

# Information Brochure

1/04/2020

## Access Europa (Access Europe)

### Swedbank Robur Access Europa

Type of fund: Equity funds  
Share classes open to trading: A, C

#### Dividend

The share class does not issue a dividend.

#### Risk and reward profile



The risk and reward profile shows the correlation between risk and possible returns of investing in the fund. The indicator is based on how the fund value has changed over the last five years. The fund is in category 5, which indicates the fund has a medium-to-high risk that unit share value will increase or decrease. Category 1 does not imply that the fund is risk free. The fund risk class may change over time, as the indicator is based on historic data which is not a guarantee of future risk and reward.

#### Fund management company

The fund is managed by Swedbank Robur Fonder AB, referred to herein as the company.

#### Share classes

The fund has 22 share classes, of which classes A and C, are currently open for trade. Share class A is a non-dividend share class traded in SEK and share class C is a non-dividend share class traded in EUR. Other share classes are not currently open for trade. The various share classes differ with regards to charges, dividend, threshold for subscription charges, currency for subscription and redemption plus specific terms and conditions for distribution. Shares in a share class have equal rights to the assets in the fund. Additional information

regarding the fund's share classes can be found further down in the investment prospectus.

#### Investment Policy

The fund is an equity fund which invests in companies across a range of industries in Russia. The objective is to as far as possible emulate the development of the MSCI Europe Net, which is a market value index that keeps abreast of the development of large and medium-sized companies in 15 European countries. The fund plans to track the OMX Stockholm 30 GI primarily through holding equities that are included in the index. A detailed description of the composition of the index can be found on [swedbankrobur.se](http://swedbankrobur.se). In addition, the fund complies with the Policy on Responsible Investments.

Fund assets may be invested in transferable securities, money market instruments, derivative instruments, fund units, and in deposits held in credit institutions.

The management of the index tracking fund strives to mimic the composition of its index. However, there are expected to be differences in returns between the fund and the index as the fund complies with the company's policy on responsible investments and, within the framework of the investment process, conducts enhanced sustainability work. This means that equity included in the index may be excluded because it does not meet the sustainability requirements and that companies with good sustainability initiatives are given priority when building the portfolio. This

means that shares included in the index may be excluded because they do not meet sustainability requirements. Information about the policy can be found below under the heading "Policy on Responsible Investments".

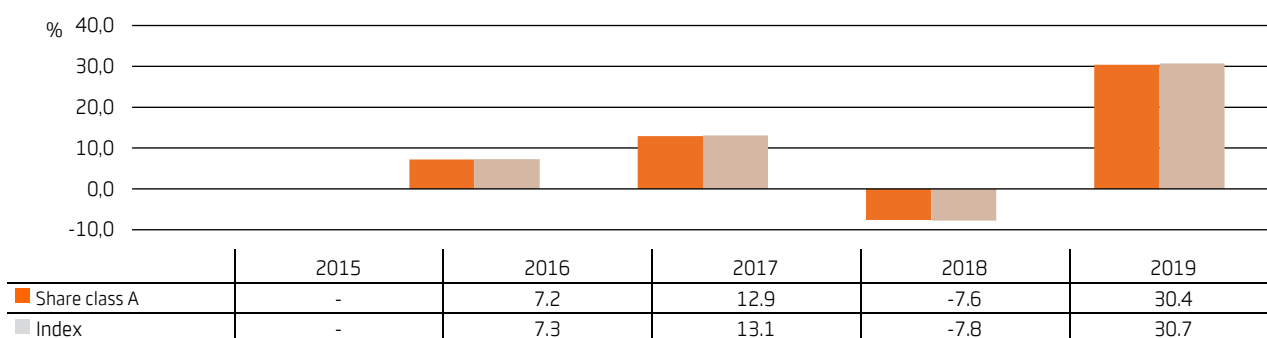
The fund's ability to follow the index will also be affected by transaction costs, which for example, arise from the reinvestment of dividends, the management of flows and index changes.

