collective investment in transferable securities as defined in the Directive and the Law.
<b><i>Underlying Asset</i></b>	The underlying asset(s) to which the investment policy of a Compartment may be linked insofar as described in the relevant Compartment's appendix.
<b><i>US Person</i></b>	Means a US citizen or resident individual, a partnership or a corporation organized in the United States or under the laws of the United States or any States thereof, a trust if (i) a court within the United States would have authority under applicable law to render orders or judgments concerning substantially all issues regarding administration of the trust, and (ii) one or more US persons have the authority to control all substantial decisions of the trust, or an estate of a decedent that is a citizen or resident of the United States. This definition shall be interpreted in accordance with the US Internal Revenue Code.
<b><i>Valuation Day</i></b>	<p>The day on which the net asset value per Share is calculated and Shares may be issued, converted and redeemed and which is, unless otherwise provided for in the Appendix to the Prospectus for a Compartment, any full bank business day in Luxembourg.</p> <p>The Board of Directors may in its absolute discretion amend the Valuation Day for some or all of the Compartments. In such case the Shareholders of the relevant Compartment will be duly informed and the Appendix to this Prospectus will be updated accordingly.</p> <p>The net asset value per Share will not be calculated on 24 December and 31 December of each calendar year.</p>

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## THE COMPANY

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Söderberg & Partners Funds is an open-ended collective investment company ("*société d'investissement à capital variable*") established under the laws of the Grand-Duchy of Luxembourg, with an "umbrella" structure comprising different Compartments and Classes. In accordance with the Law, a subscription of Shares constitutes acceptance of all terms and provisions of the Prospectus and the Articles.

There may be created within each Compartment different classes of Shares as described under "Principal Features – The Classes".

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## THE MANAGEMENT COMPANY

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The Company has appointed Söderberg & Partners Asset Management S.A. to serve as its designated Management Company in accordance with the Law pursuant to a management company services agreement. Under this agreement, the Management Company provides investment management services, administrative agency, registrar and transfer agency services and marketing, principal distribution and sales services to the Company, subject to the overall supervision and control of the Board of Directors of the Company and without prejudice to its capacity to delegate such tasks to duly authorised external services providers.

The Management Company was incorporated as a "*société anonyme*" under the laws of Luxembourg on 6 February 2014. The Management Company is registered with the Luxembourg Trade and Companies' Register under the number B 184421. The Management Company's purpose of business is the establishment and management of investment funds under the law of the Grand Duchy of Luxembourg. The Management Company is approved as a management company under Chapter 15 of the Law.

The management company services agreement is concluded for an indefinite period of time and may be terminated by either party upon three months' prior written notice or forthwith by notice in writing in the specific circumstances provided in such agreement.

In consideration of its services, the Management Company is entitled to receive fees as indicated in the relevant Appendix to the Prospectus. These fees shall be calculated based on the net asset value of the Compartment and shall be paid quarterly in arrears.

The Management Company may delegate certain of its duties to third parties. Third parties to whom such functions have been delegated by the Management Company will be remunerated directly by the Company (out of the assets of the relevant Compartment), such remunerations being in that case not included in the management fee payable to the Management Company.

These remunerations shall be calculated based on the net asset value of the Compartments and shall be paid on a monthly or quarterly basis in arrears, depending on the terms and conditions of the relevant agreements.

The Management Company adopted a remuneration policy which purpose is to promote sound, effective risk management and counteract excessive risk-taking by the Management Company's employees (the "Remuneration Policy").

The structure of the Remuneration Policy shall be updated over time to ensure that it evolves to meet the changing situation of the Management Company and any changes in the applicable laws and regulations.

The Remuneration Policy describes the structure, application and monitoring of the remuneration system. This Remuneration Policy applies to any member of the board of directors of the Management Company, the Conducting Officers of the Management Company, senior management, employees in charge of the control functions, risk-takers whose professional activities can exert a material impact on the Management Company's risk level, analysts, employees whose total remuneration amounts to or exceeds the total remuneration paid to any Conducting Officer of the Management Company and employees in charge of the support functions.

The Remuneration Policy is adopted by the board of directors of the Management Company. The conducting officers of the Management Company are responsible for (i) implementing the Remuneration Policy, (ii) elaborating procedures to this effect and submit them to the board of directors of the Management Company for approval and (iii) informing the employees.

The fixed component of the remuneration shall represent a sufficiently high proportion of the total remuneration allowing the Management Company to operate a fully flexible variable remuneration policy.

The Management Company should ensure that variable remuneration and commission payments are appropriately balanced against the fixed remuneration paid by the Management Company.

The Management Company's assessment of performance on which the calculation of variable remuneration is based should be mainly based on profit measures adjusted in terms of both current and future risks.

Details regarding the remuneration policy of the Management Company may be obtained free of charge at the registered office of the Management Company and is available on the following website: <https://www.soderbergpartners.lu/documents>.

The Management Company's Conducting Officers are:

- Mr. Niklas Vesterlund, responsible for investment management;
- Mr. Carl-Adam Högberg, responsible for risk management, compliance, and oversight of fund administration;
- Mr. Patrik Ohlsson, responsible for sustainable investments, marketing, and distribution.

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## INVESTMENT POLICIES AND RESTRICTIONS

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### 1. General Investment Policies for all Compartments

The provisions of this section apply only insofar as they are compatible with the specific investment policy disclosed in the relevant Appendix to this Prospectus.

The Board of Directors determines the specific investment policy and investment objectives of each Compartment, which are described in more detail in the respective Appendix to this

Prospectus. The investment objectives of the Compartments will be carried out in compliance with the investment restrictions set forth in section 2.

Each Compartment seeks an above-average total investment return, comprised principally of long-term capital appreciation, by investing in a diversified portfolio of transferable securities or in financial derivative instruments as described in respect of the investment objective and policies in the relevant Appendix to this Prospectus. There can be no assurance that the investment objectives of any Compartment will be achieved.

If so provided in an Appendix related to a specific Compartment, the Compartments may from time to time also hold permitted assets with a short remaining maturity, especially in times when rising interest rates are expected.

Investors are invited to refer to the description of the investment policy of each Compartment in the Appendix to this Prospectus for details.

The historical performance of the Compartments will be published on <https://soderbergpartners.lu/documents/> for each Compartment. Past performance is not necessarily indicative of future results.

## **2. Sustainability-related disclosures**

The Company does not have a sustainable objective, however it remains exposed to Sustainability Risks. Such Sustainability Risks are integrated into the investment decision making and risk monitoring to the extent that they represent a potential or actual material risks and/or opportunities to maximizing the long-term risk-adjusted returns.

The impacts following the occurrence of a Sustainability Risk may be numerous and vary depending on the specific risk, region and asset class. In general, where a Sustainability Risk occurs in respect of an asset, there will be a negative impact on, or entire loss of, its value.

It is expected that the Compartments will be exposed to a broad range of Sustainability Risks. However, as they are broadly diversified, it is not anticipated that any single Sustainability Risk will drive a material negative financial impact on the value of the Compartments.

The Investment Manager's approach to managing climate-related Sustainability Risks is guided by the recommendations of the Task Force on Climate-related Financial Disclosures ("TCFD"). The Investment Manager monitors the transition to a low-carbon society through yearly collections of each Compartment's carbon footprint by measuring the Weighted Average Carbon Intensity ("WACI"), the metric recommended by the Task Force.

The Investment Manager's exclusion strategy may limit the number of investment opportunities available to the Compartments which may affect its performance compared to other funds that do not employ such investment strategies. The positive selection of investments may result in a return that at times compares unfavourably to similar products without such focus.

## **3. Specific Investment Policies for each Compartment**

The specific investment policy of each Compartment is described in the Appendix to this Prospectus.

## **4. Investment and Borrowing Restrictions**

The Articles provide that the Board of Directors shall, based upon the principle of spreading of risks, determine the corporate and investment policy of the Company and the investment and borrowing restrictions applicable, from time to time, to the investments of the Company.

In order for the Company to qualify as a UCITS under the Law and the Directive, the Board of Directors has decided that the following restrictions shall apply to the investments of the



Company and, as the case may be and unless otherwise specified for a Compartment in the Appendix to this Prospectus, to the investments of each of the Compartments:

- I. (1) The Company, for each Compartment, may invest in:
- a) transferable securities and money market instruments admitted to or dealt in on an Eligible Market;
  - b) recently issued transferable securities and money market instruments, provided that the terms of issue include an undertaking that application will be made for admission to official listing on an Eligible Market and such admission is secured within one year of the issue;
  - c) units of UCITS and/or other UCI, whether situated in a Member State or not, provided that:
    - such other UCIs have been authorised under laws which provide that they are subject to supervision considered by the CSSF to be equivalent to that laid down in EU law, and that cooperation between authorities is sufficiently ensured,
    - the level of protection for unit holders in such other UCIs is equivalent to that provided for unit holders in a UCITS, and in particular that the rules on assets segregation, borrowing, lending, and uncovered sales of transferable securities and money market instruments are equivalent to the requirements of the Directive,
    - the business of such other UCIs is reported in half-yearly and annual reports to enable an assessment of the assets and liabilities, income and operations over the reporting period,
    - no more than 10% of the assets of the UCITS or of the other UCIs, whose acquisition is contemplated, can, according to their constitutional documents, in aggregate be invested in units of other UCITS or other UCIs;
  - d) deposits with credit institutions which are repayable on demand or have the right to be withdrawn, and maturing in no more than 12 months, provided that the credit institution has its registered office in a Member State or, if the registered office of the credit institution is situated in a third country, provided that it is subject to prudential rules considered by the Luxembourg regulatory authority as equivalent to those laid down in EU law;
  - e) financial derivative instruments, including equivalent cash-settled instruments, dealt in on an Eligible Market and/or financial derivative instruments dealt in over-the-counter ("OTC derivatives"), provided that:
    - the underlying consists of instruments covered by this section I. (1), financial indices, interest rates, foreign exchange rates or currencies, in which the Compartments may invest according to their investment objective,
    - the counterparties to OTC derivative transactions are institutions subject to prudential supervision, and belonging to the categories approved by the CSSF,
    - the OTC derivatives are subject to reliable and verifiable valuation on a daily basis and can be sold, liquidated or closed by an offsetting transaction at any time at their fair value at the Company's initiative;
  - f) money market instruments other than those dealt in on an Eligible Market, if the issuer or the issuer of such instruments are themselves regulated for the purpose of protecting investors and savings, and provided that such instruments are:
    - issued or guaranteed by a central, regional or local authority or by a central bank of a Member State, the European Central Bank, the EU or the European Investment

Bank, a third country or, in case of a Federal State, by one of the members making up the federation, or by a public international body to which one or more Member States belong, or

- issued by an undertaking any securities of which are dealt in on Eligible Markets, or
  - issued or guaranteed by an establishment subject to prudential supervision, in accordance with criteria defined by EU law, or by an establishment which is subject to and complies with prudential rules considered by the CSSF to be at least as stringent as those laid down by EU law, such as, but not limited to, a credit institution which has its registered office in a country which is an OECD member state and a FATF State,
  - issued by other bodies belonging to the categories approved by the CSSF provided that investments in such instruments are subject to investor protection equivalent to that laid down in the first, the second or the third indent and provided that the issuer is a company whose capital and reserves amount to at least ten million Euro (10,000,000 EUR) and which presents and publishes its annual accounts in accordance with the fourth directive 78/660/EEC, is an entity which, within a group of companies which includes one or several listed companies, is dedicated to the financing of the group or is an entity which is dedicated to the financing of securitisation vehicles which benefit from a banking liquidity line.
- (2) In addition, the Company may invest a maximum of 10% of the net assets of any Compartment in transferable securities and money market instruments other than those referred to under (1) above.
- (3) Under the conditions and within the limits laid down by the Law, the Company may, to the widest extent permitted by the Regulations (i) create a Compartment qualifying either as a feeder UCITS (a "Feeder UCITS") or as a master UCITS (a "Master UCITS"), (ii) convert any existing Compartment into a Feeder UCITS, or (iii) change the Master UCITS of any of its Feeder UCITS.
- a) A Feeder UCITS shall invest at least 85% of its assets in the units of another Master UCITS.
- b) A Feeder UCITS may hold up to 15% of its assets in one or more of the following:
- ancillary liquid assets in accordance with paragraph II below,
  - financial derivative instruments, which may be used only for hedging purposes.
- c) For the purposes of compliance with paragraph III a) (iii) below, the Feeder UCITS shall calculate its global exposure related to financial derivative instruments by combining its own direct exposure under the second indent of under (b) with either:
- the Master UCITS actual exposure to financial derivative instruments in proportion to the Feeder UCITS investment into the Master UCITS, or
  - the Master UCITS potential maximum global exposure to financial derivative instruments provided for in the Master UCITS management regulations or instruments of incorporation in proportion to the Feeder UCITS investment into the Master UCITS.

II. The Company may hold liquid assets on an ancillary basis. This should be understood as an exposure of up to 20% of its net assets to bank deposit at sight, such as cash held in current accounts with a bank accessible at any time in order to cover current or exceptional payments, or for the time necessary to reinvest in eligible assets provided under article 41(1) of the Law of 2010 or for a period of time strictly necessary in case of unfavourable market conditions. The abovementioned limit shall only be temporarily breached for a period of time strictly

necessary when, because of exceptionally unfavourable market conditions, circumstances so require and where such breach is justified having regard to the interests of investors.

- III. a) (i) The Company may invest no more than 10% of the net assets of any Compartment in transferable securities and money market instruments issued by the same issuing body.
- (ii) The Company may not invest more than 20% of the net assets of any Compartment in deposits made with the same body.
- (iii) The risk exposure of a Compartment to a counterparty in an OTC derivative transaction may not exceed 10% of its net assets when the counterparty is a credit institution referred to in I. (1) d) above or 5% of its net assets in other cases.
- b) Moreover, where the Company holds on behalf of a Compartment investment in transferable securities and money market instruments of issuing bodies which individually exceed 5% of the net assets of such Compartment, the total of all such investments must not account for more than 40% of the total net assets of such Compartment.

This limitation does not apply to deposits and OTC derivative transactions made with financial institutions subject to prudential supervision.

Notwithstanding the individual limits laid down in paragraph a), the Company may not combine for each Compartment:

- investments in transferable securities or money market instruments issued by a single body,
  - deposits made with a single body, and/or
  - exposures arising from OTC derivative transactions undertaken with a single body in excess of 20% of the net assets of each Compartment.
- c) The limit of 10% laid down in sub-paragraph a) (i) above is increased to a maximum of 35% in respect of transferable securities or money market instruments which are issued or guaranteed by a Member State, its local authorities, or by another Eligible State, including the federal agencies of the United States of America, Federal National Mortgage Association and Federal Home Loan Mortgage Corporation, or by public international bodies of which one or more Member States are members.
- d) The limit of 10% laid down in sub-paragraph a) (i) is increased to 25% for certain bonds when they are issued by a credit institution which has its registered office in a Member State and is subject by law, to special public supervision designed to protect bondholders. In particular, sums deriving from the issue of these bonds must be invested in conformity with the law in assets which, during the whole period of validity of the bonds, are capable of covering claims attaching to the bonds and which, in case of bankruptcy of the issuer, would be used on a priority basis for the repayment of principal and payment of the accrued interest.

If a Compartment invests more than 5% of its net assets in the bonds referred to in this sub-paragraph and issued by one issuer, the total value of such investments may not exceed 80% of the value of the assets of the Compartment.

- e) The transferable securities and money market instruments referred to in paragraphs c) and d) shall not be included in the calculation of the limit of 40% in paragraph b).

The limits set out in sub-paragraphs a), b), c) and d) may not be aggregated and, accordingly, investments in transferable securities or money market instruments issued by the same issuing body, in deposits or in derivative instruments effected with the

same issuing body may not, in any event, exceed a total of 35% of any Compartment's net assets.

Companies which are part of the same group for the purposes of the establishment of consolidated accounts, as defined in accordance with the seventh Council Directive 83/349/EEC of 13 June 1983 based on the Article 54 (3) (g) of the Treaty on consolidated accounts, as amended, or in accordance with recognised international accounting rules, are regarded as a single body for the purpose of calculating the limits contained in this paragraph III. a) to e).

The Company may cumulatively invest up to 20% of the net assets of a Compartment in transferable securities and money market instruments within the same group.

- f) Notwithstanding the limits set out above, each Compartment is authorised to invest, in accordance with the principle of risk spreading, up to 100% of its net assets in transferable securities and money market instruments issued or guaranteed by a Member State, by one or more of its local authorities, by a member State of the OECD or the Group of Twenty (G20) such as the United States of America, by the Republic of Singapore, by the Hong Kong Special Administrative Region of the People's Republic of China, or by a public international body of which one or more Member States are members (each a "**Public Issuer**"), provided that the Compartment holds in its portfolio securities from at least six different issues and that securities from any issue do not account for more than 30% of the net assets of the Compartment.

#### IV.

- a) Without prejudice to the limits laid down in paragraph V., the limits provided in paragraph III. a) to e) are raised to a maximum of 20% for investments in shares and/or bonds issued by the same issuing body if the aim of the investment policy of a Compartment is to replicate the composition of a certain stock or bond index which is sufficiently diversified, represents an adequate benchmark for the market to which it refers, is published in an appropriate manner and disclosed in the relevant Compartment's investment policy.
- b) The limit laid down in paragraph a) is raised to 35% where this proves to be justified by exceptional market conditions, in particular on Regulated Markets where certain transferable securities or money market instruments are highly dominant. The investment up to this limit is only permitted for a single issuer.

#### V.

- a) The Company may not acquire shares carrying voting rights which should enable it to exercise significant influence over the management of an issuing body.
- b) Moreover, the Company may acquire no more than:
- 10% of the non-voting shares of the same issuer,
  - 10% of the debt securities of the same issuer,
  - 10% of the money market instruments of the same issuer,
  - 25% of the units of the same UCITS or other UCIs.

These limits in the second, third and fourth indents may be disregarded at the time of acquisition, if at that time the gross amount of debt securities or of the money market instruments or the net amount of the instruments in issue cannot be calculated.

The provisions of paragraph V. shall not be applicable to transferable securities and money market instruments issued or guaranteed by a Member State or its local authorities or by any other Eligible State, or issued by public international bodies of which one or more member states of the EU are members.

These provisions are also waived as regards shares held by the Company in the capital of a company incorporated in a non-member state of the EU which invests its assets mainly in the securities of issuing bodies having their registered office in that State, where under the legislation of that State, such a holding represents the only way in which the Company can invest in the securities of issuing bodies of that State provided that the investment policy of the company from the non-member state of the EU complies with the limits laid down in paragraph III. a) to e), V. a) and b) and VI.

## VI.

- a) Unless otherwise provided for in the Appendix to the Prospectus for a Compartment, no more than 10% of a Compartment's net assets may be invested in aggregate in the units of UCITS and/or other UCIs referred to in paragraph I) (1) c).

In the case restriction VI. a) above is not applicable to a specific Compartment as provided in its investment policy, (i) such Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of a Compartment.

For the purpose of the application of this investment limit, each Compartment of a UCITS and UCI with multiple Compartments is to be considered as a separate issuer provided that the principle of segregation of the obligations of the various Compartments vis-à-vis third parties is ensured.

- b) The underlying investments held by the UCITS or other UCIs in which the Company invests do not have to be considered for the purpose of the investment and borrowing restrictions set forth under III. a) to e) above.
- c) When the Company invests in the units of UCITS and/or other UCIs linked to the Company by common management or control, no subscription or redemption fees may be charged to the Company on account of its investment in the units of such other UCITS and/or UCIs, except for any applicable dealing charge payable to the UCITS and/or UCIs.

It is expected that investments will include investment funds of the Söderberg Group. Unless specified differently in the Appendix to this Prospectus, in the case where a substantial proportion of the net assets are invested in investment funds of the Söderberg Group, the maximum management fee (excluding any performance fee, if any) charged to the Compartment and each of the UCITS or other UCIs concerned shall not exceed 3 % of the value of the relevant investments. The management fee charged to the Compartment by an investment fund of the Söderberg Group shall normally be refunded to the Compartment. Such investments may however entail a duplication of certain fees and expenses such as administration, operating and auditing costs.

## VII.

- a) The Company may not borrow for the account of any Compartment amounts in excess of 10% of the net assets of that Compartment, any such borrowings to be from banks and to be effected only on a temporary basis, provided that the Company may acquire foreign currencies by means of back to back loans.
- b) The Company may not grant loans to or act as guarantor on behalf of third parties.

This restriction shall not prevent the Company from acquiring transferable securities, money market instruments or other financial instruments referred to in I. (1) c), e) and f) which are not fully paid.

- c) The Company may not carry out uncovered sales of transferable securities, money market instruments or other financial instruments.

- d) The Company may not acquire movable or immovable property.
- e) The Company may not acquire either precious metals or certificates representing them.

#### VIII.

- a) The Company needs not comply with the limits laid down in this chapter when exercising subscription rights attaching to transferable securities or money market instruments which form part of its assets. While ensuring observance of the principle of risk spreading, recently created Compartments may derogate from paragraphs III. a) to e), IV. and VI. a) and b) for a period of six months following the date of their creation.
- b) If the limits referred to in paragraph a) are exceeded for reasons beyond the control of the Company or as a result of the exercise of subscription rights, it must adopt as a priority objective for its sales transactions the remedying of that situation, taking due account of the interest of its Shareholders.
- c) To the extent that an issuer is a legal entity with multiple Compartment where the assets of the Compartment are exclusively reserved to the investors in such Compartment and to those creditors whose claim has arisen in connection with the creation, operation or liquidation of that Compartment, each Compartment is to be considered as a separate issuer for the purpose of the application of the risk spreading rules set out in paragraphs III. a) to e), IV. and VI.

IX. Each Compartment may, subject to the conditions provided for in the Articles as well as this Prospectus, subscribe, acquire and/or hold securities to be issued or issued by one or more Compartments of the Company with respect to the subscription, acquisition and/or the holding by a company of its own Shares, under the condition however that:

- the target Compartment does not, in turn, invest in the Compartment invested in this target Compartment,
- no more than 10% of the assets of the target Compartment whose acquisition is contemplated may, pursuant to the Articles be invested in aggregate in units of other target Compartments of the same Company,
- voting rights, if any, attaching to the relevant securities are suspended for as long as they are held by the Compartment concerned and without prejudice to the appropriate processing in the accounts and the periodic reports, and
- in any event, for as long as these securities are held by the Company, their value will not be taken into consideration of the calculation of the net assets of the Company for the purposes of verifying the minimum threshold of the net assets imposed by the Law,
- there is no duplication of management/subscription or repurchase fees between those at the level of the Compartment of the Company having invested in the target Compartment, and this target Compartment.

### **5. Financial Derivative Instruments**

In accordance with the above investment restrictions the Company may invest in financial derivative instruments. Their use need not be limited to hedging the Company's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. The extent of usage of derivatives in each Compartment is laid down in the relevant Appendix.

The Company shall ensure that its global exposure relating to derivative instruments does not exceed the total net value of its net assets. The exposure is calculated taking into account the current value of the Underlying Assets, the counterparty risk, future market movements and the time available to liquidate the positions.

Each Compartment may invest in financial derivative instruments within the limits laid down in I. (1) e), provided that the exposure to the Underlying Assets does not exceed in aggregate the investment limits laid down in clause III. a) to e). When a Compartment invests in index-based financial derivative instruments, these investments do not have to be combined to the limits laid down in III. When a transferable security or money market instrument embeds a derivative, the latter must be taken into account when complying with the requirements of this restriction.

The counterparties to OTC derivative transactions will be selected among financial institutions subject to prudential supervision (such as credit institutions or investment firms) and specialised in the relevant type of transaction. The identity of the counterparties will be disclosed in the annual report of the Company. The counterparties will have no discretion over the composition or management of the portfolio of the Compartment or the Underlying Assets of the financial derivative instruments.

## **6. Collateral Policy for OTC derivative transactions**

Risk exposure to a counterparty to OTC derivatives will take into account collateral provided by the counterparty in the form of assets eligible as collateral under applicable laws and regulations, as summarized in this section.

Where the Company on behalf of a Compartment enters into OTC derivative transactions (including a swap agreement), all collateral received by the Compartment must comply with the criteria listed in ESMA Guidelines 2014/937 in terms of liquidity, valuation, issuer credit quality, correlation, risks linked to the management of collateral and enforceability.

The maximum exposure of a Compartment to any given issuer included in the basket of collateral received is limited to 20% of the NAV of the Compartment. By way of derogation, a Compartment may take an exposure up to 100% of its NAV in transferable securities and money market instruments issued or guaranteed by a Public Issuer (as defined under Section 3, III.f) above), provided that such securities are part of a basket of collateral comprised of at least six different issues and the securities from any one issue do not account for more than 30% of the Compartment's NAV. Reinvested cash collateral will be diversified in accordance with this requirement.

Permitted types of collateral include:

- a) cash;
- b) transferable securities and money market instruments issued or guaranteed by a Member State, its local authorities, any other member state of the OECD or a public international body of which one or more Member States are members.

In respect of any Compartment which has entered into OTC derivative transactions, investors in such Compartment may obtain free of charge, on request, a copy of the report detailing the composition of the collateral at any time.

The Company will determine the required level of collateral for OTC derivative transactions by reference to the applicable counterparty risk limits set out in this Prospectus and taking into account the nature and characteristics of transactions, the creditworthiness and identity of counterparties and prevailing market conditions.

Collateral will be valued, on a daily basis, using available market prices and taking into account appropriate discounts which will be determined by the Company for each asset class based on its haircut policy. The policy, established in accordance with the ESMA Guidelines 2014/937,

takes into account a variety of factors, depending on the nature of the collateral received, such as the issuer's credit standing, the maturity, currency, price volatility of the assets and, where applicable, the outcome of liquidity stress tests carried out by the Company under normal and exceptional liquidity conditions. Due to these factors, the Company expects that collateral in the form of transferable securities and money market instruments issued or guaranteed by a Member State, its local authorities, any other member state of the OECD or a public international body of which one or more Member States are members will generally be subject to a haircut of approximately 0 % - 5 %. No haircut will generally be applied to cash collateral.

Where there is a title transfer, collateral received will be held by the Depositary (or a sub-custodian thereof) on behalf of the relevant Compartment. For other types of collateral arrangements, the collateral can be held by a third party custodian which is subject to prudential supervision, and which is unrelated to the provider of the collateral.

Non-cash collateral received cannot be sold, reinvested or pledged. Cash collateral received can only be:

- placed on deposit with eligible credit institutions,
- invested in high-quality government bonds, or
- invested in eligible short-term money market funds.

A Compartment may incur a loss in reinvesting the cash collateral it receives. Such a loss may arise due to a decline in the value of the investment made with cash collateral received. A decline in the value of such investment of the cash collateral would reduce the amount of collateral available to be returned by the Compartment to the counterparty at the conclusion of the transaction. The Compartment would be required to cover the difference in value between the collateral originally received and the amount available to be returned to the counterparty, thereby resulting in a loss to the Compartment.

The above provisions apply subject to any further guidelines issued from time to time by ESMA amending and/or supplementing ESMA Guidelines 2014/937 and/or any additional guidance issued from time to time by the CSSF in relation to the above.

## **7. Exercise of Voting Rights**

Unless otherwise provided for in the Appendix to the Prospectus for a Compartment, or unless there is a loss of investor protection, the Company will not exercise voting rights in respect of instrument held by the Company in each Compartment.