The fund is managed passively through the application of a quantitative management strategy. This strategy aims to create a high-sustainability portfolio while mimicking the character of the index in its composition. The passive management of the fund means that fund management is rules-based and that no positions are taken with the aim of creating excess yield relative to index.

The fund's index is provided by an index administrator who has been approved and has been registered with ESMA.

The company has established an action plan in the event of a termination or material change to the fund's index. In such a situation, the company will identify an alternative index deemed appropriate for the fund in accordance with the action plan. Should the fund's index no longer be available, the fund rules must be amended. In the event of such a change to the fund rules, unitholders are protected by means of the review by the Financial Supervisory Authority and by notifying the unitholders (Chapter 4, sections 9, 9 a and 9 b of the Investment Funds Act (2004:46)).

#### Past performance



The performance of a share class is calculated after the deduction of the annual fee. The total value for all years is calculated in SEK and includes any dividends which have been re-invested in the share class. Past performance is no guarantee of future performance. The fund was launched in 2015.

## Policy on responsible investments

Swedbank Robur strives to be a responsible organisation. Investment decisions and ownership positions taken by the fund company provide the opportunity to influence corporate practice and thereby the objective of making a positive contribution to society in general.

The fund complies with Swedbank Robur's policy on responsible investments by integrating sustainability considerations into the various investment processes of the funds, and into ownership activities which concentrate on influencing companies where the funds are major holders, and companies which exhibit significant shortcomings relating to sustainability and/or corporate governance. In certain cases, we may refrain from investing in a company. The policy applies to direct investments in companies (equities and corporate bonds) and to equity derivatives in companies. The policy does not apply to investments in index derivatives or exchange-traded funds (ETFs).

Read more about the company's policy on responsible investments, criteria, selection process and excluded companies under the heading Sustainability on [swedbankrobur.com](http://swedbankrobur.com)

## Sustainability information

Sustainability aspects are taken into account in the management of the fund  
*The fund company's comments:*  
*Sustainability aspects are taken into account and sustainability initiatives encompass all of the fund's holdings where possible. Indirect investments, for example index futures can be used to achieve desirable exposure and manage flows. These are not holdings where the fund company can influence a company or where the fund's sustainability initiatives otherwise have an impact.*

Sustainability aspects are not taken into account in the management of the fund

## Sustainability aspects that are taken into account in the management of the fund

- Environmental aspects (e.g. companies' impact on the environment and climate)
- Social aspects (e.g. human rights, workers' rights and equal treatment)
- Corporate governance aspects (e.g. unitholders' rights, questions regarding remuneration to senior executives and anti-corruption measures)
- Other sustainability aspects

## Methods used in the sustainability work

### The fund selects

- Sustainability aspects are crucial for the fund management's choice of companies  
The fund has specific and express criteria for selecting companies based on environment, social and business ethics issues. Analysis of the companies' work on sustainability is crucial when choosing companies for the fund.
- Fund managers take into account sustainability issues  
Sustainability aspects are taken into account in financial analyses of companies and when taking investment decisions, they have an impact but do

not need to be decisive as to which companies are chosen for the fund.

### Other

Other method applied by the fund when selecting

### The fund excludes

The fund does not invest in companies that have operations in the following products and services. A maximum of five per cent of the turnover in the company in which the investment takes place may relate to business activities attributable to the specified product or service.