## **8. Use of securities financing transactions and total return swaps**

As of the date of this Prospectus, none of the Compartments had engaged and had no intention to engage in securities lending or borrowing, repurchase agreement transactions, reverse repurchase agreement transactions, sell/buy-back transactions or total return swaps. If and as applicable, the disclosure in the general part of the Prospectus and/or the Appendix of the relevant Compartment engaging in such transactions will be updated accordingly.

## **9. Responsible investments**

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through Sustainability Factors (i.e. environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager conducts responsible investments for all the Compartments based on three principal and binding pillars: exclusion screening, active engagement, and positive selection. **More information on the Compartments' environmental and social characteristics, as well as sustainable investments, can be found in the Appendix – Sustainability-related disclosures.**



The Investment Manager recognises the importance of participating in international initiatives that support businesses to operate in a more sustainable manner. The Investment Manager has signed the United Nations Principles for Responsible Investment (“**PRI**”), which is the leading international initiative for responsible investments for companies in the financial sector. The Investment Manager has also signed the TCFD, which is an agenda on climate change that is comprehensive and focused on accelerating investor action for a net-zero emissions economy.

Detailed information on the Investment Manager’s sustainability processes and policies can be found on [www.soderbergpartners.lu/sustainability/](http://www.soderbergpartners.lu/sustainability/).

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## **RISK-MANAGEMENT PROCESS**

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The Management Company must employ a risk-management process which enables it to monitor and measure at any time the risk of the positions in its portfolios and their contribution to the overall risk profile of its portfolios.

In accordance with the Law and the applicable regulations, in particular Circular CSSF 11/512, as modified by Circular CSSF 18/698 on authorisation and organisation of investment fund managers incorporated under Luxembourg law, the Management Company uses for each Compartment a risk-management process which enables it to assess the exposure of each Compartment to market, liquidity and counterparty risks, and to all other risks, including operational risks, which are material to that Compartment. As part of the risk management process, the Management Company uses the commitment approach to monitor and measure the global exposure.

This approach measures the global exposure related to positions on financial derivative instruments under consideration of netting and hedging effects (if used) which may not exceed the total net asset value of the portfolio of the relevant Compartment.

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## **RISK WARNINGS**

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The following is a general description of a number of risks which may affect the value of Shares. See also the section of the relevant Appendix to the Prospectus (if any) for a discussion of additional risks particular to a specific issue of Shares. The description of the risks made below is not, nor is it intended to be, exhaustive. Not all risks listed necessarily apply to each issue of Shares, and there may be other considerations that should be taken into account in relation to a particular issue. What factors will be of relevance to a particular Compartment will depend upon a number of interrelated matters including, but not limited to, the nature of the Shares and the Compartment’s Investment Policy.

No investment should be made in the Shares until careful consideration of all these factors has been made.

## 1. Introduction

The value of investments and the income from them, and therefore the value of and income from Shares relating to a Compartment can go down as well as up and an investor may not get back the amount the investor invests. Due to the various commissions and fees which may be payable on the Shares, an investment in Shares should be viewed as medium to long term. Short or leveraged funds are associated with higher risks and may better be considered as short to medium term investments. An investment in a Compartment should not constitute a substantial proportion of an investment portfolio and may not be appropriate for all investors. Investors should only reach an investment decision after careful consideration with their legal, tax, accounting, financial and other advisers. The legal, regulatory, tax and accounting treatment of the Shares can vary in different jurisdictions. Any descriptions of the Shares set out in the Prospectus, including any Appendix, are for general information purposes only. Investors should recognise that the Shares may decline in value and should be prepared to sustain a total loss of their investment. Risk factors may occur simultaneously and/or may compound each other resulting in an unpredictable effect on the value of the Shares.

## 2. General risks

*Valuation of the Shares:* the value of a Share will fluctuate as a result of changes in the value of, amongst other things, the Compartment's assets, the Underlying Asset and, where applicable, the financial derivative instruments used to expose the Compartment to the Underlying Asset synthetically.

*Valuation of the Underlying Asset and the Compartment's assets:* the Compartment's assets, the Underlying Asset or the financial derivative instruments used to expose the Compartment to the Underlying Asset synthetically may be complex and specialist in nature. Valuations for such assets or financial derivative instruments will usually only be available from a limited number of market professionals which frequently act as counterparties to the transactions to be valued. Such valuations are often subjective and there may be substantial differences between any available valuations.

*Exchange rates:* an investment in the Shares may directly or indirectly involve exchange rate risk. Because the net asset value of the Compartment will be calculated in its Reference Currency, the performance of an Underlying Asset or of its constituents denominated in a currency other than the Reference Currency will also depend on the exchange rate of such currency. Equally, the currency denomination of any Compartment asset in a currency other than the Reference Currency will involve exchange rate risk for the Compartment.

*Interest rates:* fluctuations in interest rates of the currency or currencies in which the Shares, the Compartment's assets and/or the Underlying Asset are denominated may affect financing costs and the real value of the Shares.

*Inflation:* the rate of inflation will affect the actual rate of return on the Shares. An Underlying Asset may reference the rate of inflation.

*Yield:* returns on Shares may not be directly comparable to the yields which could be earned if any investment were instead made in any Compartment's assets and/or Underlying Asset.

*Correlation:* the Shares may not correlate perfectly, nor highly, with movements in the value of Compartment's assets and/or the Underlying Asset.

*Volatility:* the value of the Shares may be affected by market volatility and/or the volatility of the Compartment's assets and/or the Underlying Asset.

*Credit risk:* the ability of the Company to make payments to Shareholders in respect of the Shares will be diminished to the extent of any other liabilities undertaken by, or imposed on, the Company. Any Compartment's assets, Underlying Asset or derivative technique used to

link the two may involve the risk that the counterparty to such arrangements may default on any obligations to perform thereunder.

*Liquidity risk:* certain types of securities may be difficult to buy or sell, particularly during adverse market conditions, which may affect their value. The fact that the Shares may be listed on a stock exchange is not an assurance of liquidity in the Shares.

*Leverage:* the Compartment's assets, Underlying Asset and the derivative techniques used to expose the Compartment to the Underlying Asset may comprise elements of leverage (or borrowings) which may potentially magnify losses and may result in losses greater than the amount borrowed or invested by the Compartment.

*Derivatives:* if a Compartment uses financial derivative instruments in order to get exposure to Underlying Assets those derivatives are associated with specific risks. Common derivatives are futures, options and swaps.

- a) Derivatives are time limited and will expire.
- b) The low margin amount required to establish a derivative position permits a high degree of leverage. As a result, relatively small movements in the price of a futures contract or a swap may result in a profit or loss which is high in proportion to the amount of assets actually placed as margin (collateral) and may result in losses exceeding any margin deposited.

In addition, where a Company enters into OTC derivative transactions it is exposed to increased credit and counterparty risk, which the Management Company will aim to mitigate by the collateral arrangements. Entering into transactions on the OTC markets will expose the Compartment to the credit of its counterparties and their ability to satisfy the terms of the contracts. In the event of a bankruptcy or insolvency of a counterparty, the Compartment could experience delays in liquidating the position and significant losses, including declines in the value of its investments during the period in which the Company seeks to enforce its rights, inability to realise any gains on its investments during such period and fees and expenses incurred in enforcing its rights. There is also a possibility that the above agreements and derivative techniques are terminated due, for instance, to bankruptcy, supervening illegality or change in the tax or accounting laws relative to those at the time the agreement was originated.

*Political factors, emerging market and non-OECD member country assets:* the performance of the Shares and/or the possibility to purchase, sell, or repurchase the Shares may be affected by changes in general economic conditions and uncertainties such as political developments, changes in government policies, the imposition of restrictions on the transfer of capital and changes in regulatory requirements. Such risks can be heightened in investments in, or relating to, emerging markets or non-OECD member countries. In addition, local custody services remain underdeveloped in many non-OECD and emerging market countries and there is a heightened transaction and custody risk involved in dealing in such markets. In certain circumstances, a Compartment may not be able to recover or may encounter delays in the recovery of some of its assets. Furthermore, the legal infrastructure and accounting, auditing and reporting standards in emerging markets or non-OECD member countries, may not provide the same degree of investor information or protection as would generally apply to major markets.

*Share subscriptions and repurchases:* provisions relating to the subscription and repurchase of Shares grant the Company discretion to limit the amount of Shares available for subscription or repurchase on any bank full business day in Luxembourg and Sweden and, in conjunction with such limitations, to defer or pro rata such subscription or repurchase. In addition, where requests for subscription or repurchase are received after the cut-off deadline, there will be a delay between the time of submission of the request and the actual date of subscription or repurchase. Such deferrals or delays may operate to decrease the number of Shares or the repurchase amount to be received.

*Listing:* there can be no certainty that a listing on any stock exchange applied for by the Company will be achieved and/or maintained or that the conditions of listing will not change. Further, trading in Shares on a stock exchange may be halted pursuant to that stock exchange's rules due to market conditions and investors may not be able to sell their Shares until trading resumes.

*Legal and regulatory:* the Company must comply with regulatory constraints or changes in the laws affecting it, the Shares, or the investment restrictions, which might require a change in the investment policy and objectives followed by a Compartment. The Compartment's assets, the Underlying Asset and the derivative instruments used to expose the Compartment to the Underlying Asset may also be subject to change in laws or regulations and/or regulatory action which may affect the value of the Shares.

*Nominee arrangements:* where an investor invests in Shares via the Principal Placement and Distribution Agent, its sub-distribution or private placement agents and/or a nominee or holds interests in Shares through a clearing agent, such Shareholder will typically not appear on the register of Shareholders of the Company and may not therefore be able to exercise voting or other rights available to those persons appearing on the register.

*Duplication of costs:* The Compartment incurs costs of its own management and administration comprising the fees paid to the Management Company, the Investment Manager, the Depositary, unless otherwise provided hereinafter and other service providers. It should be noted that, in addition, the Compartment incurs similar costs in its capacity as an investor in the funds in which a Compartment invests, which in turn pay similar fees to their manager and other service providers. It is endeavoured to reduce duplication of management charges by negotiating rebates where applicable in favour of the Company with such funds or their managers. Further, the investment strategies and techniques employed by certain funds may involve frequent changes in positions and a consequent portfolio turnover. This may result in brokerage commission expenses which exceed significantly those of the funds of comparable size. The funds may be required to pay performance fees to their manager. Under these arrangements the managers will benefit from the appreciation, including unrealised appreciation of the investments of such funds, but they are not similarly penalised for realised or unrealised losses. As a consequence, the direct and indirect costs borne by the Compartment are likely to represent a higher percentage of the net asset value per Share than would typically be the case with UCITS which invest directly in equity and bond markets (and not through other UCITS/UCI/funds).

*Custody:* Any bankruptcy or other serious failure affecting the Depositary could place at risk of loss those assets a Compartment has deposited there (typically most or all assets). The risk of loss is higher for cash deposits, which are not segregated from other assets deposited with the Depositary in the way that non-cash assets are. If the Depositary uses sub-custodians in other countries where the Compartment invest, a Compartment's assets are subject to similar risks at the sub-custodian level. In countries where custodial or settlement systems are not fully developed, there may be a risk that investments are not returned by the Depositary. The Compartment may invest from time to time in a country where the Depositary has no correspondent. In such a case, the Depositary may in its sole discretion identify and appoint after satisfactory due diligence a local custodian. This process may take time and deprive in the meantime the Compartment of investment opportunities. The Depositary may remove at its sole discretion, in the best interest of the investors, any sub-custodian whenever it identified material risks and certain aspects of Country Risk associated with certain markets for which the Depositary believes that special investment-related risks are present. In doing so, the price at which such assets will be sold may be lower than the price the Company would have received in normal circumstances, potentially affecting the performance of the relevant Compartments.

*Sustainability risk:* an environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investments made by the Company.

Due to the nature of the investments, the Compartments are exposed to varied Sustainability Risks which include, but are not limited to:

- physical risks (actual or expected effects of environmental changes);
- transition risks (resulting from, among others, the transition to a low-carbon economy);
- social risks (e.g. gender gaps, social inequality) and
- governance risks (e.g. bribery issues, selling practices).

### **3. Underlying Asset risks**

#### **(A) General**

*Underlying Asset calculation and substitution:* in certain circumstances described in the relevant Appendix, the Underlying Asset may cease to be calculated or published on the basis described or such basis may be altered or the Underlying Asset may be substituted. In certain circumstances such as the discontinuance in the calculation or publication of the Underlying Asset or suspension in the trading of any constituents of the Underlying Asset, it could result in the suspension of trading of the Shares or the requirement for market makers to provide two way prices on the relevant stock exchanges.

*Corporate actions:* securities comprising an Underlying Asset may be subject to change in the event of corporate actions in respect of those securities.

*Tracking error:* the following are some of the factors which may result in the value of the Shares varying from the value of the Underlying Asset: investments in assets other than the Underlying Asset may give rise to delays or additional costs and taxes compared to an investment in the Underlying Asset; investment or regulatory constraints may affect the Company but not the Underlying Asset; the fluctuation in value of a Compartment's assets; where applicable, any differences between the maturity date of the Shares and the Maturity Date of the relevant Compartment's assets; and the existence of a cash position held by a Compartment.

*No investigation or review of the Underlying Asset(s):* none of the Management Company or any of its affiliates has performed or will perform any investigation or review of the Underlying Asset on behalf of any prospective investor in the Shares. Any investigation or review made by or on behalf of the Company, the Management Company or any of its affiliates is or shall be for their own proprietary investment purposes only.

#### **(B) Certain risks associated with particular Underlying Assets**

Certain risks associated with investment in particular Underlying Assets or any securities comprised therein are set out below.

*Shares:* the value of an investment in Shares will depend on a number of factors including, but not limited to, market and economic conditions, sector, geographical region and political events.

*Pooled investment vehicles:* alternative investment funds, mutual funds and similar investment vehicles operate through the pooling of investors' assets. Investments are then invested either directly into assets or are invested using a variety of hedging strategies and/or mathematical modelling techniques, alone or in combination, any of which may change over time. Such strategies and/or techniques can be speculative, may not be an effective hedge and may involve substantial risk of loss and limit the opportunity for gain. It may be difficult to obtain valuations of products where such strategies and/or techniques are used and the value of such products may depreciate at a greater rate than other investments. Pooled investment vehicles are often unregulated, make available only limited information about their operations, may incur extensive costs, commissions and brokerage charges, involve substantial fees for investors (which may include fees based on unrealised gains), have no minimum credit standards, employ

high risk strategies such as short selling and high levels of leverage and may post collateral in unsegregated third party accounts.

*Indices:* the compilation and calculation of an index or portfolio will generally be rules based, account for fees and include discretions exercisable by the index provider or investment manager. Methodologies used for certain proprietary indices are designed to ensure that the level of the index reaches a pre-determined level at a specified time. However, this mechanism may have the effect of limiting any gains above that level. Continuous protection or lock-in features designed to provide protection in a falling market may also result in a lower overall performance in a rising market.

*Real estate:* the risks associated with a direct or indirect investment in real estate include, but are not limited to: the cyclical nature of real estate values, changes in environmental, planning, landlord and tenant, tax or other laws or regulations affecting real property, demographic trends, variations in rental income and increases in interest rates.

*Commodities:* prices of commodities are influenced by, among other things, various micro and macro economic factors such as changing supply and demand relationships, weather conditions and other natural phenomena, agricultural, trade, fiscal, monetary, and exchange control programmes and policies of governments (including government intervention in certain markets) and other events.

*Structured finance securities:* structured finance securities include, without limitation, asset-backed securities and credit-linked securities, which may entail a higher liquidity risk than exposure to sovereign or corporate bonds. Certain specified events and/or the performance of assets referenced by such securities, may affect the value of, or amounts paid on, such securities (which may in each case be zero).

*Emerging Markets :* Underlying investments in emerging markets involve additional risks and special considerations not typically associated with investing in other more established economies or markets. Such risks may include (i) increased risk of nationalization or expropriation of assets or confiscatory taxation; (ii) greater social, economic and political uncertainty, including war; (iii) higher dependence on exports and the corresponding importance of international trade; (iv) greater volatility, less liquidity and smaller capitalization of markets; (v) greater volatility in currency exchange rates; (vi) greater risk of inflation; (vii) greater controls on foreign investment and limitations on realization of investments, repatriation of invested capital and on the ability to exchange local currencies for the Reference Currency; (viii) increased likelihood of governmental involvement in and control over the economy; (ix) governmental decisions to cease support of economic reform programs or to impose centrally planned economies; (x) differences in auditing and financial reporting standards which may result in the unavailability of material information about issuers; (xi) less extensive regulation of the markets; (xii) longer settlement periods for transactions and less reliable clearance and custody arrangements; (xiii) less developed corporate laws regarding fiduciary duties of officers and directors and the protection of investors; and (xiv) certain considerations regarding the maintenance of the Compartment's financial instruments with brokers and securities depositories. Repatriation of investment income, assets and the proceeds of sales by foreign investors may require governmental registration and/or approval in some emerging countries. A Compartment may be adversely affected by delays in or a refusal to grant any required governmental registration or approval for such repatriation or by withholding taxes imposed by emerging markets countries on interest or dividends paid on financial instruments held by the Company or gains from the disposal of such financial instruments.

In emerging markets, there is often less government supervision and regulation of business and industry practices, stock exchanges, OTC markets, brokers, dealers, counterparties and issuers than in other more established markets. Any regulatory supervision which is in place may be subject to manipulation or control. Some emerging market countries do not have mature legal systems comparable to those of more developed countries. Moreover, the process of legal and

regulatory reform may not be proceeding at the same pace as market developments, which could result in investment risk. Legislation to safeguard the rights of private ownership may not yet be in place in certain areas, and there may be the risk of conflict among local, regional and national requirements. In certain cases, the laws and regulations governing investments in securities may not exist or may be subject to inconsistent or arbitrary appreciation or interpretation. Both the independence of judicial systems and their immunity from economic, political or nationalistic influences remain largely untested in many countries. The Compartments may also encounter difficulties in pursuing legal remedies or in obtaining and enforcing judgments in local courts.

Investments in securities of issuers in emerging markets maybe subject to greater risks than investments in securities of issuers from member states of the OECD due to a variety of factors including currency controls and currency exchange rates fluctuations, changes in governmental administration or economic or monetary policy or changed circumstances in dealings between nations, expropriation, confiscatory taxation and potential difficulties in enforcing contractual obligations. There may be less publicly available information about issuers in certain countries and such issuers may not be subject to uniform accounting, auditing and financial reporting standards and requirements comparable to those of most OECD issuers. In certain countries, securities of local issuers are less liquid and more volatile than securities of comparable issuers of more mature economies and subject to lower levels of government supervision than those on the OECD. The investments in such markets may be considered speculative and subject to significant custody and clearance risks and delay in settlement.

*Others:* underlying Asset(s) may include other assets which involve substantial financial risk such as distressed debt, low quality credit securities, forward contracts and deposits with commodity trading advisors (in connection with their activities).

#### **4. Other risks**

*Potential conflicts of interest:* the Management Company, the sales agents, the Central Administration Agent and the Depositary may from time to time act as management company, investment manager or adviser, sales agent, administration agent, registrar or depositary in relation to, or be otherwise involved in, other funds or collective investment schemes which have similar investment objectives to those of any Compartment.

The Management Company will enter into all transactions on an arm's length basis.

The directors of the Management Company and any affiliate thereof, its members and staff may engage in various business activities other than their business, including providing consulting and other services (including, without limitation, serving as director) to a variety of partnerships, corporations and other entities, not excluding those in which the Company invests.

In the due course of their business, the above persons and entities may have potential conflicts of interest with the Company or Compartment.

Any kind of conflict of interest is to be fully disclosed to the Board of Directors.

In such event, each person and entities will at all times endeavour to comply with its obligations under any agreements to which it is party or by which it is bound in relation to the Company or any Compartment.

The directors of the Management Company and its members will devote the time and effort necessary and appropriate to the business of the Company.

Although it is aimed to avoid such conflicts of interest, the Management Company and its members will attempt to resolve all nonetheless arising conflicts in a manner that is deemed equitable to all parties under the given circumstances so as to serve the best interests of the Company and its Shareholders.

*Allocation of shortfalls among Classes of a Compartment:* the right of holders of any Class of Shares to participate in the assets of the Company is limited to the assets (if any) of the relevant Compartment and all the assets comprising a Compartment will be available to meet all of the liabilities of the Compartment, regardless of the different amounts stated to be payable on the separate Classes (as set out in the relevant Appendix). For example, if on a winding-up of the Company, the amounts received by the Company under the relevant Compartment's assets (after payment of all fees, expenses and other liabilities which are to be borne by the relevant Compartment) are insufficient to pay the full redemption amount payable in respect of all Classes of Shares of the relevant Compartment, each Class of Shares of the Compartment will rank *pari passu* with each other Class of Shares of the relevant Compartment, and the proceeds of the relevant Compartment will be distributed equally amongst the Shareholders of that Compartment pro rata to the amount paid up on the Shares held by each Shareholder. The relevant Shareholders will have no further right of payment in respect of their Shares or any claim against any other Compartment or any other assets of the Company. This may mean that the overall return (taking account of any dividends already paid) to Shareholders who hold Shares paying dividends quarterly or more frequently may be higher than the overall return to Shareholders who hold Shares paying dividends annually and that the overall return to Shareholders who hold Shares paying dividends may be higher than the overall return to Shareholders who hold Shares paying no dividends. In practice, cross liability between Classes is only likely to arise where the aggregate amounts payable in respect of any Class exceed the assets of the Compartment notionally allocated to that Class, that is, those amounts (if any) received by the Company under the relevant Compartment's assets (after payment of all fees, expenses and other liabilities which are to be borne by such Compartment) that are intended to Company payments in respect of such Class or are otherwise attributable to that Class. In these circumstances, the remaining assets of the Compartment notionally allocated to any other Class of the same Compartment may be available to meet such payments and may accordingly not be available to meet any amounts that otherwise would have been payable on such other Class.

*Segregated liability between Compartments:* while the provisions of the Law provide for segregated liability between Compartments, these provisions have yet to be tested in foreign courts, in particular, in satisfying local creditors' claims. Accordingly, it is not free from doubt that the assets of any Compartment may be exposed to the liabilities of other Compartments. As at the date of this Prospectus, the Directors are not aware of any existing or contingent liability of any Compartment.

*Consequences of winding-up proceedings:* If the Company fails for any reason to meet its obligations or liabilities, or is unable to pay its debts, a creditor may be entitled to make an application for the winding-up of the Company. The commencement of such proceedings may entitle creditors (including the Swap Counterparty) to terminate contracts with the Company and claim damages for any loss arising from such early termination. The commencement of such proceedings may result in the Company being dissolved at a time and its assets (including the assets of all Compartments) being realised and applied to pay the fees and expenses of the appointed liquidator or other insolvency officer, then in satisfaction of debts preferred by law and then in payment of the Company's liabilities, before any surplus is distributed to the Shareholders of the Company. In the event of proceedings being commenced, the Company may not be able to pay the full amounts anticipated by the relevant Appendix in respect of any Class or Compartments.



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## ISSUE, REDEMPTION AND CONVERSION OF SHARES

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As further described in each relevant Appendix to this Prospectus, the Company may create within each Compartment different classes of Shares whose assets will be commonly invested pursuant to the specific investment policy of the relevant Compartment.

A distinct fee structure, currency of denomination, dividend policy minimum holding amount, eligibility requirements or other specific feature may apply. The Company may notably issue Shares reserved to retail investors and Shares reserved to institutional investors. The range of available Classes and their features are described in the relevant Appendix to this Prospectus.

### **1. Subscription Redemption and Conversion Requests**

Unless otherwise provided for a specific Compartment in the relevant Appendix to this Prospectus, requests for subscription, redemption and conversion of Shares should be sent to the Central Administration Agent, one of the sub-distribution and private placement agents or to the Company at its registered address in Luxembourg. Requests may also be accepted by facsimile transmission, or at the discretion of the Company by other means of telecommunication. An application form can be obtained from the Company.

Unless otherwise specified in the Appendix to the Prospectus for any Compartment, requests for subscriptions, redemptions and conversions from or to any Compartment will be dealt with on the Valuation Day on which they are received, provided they are received prior to 15:00 Luxembourg time on that Valuation Day.

Requests received after such time will be accepted on the next Valuation Day. As a result, requests for the subscription, redemption and conversion of Shares shall be dealt with on an unknown net asset value basis before the determination of the net asset value for that day.

The Company does not permit market timing (as set out in CSSF circular 04/146) or related excessive, short-term trading practices.

The Company has the right to reject any request for the subscription or conversion of Shares from any investor engaging in such practices or suspected of engaging in such practices and to take such further action as it may deem appropriate or necessary.

Subscription, redemption and conversion of Shares of a given Compartment shall be suspended whenever the determination of the net asset value per Share of such Compartment is suspended by the Company.

The Company may enter into an agreement with the distribution agent giving the distribution agent the power to sub delegate the distribution pursuant to which they agree to act as or appoint nominees for investors subscribing for Shares through their facilities. In such capacity the distributor or sales agent may affect subscriptions, conversion and redemptions of Shares in the nominee name on behalf of individual investors and request the registration of such transactions on the register of Shareholders of the Company in the nominee name. The appointed nominee maintains its own records and provides the investor with individualised information as to its holdings of Shares in the Company. Except where local law or custom prohibits the practice, investors may invest directly in the Company and not avail themselves of a nominee service.

Unless otherwise provided by local law, any Shareholder holding Shares in a nominee account with a distributor has the right to claim, at any time, direct title to such Shares.

## **2. Deferral of Redemptions and Conversion**

If the total requests for redemption and conversion out of a Compartment on any Valuation Day exceed 10% of the total value of Shares in issue of that Compartment, the Company may decide that redemption and conversion requests in excess of 10% shall be deferred until the next Valuation Day. On the next Valuation Day, or Valuation Days until completion of the original requests, deferred requests will be dealt with in priority to later requests.

## **3. Settlements**

If, on the settlement day as determined in the Appendix of the Prospectus, banks are not open for business, or an interbank settlement system is not operational, in the country of the currency of the relevant Class, then settlement will be on the next Business Day on which those banks and settlement systems are open.

Confirmation of completed subscriptions, redemptions and conversions will normally be dispatched on the Business Day following the execution of the transaction.

No redemption payments will be made until the original application form and relevant subscription monies have been received from the Shareholder and all the necessary anti-money laundering checks have been completed. Redemption proceeds will be paid on receipt of faxed instructions where such payment is made into the account specified by the Shareholder in the original application form submitted. However, any amendments to the Shareholder's registration details and payment instructions can only be affected upon receipt of original documentation.

## **4. Minimum Subscription and Holding Amounts and Eligibility for Shares**

A minimum initial and subsequent subscription amount and minimum holding amounts for each Class may be set forth, as further detailed in the Appendix to the Prospectus. The Company has the discretion, from time to time, to waive or reduce any applicable minimum subscription amounts.

The right to transfer, redeem or convert Shares is subject to compliance with any conditions (including any minimum subscription or holding amounts and eligibility requirements) applicable to the Class from which the redemption or conversion is being made, and also the Class into which the conversion is to be affected.

The Board of Directors may also, at any time, decide to compulsorily redeem all Shares from Shareholders whose holding is less than the minimum holding amount specified in the Appendix to the Prospectus or who fail to satisfy any other applicable eligibility requirements set out above. In such case the Shareholder concerned will receive one month's prior notice so as to be able to increase its holding above such amount or otherwise satisfy the eligibility requirements.

If a redemption or conversion request would result in the amount remaining invested by a Shareholder falling below the minimum holding amount of that Class, such request will be treated as a request to redeem or convert, as appropriate, the Shareholder's total holding in that Class. If the request is to transfer Shares, then that request may be refused by the Company.

Shareholders are required to notify the Company immediately in the event that they are or become US Persons or hold Shares for the account or benefit of US Persons or hold Shares in breach of any law or regulation or otherwise in circumstances having, or which may have, adverse regulatory, tax or fiscal consequences for the Company or the Shareholders or otherwise be detrimental to the interests of the Company. If the Company becomes aware that a Shareholder is holding Shares in breach of any law or regulation or otherwise in circumstances having, or which may have, adverse regulatory, tax or fiscal consequences for the Company or the Shareholders or would otherwise be detrimental to the interests of the Company or that the

Shareholder has become or is a US Person, the Company may, in its sole discretion, redeem the Shares of the Shareholder in accordance with the provisions of the Articles. For the purpose of the above, "US Person" shall have the meaning given in Regulation S under the U.S. Securities Act of 1933, as amended, and shall mean any national, citizen or resident of the United States of America or of any of its territories or possessions or areas subject to its jurisdiction or any person who is normally resident therein (including the estate of any such person or corporations or partnerships created or organised therein).

## **5. Issue of Shares**

Subscriptions for Shares can be made on any day that is a Valuation Day for the relevant Compartment. Shares will be allotted at the subscription price of the relevant Class i.e. the net asset value per Share of such Class determined on the applicable Valuation Day on which the request has been accepted plus the applicable subscription charge, if any.

If any subscription charge is applied in relation to any particular Compartment, it will be disclosed in the relevant Appendix to the Prospectus. The Company is entitled to receive the subscription charge (if any).

Failure to make good settlement by the settlement day, as determined in the Appendix of the Prospectus may result in the Company bringing an action against the defaulting investor or its financial intermediary or deducting any costs or losses incurred by the Company against any existing holding of the applicant in the Company. In all cases any money returnable to the investor will be held by the Company without payment of interest pending receipt of the remittance.

Payment for Shares must be received by the Company in the reference currency of the relevant Class. Requests for subscriptions in any other major freely convertible currency will only be accepted if so determined by the Company.

Investors are advised to refer to the terms and conditions applicable to subscriptions, which may be obtained by contacting the Company.

The Company reserves the right to accept or refuse any subscription in whole or in part and for any reason. The Company may also limit the distribution of a given Class or Compartment to specific countries. The Company may also restrict the distribution of the Company's Shares by distributors or agents who have not been approved. The Company may also restrict or prevent the ownership of Shares by any person, firm or corporation, if such ownership may be against the interests of the Company or of the majority of Shareholders or of any Compartment or Class therein.

Where it appears that a person who should be precluded from holding Shares, either alone or in conjunction with any other person, is a beneficial owner of Shares, the Company may compulsorily redeem all Shares so owned in accordance with the provisions of the Articles.

The Company may, in its absolute discretion, delay the acceptance of any subscription for Shares of a Class restricted to institutional investors until such date as it has received sufficient evidence of the qualification of the investor as an institutional investor.

## **6. Anti-Money Laundering Procedures**

Pursuant to the AML Regulations, obligations have been imposed inter alia on UCI as well as on professionals of the financial sector to prevent the use of UCI for money laundering purposes. Within this context a procedure for the identification of potential investors and Shareholders has been imposed. Namely, the requests for subscription must be accompanied, in the case of individuals, by a certified copy of the investor's passport or identification card and, in the case of legal entities, by a certified copy of the investor's articles of incorporation and, where applicable, an extract from the commercial register or a copy of such other

documents as may be requested as verification of the identity and address of the individual or legal entity.

This identification procedure must be complied with by the Central Administration Agent acting as registrar and transfer agent (or the relevant competent agent of the Central Administration Agent) in the case of direct subscriptions to the Company, and in the case of subscriptions received by the Company from any intermediary resident in a country that does not impose on such intermediary an obligation to identify investors equivalent to that required under AML Regulations.

The Central Administration Agent, acting as registrar and transfer agent may request any such additional documents, as it deems necessary to establish the identity of the investors or beneficial owners. Any information provided to the Company in this context is collected for anti-money laundering compliance purposes only.

## **7. Redemption of Shares**

Requests for the redemption of Shares can be made on any day that is a Valuation Day for the relevant Compartment. Redemptions will be carried out at the redemption price of the relevant Class i.e. the net asset value per Share of such Class determined on the applicable Valuation Day on which the request has been accepted less the applicable redemption fee, if any.

The Company may carry out any authentication procedures that it considers appropriate relating to a redemption request. This aims to mitigate the risk of error and fraud for the Company, its agents or Shareholders. Where it has not been possible to complete any authentication procedures to its satisfaction, the Company may delay the processing of payment instructions until authentication procedures have been satisfied.

This will not affect the Valuation Day on which the redemption request is accepted and the redemption to be applied. The Company shall not be held responsible to the Shareholder or anyone if it delays execution or declines to execute redemption instructions in these circumstances.

Redemption payments will normally be paid in the Reference Currency of the Class by bank transfer within 3 Business Days of the relevant Valuation Day. The Company is not responsible for any delays or charges incurred at any receiving bank or settlement system. A Shareholder may request, at its own cost and subject to agreement by the Company that their redemption proceeds be paid in a currency other than the Reference Currency of the relevant Class.

If, in exceptional circumstances, redemption proceeds cannot be paid within the period specified above, payment will be made as soon as reasonably practicable thereafter (not exceeding, however, 10 Business Days) at the redemption price calculated on the relevant Valuation Day, it being understood that the Board of Directors will always ensure the overall liquidity of the Company.

If any redemption charge is applied in relation to any particular Compartment, it will be disclosed in the relevant Appendix to the Prospectus. The Company is entitled to receive the redemption charge (if any).

Shares redeemed by the Company become null and void.

## **8. Conversion of Shares**

Subject to any provision under this Prospectus and its Appendix, Shareholders have the right to convert all or part of their Shares of any Class of a Compartment into Shares of another Class of that or another Compartment, by applying for conversion in the same manner as for the subscription and redemption of Shares. Conversions within the Company are permitted provided that the Shareholder satisfies the eligibility requirements and minimum holding amounts set out in the Appendix to the Prospectus and such other conditions applicable to the contemplated Classes.

### *Procedure for conversion within the Company*

Conversion may be requested on a common Valuation Day for the original Class and the contemplated Class. The number of Shares issued upon conversion will be based upon the net asset value of the original Class and the net asset value of the contemplated Class, plus a conversion charge (if any), as disclosed in the relevant Appendix to the Prospectus. The Company is entitled to any charges arising from conversions and any rounding adjustment.

## **9. Transfer of Shares**

Subject to the restrictions described herein, Shares are freely transferable and are each entitled to participate equally in the profits and liquidation proceeds attributable to the relevant Class.

The transfer of Shares may normally be carried out by delivery to the Central Administration Agent, distributor, sales agent or the Company of an instrument of transfer in appropriate form. On the receipt of the transfer request, and after reviewing the endorsement(s), signature(s) may be required to be certified by an approved bank, stock broker or public notary.

The right to transfer Shares is subject to the minimum investment and holding requirements as detailed above and in the Appendix of the Prospectus.

Shareholders are advised to contact the relevant distributor, sales agent or the Company prior to requesting a transfer to ensure that they have the correct documentation for the transaction.

## **10. Restrictions on Subscriptions to and Conversions in certain Compartments or Classes**

Unless otherwise specified in the Appendix of the relevant Compartment, the Board of Directors may, in its discretion and taking into account the equal treatment of Shareholders in comparable situations and the general interest of all Shareholders, refuse to accept new subscriptions or conversion in a Compartment or a particular Class. By way of non-limiting example, the Board of Directors might determine, upon consultation with the Investment Manager, that there is no capacity in the investment strategy adopted by a Compartment to accept further subscriptions or conversion in a Compartment or a particular Class. To the extent that, at a later date, the Board of Directors determines that there is no longer any reason to refuse new subscriptions to or conversions in the Compartment or the Class then they may in their discretion accept new subscriptions to or conversions in the Compartment or the Class.

Any Compartment or Class may be closed to new subscriptions or conversions in without notice to Shareholders unless otherwise specified in the Appendix of the relevant Compartment. Once closed, a Compartment or Class, will not be re-opened until, in the opinion of the Board of Directors, the circumstances which required closure no longer prevail. A Compartment or Class may be re-opened to new subscriptions or switches in without notice to Shareholders.

Investors should contact the Company or check the website [www.soderbergpartners.lu](http://www.soderbergpartners.lu) for the current status of the relevant Compartments or Classes.

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## **DISTRIBUTION POLICY**

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The general policy regarding the appropriation of net income and capital gains is as follows:

Unless otherwise stated in the relevant appendix all share classes are capital appreciation Classes of shares and the Board of Directors intends to recommend at the annual general meeting the reinvestment of their net assets.

For any distributing Class of shares, the Board of Directors may decide to distribute interim dividends either in the form of cash in the relevant currency or in the form of reinvestment by the purchase of Shares of the same Class.

No dividends will be distributed if their amount is below the amount of SEK 100 or its equivalent in EUR and will be capitalised.

Dividends may in any case result from a decision of the Shareholders in general meeting, subject to a majority vote of those present or represented and within limits provided by law, and a concurring decision at the same majority in the relevant Compartment.

Dividends unclaimed after five years from the date of declaration will lapse and revert to the Company in the relevant Compartment.

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## **MANAGEMENT AND ADMINISTRATION**

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The Directors of the Company and the Management Company are responsible for its management and supervision including the determination of investment policies.

### **1. Management Company**

The Management Company shall at all time act in the best interests of the Shareholders and according to the provisions set forth by the Law, the Prospectus and the Articles.

In fulfilling its responsibilities set forth by the Law and the management company services agreement, the Management Company is permitted to delegate all or a part of its functions and duties to third parties, provided that it retains responsibility and oversight over such delegates. The appointment of third parties is subject to the approval of the Company and the CSSF. The Management Company's liability shall not be affected by the fact that it has delegated its functions and duties to third parties.

With the consent of the Company, the Management Company performs the management of the assets of the Compartments.

In accordance with the Company's Articles and the Law, as amended, and subject to the prior approval of the CSSF, the Management Company may appoint additional sub-investment managers to whom it may delegate all or part of the day-to-day conduct of its investment management responsibilities in respect of any Compartment.

For its services as Investment Manager, the Management Company shall receive remuneration from the Company as further described in the relevant Appendix to the Prospectus.

The Management Company shall also ensure compliance of the Company with the investment restrictions and oversee the implementation of the investment policy of each Compartment.

The Management Company will receive periodic reports from the Company's service providers in relation to the services which they provide. The Management Company shall also submit its own report to the Board of Directors on a periodic basis and inform the Board of Directors without delay of any non-compliance of the Company with the investment restrictions.

The Management Company may act as the management company of other open-ended collective investment schemes. The names of these other collective investment schemes are available upon request.

For its services, the Management Company shall receive remuneration as further described in the relevant Appendix to the Prospectus.

## **2. Conflicts of Interest**

For the purpose of identifying the types of conflict of interest that arise in the course of providing services and activities and whose existence may damage the interest of the Company, the Management Company will take into account, by way of minimum criteria, the question of whether the Management Company or a relevant person, or a person directly or indirectly linked by way of control to the Management Company, is in any of the following situations, whether as a result of providing collective portfolio management activities or otherwise:

- (a) the Management Company or that person is likely to make a financial gain, or avoid a financial loss, at the expense of the Company;
- (b) the Management Company or that person has an interest in the outcome of a service or an activity provided to the Company or another client or of a transaction carried out on behalf of the Company or another client or, which is distinct from the Company interest in that outcome;
- (c) the Management Company or that person has a financial or other incentive to favour the interest of another client or group of clients over the interests of the Company;
- (d) the Management Company or that person carries on the same activities for the Company and for another client or clients which are not UCITS; and
- (e) the Management Company or that person receives or will receive from a person other than the Company an inducement in relation to collective portfolio management activities provided to the Company, in the form of monies, goods or services, other than the standard commission or fee for that service.

When identifying any potential types of conflict of interests, the Management Company will take into account:

- (a) the interests of the Management Company, including those deriving from its belonging to a group or from the performance of services and activities, the interests of the clients and the duty of the Management Company towards the Company; as well as
- (b) the interests of two or more managed UCITS.

## **3. Best Execution**

The Management Company will act in the best interests of the managed Company when executing decision to deal on behalf of the managed Company in the context of the management of their portfolios. For that purpose the Management Company will take all reasonable steps to obtain the best possible results for the Company, taking into account price, costs, speed,

likelihood of execution and settlement, order size and nature, or any other consideration relevant to the execution of the order (best execution).

The relative importance of such factors will be determined by reference to the following criteria:

- (a) the objectives, investment policy and risks specific to the Company;
- (b) the characteristics of the order.

The summary description of the strategies referred to in that paragraph will be made available to the investors on [www.soderbergpartners.lu](http://www.soderbergpartners.lu).

#### **4. Central Administration Agent**

With the Company's consent, the management company has concluded an agreement (the "Administrative, Registrar and Transfer Agent Agreement") appointing UI efa S.A. as central administration and registrar and transfer agent.

The registered address of the Central Administration Agent is 2, rue d'Alsace, L-1122 Luxembourg, Grand Duchy of Luxembourg.

The Central Administration Agent will carry out all administrative duties related to the administration of the Company, including the calculation of the Net Asset Value of the Shares and the provision of accounting services to the Company. As Registrar and Transfer Agent, it will process all subscriptions, redemptions and transfers of shares and will register these transactions in the register of the Company.

#### **5. Depositary**

Pursuant to a depositary and paying agent services agreement (the "Depositary Agreement"), Skandinaviska Enskilda Banken AB (publ), Luxembourg Branch, registered with the Luxembourg trade and companies register under number B39819 and having its place of business at 4, rue Peternelchen, L-2370 Howald, a branch of Skandinaviska Enskilda Banken AB (publ), a credit institution incorporated in Sweden and registered with the Swedish Companies Registration Office under number 502032-9081 with its registered office in Stockholm, Sweden has been appointed as depositary of the Company (the "Depositary"). The Depositary will also provide paying agent services to the Company.

The Depositary has been appointed for the safe-keeping of the assets of the Company which comprises the custody of financial instruments, the record keeping and verification of ownership of other assets of the Company as well as the effective and proper monitoring of the Company's cash flows in accordance with the provisions of the Law, as amended from time to time, and the Depositary Agreement.

In addition, the Depositary shall also ensure that (i) the sale, issue, repurchase, redemption and cancellation of Shares are carried out in accordance with Luxembourg law and the Articles of Incorporation; (ii) the value of the Shares is calculated in accordance with Luxembourg law and the Articles of Incorporation; (iii) the instructions of the Management Company or the Company are carried out, unless they conflict with applicable Luxembourg law and/or the Articles of Incorporation; (iv) in transactions involving the Company's assets any consideration



is remitted to the Company within the usual time limits; and (v) the Company's incomes are applied in accordance with Luxembourg law and the Articles of Incorporation.

In compliance with the provisions of the Depositary Agreement and the Law, the Depositary may, subject to certain conditions and in order to effectively conduct its duties, delegate part or all of its safe-keeping duties in relation to financial instruments that can be held in custody and that are duly entrusted to the Depositary for custody purposes to one or more sub-depositaries, and/or in relation to other assets of the Fund all or part of its duties regarding the record keeping and verification of ownership to other delegates, as they are appointed by the Depositary from time to time.

The Depositary shall exercise all due skill, care and diligence as required by the Law in the selection and the appointment of any sub-custodian and/or other delegate to whom it intends to delegate parts of its tasks and has to continue to exercise all due skill, care and diligence in the periodic review and ongoing monitoring of any sub-custodian and/or other delegate to which it has delegated parts of its tasks as well as of the arrangements of the sub-custodian and/or other delegate in respect of the matters delegated to it. In particular, any delegation of custody tasks may only occur when the sub-custodian, at all times during the performance of the tasks delegated to it, segregates the assets of the Fund from the Depositary's own assets and from assets belonging to the sub-custodian in accordance with the Law.

Where the law of a third country requires that financial instruments are held in custody by a local entity and no local entity satisfies the delegation requirements of article 18bis, paragraph 3, lit. b) i) of the Law, the Depositary may delegate its functions to such local entity to the extent required by the law of that third country for as long as there are no local entities satisfying the aforementioned requirements.

The Depositary's liability shall not be affected by any such delegation to a sub-custodian unless otherwise stipulated in the Law and/or the Depositary Agreement.

An up-to-date list of these delegates can be found on the following webpage:

<http://sebgroupl.lu/siteassets/corporations-and-institutions/global-custody-network.pdf>

The Depositary is liable to the Company and to the investors for the loss of a financial instrument held in custody by the Depositary and/or a sub-custodian. In case of loss of such financial instrument, the Depositary has to return a financial instrument of an identical type or the corresponding amount to the Company or the Management Company without undue delay. In accordance with the provisions of the Law, the Depositary will not be liable for the loss of a financial instrument, if such loss has arisen as a result of an external event beyond its reasonable control, the consequences of which would have been unavoidable despite all reasonable efforts to the contrary.

The Depositary shall be liable to the Company and to the investors for all other losses suffered by them as a result of the Depositary's negligent or intentional failure to properly fulfil its duties in accordance with applicable law, in particular the Law and/or the Depositary Agreement.

In carrying out its functions the Depositary acts honestly, fairly, professionally and independently and solely in the interest of the investors. The Depositary is on an ongoing basis

analysing, based on applicable laws and regulations as well as its conflict of interest policy potential conflicts of interests that may arise while carrying out its functions.

When performing its activities, the Depositary obtains information relating to funds which could theoretically be misused (and thus raise potential conflict of interests issues) in relation to e.g. the interests of its other clients, whether engaging in trading in the same securities or seeking other services, particularly in the area of offering services competing with the interests of other counterparties used by the funds/fund managers, and the interests of the Depositary's employees in personal account dealings.

Consequently, to mitigate the potential conflicts of interest, it has been ensured that the activities of a depositary function are physically, hierarchically and systematically separated from other functions of the Depositary in order to establish information firewalls. Moreover, the depositary function has a mandate and a veto to approve or decline fund clients independent of other functions and has its own committees for escalation of matters connected to its role as a depositary, where other functions with potentially conflicting interests are not represented.

For further details on management, monitoring and disclosure of potential conflicts of interest please refer to Instruction for Handling of Conflicts of Interest in Skandinaviska Enskilda Banken AB (publ), Luxembourg Branch which can be found on the following webpage: <https://sebgrouplu/conflictsofinterest>

In order to avoid any potential conflicts of interest, irrespective of whether a given delegate is part of the SEB group or not, the Depositary exercise the same level of due skill, care and diligence both in relation to the selection and appointment as well as in the on-going monitoring of the relevant delegate. Furthermore, the conditions of any appointment of a delegate that is member of the SEB group will be negotiated at arm's length in order to ensure the interests of the investors. Should a conflict of interest occur and in case such conflict of interest cannot be neutralized, such conflict of interest as well as the decisions taken will be disclosed to the investors and the Prospectus revised accordingly. An up-to-date list of these delegates can be found on the following webpage:

<https://sebgrouplu/globalcustodynetwork>

The Management Company, the Company and the Depositary may terminate the Depositary Agreement at any time by giving ninety (90) days' notice in writing. In case of a voluntary withdrawal of the Depositary or of its removal by the Management Company or the Company, the Depositary must be replaced at the latest within two (2) months after the expiry of the aforementioned termination notice by a successor depositary to whom the Company's assets are to be delivered and who will take over the functions and responsibilities of the Depositary. If the Management Company does not name such successor depositary in time the Depositary may refuse to process any instructions, except for the delivery to the Company or the Management Company (or such other person, such as the new depositary, as is specified in instructions) of all the assets of the Fund entrusted to the Depositary and notify the CSSF of the situation. The Management Company will take the necessary steps, if any, to initiate the liquidation of the Company, if no successor depositary bank has been appointed within two (2) months after the expiry of the termination notice.

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## CHARGES & EXPENSES

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The Company shall bear the following expenses:

- all taxes which may be payable on the assets, income and expenses chargeable to the Company;
- standard brokerage fees and bank charges originating from the Company's business transactions;
- all fees due to the Board of Directors of the Company, the correspondent banks and to the Auditor;
- all fees due to any sub-paying agent, to representatives in foreign countries and any other agents,
- all fees due to the legal advisors or similar administrative charges, incurred by the Company, the Management Company and the Depositary for acting on behalf of the Shareholders;
- all reasonable expenses of the Board of Directors of the Company, the Management Company, the Central Administration Agent and the Depositary;
- all expenses connected with publications and the supply of information to Shareholders, in particular the cost of printing global certificates and proxy forms for general meetings for the Shareholders, the cost of publishing the issue and redemption prices, and also the cost of printing, the distribution of the annual and semi-annual reports, the Prospectus as well as the KID;
- all expenses involved in registering and maintaining the registration of the Company with all governmental agencies and stock exchanges;
- all expenses incurred in connection with its operation and its management (e.g. insurance and interests) also including all extraordinary and irregular expenses which are normally incurred by the Company.

All recurring expenses will be charged first against current income, then, should this not suffice, against realised capital gains, and, if necessary, against asset.

Any costs incurred by the Company, which are not attributable to a specific Compartment, will be charged to all Compartments in proportion to their net assets. Each Compartment will be charged with all costs or expenses directly attributable to it.

The Company shall pay out of the assets of each Compartment fees which shall cover the remuneration of the Management Company, the Central Administration Agent and the Depositary as further described in the relevant Appendix.

### **1. Total Expense Ratio**

This ratio expresses the sum of all costs and commissions charged on an ongoing basis to the Compartment's assets taken retrospectively as a percentage of the Compartment's average assets.

The latest calculated TER can be found in the Company's latest financial report.

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## TAXATION

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### 1. The Company

Under current law and practice, the Company is not liable to any Luxembourg income tax, nor are dividends paid by the Company liable to any Luxembourg withholding tax.

However, any Class reserved to retail investors is liable in Luxembourg to a "*taxe d'abonnement*" of 0.05% per annum of its net assets, such tax being payable quarterly and calculated on the total net asset value of each Class at the end of the relevant quarter.

Any Class reserved to institutional investors is liable in Luxembourg to a "*taxe d'abonnement*" of 0.01% per annum of their net assets. Such tax being payable quarterly and calculated on the total net asset value of each Class at the end of the relevant quarter.

For Compartments whose exclusive policy is the investment in money market instruments, qualify for the reduced "*taxe d'abonnement*" of 0.01% per annum.

No tax is payable in Luxembourg on realised or unrealised capital appreciation of the assets of the Company. Although the Company's realised capital gains, whether short- or long-term, are not expected to become taxable in another country, the Shareholders must be aware and recognise that such a possibility, though quite remote, is not totally excluded. The regular income of the Company from some of its securities as well as interest earned on cash deposits in certain countries may be liable to withholding taxes at varying rates, which normally cannot be recovered.

As a result of recent developments in EU law concerning the scope of the VAT exemption for management services rendered to investment funds, VAT on some of the fees paid out of the assets of the Company to remunerate service providers might be applied.

### 2. Shareholders

#### ***Taxation of Luxembourg resident shareholders***

##### *Individual shareholders*

Dividends and other payments derived from the Shares by resident individuals shareholders, who act in the course of the management of either their private wealth or their professional / business activity, are subject to income tax at the progressive ordinary rate (with a top effective marginal rate for the year 2011 of 41.34 per cent (42.14 per cent as from a taxable income of more than EUR 150.000 / EUR 300.000 for a household of 2 persons, including solidarity surcharge and a special crisis contribution). Under current Luxembourg tax laws, 50 per cent of the gross amount of dividends received by resident individuals from (i) a fully-taxable Luxembourg resident company limited by share capital (*société de capitaux*), (ii) a company limited by share capital (*société de capitaux*) resident in a State with which Luxembourg has concluded a double tax treaty and liable to a tax corresponding to Luxembourg corporate income tax or (iii) a company resident in a EU Member State and covered by Article 2 of the EU Parent-Subsidiary Directive is exempt from income tax.

A tax credit is as a rule granted for the 15 per cent withholding tax.

Capital gains realized on the disposal of the Shares by resident individual shareholders, who act in the course of the management of their private wealth, are not subject to income tax, unless said capital gains qualify either as speculative gains or as gains on a substantial participation. Capital gains are deemed to be speculative gains and are subject to income tax at ordinary rates if the Shares are disposed of within six months after their acquisition or if their disposal precedes their acquisition. A participation is deemed to be substantial where a resident individual shareholder holds, either alone or together with his spouse/partner and/or minor children, directly or indirectly at any time within the five years preceding the disposal, more than ten per cent of the share capital of the Company. Capital gains realized on a substantial participation more than six months after the acquisition thereof are subject to income tax according to the half-global rate method, (i.e. the average rate applicable to the total income is calculated according to progressive income tax rates and half of the average rate is applied to the capital gains realized on the substantial participation). A shareholder is also deemed to alienate a substantial participation if he acquired free of charge, within five years preceding the transfer, a participation that was constituting a substantial participation in the hands of the alienator (or the alienators in case of successive transfers free of charge within the same five-year period). A disposal may include a sale, an exchange, a contribution or any other kind of alienation of the Shares.

Capital gains realized on the disposal of the Shares by resident individual shareholders, who act in the course of their professional / business activity, are subject to income tax at ordinary rates. Taxable gains are determined as being the difference between the price for which the Shares have been disposed of and the lower of their cost or book value.

#### *Luxembourg resident corporate shareholders*

Dividends and other payments derived from the Shares by a Luxembourg fully-taxable resident company are subject to corporate income tax and municipal business tax, unless the conditions of the participation exemption regime, as described below, are satisfied.

Should the conditions of the participation exemption not be fulfilled, 50 per cent of the dividends received by a Luxembourg fully-taxable resident company from the Company are exempt from corporate income tax and municipal business tax. A tax credit is as a rule granted for the 15 per cent withholding tax and any excess may be refundable.

Under the participation exemption regime, dividends derived from the Shares by a Luxembourg fully-taxable resident company may be exempt from income tax if cumulatively (i) the shareholder is a Luxembourg resident fully-taxable company and (ii) at the time the dividend is put at the shareholder's disposal, the shareholder has held or commits itself to hold for an uninterrupted period of at least 12 months a Qualified Shareholding in the Company. Liquidation proceeds are assimilated to receive dividends for the purpose of the participation exemption and may be exempt under the same conditions. Shares held through a fiscally transparent entity are considered as being a direct participation proportionally to the percentage held in the net assets of the transparent entity.

Capital gains realized by a Luxembourg fully-taxable resident company on the Shares are subject to income tax at ordinary rates, unless the conditions of the participation exemption regime, as described below, are satisfied. Taxable gains are determined as being the difference between the price for which the Shares have been disposed of and the lower of their cost or book value.

Under the participation exemption regime, capital gains realized on the Shares by a Luxembourg fully-taxable resident company may be exempt from income tax at the level of the shareholder if cumulatively (i) the shareholder is a Luxembourg resident fully-taxable company and (ii) at the time the capital gain is realized, the shareholder has held or commits itself to hold for an uninterrupted period of at least 12 months Shares representing a direct participation (a) in the share capital of the Company of at least ten per cent or (b) of an acquisition price of at

least EUR six million. Shares held through a fiscally transparent entity are considered as being a direct participation proportionally to the percentage held in the net assets of the transparent entity.