### Products and services

Cluster bombs, land mines

*The fund company's comments:*

*The fund does not invest in companies that generates any revenue from cluster munitions and anti-personal mines.*

Chemical and biological weapons

*The fund company's comments:*

*The fund does not invest in companies that generates any revenue from chemical- and biological weapons.*

Nuclear weapons

*The fund company's comments:*

*The fund does not invest in companies that generates any revenue from nuclear weapons.*

Weapons and/or munitions

*The fund company's comments:*

*The fund does not invest in companies whose main business generates revenue above 5 % from weapons or military equipment.*

Alcohol

*The fund company's comments:*

*The fund does not invest in companies whose main business generates revenue above 5 % from alcohol.*

Tobacco

*The fund company's comments:*

*The fund does not invest in companies whose main business generates revenue above 5 % from tobacco.*

Commercial gaming operations

*The fund company's comments:*

*The fund does not invest in companies whose main business generates revenue above 5 % from gambling.*

Pornography

*The fund company's comments:*

*The fund does not invest in companies whose main business generates revenue above 5 % from pornography.*

Coal

*The fund company's comments:*

*The fund does not invest in companies whose main business generates revenue above 5 % from coal.*

Fossil fuel

*The fund company's comments:*

*The fund refrains from investing in fossil fuel production. Investments in companies whose main business activity is fossil fuel distribution are also excluded, however, companies that contribute to a*

*sustainable energy transition can in some cases be included. Service companies within the oil and gas sector are excluded. In other sectors, investments can be made in service companies if the main business is not linked to fossil fuels; for example, within the chemical, engineering and transport sectors.*

## International norms

The fund avoids investing in companies involved in violations of international norms and conventions with regard to the environment, human rights, working conditions and business ethics, e.g. the UN Global Compact and OECD's guidelines for multinational companies.

The fund avoids investing in all identified companies that do not comply with international norms.

*The fund company's comments:*

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

Companies where the fund does not see a willingness to change or where the fund assesses that the companies will not be able to rectify problems during an acceptable time horizon are rejected as investments.

## Countries

For sustainability reasons, the fund does not invest in companies that are involved in certain countries/interest-bearing securities issued by certain states.

### Other

Other

*The fund company's comments:*

*The above is applicable for direct investments in companies and equity derivatives in companies, but it is not applicable for investments in index derivatives or exchange-traded funds (ETF).*

## The fund company influences

The fund company uses its ownership influence to influence companies in sustainability matters. The fund company has contact with companies in order to influence them to act in a more sustainable manner.

Corporate influence in-house

*The fund company's comments:*

*In total, we have nine internal specialists in sustainability and owner governance. The specialists conduct an ongoing dialogue with different companies and/or issuers to influence them to be more sustainable and to move them in a positive direction. The fund managers and fund company board are also involved.*

Corporate influence in cooperation with other investors

*The fund company's comments:*

*We engage with companies within the framework of PRI (Principles for Responsible Investment) and together with other investors on our own*

initiative.

- Corporate influence through external suppliers/consultants

*The fund company's comments:*

*Influence is conducted through two external suppliers: ISS-Ethix and Sustainalytics Engagement Service.*

- Voting at general meetings

*The fund company's comments:*

*The fund company participates and votes on general meetings based on the fund company's principles of unitholder engagement.*

- Participates in nomination committees in order to influence the composition of the Board

*The fund company's comments:*

*The fund company participates in nomination committees based on the fund company's principles of unitholder engagement.*

- Other corporate influence

### The fund risk profile

Equity funds normally have higher potential for long-term value growth. However, investment in equity funds also involves higher risk, as prices can fluctuate a great deal on the stock market.

The fund invests in assets concentrated in one region (Europe), which increases the risk relating to the fund. However, the risk is somewhat diminished as most European equity markets are established and mature markets, and in addition investments are diversified over several sectors, which reduces the risk somewhat. The fund invests in securities denominated in other currencies than Swedish kronor and is therefore also affected by exchange rate fluctuations.

As the fund usually uses derivatives on a small scale, this impacts on the fund's risk profile to a certain extent. The use of derivatives can vary from time to time.

### Target market

This fund may not be appropriate for investors who plan to withdraw their investment within 5 years.

### Level of activity

#### Description of activity rate

The fund tracks the index closely. The manager applies a quantitative investment strategy aimed at minimising the risk of deviations from the index given the fund's sustainability strategy. In order to meet the fund's objective, the fund manager monitors and modifies the portfolio.

**Explanation of the fund's benchmark** The fund's benchmark is the MSCI Europe Index, which keeps abreast of the development of large and medium-sized companies on stock markets throughout Europe. Indices do not include emerging market countries. The fund company determines that the index is in line with the fund's investment focus with regard to the choice of asset classes and the market and with regard to the return and risk profile.

### Active risk

Year	Active risk (Tracking Error), %
2019	0.671
2018	0.541
2017	0.234

#### Comment on achieved active risk

The fund's investment strategy is to track the index closely with the goal of following the benchmark index. Over the last 4 years, the fund's activity rate has varied. As a result of its in-depth sustainability work, the fund has been both overweight and underweight compared to index with an active risk greater than zero. Under normal market conditions, active risk varies around 0.70 per cent, which means that the fund may show both a positive and negative deviation from the index's performance. The fund's ability to follow the index will also be generally affected by transaction costs, which for example, arise from the reinvestment of dividends, the management of flows and index changes.

### Fees

#### Ongoing charges:

Ongoing charges represent the total costs for operating the fund, including marketing and distribution, and this figure, unless otherwise stated, regards costs for the previous year. Ongoing charges do not include transaction costs or any performance-based fees.

Ongoing charges	%
- Share class A	0.20
- Share class C	0.20

#### Current management fee

The current management fee is the annual management fee the company takes from the fund. The management fee includes compensation for the expenses related to custody of the fund's assets plus the costs of financial supervision and auditors' fees.

Current management fee	%
- Share class A	0.20
- Share class C	0.20

#### Maximum management fee

The maximum management fee is the annual management fee that the company is permitted to charge the fund in accordance with the fund rules. The management fee includes compensation for the expenses related to custody of the fund's assets plus the costs of financial supervision and auditors' fees.

Maximum management fee	%
- Share class A	0.30
- Share class C	0.30

#### Cost of analysis

The fund company procures external investment analyses in its fund management activities. The analyses can relate to companies, geographic markets, industries or macroeconomic conditions. As of 2018, the fund company pays the cost of the analyses instead of the fund. The fund is therefore not encumbered with analysis costs.

#### Risk measurement

Each day, the company measures the total exposure of the fund using the commitment method.

The commitment method measures fund exposure arising from the use of derivatives. This calculation involves converting derivative positions into a comparable position in the derivative's underlying assets. Delta is also calculated for options, which is included in the total exposure when using the commitment approach. When calculating total exposure, the fund company considers netting and hedging. Using this calculation, total exposure may not exceed 100 per cent of the fund's value.

#### Derivative instruments

When the fund does use derivatives in its management strategy, both the total and the active risk levels can fluctuate significantly.

The purpose of the use of derivatives may be to protect the fund against certain risks, e.g. currency risks. It may also be to create leverage in the fund's market exposure in order to benefit from the fund management's prevailing market expectations. Derivatives are also used to increase efficiency in the fund exposure to direct market risk as may be desirable for the fund from time to time.

#### Collateral management

Entering OTC financial derivative transactions exposes the fund to counterparty risk. In order to regulate counterparty risk, the company has a policy of entering into collateral agreements with the counterparties. The type of collateral accepted is defined in the company's collateral instruction established in accordance with applicable regulations and ESMA's guidelines on exchange-traded funds and other matters relating to fund companies (ESMA 2014/937).

As collateral, cash and cash equivalents are primarily accepted. Collaterals by other means than cash and cash equivalents may, however, arise. Collateral received which does not consist of cash and cash equivalents shall have a low market, credit and liquidity risk. Collateral obtained for OTC derivatives which are not cash and cash equivalents may not be reinvested, sold or pledged.

#### Special information on total return swaps

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

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

financial instrument will therefore not change the fund's overall market exposure.

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

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

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

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

The expected use of total collection swaps will be limited.