#### *Tax exempt shareholders*

A shareholder who is either (i) an undertaking for collective investment subject to the amended law of 20 December 2002 or the law of 17 December 2010, (ii) a specialized investment fund governed by the law of 13 February 2007, or (iii) a family wealth management company governed by the law of 11 May 2007, is exempt from income tax in Luxembourg. Dividends derived from and capital gains realized on the Shares are thus not subject to income tax in their hands.

#### ***Taxation of Luxembourg non-residents shareholders***

Non-resident shareholders who have neither a permanent establishment nor a permanent representative in Luxembourg to which or whom the Shares are attributable are generally not liable to any Luxembourg income tax, whether they receive payments of dividends or realize capital gains upon sale of Shares, except for a potential withholding tax (see above) and/or capital gains realised on a substantial participation (see above) (i) before the acquisition or within the first six months of the acquisition thereof or (ii) when the beneficiary was a Luxembourg tax resident for more than 15 years and became a non-resident less than 5 years prior to the realization of the said capital gains that are subject to income tax in Luxembourg at ordinary rates (subject to the provisions of an applicable double tax treaty).

Dividends received by a Luxembourg permanent establishment or permanent representative, as well as capital gains realised on the Shares, are subject to Luxembourg income tax, unless the conditions of the participation exemption regime are satisfied i.e. if cumulatively (i) the Shares are attributable to a qualified permanent establishment ("**Qualified Permanent Establishment**") and (ii) at the time the dividend is put at the disposal of the Qualified Permanent Establishment, it has held or commits itself to hold for an uninterrupted period of at least 12 months a Qualified Shareholding. A Qualified Permanent Establishment means (a) a Luxembourg permanent establishment of a company covered by Article 2 of the EU Parent-Subsidiary Directive, (b) a Luxembourg permanent establishment of a company limited by share capital (*société de capitaux*) resident in a State having a tax treaty with Luxembourg and (c) a Luxembourg permanent establishment of a company limited by share capital (*société de capitaux*) or a cooperative society (*société coopérative*) resident in the European Economic Area other than a EU Member State. If the conditions of the participation exemption are not fulfilled, 50 per cent of the gross amount of dividends received by a Luxembourg permanent establishment or permanent representative is exempt from income tax. A tax credit is further granted for the 15 per cent withholding tax.

Under the participation exemption regime, capital gains realized on the Shares may be exempt from income tax if cumulatively (i) the Shares are attributable to a Qualified Permanent Establishment and (ii) at the time the capital gain is realized, the Qualified Permanent Establishment has held or commits itself to hold for an uninterrupted period of at least twelve months Shares representing a direct participation in the share capital of the Company (a) of at least ten per cent or (b) of an acquisition price of at least EUR six million.

#### *Inheritance tax and gift tax*

Under Luxembourg tax law, where an individual shareholder is a resident of Luxembourg for inheritance tax purposes at the time of his/her death, the Shares are included in his or her taxable basis for inheritance tax purposes. On the contrary, no inheritance tax is levied on the transfer of the Shares upon death of a shareholder in cases where the deceased was not a resident of Luxembourg for inheritance purposes.

### ***EU Savings Directive***

Under the Luxembourg laws dated 21 June 2005 implementing Council Directive 2003/48/EC of 3 June 2003 on taxation of savings income in the form of interest payments (“**EU Savings Directive**”), as amended by the Luxembourg law of 25 November 2014 concerning the procedure applicable to the exchange of tax information upon request, (together referred to as the “**Laws**”), and several agreements concluded between Luxembourg and certain dependent and associated territories of the European Union (the “**Associated Territories**”), a Luxembourg paying agent (within the meaning of article 4.1 of the EU Savings Directive) is required to provide the LTA with information on payments of interest and other similar income paid by it to (or under certain circumstances, to the benefit of) an individual or a residual entity in the meaning of article 4.2. of the EU Savings Directive (i.e. an entity (i) without legal personality (except for a Finnish *avoin yhtiö* and *kommandiittiyhtiö/öppet bolag* and *kommanditbolag* and a Swedish *handelsbolag* and *kommanditbolag*) and (ii) whose profits are not taxed under the general arrangements for the business taxation and (iii) which is not, or has not opted to be considered as, an undertaking for collective investment in transferable securities (“**UCITS**”) authorised in accordance with Council Directive 2009/65/EC (namely the **Residual Entities**”), resident or established in another EU Member State than Luxembourg. The LTA then communicates such information to the competent authority of such EU Member State.

The same regime applies to payments to individuals or Residual Entities resident or established in one of the following Associated Territories: Aruba, British Virgin Islands, Curacao, Guernsey, Isle of Man, Jersey, Montserrat and Sint Maarten.

The EU Savings Directive has been repealed by Council Directive of 2015/2060 of 10 November 2015 with effect from 1 January 2016. However, for a transitional period, the EU Savings Directive shall continue to apply and notably regarding reporting obligations and scope of information to be provided by the Luxembourg paying agent (within the meaning of the EU Savings Directive) and regarding obligations of the Member States in respect of the issuance of the tax residence certificate and elimination of double taxation. As a consequence of the repeal of the EU Savings Directive, the Laws will no longer apply, save for the provisions related to the above mentioned obligations and within the transitional period foreseen by the said Council Directive.

On 9 December 2014, the Council of the European Union adopted Directive 2014/107/EU amending Directive 2011/16/EU of 15 February 2011 on administrative cooperation in the field of taxation which now provides for an automatic exchange of financial account information between EU Member States (“**DAC Directive**”), including income categories contained in the EU Savings Directive. The adoption of the aforementioned directive implements the CRS and generalises the automatic exchange of information within the European Union as of 1 January 2016.

Thus, the measures of cooperation provided by the EU Savings Directive are to be replaced by the implementation of the DAC Directive which is also to prevail in cases of overlap of scope. As Austria has been allowed to start applying the DAC Directive up to one year later than other Member States, special transitional arrangements taking account of this derogation apply to Austria.

In addition, Luxembourg signed the OECD’s multilateral competent authority agreement (“**Multilateral Agreement**”) to automatically exchange information under the CRS. Under this Multilateral Agreement, Luxembourg will automatically exchange financial account information with other participating jurisdictions as of 1 January 2016.

The Luxembourg law of 18 December 2015 relating to the automatic exchange of information in tax matters that implements the DAC Directive and the Multilateral Agreement in Luxembourg has been published in the official journal on 24 December 2015 and is effective as from 1 January 2016.

Shareholders should get information about, and where appropriate take advice on, the impact of the changes to the EU Savings Directive, the implementation of the DAC Directive and the Multilateral Agreement in Luxembourg and in their country of residence on their investment.

### ***FATCA***

The United States HIRE Act was adopted in March 2010. It includes provisions generally known as FATCA.

The intention of these is that details of Specified US Persons holding assets outside the US will be reported by financial institutions to the IRS as a safeguard against US tax evasion. As a result of the HIRE Act, and to discourage non-US Financial Institutions from staying outside this regime, all US securities held by a Financial Institution that does not enter and comply with the regime will in principle be subject to a US tax withholding of 30 per cent on gross sales proceeds as well as income.

On 28 March 2014, Luxembourg has signed an IGA with the United States, in order to facilitate compliance of Luxembourg Financial Institutions, such as the Company, with FATCA and avoid the above-described US withholding tax. Under the Luxembourg Law of 24 July 2015 transposing such IGA in relation to FATCA on 28 March 2014 (the “**FATCA Law**”), Luxembourg Financial Institutions will provide the Luxembourg tax authorities with information on the identity and the investments of and the income received by their investors that are Specified US Persons or, in case of a Non-US Entity being a Shareholder, on the status of any Controlling Person as a Specified US Person. The Luxembourg tax authorities will then automatically pass the information on to the IRS. Such reporting is, however, not required in case the Luxembourg Financial Institution can rely on a specific exemption or a deemed-compliant category contained in the FATCA Law.

The Company therefore, as a Luxembourg Reporting Financial Institution, requires all Shareholders to provide mandatory documentary evidence on their status as a Specified US Person or, in case of a Non-US Entity being a Shareholder, on the status of any Controlling Person as a Specified US Person. Under the FATCA Law, the Company will be required to, inter alia, disclose the name, address and taxpayer identification number of these Specified US persons that own, directly or indirectly, interests in the Company, as well as information on the balance or value of the direct or indirect interest owned in the Company by such Specified US Persons, and on any amounts directly or indirectly paid by the Company to such Specified US Persons.

Company’s ability to satisfy its obligations under the FATCA Law will depend on each Shareholder in the Company providing the Company with any information, including information concerning the direct or indirect owners of such Shareholder, that the Company determines is necessary to satisfy such obligations. Each Shareholder agrees to provide such information upon request by the Company.

A Shareholder that fails to comply with such documentation requests may be charged with any taxes or penalties imposed on the Company attributable to such Shareholder’s non-compliance under the FATCA Law, and the Company may, in its sole discretion, redeem such Shares.

Despite anything else herein contained and as far as permitted by Luxembourg law, the Company shall have the right to: (i) withhold on any payment to Shareholders an amount equal to any taxes or similar charges required by applicable laws and regulations to be withheld in respect of certain shareholding in the Company, (ii) delay payments to certain Shareholders, including any dividend or redemption proceeds, until the Company holds sufficient information to comply with the FATCA Law and/or determine the amount to be withheld.

While the Company will make all reasonable efforts to seek documentation from Shareholders to comply with these rules and to allocate any taxes or penalties imposed or required to be deducted under the FATCA Law to Shareholders whose non-compliance caused the imposition



or deduction of the tax or penalty, it cannot be excluded that other complying Shareholders in the Company may be affected by the presence of such non-complying Shareholders.

All prospective investors and Shareholders are advised to consult with their own tax advisors regarding the possible implications of FATCA on their investment in the Company.

#### *Common Reporting Standard*

The Company may be subject to the Standard for Automatic Exchange of Financial Account Information in Tax Matters and its Common Reporting Standard (“**CRS**”) as set out in the Luxembourg law on the Common Reporting Standard (the “**CRS Law**”).

Under the terms of the CRS Law, the Company is likely to be treated as a Luxembourg Reporting Financial Institution. As such, as of 30 June 2017 and without prejudice to other applicable data protection provisions as set out in the Company documentation, the Company will be required to annually report to the Luxembourg tax authorities personal and financial information related, *inter alia*, to the identification of, holdings by and payments made to (i) investors that are reportable persons under the CRS Law, and (ii) Controlling Persons (as defined below) of certain non-financial entities which are themselves reportable persons. This information, as exhaustively set out in the CRS Law, will include personal data related to the reportable persons (the “**CRS Information**”).

The Company’s ability to satisfy its reporting obligations under the CRS Law will depend on each investor providing the Company with the required CRS Information, as explained above, along with the required supporting documentary evidence. In this context, the investors are hereby informed that, as data controller, the Company will process such CRS Information for the purposes as set out in the CRS Law. The investors undertake to inform their controlling persons, if applicable, of the processing of their CRS Information by the Company.

For the purposes of this section, “Controlling Person” means the natural persons who exercise control over an entity. In the case of a trust, the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, and any other natural person(s) exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term “Controlling Persons” must be interpreted in a manner consistent with the Financial Action Task Force Recommendations.

Investors are further informed that the CRS Information related to reportable persons within the meaning of the CRS Law will be disclosed to the Luxembourg tax authorities annually for the purposes set out in the CRS Law. In particular, reportable persons are informed that certain operations performed by them will be reported to them through the issuance of statements, and that part of this information will serve as a basis for the annual disclosure to the Luxembourg tax authorities. Similarly, investors undertake to inform the Company within thirty (30) days of receipt of these statements should any personal data not be accurate. The investors further undertake to immediately inform the Company of and provide the Company with all supporting documentary evidence of any changes related to the CRS Information after occurrence of such changes. Any investor that fails to comply with the Company’s CRS Information or documentation requests may be held liable for penalties imposed on the Company and attributable to such investor’s failure to provide the Information or subject to disclosure of the CRS Information by the Company to the Luxembourg tax authorities.

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## GENERAL INFORMATION

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### 1. Organisation

The Company is an investment company organised as a *société anonyme* under the laws of the Grand-Duchy of Luxembourg and qualifies as a *société d'investissement à capital variable* (SICAV) subject to Part I of the Law. The Company was initially incorporated on 24 November 2011. The articles of incorporation were published in the *Memorial C, Recueil des Sociétés et Associations*, on 4 February 2012. The Company is registered with the Luxembourg Trade and Companies' Register under number B 165 541.

**The minimum capital of the Company required by Luxembourg law shall be the equivalent in SEK of 1,250,000 EUR.**

### 2. The Shares

Shares will be issued in registered form. Fractional entitlements to Shares will be rounded to 2 decimal places. Subject to the restrictions described herein, Shares in each Compartment are freely transferable and are each entitled to participate equally in the profits and liquidation proceeds attributable to each Class of the relevant Compartment. The rules governing such allocation are set forth under 5. "Allocation of Assets and Liabilities among the Compartments".

The Shares, which are of no par value and which must be fully paid upon issue, carry no preferential or pre-emptive rights and each one is entitled to one vote at all meetings of Shareholders. Shares redeemed by the Company become null and void.

Should the Shareholders, at an annual general meeting, decide any distributions in respect of distribution Shares (if issued) these will be paid within one month of the date of the annual general meeting. Under Luxembourg law, no distribution may be decided as a result of which the net assets of the Company would become less than the minimum provided for under Luxembourg law.

### 3. Meetings

The annual general meeting of Shareholders shall be held, within five (5) months of the end of each financial year, at the registered office of the Company in Luxembourg, and notices will be sent to the holders of registered Shares recorded by the transfer agent in the Share register of the Company by post at least 8 days prior to the meeting at their addresses shown on the register of Shareholders. Such notices will include the agenda and will specify the time and place of the meeting and the conditions of admission. They will also refer to the rules of quorum and majorities required by Luxembourg law and laid down in Articles 67 and 67-1 of the Luxembourg law of 10 August 1915 on commercial companies (as amended) and in the Articles of the Company.

Each Share confers the right to one vote. The vote on the payment of a dividend on a particular Class requires a separate majority vote from the meeting of Shareholders of the Class concerned. Any change in the Articles affecting the rights of a Compartment must be approved by a resolution of both the general meeting of the Company and the Shareholders of the Compartment concerned.

The Board of Directors draws the investors' attention to the fact that any investor will only be able to fully exercise his investor rights directly against the Company, notably the right to participate in general shareholders' meetings if the investor is registered himself and in his own

name in the shareholders' register of the Company. In cases where an investor invests in the Company through an intermediary investing into the Company in his own name but on behalf of the investor, it may not always be possible for the investor to exercise certain shareholder rights directly against the Company. Investors are advised to take advice on their rights.

#### **4. Reports and Accounts**

Audited annual reports shall be published within 4 months following the end of the accounting year and unaudited semi-annual reports shall be published within 2 months following the period to which they refer. The annual and semi-annual reports shall be made available at the registered offices of the Company, the Depository, the representatives and paying agents during ordinary office hours. The Company's accounting year ends on 31 December each year..

The Reference Currency of the Company is the SEK. The aforesaid reports will comprise consolidated accounts of the Company expressed in SEK as well as individual information on each Compartment expressed in the Reference Currency of each Compartment.

#### **5. Allocation of assets and liabilities among the Compartments**

For the purpose of allocating the assets and liabilities between the Compartments, the Board of Directors has established a pool of assets for each Compartment in the following manner:

- (a) the proceeds from the issue of each Share of each Compartment are to be applied in the books of the Company to the pool of assets established for that Compartment and the assets and liabilities and income and expenditure attributable thereto are applied to such pool subject to the provisions set forth hereafter;
- (b) where any asset is derived from another asset, such derivative asset is applied in the books of the Company to the same pool as the asset from which it was derived and on each revaluation of an asset, the increase or diminution in value is applied to the relevant pool;
- (c) here the Company incurs a liability which relates to any asset of a particular pool or to any action taken in connection with an asset of a particular pool, such liability is allocated to the relevant pool;
- (d) in the case where any asset or liability of the Company cannot be considered as being attributable to a particular pool, such asset or liability is allocated to all the pools in equal parts or, if the amounts so justify, pro rata to the net asset values of the relevant Compartments;
- (e) upon the payment of dividends to the holders of Shares in any Compartment, the net asset value of such Compartment shall be reduced by the amount of such dividends.

If there have been created within each Compartment different classes of Shares, the rules shall mutatis mutandis apply for the allocation of assets and liabilities amongst Classes.

#### **6. Determination of the net asset value of Shares**

The net asset value of Shares of each Compartment shall be expressed in the currency of the relevant Compartment. The net asset value shall be determined by the Central Administration Agent by dividing the net assets of the Company attributable to each Compartment by the number of outstanding Shares of that Compartment.

The Central Administration Agent calculates the net asset value per Share in each Compartment on the Valuation Day as defined in the Appendix of the Prospectus.

The calculation of the net asset value of the Shares of any Compartment and the issue, redemption, and conversion of the Shares of any Compartment may be suspended in the following circumstances, in addition to any circumstances provided for by law:

- during any period (other than ordinary holidays or customary weekend closings) when any market or stock exchange is closed which is the principal market or stock exchange for a significant part of the Compartment's investments, or in which trading is restricted or suspended;
- during any period when an emergency exists as a result of which it is impossible to dispose of investments which constitute a substantial portion of the assets of the Compartment, or it is impossible to transfer money involved in the acquisition or disposal of investments at normal rates of exchange, or it is impossible to fairly determine the value of any assets in the Compartment;
- during any breakdown in the means of communication normally employed in determining the price of any of the Compartment's investments or the current prices on any stock exchange;
- when for any reason beyond the control of the Board of Directors, the prices of any investment held by the Compartment cannot be reasonably, promptly or accurately ascertained;
- during any period when remittance of money which will or may be involved in the purchase or sale of any of the Compartment's investments cannot, in the opinion of the and/or the Board of Directors, be effected at normal rates of exchange
- when there is a suspension of the net asset value calculation or of the issue, redemption or conversion rights by the investment fund(s) in which the Company or a Compartment is invested;
- following the suspension of the net asset value calculation and/or the issue, redemption and conversion at the level of a master fund in which the Company or a Compartment invests as a feeder fund;
- following a possible decision of the board of directors (i) to convene an extraordinary general meeting of shareholders for the purpose of dissolving and liquidating the Company or (ii) to inform them about the termination and liquidation of a Compartment or class of shares, and (iii) more generally, during the process of liquidation of the Company, a Compartment or class of shares;
- during the process of establishing exchange ratios in the context of a merger, a contribution of assets, an asset or share split or any other restructuring transaction;
- during any period when the dealing of the shares of the Company or Compartment or class of shares on any relevant stock exchange where such shares are listed is suspended or restricted or closed; and
- in exceptional circumstances, whenever the board of directors considers it necessary in order to avoid irreversible negative effects on the Company, a Compartment or class of shares, in compliance with the principle of fair treatment of shareholders in their best interests.

The suspension of the calculation of the net asset value and of the issue, redemption, and conversion of shares shall be published in a daily newspaper in Luxembourg and in another newspaper generally circulating in jurisdictions in which the Company is registered and/or communicated to shareholders as required by applicable laws and regulations.

The value of the assets of each Class of Shares of each Compartment is determined as follows:

- A) The assets of the Company contain the following:

- 1) all fixed-term deposits, money market instruments, cash in hand or cash expected to be received or cash contributions including interest accrued;
  - 2) all debts which are payable upon presentation as well as all other money claims including claims for purchase price payment not yet fulfilled that arise from the sale of investment fund Shares or other assets;
  - 3) all investment fund Shares;
  - 4) all dividends and distributions due in favour of the Company, as far as they are known to the Company;
  - 5) all interest accrued on interest-bearing securities that the Company holds, as far as such interest is not contained in the principal claim;
  - 6) all financial rights which arise from the use of derivative instruments;
  - 7) the provisional expenses of the Company, as far as these are not deducted, under the condition that such provisional expenses may be amortised directly from the capital of the Company;
  - 8) all other assets of what type or composition, including prepaid expenses.
- B) The value of such assets is fixed as follows:
- 1) investment funds are valued at their net asset value or bid price, if bid and offer prices are quoted;
  - 2) liquid assets are valued at their nominal value plus accrued interest;
  - 3) fixed term deposits are valued at their nominal value plus accrued interest. Fixed term deposits with an original term of more than 30 days can be valued at their yield adjusted price if an arrangement between the Company and the bank, with which the fixed term deposit is invested has been concluded including that the fixed term deposits are terminable at any time and the yield adjusted price corresponds to the realisation value;
  - 4) securities, including money market instruments or financial instruments admitted for official listing on a Regulated Market are valued on the basis of the last available price at the time when the valuation is carried out. If the same security is quoted on a Regulated Markets, the quotation on the principal market for this security will be used. If there is no relevant quotation or if the quotations are not representative of the fair value, the evaluation will be made in good faith by the Board of Directors or their delegate with a view to establishing the probable bid price for such securities;
  - 5) unlisted securities, including money market instruments, or financial instruments are valued on the basis of their probable bid price as determined by the Board of Directors or their delegate using valuation principles which can be examined by the auditor of the Company, in order to reach a proper and fair valuation of the total assets of each Compartment;
  - 6) where permitted under applicable laws and regulations, money market instruments may be valued using an amortisation method whereby instruments are valued at their acquisition cost as adjusted for amortisation of premium or accrual of discount on a constant basis until maturity, regardless of the impact of fluctuating interest rates on the market value of the instruments. The amortisation method will only be used if it is not expected to result in a material discrepancy between the market value of the instruments and their value calculated according to the amortisation method;
  - 7) Financial derivative instruments which are quoted, listed or traded on an exchange or regulated market will be valued at the last available closing or settlement price or

quotation, prior to the time of valuation, on the exchange or regulated market where the instruments are primarily quoted, listed or traded. Where instruments are quoted, listed or traded on more than one exchange or regulated market, the Board of Directors will determine on which exchange or regulated market the instruments are primarily quoted, listed or traded and the closing or settlement prices or quotations on such exchange or regulated market will be used for the purpose of their valuation. Financial derivative instruments for which closing or settlement prices or quotations are not available or representative will be valued at their probable realisation value estimated with care and in good faith by the Board of Directors using any valuation method approved by the Board of Directors.

- 8) financial derivative instruments which are traded 'over-the-counter' (OTC) will be valued daily at their fair market value, on the basis of valuations provided by the counterparty which will be approved or verified on a regular basis independently from the counterparty. Alternatively, OTC financial derivative instruments may be valued on the basis of independent pricing services or valuation models approved by the Board of Directors which follow international best practice and valuation principles. Any such valuation will be reconciled to the counterparty valuation on a regular basis independently from the counterparty, and significant differences will be promptly investigated and explained.
- 9) any other assets are valued on the basis of their probable bid price as determined by the Board of Directors or their delegate using valuation principles which can be examined by the auditor of the Company, in order to reach a proper and fair valuation of the total assets of each Compartment;
- 10) in the event that it is impossible or incorrect to carry out a valuation in accordance with the above rules owing to particular circumstances, the Board of Directors or their delegate shall be entitled to use other generally recognised valuation principles which can be examined by an auditor, in order to reach a pro-per valuation of the total assets of each Compartment.

The Board of Directors may adjust the value of any asset if the Board of Directors determines that such adjustment is required to reflect the fair value thereof. The net asset value may also be adjusted to reflect certain dealing charges if need be as more fully described in the Prospectus.

- C) The liabilities of the Company contain the following:
- 1) all loans, bills of exchange and other sums due, including deposits of security such as margin accounts, etc. in connection with the use of derivative instruments; and
  - 2) all administrative expenses that are due or have been incurred, including the costs of formation and registration at the registration offices as well as legal fees, auditing fees, all fees of the Management Company, the Central Administration Agent, the Investment Manager, the Depositary and all other representatives and agents of the Company, the costs of mandatory publications, the Prospectus and the KID, conclusions of transactions and other documents which are made available to the Shareholders. If the fee rates agreed between the Company and the employed service providers (such as the Management Company or the Central Administration Agent) for such services deviate with regard to individual Classes, the corresponding varying fees shall be charged exclusively to the respective Class; and
  - 3) all known liabilities, whether due or not, including dividends that have been declared but not yet been paid; and
  - 4) a reasonable sum provided for taxes, calculated as of the day of the valuation as well as other provisions and reserves approved by the Board of Directors; and

- 5) all other liabilities of the Company, of whatever nature, vis-à-vis third parties; however, each Compartment shall be exclusively responsible for all debts, liabilities and obligations attributable to it.

For the purpose of valuing its liabilities, the Company may include all administrative and other expenses of a regular or periodic nature by valuing these for the entire year or any other period and apportioning the resulting amount proportionally to the respective expired period of time. The method of valuation may only apply to administrative or other expenses which concern all of Shares equally.

D) For the purpose of valuation within the scope of this chapter, the following applies:

- 1) Shares that are redeemed in accordance with the provisions under “ISSUE, REDEMPTION AND CONVERSION OF SHARES” above shall be treated as existing Shares and shall be posted until immediately after the point in time set by the Board of Directors for carry out the valuation; from this point in time until the price is paid, they shall be treated as a liability of the Company; and
- 2) all investments, cash in hand and other assets of any fixed assets that are not in the denomination of the Share Class concerned shall be converted at the exchange rate applicable on the day of the calculation of net asset value, taking into consideration their market value; and
- 3) on every Valuation Day, all purchases and sales of securities which were contracted by the Company on this very Valuation Day must be included in the valuation to the extent possible.

## **7. Liquidation of Compartments or Classes of Shares**

The Board of Directors may decide to liquidate any Compartment if a change in the economic or political situation relating to the Compartment concerned would justify such liquidation or if required by the interests of the Shareholders of any of the Compartments concerned. The decision of the liquidation will be notified to the Shareholders concerned prior to the effective date of the liquidation and the notification will indicate the reasons for, and the procedures of, the liquidation operations. Unless the Board of Directors otherwise decides in the interests of the Shareholders of the Compartment concerned, they may continue to request redemption or conversion of their Shares on the basis of the applicable net asset value, taking into account the estimated liquidation expenses. Assets which could not be distributed to their beneficiaries upon the close of the liquidation of the Compartment will be deposited with the *Caisse de Consignation* on behalf of their beneficiaries.

Termination of a Compartment by compulsory redemption of its Shares for a reason other than those mentioned in the preceding paragraph, may be effected only upon its prior approval by the Shareholders of the Compartment to be terminated, at a duly convened Compartment's Shareholders meeting which may be validly held without a quorum and decide by a simple majority of the Shareholders of the relevant Compartment present or represented.

## **8. Merger and division of Compartment(s)**

Any Compartment may be merged, either as a merging Compartment or as a receiving Compartment, with another Compartment, or a foreign and/or a Luxembourg UCITS or Compartment thereof, in accordance with the definitions, procedures and conditions set out in the Law. The Board of Directors will be competent to decide on such a merger as well as on the effective date thereof.

The Board of Directors may also decide to proceed, in accordance with applicable laws and regulations, with the absorption by any Compartment, including by way of merger or by acceptance of a contribution in kind, from one or several Compartments of another Luxembourg

or foreign UCI (other than a UCITS) irrespective of its legal form. In case of a merger, the exchange ratio between the relevant shares of the relevant Compartment thereof and the shares or units of the absorbed UCI thereof will be calculated on the basis of the relevant net asset value per share or unit as of the effective date of the absorption. In the case of a contribution in kind, a report relating to the contributed assets must be delivered to the Compartment by an independent auditor (réviseur d'entreprises agréé) save as otherwise provided for under applicable laws. Any costs incurred in connection with a contribution in kind of other securities or assets shall be borne by the relevant shareholder(s) making the contribution, or by such other third party(ies) as agreed by the Company. In addition, the nature and type of assets to be accepted in any such case shall be determined by the Board of Directors and must correspond to the investment policy and restrictions of the relevant Compartment.

Any Compartment may also be merged, as a receiving Compartment, with another Luxembourg and/or foreign UCI (other than a UCITS) in accordance with the definitions, procedures and conditions set out in the Law. The Board of Directors will be competent to decide on such a merger as well as on the effective date thereof.

Insofar as the effective date of the merger requires the approval of the shareholders concerned by the merger pursuant to the provisions of the Law, the general meeting of shareholders deciding by simple majority of the votes cast by shareholders present or represented at the meeting, is competent to approve such an effective date of the merger. No quorum requirement will be applicable. In all cases, notice of the merger will be given to the shareholders. When the approval of shareholders is required, each shareholder of the relevant Compartments or Classes shall be given the possibility, within a period of one month as of the date of the sending, to request either the repurchase of its Shares, free of any charges, or the conversion of its Shares, free of any charges.

Subject to obtaining any prior necessary regulatory non-objection, the Board of Directors may decide on the division of any Compartment into two or more Compartments and/or into other compartments, in accordance with applicable laws and regulations. The Board of Directors will be competent to decide on such division and/or partial division as well as on the effective date thereof.

## **9. Consolidation and division of classes**

Subject to obtaining any prior necessary regulatory prior non-objection, the board of directors may decide on the division or consolidation of any class of any Compartment into two or more classes of any Compartment and/or into other share class(es), in accordance with applicable laws and regulations. The board of directors will be competent to decide on such consolidation and/or division as well as on the effective date thereof.



## **10. Liquidation of the Company**

The Company is incorporated for an unlimited period and liquidation shall normally be decided upon by an extraordinary general meeting of Shareholders. Such a meeting must be convened by the Board of Directors within 40 days if the net assets of the Company become less than two thirds of the minimum capital required by law. The meeting, for which no quorum shall be required, shall decide on the dissolution by a simple majority of Shares represented at the meeting. If the net assets fall below one fourth of the minimum capital, the dissolution may be resolved by Shareholders holding one fourth of the Shares at the meeting.

Should the Company be liquidated, such liquidation shall be carried out in accordance with the provisions of the Law which specifies the steps to be taken to enable Shareholders to participate in the liquidation distributions and in this connection provides for deposit in escrow at the Caisse de Consignation in Luxembourg of any such amounts which it has not been possible to distribute to the Shareholders at the close of liquidation. Amounts not claimed within the prescribed period are liable to be forfeited in accordance with the provisions of Luxembourg law. The net liquidation proceeds of each Compartment shall be distributed to the Shareholders of the relevant Compartment in proportion to their respective holdings.

## **11. Material Contracts**

The following material contracts have been entered into:

- (a) an agreement between the Company and Söderberg & Partners Asset Management S.A. pursuant to which the latter acts as management company of the Company. This Agreement is entered into for an unlimited period and may be terminated by either party upon three months written notice;
- (b) an agreement between the Company and Skandinaviska Enskilda Banken AB (publ), Luxembourg Branch pursuant to which the latter was appointed Depositary and Paying Agent. The Agreement is entered into for an unlimited period and may be terminated by either party upon three months' written notice;
- (c) an agreement between the Company, Söderberg & Partners Asset Management S.A. and UI efa S.A. pursuant to which the latter acts as Central Administration Agent of the Company. The Agreement is entered into for an unlimited period and may be terminated by either party upon ninety days' written notice.

## **12. Documents**

Copies of the contracts mentioned above are available for inspection, and copies of the Articles, the current Prospectus, the KID for the Compartments and the latest financial reports may be obtained free of charge during normal office hours at the registered office of the Company in Luxembourg, as well as on [www.soderbergpartners.lu](http://www.soderbergpartners.lu).

## **13. Complaints Handling**

Shareholders of each Compartment of the Company may file complaints free of charge with the Management Company in an official language of their home country.

Shareholders can access the complaints handling procedure on [www.soderbergpartners.lu](http://www.soderbergpartners.lu).

## APPENDIX – LIST OF COMPARTMENTS

The Compartments are the following:

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For the avoidance of doubt all the foregoing definitions of Section 1 “PRINCIPAL FEATURES” shall apply to the following Appendices.

In case of discrepancy or any inconsistency between provisions contained in the general part of the Prospectus and the Appendices, the provisions of the Appendices shall ever prevail over those of general part.

## **APPENDIX 1. SÖDERBERG & PARTNERS FUNDS – PROAKTIV 75 PM**

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs), index funds and hedge funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 75 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) in under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class C	Class S
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	4 February 2016	1 February 2019
<b>Initial Price</b>	SEK 100	SEK 159.68
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class C	Class S
<b>Management Company fee <sup>1</sup></b>	Up to 1.00 % per annum	Up to 1.75 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company Fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 2. SÖDERBERG & PARTNERS FUNDS – PROAKTIV 80 PM

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs), index funds and hedge funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 80 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) of under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class C	Class S
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	1 February 2019	1 February 2019
<b>Initial Price</b>	SEK 100	SEK 148.04
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class C	Class S
<b>Management Company fee <sup>1</sup></b>	Up to 1.00 % per annum	Up to 1.7 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

### APPENDIX 3. SÖDERBERG & PARTNERS FUNDS – PROAKTIV 85 S

#### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 85 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) of under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

#### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in a medium risk investment fund. The limited risk will also lead to a lower expected return compared to a high risk investment.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class C
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	12 April 2013	28 October 2014
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class C
<b>Management Company fee <sup>1</sup></b>	Up to 1.65 % per annum	Up to 1.00 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.



## APPENDIX 4. SÖDERBERG & PARTNERS FUNDS – PROAKTIV 90 S

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 90 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur. The Compartment is dedicated to investors willing to invest in a low risk investment fund, but it is not risk free. Due to the relatively low risk, the expected return will also be moderate.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class C
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	12 April 2013	28 October 2014
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class C
<b>Management Company fee <sup>1</sup></b>	Up to 1.4 % per annum	Up to 1.00 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## **APPENDIX 5. SÖDERBERG & PARTNERS FUNDS – TILLVÄXT 75**

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified exposure to global emerging markets, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 75 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK
<b>Launch Date</b>	23 March 2015	26 January 2018	29 May 2020
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D
<b>Management Company fee <sup>1</sup></b>	Up to 1.75 % per annum	Up to 1.35 % per annum	Up to 0.95 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 6. SÖDERBERG & PARTNERS FUNDS – PROAKTIV 75

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 75 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class C	Class D
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK	SEK
<b>Launch Date</b>	17 April 2015	26 January 2018	28 April 2015	29 May 2020
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class C	Class D
<b>Management Company fee <sup>1</sup></b>	Up to 1.75 % per annum	Up to 1.35 % per annum	Up to 1.00 % per annum	Up to 0.95 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 7. SÖDERBERG & PARTNERS FUNDS – PROAKTIV 80

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 80 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class C	Class D
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK	SEK
<b>Launch Date</b>	17 April 2015	26 January 2018	28 April 2015	29 May 2020
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class C	Class D
<b>Management Company fee <sup>1</sup></b>	Up to 1.7 % per annum	Up to 1.3 % per annum	Up to 1.0 % per annum	Up to 0.9 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.



## **APPENDIX 8.**

### **SÖDERBERG & PARTNERS FUNDS – PROAKTIV 85**

#### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 85 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

#### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in a medium risk investment fund. The limited risk will also lead to a lower expected return compared to a high risk investment.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class C	Class D
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK	SEK
<b>Launch Date</b>	17 April 2015	26 January 2018	28 April 2015	29 May 2020
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class C	Class D
<b>Management Company fee <sup>1</sup></b>	Up to 1.65 % per annum	Up to 1.25 % per annum	Up to 1.00 % per annum	Up to 0.85 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 9. SÖDERBERG & PARTNERS FUNDS – PROAKTIV 90

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) of under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 90 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur. The Compartment is dedicated to investors willing to invest in a low risk investment fund, but it is not risk free. Due to the relatively low risk, the expected return will also be moderate.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class C	Class D
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK	SEK
<b>Launch Date</b>	17 April 2015	26 January 2018	28 April 2015	29 May 2020
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class C	Class D
<b>Management Company fee <sup>1</sup></b>	Up to 1.4 % per annum	Up to 1.2 % per annum	Up to 1.0 % per annum	Up to 0.8 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company Fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 10. SÖDERBERG & PARTNERS FUNDS – CONTRARIAN 65

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to provide a good long-term return on the Shareholder's capital in combination with a risk management strategy.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The Compartment may also use derivatives such as futures, options and swaps as part of the investment strategy. The purpose of the derivatives used is to allow an equity exposure exceeding 100 percent at times of market stability as well as to protect the value of the portfolio in more turbulent market conditions. The purpose of the investment strategy is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has an objective of not falling below 65 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK
<b>Launch Date</b>	11 December 2015	26 January 2018	29 May 2020
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D
<b>Management Company fee</b> <sup>1</sup>	Up to 1.75 % per annum	Up to 1.35 % per annum	Up to 0.95 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 11. SÖDERBERG & PARTNERS FUNDS – ALTERNATIVE R5

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to provide a good long-term risk-adjusted return on the Shareholder's capital through very well diversified investments across several asset classes. The designation R5 in the name of the Compartment refers to the risk level in the Söderberg & Partners risk classification system. The risk of the Compartment should correspond to risk level 5 over the long term. This signifies a relatively high risk level.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs, including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The Compartment may also use derivatives such as futures, options and swaps as part of the investment strategy. The purpose is to gain cost-effective, well diversified exposure across asset classes, in order to secure a good long-term risk-adjusted return.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure broad diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. Since the Compartment targets a relatively high level of risk the portfolio will be more heavily weighted towards asset classes with a higher risk profile, such as equities, and it will not have large exposure to low risk asset classes, such as money market instruments.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D
Investor Restriction	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.
Currency	SEK	SEK	SEK
Launch Date	19 September 2018	19 September 2018	29 May 2020
Cut-Off Time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
Settlement day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D
Management Company fee <sup>1</sup>	Up to 1.45 % per annum	Up to 1.35 % per annum	Up to 0.95 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.



**APPENDIX 12.**  
**SÖDERBERG & PARTNERS FUNDS – ALTERNATIVE R2**

**Investment objective and policy of the Compartment**

The investment objective of this Compartment is to provide a good long-term risk-adjusted return, with a focus on preserving the Shareholder’s capital, through very well diversified investments across several asset classes. The designation R2 in the name of the Compartment refers to the risk level in the Söderberg & Partners risk classification system. The risk of the Compartment should correspond to risk level 2 over the long term. This signifies a relatively low risk level.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs, including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) of under 4. "Investment and Borrowing Restrictions" in the “Investment Policies and Restrictions” section in the main part of the Prospectus. The Compartment may also use derivatives such as futures, options and swaps as part of the investment strategy. The purpose is to gain cost-effective, well diversified exposure across asset classes, in order to secure a good long-term risk-adjusted return.

The purpose of the Compartment’s investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure broad diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. Since the Compartment targets a relatively low level of risk the portfolio will be more heavily weighted towards asset classes with a lower risk profile, such as money market instruments, and it will not have large exposure to high risk asset classes, such as equities.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the “Investment Policies and Restrictions” section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the “Investment Policies and Restrictions” section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

**Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under “Principal Features” above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur. The Compartment is dedicated to investors willing to invest in a low risk investment fund, but it is not risk free. Due to the relatively low risk, the expected return will also be moderate.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK
<b>Launch Date</b>	19 September 2018	19 September 2018	29 May 2020
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D
<b>Management Company fee</b> <sup>1</sup>	Up to 1.3 % per annum	Up to 1.2 % per annum	Up to 0.8 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 13. SÖDERBERG & PARTNERS FUNDS – AKTIV PÅVERKAN R5

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to provide a good long-term return on the Shareholder's capital through investments with a focus on sustainability. The designation R5 in the name of the Compartment refers to the risk level in the Söderberg & Partners risk classification system. The risk of the Compartment should correspond to risk level 5 over the long term. This signifies a relatively high risk level.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs, including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The Compartment may also invest in equity securities qualifying as transferable securities. The Compartment may also use derivatives such as futures, options and swaps as part of the investment strategy. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk. The Company may exercise voting rights attached to equity securities. Where such voting rights are exercised, these will be made in accordance with the investment objectives and policy of this Compartment.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value, while taking sustainability issues into consideration. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment will be primarily invested in securities which give exposure to equity markets in order to achieve a relatively high risk level.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D
Investor Restriction	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.
Currency	SEK	SEK	SEK
Launch Date	19 September 2018	19 September 2018	29 May 2020
Cut-Off Time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
Settlement day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D
Management Company fee <sup>1</sup>	Up to 1.45 % per annum	Up to 1.35 % per annum	Up to 0.95 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 14. SÖDERBERG & PARTNERS FUNDS – AKTIV PÅVERKAN R2

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate long-term return through investments with a focus on sustainability. The designation R2 in the name of the Compartment refers to the risk level in the Söderberg & Partners risk classification system. The risk of the Compartment should correspond to risk level 2 over the long term. This signifies a relatively low risk level.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs, including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The Compartment may also invest in equity securities qualifying as transferable securities. The Compartment may also use derivatives such as futures, options and swaps as part of the investment strategy. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk. The Company may exercise voting rights attached to equity securities. Where such voting rights are exercised, these will be made in accordance with the investment objectives and policy of this Compartment.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value, while taking sustainability issues into consideration. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment will be primarily invested in securities which give exposure to fixed income in order to achieve a relatively low risk level.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur. The Compartment is dedicated to investors willing to invest in a low risk investment fund, but it is not risk free. Due to the relatively low risk, the expected return will also be moderate.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D
Investor Restriction	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.
Currency	SEK	SEK	SEK
Launch Date	19 September 2018	19 September 2018	29 May 2020
Cut-Off Time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
Settlement day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D
Management Company fee <sup>1</sup>	Up to 1.3 % per annum	Up to 1.2 % per annum	Up to 0.8 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

**APPENDIX 15.**  
**SÖDERBERG & PARTNERS FUNDS – PROAKTIV 75 TL**

**Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder’s capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment’s assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment’s investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 75 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

**Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Intended for</b>	SEB Pension och Försäkring AB	SEB Pension och Försäkring AB
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	8 December 2021	8 December 2021
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B
<b>Management Company fee <sup>1</sup></b>	Up to 1.75 % per annum	Up to 1.35 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.



**APPENDIX 16.**  
**SÖDERBERG & PARTNERS FUNDS – PROAKTIV 80 TL**

**Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder's capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment's assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 80 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) in Section 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

**Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Intended for</b>	SEB Pension och Försäkring AB	SEB Pension och Försäkring AB
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	8 December 2021	8 December 2021
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B
<b>Management Company fee <sup>1</sup></b>	Up to 1.7 % per annum	Up to 1.3 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

**APPENDIX 17.**  
**SÖDERBERG & PARTNERS FUNDS – PROAKTIV 85 TL**

**Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder’s capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment’s assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment’s investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 85 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

**Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in a medium risk investment fund. The limited risk will also lead to a lower expected return compared to a high risk investment.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Intended for</b>	SEB Pension och Försäkring AB	SEB Pension och Försäkring AB
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	8 December 2021	8 December 2021
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B
<b>Management Company fee <sup>1</sup></b>	Up to 1.65 % per annum	Up to 1.25 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

**APPENDIX 18.**  
**SÖDERBERG & PARTNERS FUNDS – PROAKTIV 90 TL**

**Investment objective and policy of the Compartment**

The investment objective of this Compartment is to preserve the Shareholder’s capital and to provide an adequate rate of return on the investment.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs (both equity and fixed income funds), including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The Compartment’s assets may be invested in fund units, transferable securities, money-market instruments and accounts with credit institutions. The Compartment may also use futures contracts, options, swaps and other derivatives as part of the investment strategy. It may also use derivatives to make its management more efficient, for the purpose of reducing management costs and risks.

The purpose of the Compartment’s investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment has the objective of not falling below 90 per cent of the highest price achieved over a one-year period. Although every effort is made to achieve the investment objectives of the Compartment, no formal guarantee can be given as to whether the investment objectives will be achieved.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

**Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur. The Compartment is dedicated to investors willing to invest in a low risk investment fund, but it is not risk free. Due to the relatively low risk, the expected return will also be moderate.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors
<b>Intended for</b>	SEB Pension och Försäkring AB	SEB Pension och Försäkring AB
<b>Currency</b>	SEK	SEK
<b>Launch Date</b>	8 December 2021	8 December 2021
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B
<b>Management Company fee <sup>1</sup></b>	Up to 1.4 % per annum	Up to 1.2 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX 19. SÖDERBERG & PARTNERS FUNDS – DYNAMIC R5

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to provide a good long-term return on the Shareholder's capital, primarily through investments in global equity markets. The Compartment will also employ derivatives to provide some protection against extreme market movements. The designation R5 in the name of the Compartment refers to the risk level in the Söderberg & Partners risk classification system. The risk of the Compartment should correspond to risk level 5 over the long term. This signifies a relatively high risk level.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs, including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The Compartment may also invest in equity securities qualifying as transferable securities. The Compartment may also use derivatives such as futures, options and swaps as part of the investment strategy. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. The Compartment will be primarily invested in securities which give exposure to equity markets in order to achieve a relatively high risk level.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur, since the Compartment is dedicated to investors willing to invest in an aggressive investment fund.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D	Class S
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK	SEK
<b>Launch Date</b>	28 September 2022	28 September 2022	28 September 2022	TBD
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D	Class S
<b>Management Company fee <sup>1</sup></b>	Up to 1.45 % per annum	Up to 1.35 % per annum	Up to 0.95 % per annum	Up to 1.75 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.



## APPENDIX 20. SÖDERBERG & PARTNERS FUNDS – DYNAMIC R2

### **Investment objective and policy of the Compartment**

The investment objective of this Compartment is to provide an adequate long-term return on the Shareholder's capital, through investments in global equity and fixed-income markets. The Compartment will also employ derivatives to provide some protection against extreme market movements. The designation R2 in the name of the Compartment refers to the risk level in the Söderberg & Partners risk classification system. The risk of the Compartment should correspond to risk level 2 over the long term. This signifies a relatively low risk level.

The Compartment is a fund of funds that invests in units of other UCITS/UCIs, including Exchange Traded Funds (ETFs) and index funds meeting the criteria set out under I. (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus. The Compartment may also invest in equity securities qualifying as transferable securities. The Compartment may also use derivatives such as futures, options and swaps as part of the investment strategy. The purpose is to gain cost-effective, well diversified and global exposure, in order to secure a good long-term return at a limited risk.

The purpose of the Compartment's investments is, while observing due caution, to achieve the highest possible rise in value. The management aim is to ensure constant diversification among and within asset classes and across a large number of liquid markets, in order thereby to achieve a good spread of risk. Since the Compartment targets a relatively low level of risk the portfolio will be more heavily weighted towards asset classes with a lower risk profile, such as money market instruments, cash and securities which give exposure to fixed income.

The 10% limit of investment restriction VI. a) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus pursuant to which a Compartment cannot invest more than 10% of its net assets in aggregate in the units of UCITS and/or other UCIs is not applicable to this Compartment. The Compartment may acquire units of UCITS and/or other UCIs referred to in paragraph I) (1) c) under 4. "Investment and Borrowing Restrictions" in the "Investment Policies and Restrictions" section in the main part of the Prospectus provided that no more than 20% of the Compartment's net assets be invested in the units of a single UCITS or other UCI, and (ii) investments made in units of UCIs other than UCITS may not in aggregate exceed 30% of the net asset of the Compartment.

The Compartment is actively managed and is not managed in reference to a benchmark.

This Compartment has (E) environmental and (S) social characteristics according to Article 8 of the SFDR. This Compartment does not have a sustainable investment objective. **More information can be found in Appendix – Sustainability-related disclosures.**

### **Principal Adverse Impacts on Sustainability Factors**

The Sub-Fund considers Principle Adverse Impacts on Sustainability Factors through a series of PAI Indicators as defined under "Principal Features" above.

Information on Principle Adverse Impacts on Sustainability Factors is available in Appendix – Sustainability-related disclosures.

### Profile of the typical investor

The Compartment is most suitable for investors who have an investment horizon of at least five years. The Compartment investors must be able to accept that certain price fluctuations may occur. The Compartment is dedicated to investors willing to invest in a low risk investment fund, but it is not risk free. Due to the relatively low risk, the expected return will also be moderate.

### Form of Shares and Classes

The Share Classes of the Compartment will only be issued in registered form only on each Valuation Day, as further defined in the Prospectus.

Share Classes	Class A	Class B	Class D	Class S
<b>Investor Restriction</b>	Restricted to institutional investors	Restricted to institutional investors.	Restricted to institutional investors.	Restricted to institutional investors.
<b>Currency</b>	SEK	SEK	SEK	SEK
<b>Launch Date</b>	28 September 2022	28 September 2022	28 September 2022	TBD
<b>Cut-Off Time</b>	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time	15:00 Luxembourg time
<b>Settlement day</b>	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day	3 <sup>rd</sup> Business Day cob after Valuation Day

### Charges & Expenses

Share Classes	Class A	Class B	Class D	Class S
<b>Management Company fee <sup>1</sup></b>	Up to 1.3 % per annum	Up to 1.2 % per annum	Up to 0.8 % per annum	Up to 1.4 % per annum

<sup>1</sup> The Central Administration fee and the Depositary fee will be deducted from the Management Company fee. Such fees are determined in accordance with the applicable market standards in Luxembourg and are proportionate to the NAV of the Compartment.

## APPENDIX – SUSTAINABILITY-RELATED DISCLOSURES

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**APPENDIX SFDR 1.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 75 PM**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 75 PM  
**Legal entity identifier:** 52990017NLNTFONY4032

## 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?**

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

**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, anti-corruption and anti-bribery matters.

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 20 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

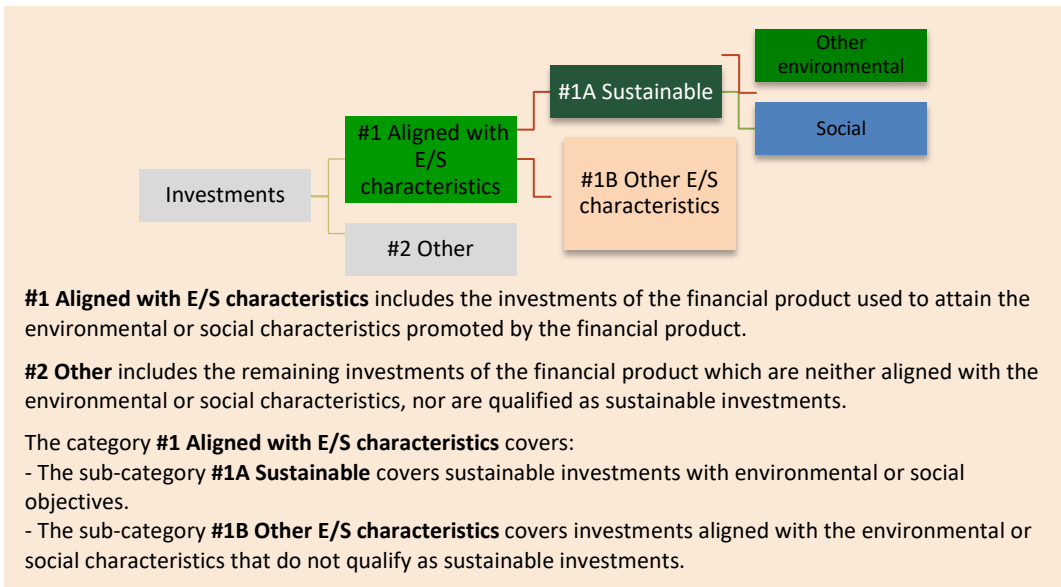
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

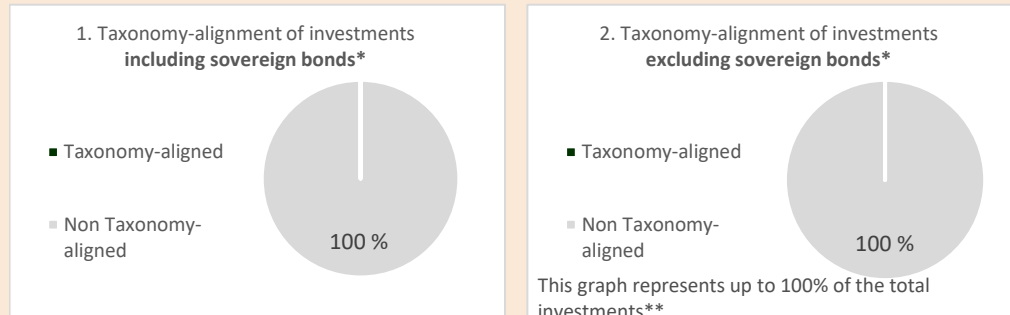
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-75-pm/](http://www.soderbergpartners.lu/our-funds/proaktiv-75-pm/)

**APPENDIX SFDR 2.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 80 PM**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 80 PM  
**Legal entity identifier:** 529900307WV4FGOLTR34

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 15 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

**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, anti-corruption and anti-bribery matters.

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 15 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

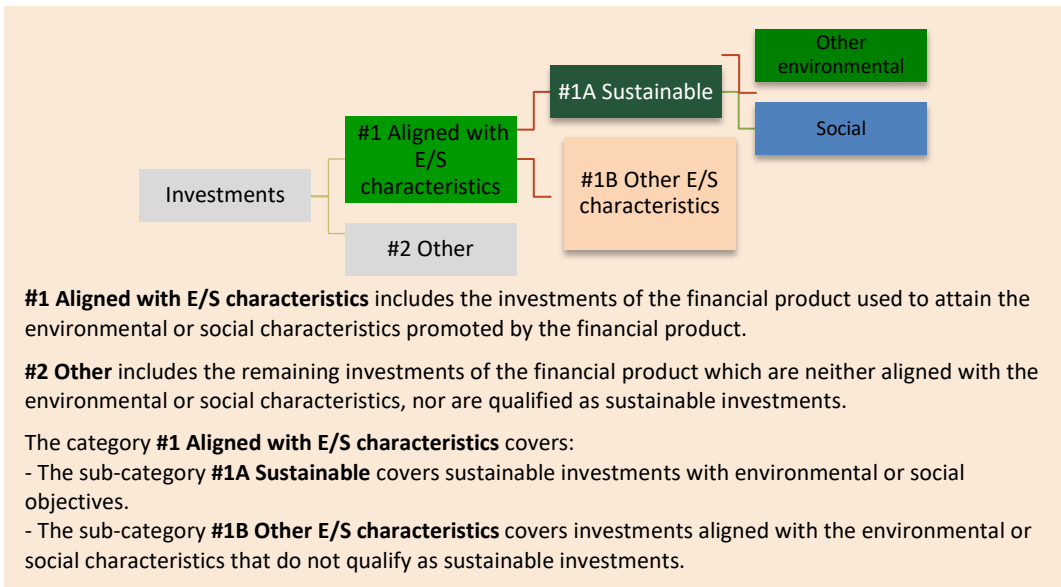
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

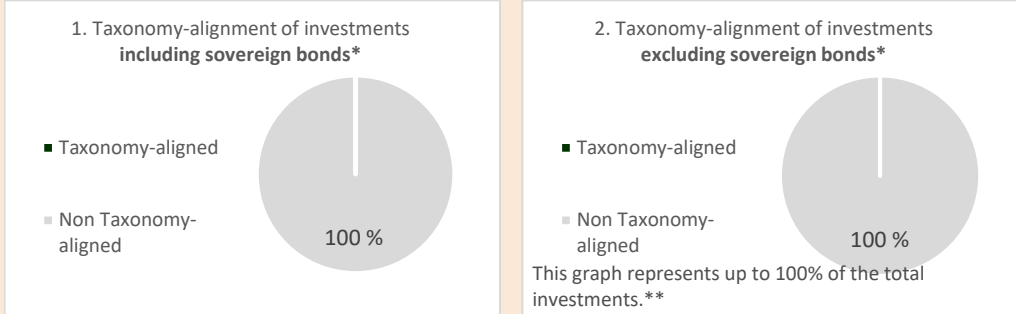
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.*

*\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.*

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-80-pm/](http://www.soderbergpartners.lu/our-funds/proaktiv-80-pm/)

**APPENDIX SFDR 3.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 85 S**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 85 S  
**Legal entity identifier:** 52990096U48JDI7B0V74

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“PAI process”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value (“NAV”) in investments that qualify as aligned with E/S characteristics (#1) and at least 10 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

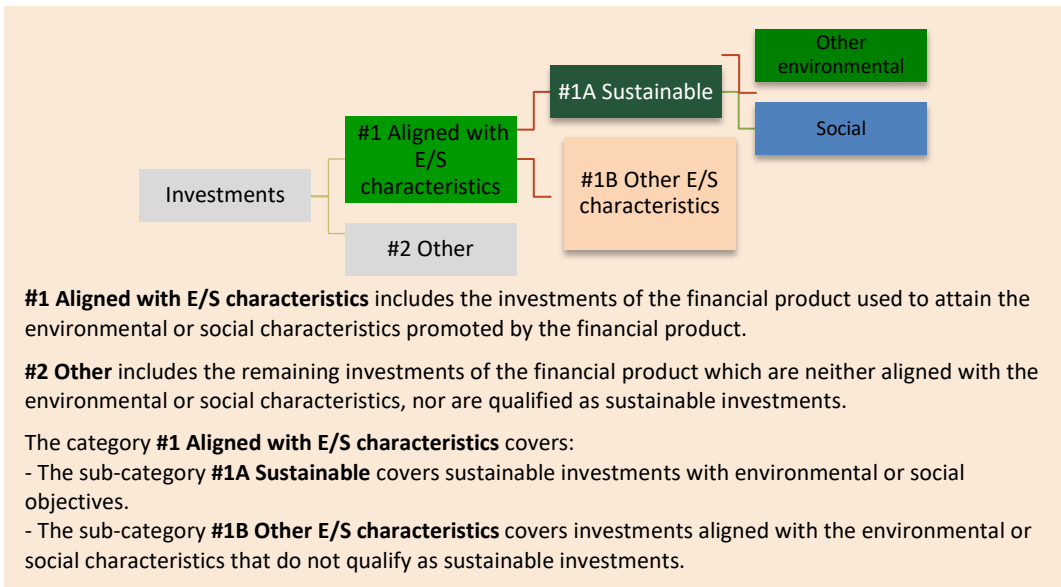
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

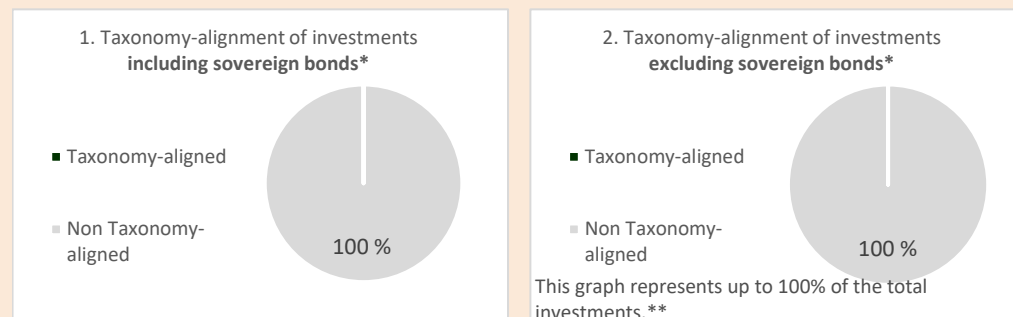
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-85-s/](http://www.soderbergpartners.lu/our-funds/proaktiv-85-s/)

**APPENDIX SFDR 4.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 90 S**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 90 S  
**Legal entity identifier:** 5299006C44ZFM61SU017

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

**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, anti-corruption and anti-bribery matters.

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 5 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

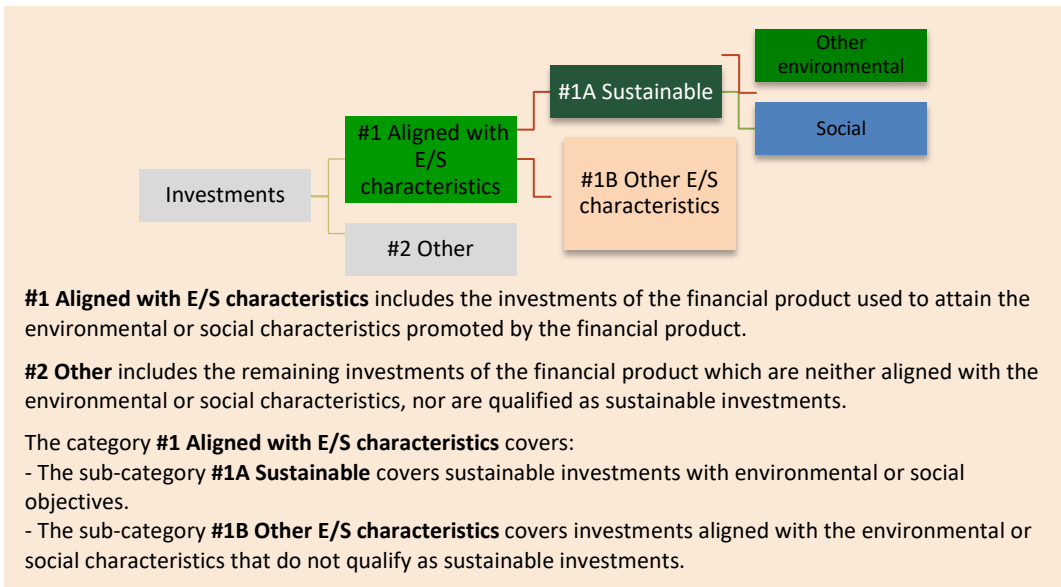
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

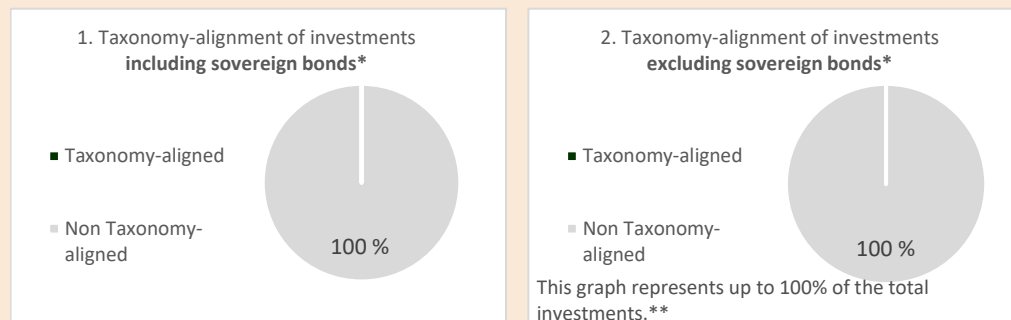
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

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

The minimum share of socially sustainable investments is 1 %.

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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.

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



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-90-s/](http://www.soderbergpartners.lu/our-funds/proaktiv-90-s/)

**APPENDIX SFDR 5.  
SÖDERBERG & PARTNERS FUNDS – TILLVÄXT 75**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Tillväxt 75  
**Legal entity identifier:** 529900U6FN0W5ZQJQ350

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 20 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

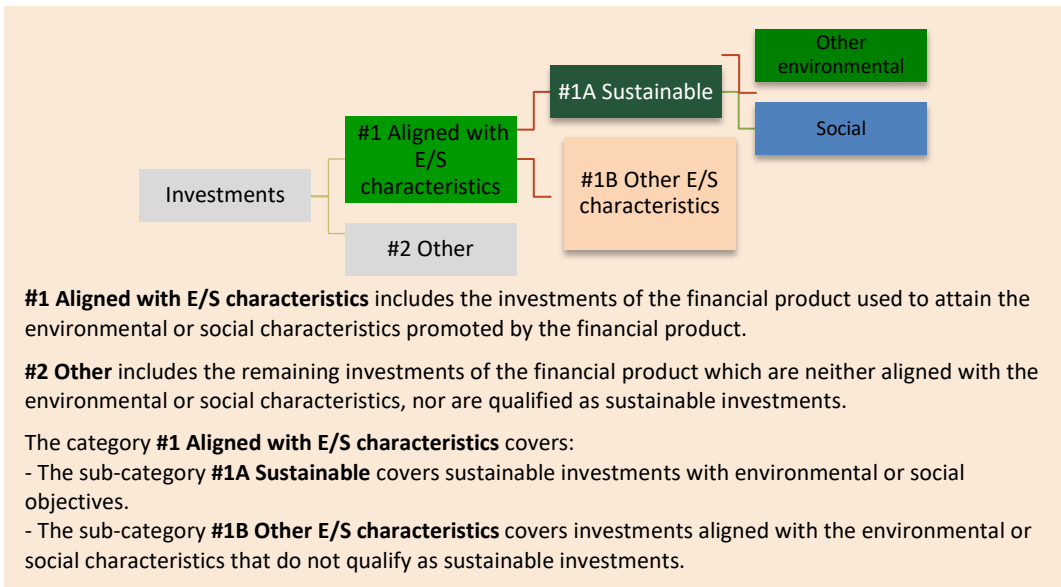
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

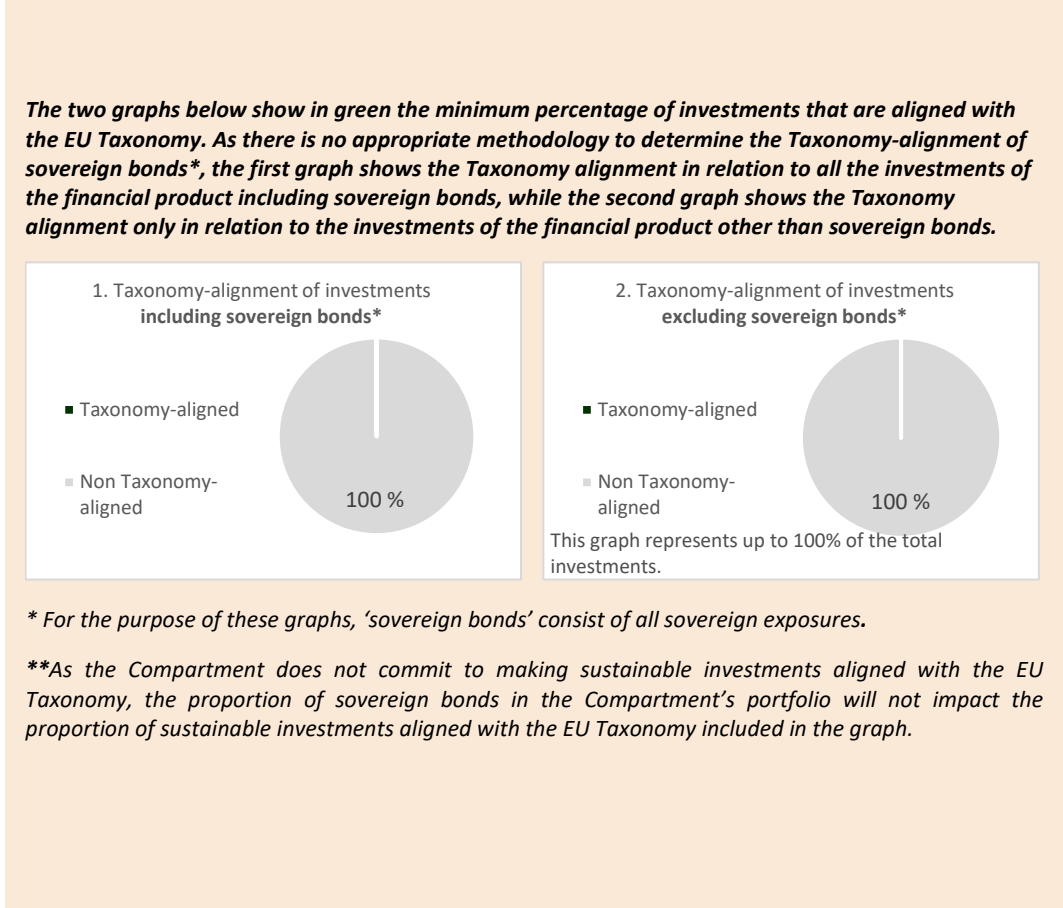
No

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.

<sup>1</sup> 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.

**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.



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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/tillvaxt-75/](http://www.soderbergpartners.lu/our-funds/tillvaxt-75/)

**APPENDIX SFDR 6.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 75**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 75  
**Legal entity identifier:** 529900HE8W06X02HU057

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value (“NAV”) in investments that qualify as aligned with E/S characteristics (#1) and at least 20 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

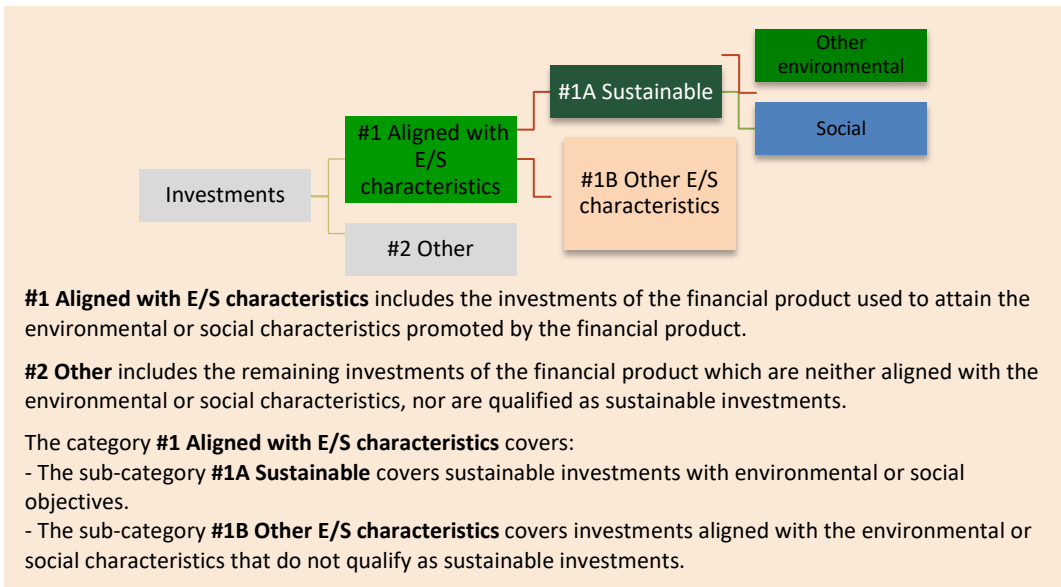
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

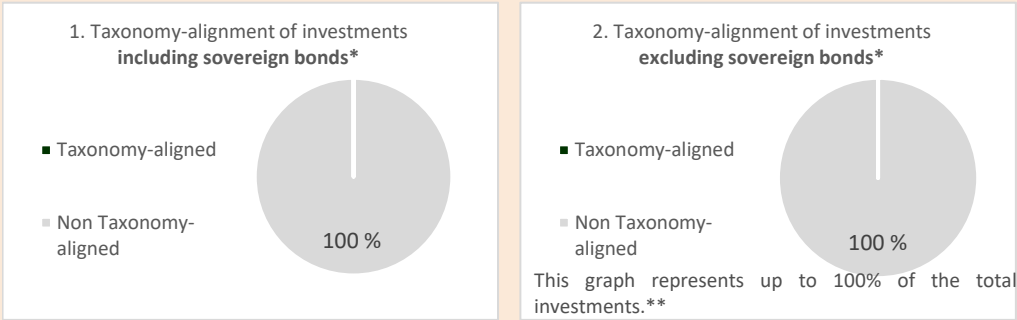
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-75/](http://www.soderbergpartners.lu/our-funds/proaktiv-75/)

**APPENDIX SFDR 7.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 80**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 80  
**Legal entity identifier:** 529900RY9O0Z9W23RR06

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
●● <input type="checkbox"/> <b>Yes</b>	●○ <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 15 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

**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, anti-corruption and anti-bribery matters.

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 15 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

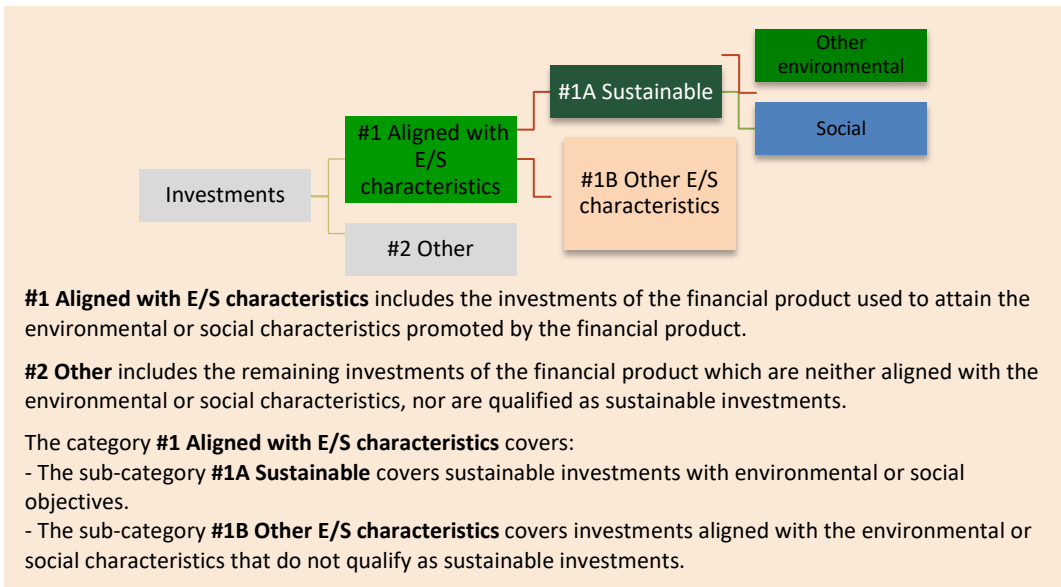
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

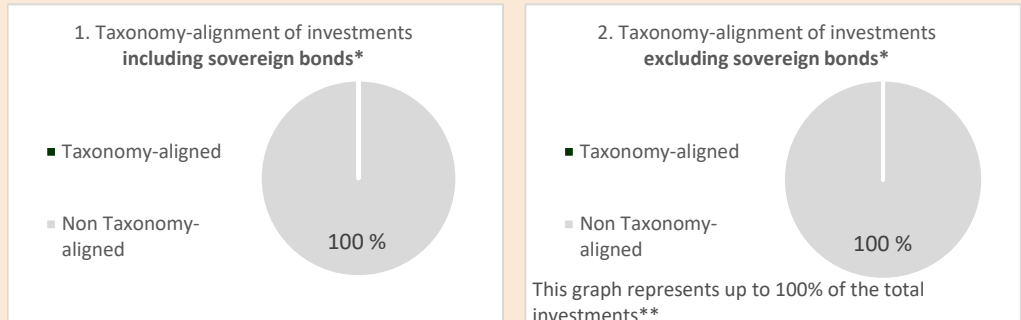
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-80/](http://www.soderbergpartners.lu/our-funds/proaktiv-80/)

**APPENDIX SFDR 8.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 85**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 85  
**Legal entity identifier:** 5299009300M8RTDQG390

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

**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, anti-corruption and anti-bribery matters.

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“PAI process”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

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funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value (“NAV”) in investments that qualify as aligned with E/S characteristics (#1) and at least 10 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

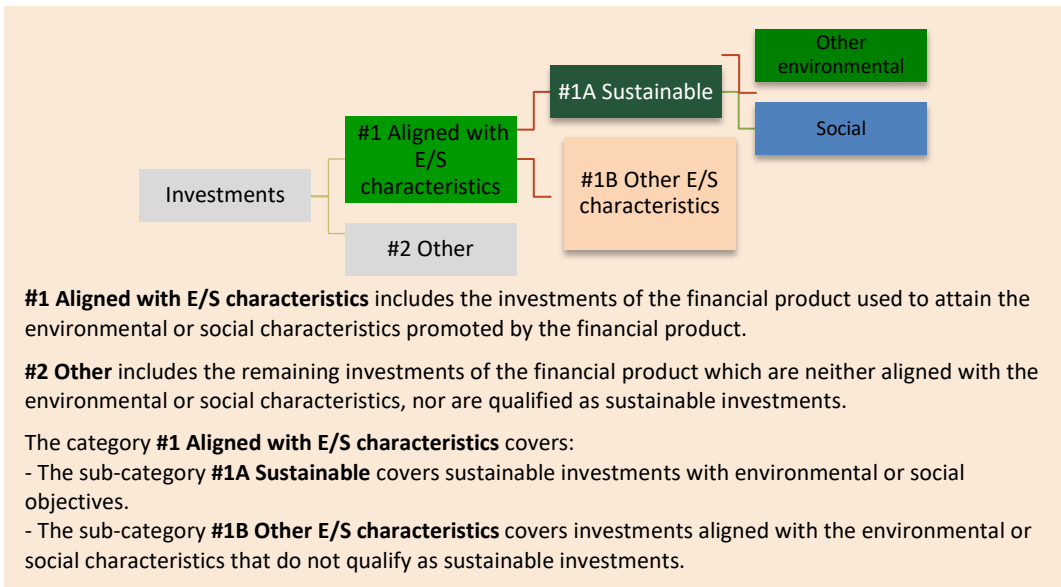
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

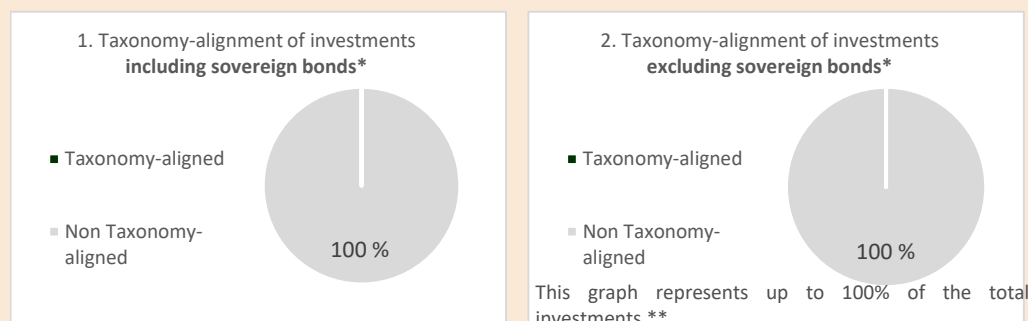
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-85/](http://www.soderbergpartners.lu/our-funds/proaktiv-85/)

**APPENDIX SFDR 9.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 90**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 90  
**Legal entity identifier:** 529900M3TEBE5S356T62

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 5 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

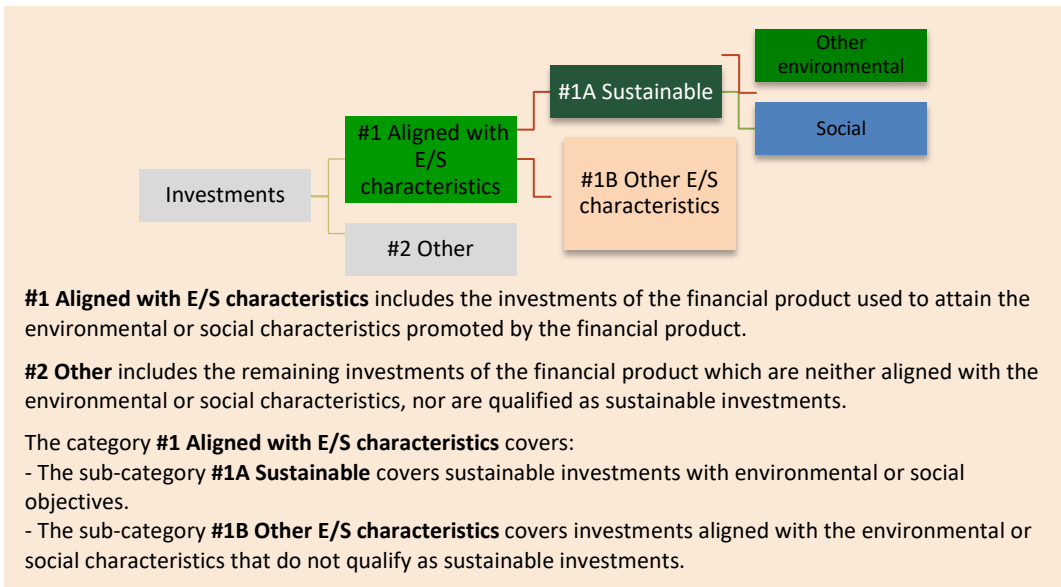
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

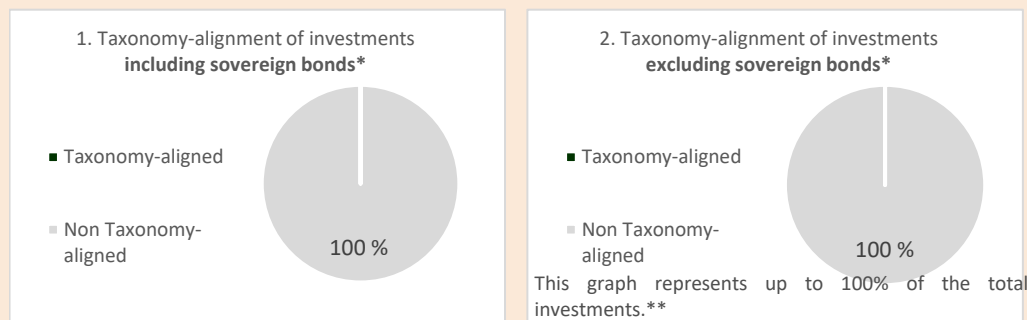
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-90/](http://www.soderbergpartners.lu/our-funds/proaktiv-90/)

**APPENDIX SFDR 10.  
SÖDERBERG & PARTNERS FUNDS – CONTRARIAN 65**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Contrarian 65  
**Legal entity identifier:** 529900FOZTDU86L5T698

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
●● <input type="checkbox"/> <b>Yes</b>	●● <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 20 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

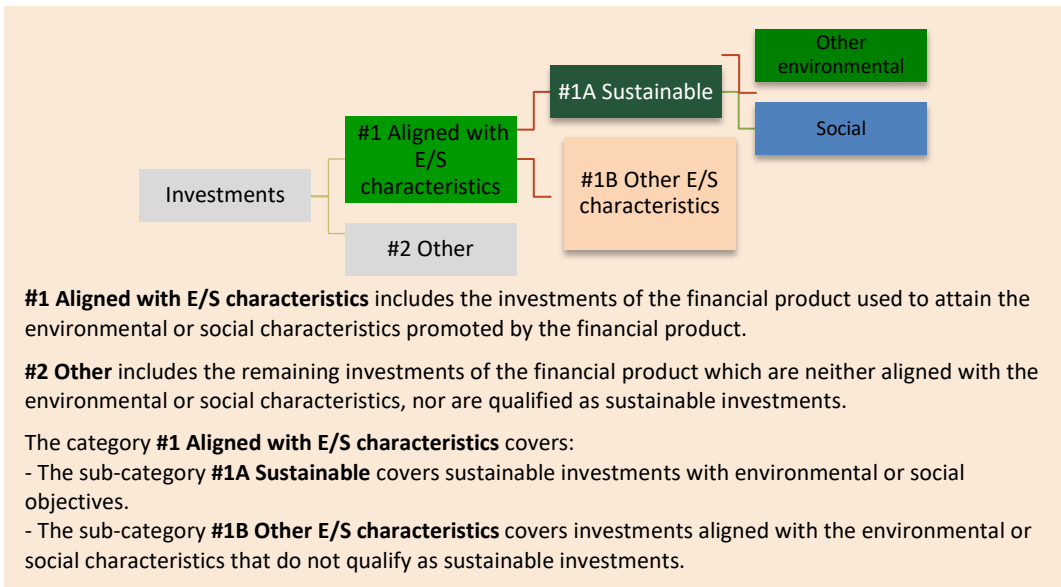
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

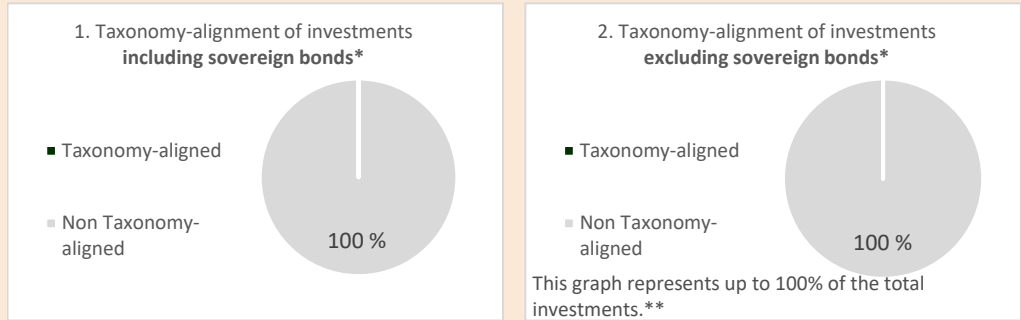
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/contrarian-65/](http://www.soderbergpartners.lu/our-funds/contrarian-65/)

**APPENDIX SFDR 11.  
SÖDERBERG & PARTNERS FUNDS – ALTERNATIVE R5**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Alternative R5  
**Legal entity identifier:** 529900SD1N798C4UBA22

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
●● <input type="checkbox"/> <b>Yes</b>	●● <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“PAI process”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 20 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

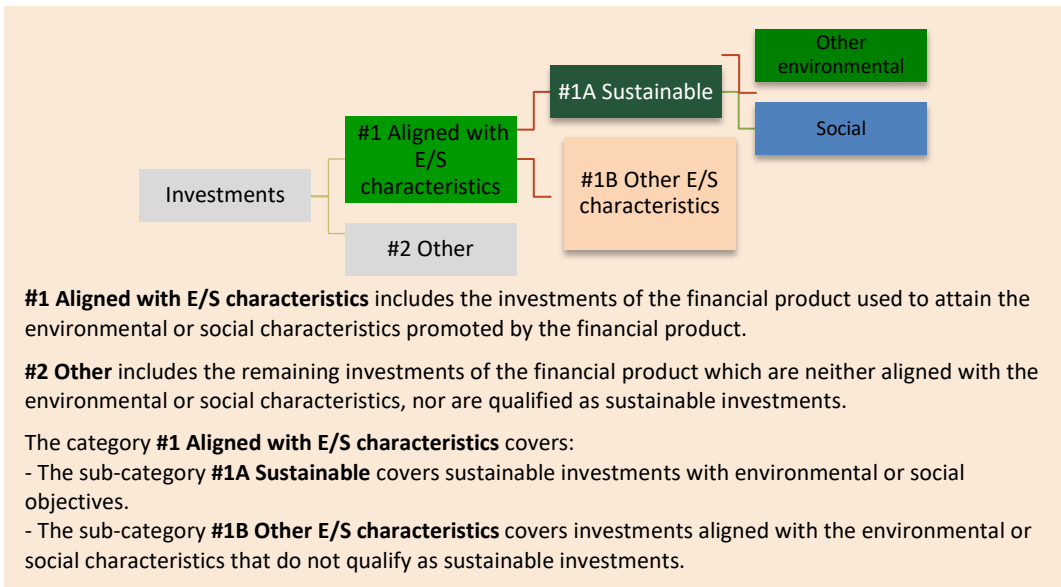
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

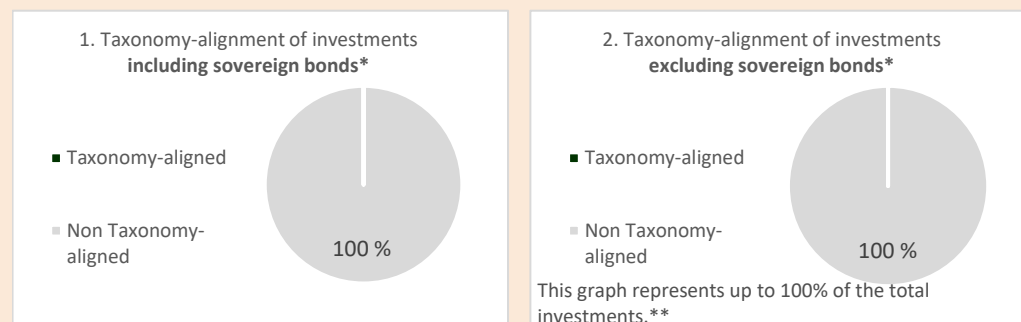
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/alternative-r5/](http://www.soderbergpartners.lu/our-funds/alternative-r5/)

**APPENDIX SFDR 12.**  
**SÖDERBERG & PARTNERS FUNDS – ALTERNATIVE R2**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Alternative R2  
**Legal entity identifier:** 529900B2N6Y82TMLX104

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value (“NAV”) in investments that qualify as aligned with E/S characteristics (#1) and at least 10 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

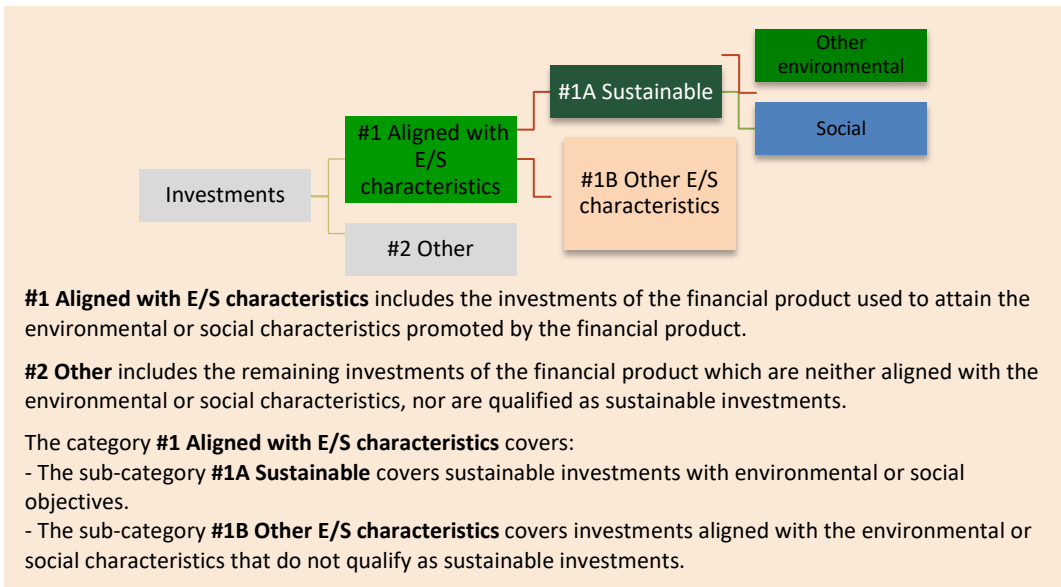
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

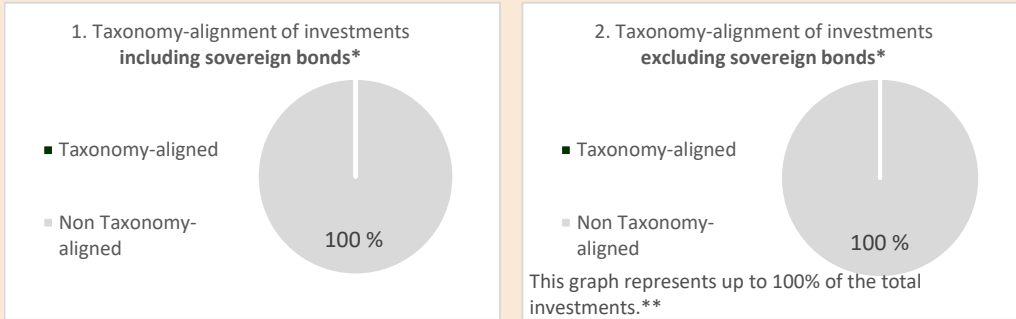
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/alternative-r2/](http://www.soderbergpartners.lu/our-funds/alternative-r2/)

**APPENDIX SFDR 13.**  
**SÖDERBERG & PARTNERS FUNDS – AKTIV PÅVERKAN R5**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Aktiv Påverkan R5  
**Legal entity identifier:** 529900E4V8GXB5RHW045

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). In addition, the Compartment makes investments in listed equities to influence the companies on different themes. These themes are decided annually by voting of the investors of the Compartment and are linked to specific SDGs. The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy

- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds and listed equities in which the Compartment invests ("**Target equities**") with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make. The Target equities are not classified as sustainable investments.

The Investment Manager does not invest in Target equities that are not compliant with the exclusion criteria. However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds and Target equities follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds and Target equities ("**Investee companies**") follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an Investee company is transitioning towards a more sustainable business. If an Investee company is flagged in a screening, the Investment Manager will discuss the Investee company's progress with the Target fund or Target equity, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

✘ Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds and Target equities (“**PAI process**”). For Target funds, this is done on a look-through basis. The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section. The Investment Manager monitors and classifies Target equities in the same manner as Target funds.

More information on the principal adverse impacts is available in the Investment Manager's separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or Investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the Investee companies follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an Investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds or Target equities that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds or Target equities flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and Investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, as well as the Target funds and Target equities exclusion screening results, and alignment with the Targeted SDGs.



The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the Investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target funds and Investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund or Target equity is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating.* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds and Target equities with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment. The Investment Manager monitors and classifies Target equities in the same manner as Target funds.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 30 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

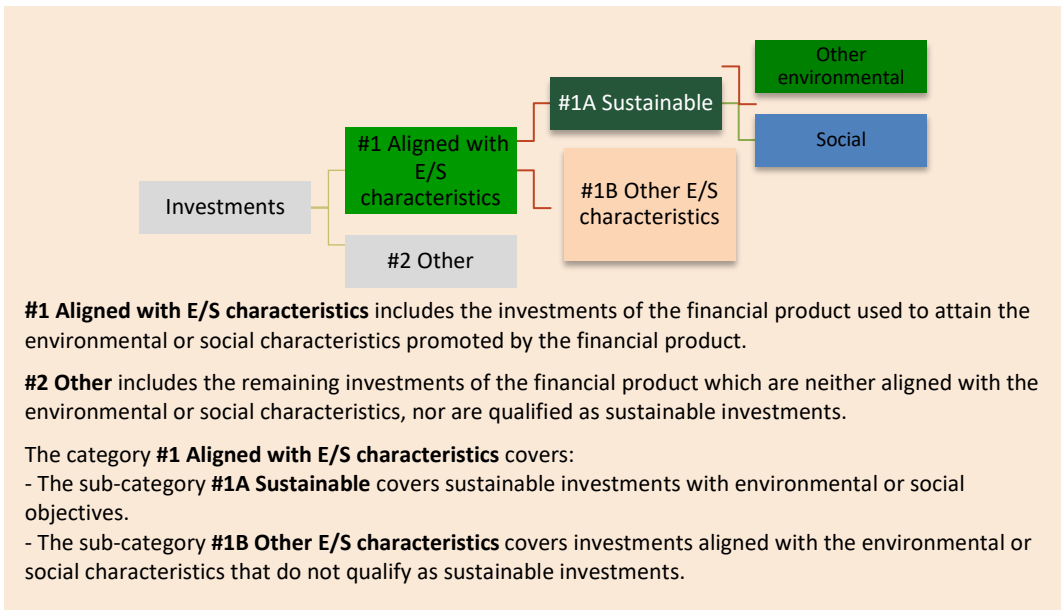
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

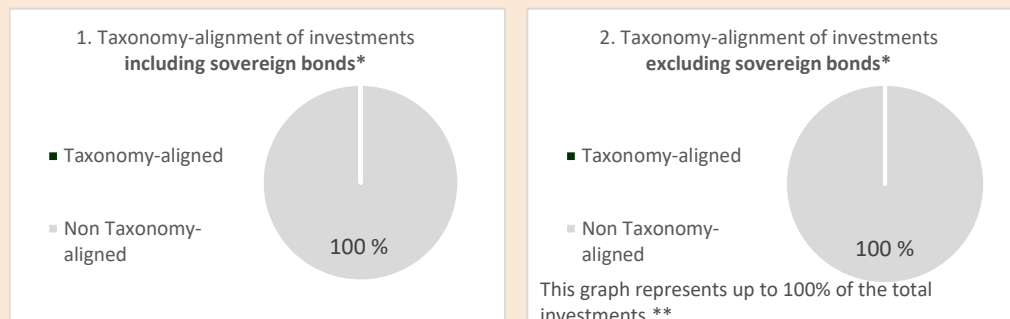
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/aktiv-paverkan-r5/](http://www.soderbergpartners.lu/our-funds/aktiv-paverkan-r5/)

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**APPENDIX SFDR 14.**  
**SÖDERBERG & PARTNERS FUNDS – AKTIV PÅVERKAN R2**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Aktiv Påverkan R2  
**Legal entity identifier:** 5299004NTD5HQT44IV58

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 30 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). In addition, the Compartment makes investments in listed equities to influence the companies on different themes. These themes are decided annually by voting of the investors of the Compartment and are linked to specific SDGs. The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy

- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds and listed equities in which the Compartment invests ("**Target equities**") with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make. The Target equities are not classified as sustainable investments.

The Investment Manager does not invest in Target equities that are not compliant with the exclusion criteria. However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds and Target equities follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds and Target equities ("**Investee companies**") follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an Investee company is transitioning towards a more sustainable business. If an Investee company is flagged in a screening, the Investment Manager will discuss the Investee company's progress with the Target fund or Target equity, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

✘ Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds and Target equities (“**PAI process**”). For Target funds, this is done on a look-through basis. The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section. The Investment Manager monitors and classifies Target equities in the same manner as Target funds.

More information on the principal adverse impacts is available in the Investment Manager's separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or Investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the Investee companies follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an Investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds or Target equities that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds or Target equities flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and Investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, as well as the Target funds and Target equities exclusion screening results, and alignment with the Targeted SDGs.



The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the Investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target funds and Investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund or Target equity is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating.* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds and Target equities with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment. The Investment Manager monitors and classifies Target equities in the same manner as Target funds.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 30 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

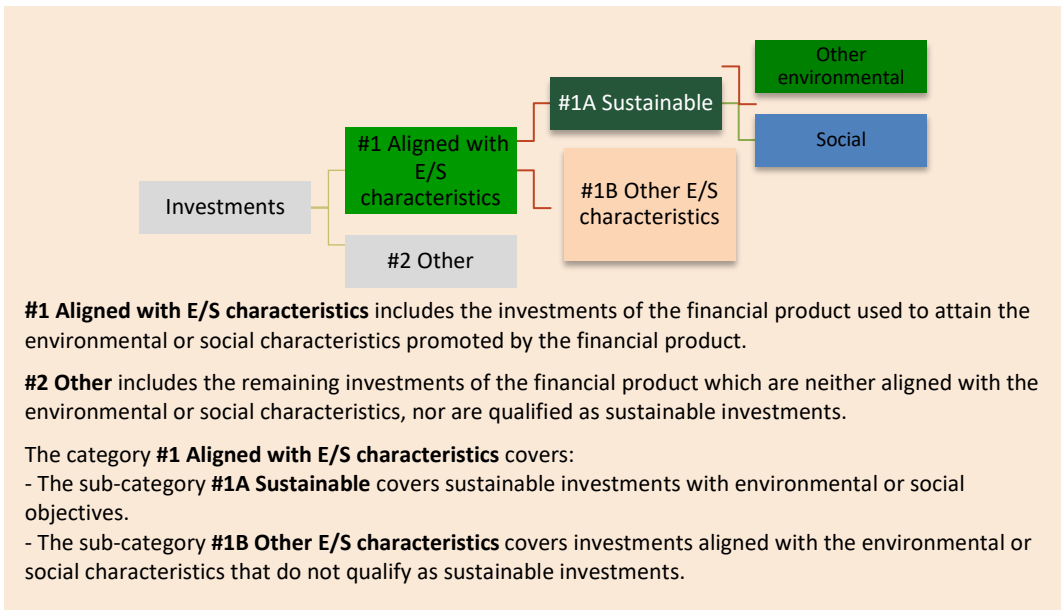
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

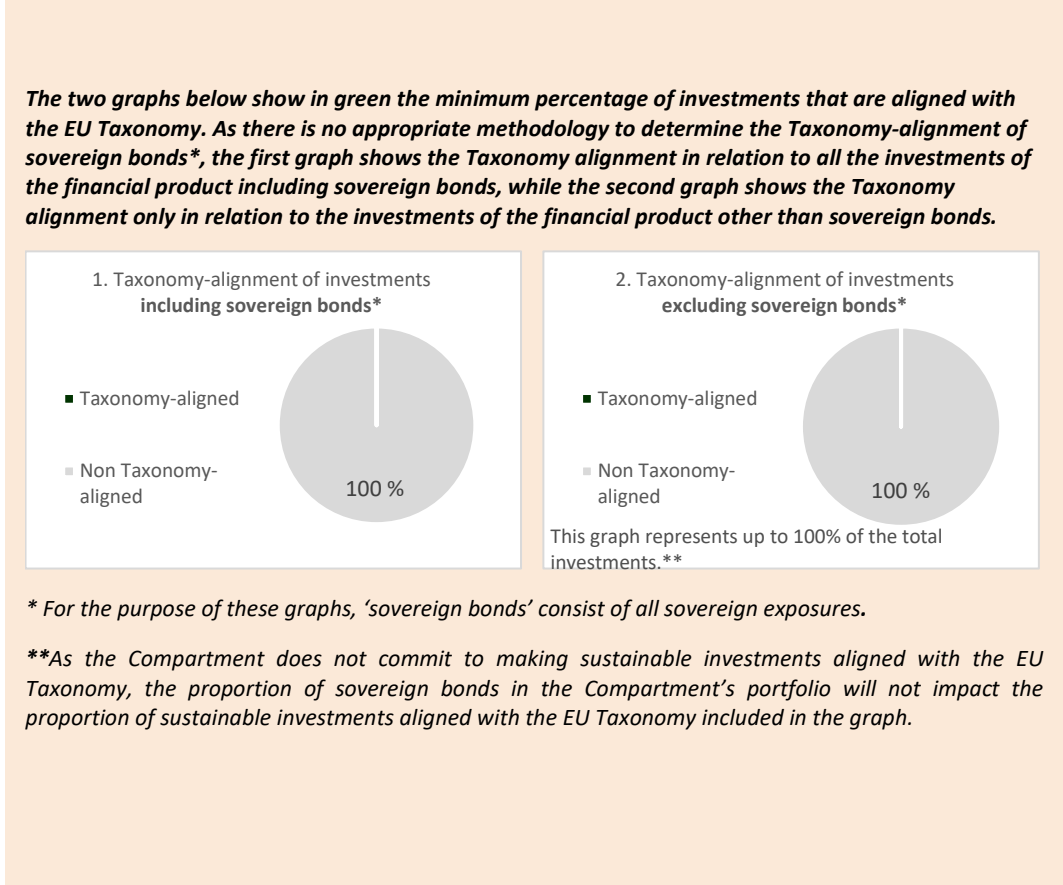
No

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.

<sup>1</sup> 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.

**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.



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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/aktiv-paverkan-r2/](http://www.soderbergpartners.lu/our-funds/aktiv-paverkan-r2/)

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**APPENDIX SFDR 15.**  
**SÖDERBERG & PARTNERS FUNDS – PROAKTIV 75 TL**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 75 TL  
**Legal entity identifier:** 529900VXVS3WKWZGSE80

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value (“NAV”) in investments that qualify as aligned with E/S characteristics (#1) and at least 20 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

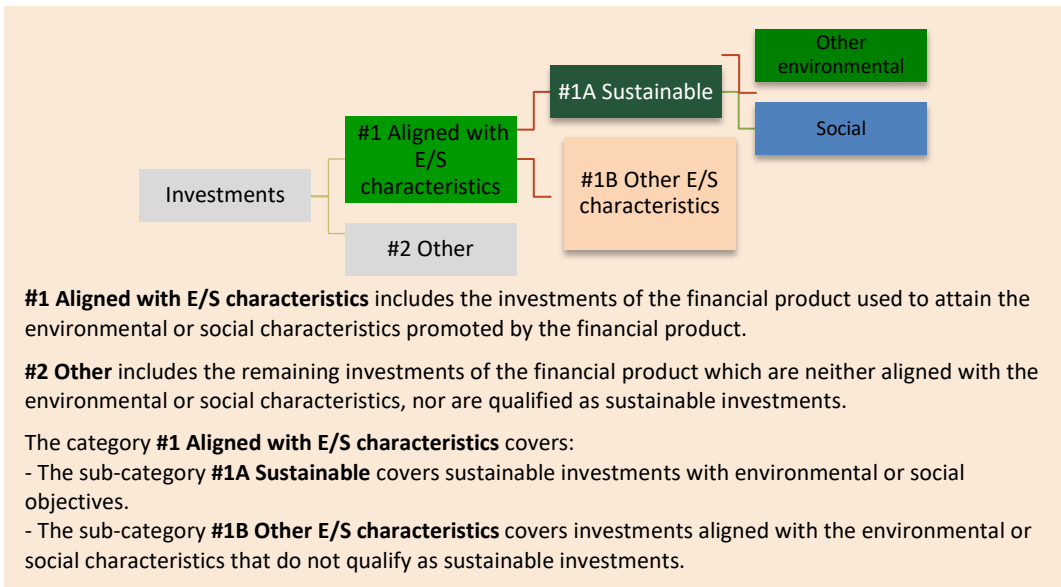
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

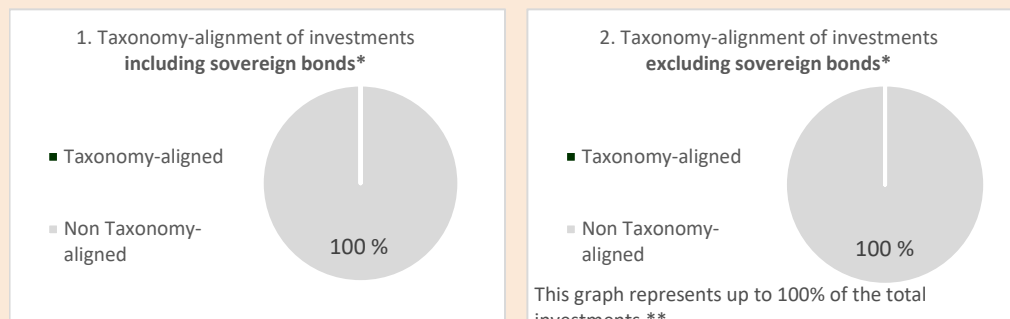
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-75-tl/](http://www.soderbergpartners.lu/our-funds/proaktiv-75-tl/)

**APPENDIX SFDR 16.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 80 TL**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 80 TL  
**Legal entity identifier:** 529900JRA7OYLUNMR44

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
●● <input type="checkbox"/> <b>Yes</b>	●● <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 15 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value (“NAV”) in investments that qualify as aligned with E/S characteristics (#1) and at least 15 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

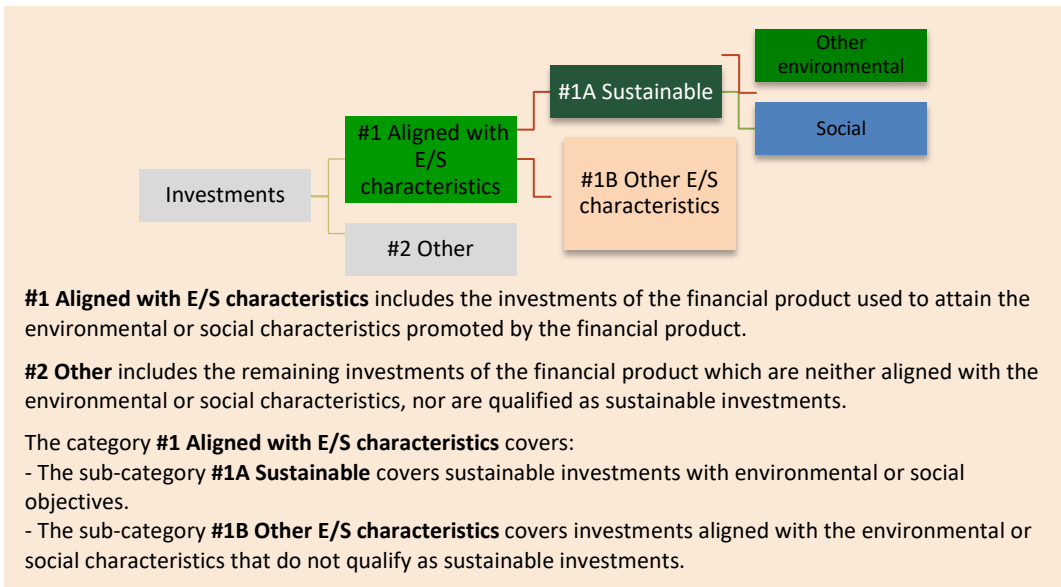
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

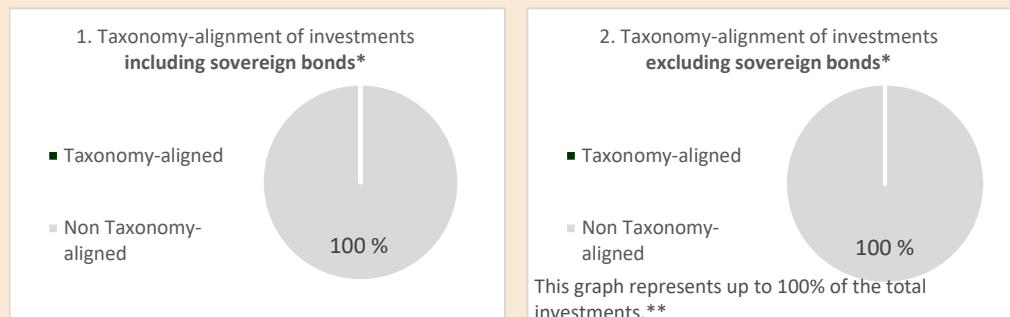
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-80-tj/](http://www.soderbergpartners.lu/our-funds/proaktiv-80-tj/)

**APPENDIX SFDR 17.  
SÖDERBERG & PARTNERS FUNDS – PROAKTIV 85 TL**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 85 TL  
**Legal entity identifier:** 529900NYNTK0D5OZOH68

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“PAI process”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 10 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

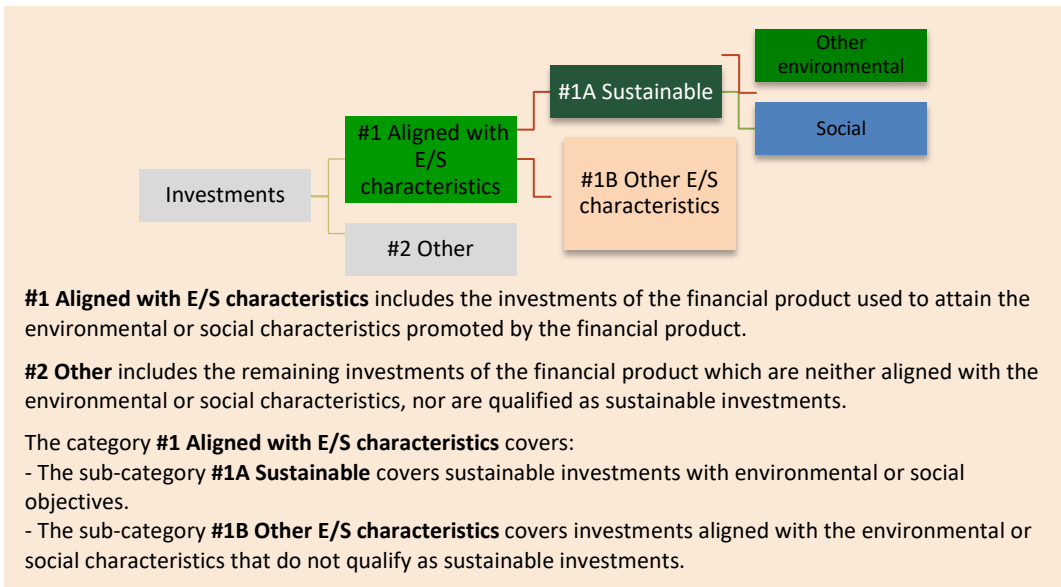
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

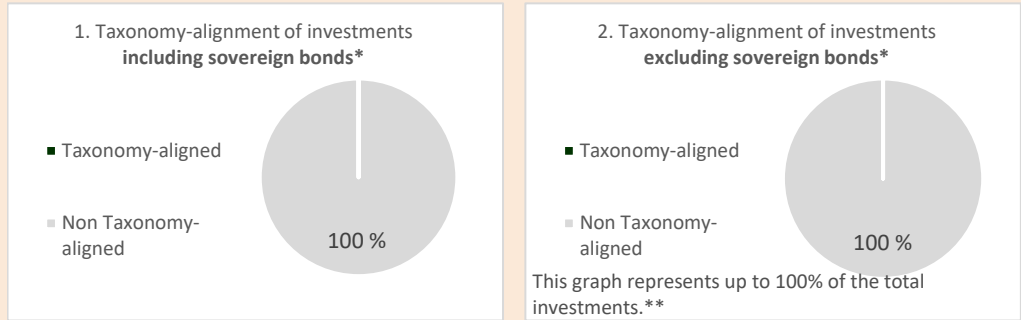
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-85-tj/](http://www.soderbergpartners.lu/our-funds/proaktiv-85-tj/)

**APPENDIX SFDR 18.**  
**SÖDERBERG & PARTNERS FUNDS – PROAKTIV 90 TL**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Proaktiv 90 TL  
**Legal entity identifier:** 529900LY3B5MGF3GCI14

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 5 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“PAI process”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 5 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

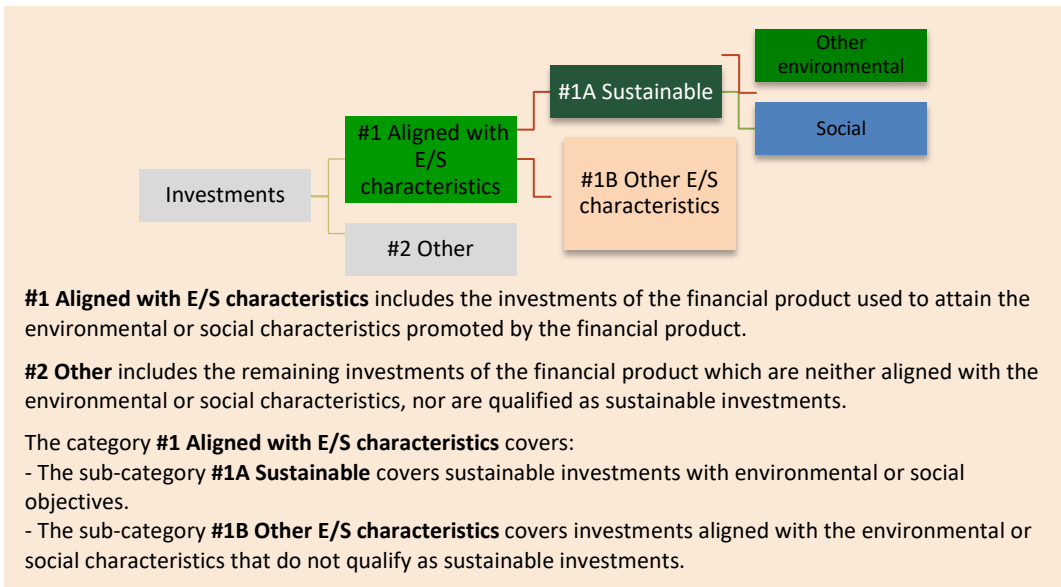
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

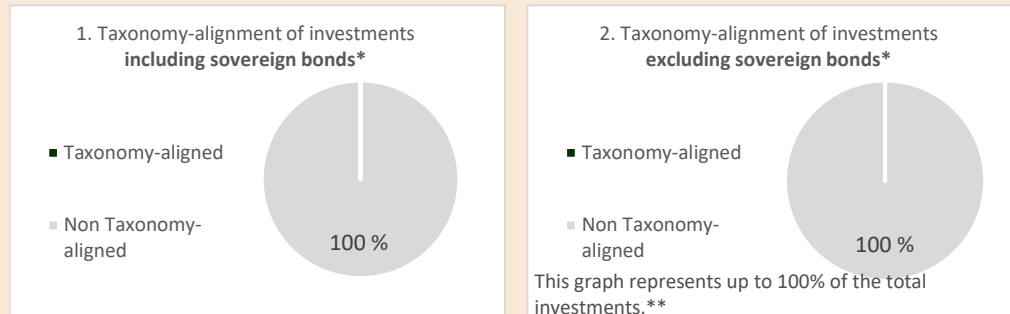
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/proaktiv-90-tj/](http://www.soderbergpartners.lu/our-funds/proaktiv-90-tj/)

**APPENDIX SFDR 19.  
SÖDERBERG & PARTNERS FUNDS – DYNAMIC R5**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Dynamic R5  
**Legal entity identifier:** 529900ZO1UFA0YVX0A17

## Environmental and/or social characteristics

<b>Does this financial product have a sustainable investment objective?</b>	
●● <input type="checkbox"/> <b>Yes</b>	●○ <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 20 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“**PAI process**”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value (“NAV”) in investments that qualify as aligned with E/S characteristics (#1) and at least 20 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

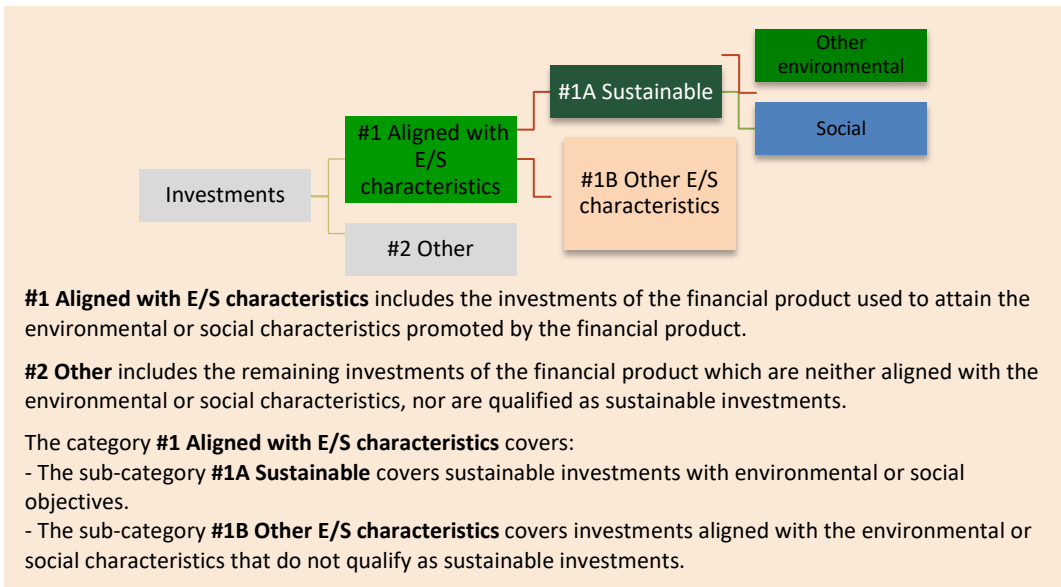
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.



**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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

No

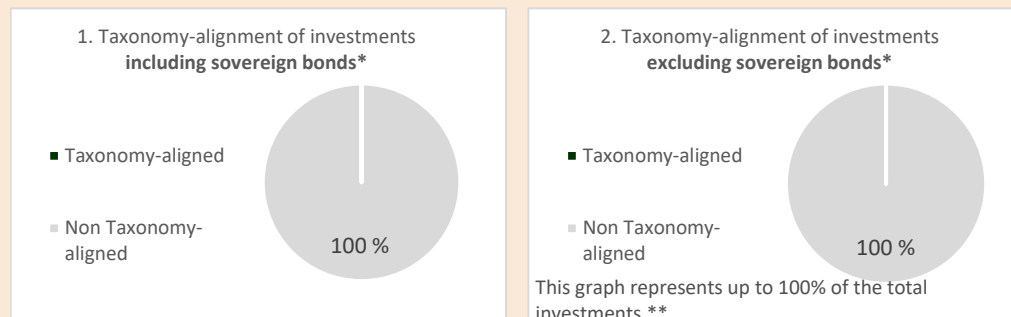
To comply with the EU Taxonomy, the criteria for **fossil gas** include limitations on emissions and switching to renewable power or low-carbon fuels by the end of 2035. For **nuclear energy**, the criteria include comprehensive safety and waste management rules.

<sup>1</sup> 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.

**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.

*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.

\*\*As the Compartment does not commit to making sustainable investments aligned with the EU Taxonomy, the proportion of sovereign bonds in the Compartment's portfolio will not impact the proportion of sustainable investments aligned with the EU Taxonomy included in the graph.

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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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

More product-specific information can be found on the website: [www.soderbergpartners.lu/our-funds/dynamic-r5/](http://www.soderbergpartners.lu/our-funds/dynamic-r5/)

**APPENDIX SFDR 20.  
SÖDERBERG & PARTNERS FUNDS – DYNAMIC R2**

**Template 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 lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Söderberg & Partners Funds - Dynamic R2  
**Legal entity identifier:** 529900H67Y8QKNESZ703

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 10 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

In general, Söderberg & Partners Asset Management S.A. (the “**Investment Manager**”) has a broad approach to responsible investments and thus a wide range of E/S characteristics are promoted by this financial product (the “**Compartment**”). As the Compartment is a fund-of-funds, the Investment Manager particularly focuses on the inclusion of funds with exposures to sustainable companies and on the engagement with those companies in order to continue to support companies in their transition towards alignment with the Sustainable Development Goals (“**SDGs**”). The following SDGs are prioritized by the Investment Manager (“**Targeted SDGs**”):

- Goal 6: Clean Water and Sanitation
- Goal 7: Affordable and Clean energy
- Goal 11: Sustainable Cities and Communities
- Goal 13: Climate Action

A reference benchmark is not used to attain the E/S characteristics promoted by the Compartment.

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

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

The sustainability indicators used are:

- 1- Percentage exposure of the Compartment to the sectors excluded, further described in the investment strategy section.
- 2- Percentage of the funds in which the Compartment invests ("**Target funds**") with a red sustainability rating ("**Sustainability rating**") generated by Söderberg & Partners Wealth Management AB ("**S&P WM**").
- 3- Percentage exposure of the Target funds with principal adverse impact indicators classified as Unresolved, further described below.

● ***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?***

As the Compartment is a fund-of-funds, the objectives of the sustainable investments that the Compartment partially intends to make can vary based on the investment philosophy of the Target funds. Therefore, the objectives are decided by the managers of the Target funds. The Investment Manager regularly reviews the objectives of the Target funds and ensures they are compliant with the Investment Manager's policy for responsible investments ("**Policy for Responsible Investments**").

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

The Investment Manager considers principal adverse impacts of its investments in the Compartment on a look-through basis. The do no significant harm principle is thus principally applied by the Target funds on the portion of sustainable investments they make.

However, to mitigate negative externalities, the Investment Manager has a process in place to ensure that Target funds follow its rules for the exclusion of investee companies as stated in the Policy for Responsible Investments ("**Screening process**"). This entails that the Investment Manager conducts pre-investment and semi-annual screenings on whether the investee companies of the Target funds follow the exclusion criteria stated in the investment strategy section using an internal tool. The Investment Manager can accept deviations from the exclusion criteria if an investee company is transitioning towards a more sustainable business. If an investee company is flagged in a screening, the Investment Manager will discuss the investee company's progress with the Target fund, whereafter it is classified, using an internal tool based on data provided by external parties, as Resolved, Transitioning (clear action plan to resolve the violation) or Unresolved (in violation of the exclusion criteria). If the investment is classified as Unresolved after the first assessment, it will be discussed with the Investment Manager's responsible investment committee (the "**RI Committee**") to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

**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, anti-corruption and anti-bribery matters.

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

The Investment Manager requires that Target funds take the principal adverse impacts on sustainability factors of their investee companies into account for the sustainable investments. In turn, the Investment Manager measures the principal adverse impacts on sustainability factors of the Target funds on a look-through basis. The Investment Manager will engage with Target funds on indicators that have deteriorated since last measured.

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

The Investment Manager monitors how the investee companies of all Target funds adhere to international norms and conventions through a norm-based screening based on UN Global

Compact and the OECD Guidelines for Multinational Enterprises. The Investment Manager conducts pre-investment and semi-annual screenings using an internal tool where the data is provided by external parties, following the methodology of the Screening process, further explained above.

*The EU Taxonomy sets out a “do not significant harm” principle by which Taxonomy-aligned investments should not significantly harm EU Taxonomy objectives and is accompanied by specific EU criteria.*

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

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



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

Yes. The Compartment considers the following principal adverse impact indicators:

- Table 1 – Indicator 1: GHG emissions
- Table 1 – Indicator 2: Carbon footprint
- Table 1 – Indicator 3: GHG intensity of investee companies
- Table 1 – Indicator 4: Exposure to companies active in the fossil fuel sector
- Table 1 – Indicator 5: Share of non-renewable energy consumption and production
- Table 1 – Indicator 8: Emissions to water
- Table 1 – Indicator 9: Hazardous waste and radioactive waste ratio
- Table 2 – Indicator 6: Water usage and recycling
- Table 2 – Indicator 8: Exposure to areas of high water stress

The principal adverse impact indicators are selected because the Investment Manager considers that they correspond to the Targeted SDGs.

The Investment Manager requires that Target funds consider principal adverse impacts on sustainability factors. The Investment Manager has a process in place to measure the principal adverse impacts on sustainability factors of the Target funds on a look-through basis (“PAI process”). The Investment Manager uses an internal tool based on data provided by external data providers for measuring and comparing principal adverse impacts of the Target funds pre-investment and on an annual basis. If a Target fund shows deterioration of a considered indicator between measurements, the investment will be flagged. The Investment Manager will discuss the progress of the indicator with the Target fund, whereafter the flagged investment can be classified as Resolved, Transitioning (clear action plan to improve the indicator in place) or Unresolved (no action is taken or plan in place). If the investment is flagged as Unresolved after the first assessment, it will be discussed with the Investment Manager’s RI Committee to determine the appropriate action that needs to be taken, as explained in the investment strategy section.

More information on the principal adverse impacts is available in the Investment Manager’s separate statement on the matter and its annual report.

No



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

## What investment strategy does this financial product follow?

The Investment Manager's view is that responsible investing is a requirement for long-term and sustainable value creation through sustainability factors (i.e., environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters) integration to foster a positive change. The Investment Manager therefore has a strong commitment to invest responsibly and environmental, social and governance ("ESG") issues are considered in the investment decisions. The Investment Manager conducts responsible investments based on three principal pillars as part of the Policy for Responsible Investments: exclusion screening, positive selection, and active engagement. The focus is on the inclusion of sustainable companies and engagement in order to continue to support companies in their transition towards alignment with the Targeted SDGs.

*Exclusion screening:* The Investment Manager's main principle is to use its influence to effect positive change in its investments, rather than to exclude and divest. However, the Investment Manager conducts exclusion when the ability to influence the Target fund or investee company to align its operations with the Targeted SDGs is limited, or when an investment does not show a willingness to comply with the Policy for Responsible Investments. The Investment Manager uses the application of exclusion filters in the portfolio construction process and conducts a pre-investment and semi-annual screening on whether the investee companies of the Target funds follow the full exclusion criteria:

- Companies that manufacture, modernize, sell, or buy products that are specially designed for controversial weapons or nuclear weapons.
- Companies for which thermal coal account for more than 30 % of the turnover.
- Companies with turnover derived from pornography or tobacco.
- Companies that violate international norms and conventions related to the environment, human rights, labour rights and business ethics, e.g., the UN Global Compact and the OECD guidelines for multinational companies.

No more than 5 % of an investee company's turnover may be derived from these activities, unless otherwise stated.

Furthermore, through the consideration of a set of principle adverse impact indicators that correspond to the Targeted SDGs, the Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. Target funds flagged as Unresolved after the first assessment and are in violation of the binding elements, follow the process of the RI Committee, as described hereafter.

*Positive selection:* In the management of the Compartment, the Investment Manager utilizes the Sustainability rating of funds generated by S&P WM. Target funds with a better Sustainability rating are preferred when selecting investments and the Compartment shall not be invested in Target funds with a red Sustainability rating as one of the binding elements detailed below. The Sustainability rating of the Target funds is an assessment based on self-reported information about fund managers' and fund companies' sustainability work. If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to bring clarity to the background and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, as detailed below. In addition, the Investment Manager's consideration of E/S characteristics is verified through a sustainability questionnaire that is addressed to the managers of the Target funds. The Compartment aims to primarily, where available, invest in Target funds with a sustainable investment objective. Secondly, the Compartment aims to invest in Target funds that promote E/S characteristics, or in Target funds that demonstrate improvements of these characteristics, resulting in improved Sustainability ratings. Good governance practices are a precondition for all investments.

*Active engagement:* The Investment Manager wants to encourage Target funds and their investee companies to be compliant with international norms and conventions and manage their business in a more sustainable manner. The Investment Manager will engage for positive outcomes with the ambition of aligning corporate outputs with improving E/S characteristics based on the Target funds Sustainability ratings, exclusion screening results, and alignment with the Targeted SDGs.

The process of managing the overall responsible investing activities is coordinated internally within the Söderberg & Partners Group, with an active input from the RI Committee. The RI Committee is involved in the process of updating and overseeing related policies and procedures adhering to the ESG management. The RI Committee discusses the investee companies based on the first and third binding elements of the Compartment, and Target funds based on the second binding element. The RI Committee focuses on Target



funds and investee companies that can be influenced to apply a more sustainable solution so that they are not in violation of these elements. Should the monitoring show that the management of a Target fund is not sufficiently addressing a potential violation within one year of first being identified, i.e., no progress is made or no action plan is in place, the Investment Manager shall divest.

● ***What are the binding 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 binding elements of the investment strategy are:

- 1- *The application of the exclusion criteria.* The Compartment is subject to an exclusion screening, which identifies companies that may be involved in controversial and nuclear weapons, pornography, tobacco, thermal coal, and international norms breaches. If a company is identified in the Screening process, an internal assessment of the company is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 2- *The exclusion of Target funds with a red Sustainability rating* If a Target fund is downgraded to a red Sustainability rating, the Investment Manager will initiate a dialogue with S&P WM to understand why and engage with the management of the Target fund to see what they must do to improve. It is then discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.
- 3- *The exclusion of Target funds with principal adverse impact indicators classified as Unresolved, and accordingly failing to align with the Targeted SDGs.* The Investment Manager flags Target funds that show deterioration of a considered indicator, and accordingly a deterioration in aligning with the Targeted SDGs. If a Target fund is identified in the PAI process, an internal assessment of the Target fund is conducted, whereafter it is discussed with the Investment Manager's RI Committee to determine the appropriate action that needs to be taken, e.g., engagement or divestment.

● ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

Not applicable.

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

To assess good governance practices, the Compartment excludes companies that are in breach of international norms and conventions, whilst including with respect to sound management structures, employee relations, remuneration of staff, and tax compliance. As aforementioned, the investments are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

**What is the asset allocation planned for this financial product?**

The Compartment is expected to invest at least 75 % of its net asset value ("NAV") in investments that qualify as aligned with E/S characteristics (#1) and at least 10 % of its NAV in investments that qualify as sustainable investments (#1A).

The Compartment is allowed to invest up to 25 % of its NAV in cash, cash equivalents, and/or hedging instruments (#2 Other).

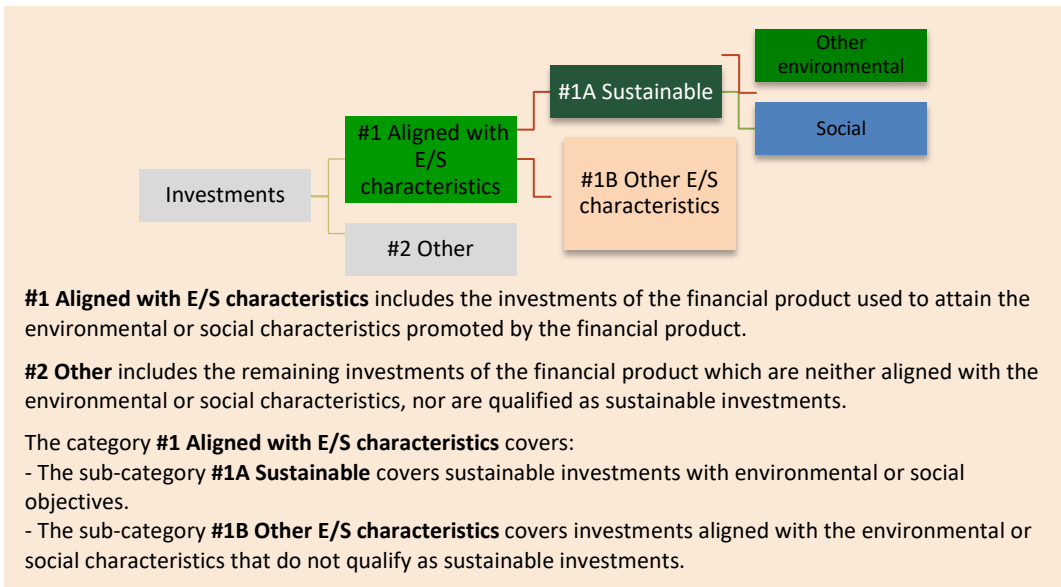
Good governance practices include sound management structures, employee relations, remuneration of staff and tax compliance.



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.



- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
Not applicable.



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

The Compartment does not currently commit to invest in any “sustainable investment” within the meaning of the EU Taxonomy regulation, but only within the meaning of the Regulation (EU) 2019/2088 (the “SFDR”). However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.

- **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy<sup>1</sup>?**

Yes:  In fossil gas  In nuclear energy

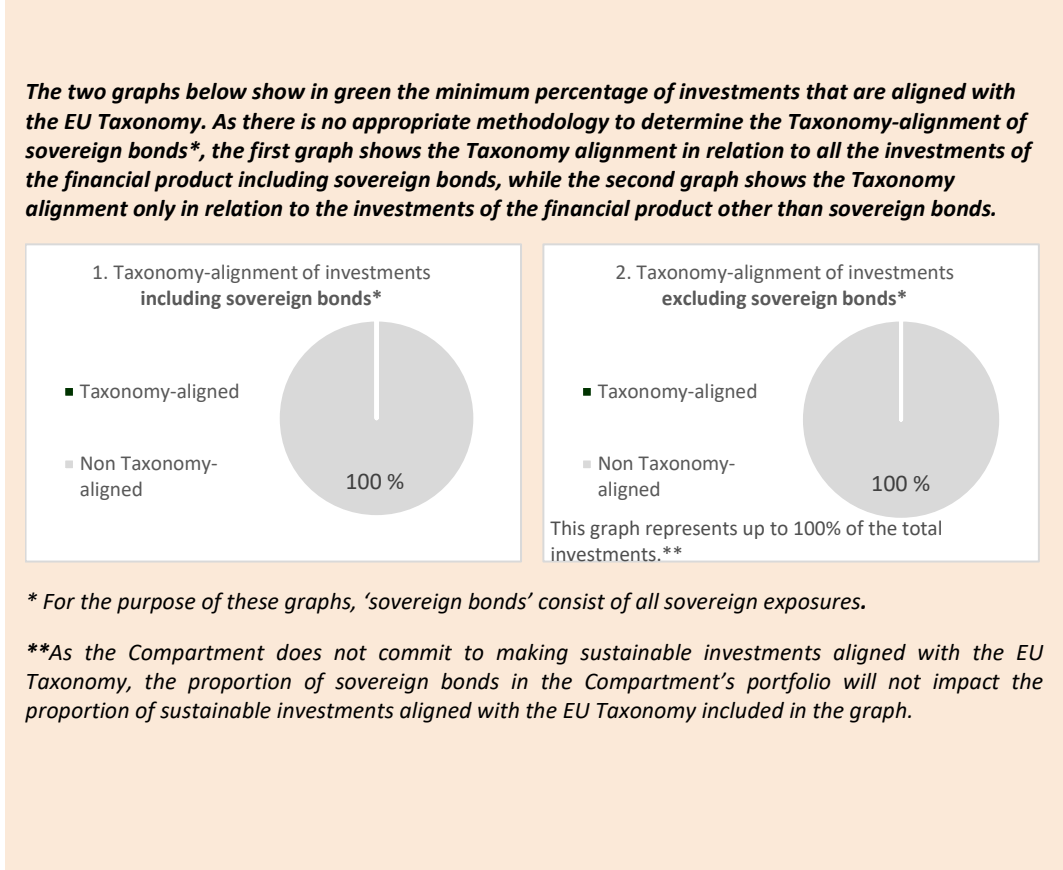
No

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.

<sup>1</sup> 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.

**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.



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

The minimum share of investments in transitional and enabling activities is 0 %.

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 sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 1 %. These investments could be aligned with the EU Taxonomy, but the Investment Manager is not currently in a position to specify the exact proportion of the Compartment's underlying investments which take into account the EU criteria for environmentally sustainable economic activities. However, the position will be kept under review as the underlying rules are finalised and the availability of reliable data increases over time.



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

The minimum share of socially sustainable investments is 1 %.



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

The Compartment may from time-to-time hold, on an ancillary basis, cash reserves. The Investment manager may also invest in financial derivative instruments. Their use need not be limited to hedging the Investment Manager's assets, they may also be part of the investment strategy or for efficient portfolio management purposes. This category may also include investments for which relevant data is not available. There are no expressed minimum environmental or social safeguards for these types of investments.



**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?**

Not applicable.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



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