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

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

#### **Limitation of sale and redemption orders**

Sales or redemption orders for fund units cannot be limited. There is no maximum or minimum limit for purchases.

#### **Sale and redemption of fund units**

The sale and redemption of units is made through Swedbank AB (publ) and cooperating savings banks etc. The request for sale and redemption may only be withdrawn if the company permits it.

In the event of sale and redemption made before 16:00 (break-off point) on a certain business day, the trading price is normally set on the same banking day. For sales and redemptions transacted after the cut-off time, the trading price is normally set on the next banking day.

On certain banking days, the break-off point can occur earlier than as stated above. The trading price is normally available at the company no later than the banking day following the banking day on which the trading price is set as described above.

The company will confirm all sales and redemptions in writing on the same banking day, or no later than the next banking day. Regular monthly savings, by direct debit or similar, shall be confirmed in writing every six months.

Visit [swedbankrobur.com](http://swedbankrobur.com) for additional information on fund distributors and current fund rates.

#### **Shares Classes – dividend, conditions, etc.**

The fund consists of the following share classes:

A. Accumulating share class (non-dividend) traded in SEK.

B. Dividend share class traded in SEK.

C. Accumulating share class (non-dividend) traded in EUR.

D. Dividend share class traded in EUR.

E. Accumulating share class (non-dividend) traded in NOK.

F. Dividend share class traded in NOK.

G. Accumulating share class (non-dividend) traded in USD.

H. Dividend share class traded in USD.

I. Accumulating (non-dividend) share class traded in SEK with a subscription fee threshold of SEK 10,000,000.

J. Dividend share class traded in SEK with a subscription fee threshold of SEK 10,000,000.

K. Accumulating (non-dividend) share class traded in EUR with a subscription fee threshold of EUR 1,000,000.

L. Accumulating share class (non-dividend) traded in SEK with distribution conditions.

M. Dividend share class traded in SEK with distribution conditions.

N. Accumulating share class (non-dividend) traded in EUR with distribution conditions.

O. Accumulating share class (non-dividend) traded in NOK with distribution conditions.

P. Accumulating share class (non-dividend) traded in USD with distribution conditions.

Q. Accumulating share class (non-dividend) traded in SEK with distribution conditions.

R. Dividend share class traded in SEK with distribution conditions.

S. Accumulating share class (non-dividend) traded in EUR with distribution conditions.

T. Accumulating share class (non-dividend) traded in NOK with distribution conditions.

U. Accumulating share class (non-dividend) traded in USD with distribution conditions.

V. Accumulating share class (non-dividend) traded in SEK. Open only to funds managed by Swedbank Robur Fonder AB.

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

A share class with distribution conditions (share class L-U) is open only for:

– unit holders who, within the framework of the investment service agreement as per Chapter 2, section 1 of the Securities Market Act (2007:528) or equivalent Swedish or foreign regulation, invest in the fund, provided that, and only as long as, there is a written agreement between the fund company and the provider of the investment service, or an intermediate party within the distribution chain, which expressly allows the distribution of the share class without entitling the distributor to compensation from the fund company, and for

– insurance undertakings that within the framework of the agreement invest in the fund, provided that, and only as long as, there is a written agreement between the fund company and the insurance undertaking or an insurance distributor which expressly allows investment in the share class without entrusting the insurance undertaking or insurance distributor to compensation from the fund management company.

If a unit holder with the same funds simultaneously fulfils the conditions for more than one share class, the funds shall be transferred to the share class with the lowest management fee as per section 11 of the fund regulations. If a unit holder's funds no longer meet the conditions of a share class, the funds shall be transferred to the share class with the lowest management fee as per section 11 whose conditions the unitholder's funds meet.

The transfer shall take place without changing the conditions for dividend payments and currency.

The person who has distributed fund units to a unit holder is responsible for ensuring that the unit holder receives the share class to which he/she is entitled.

If there is no receiving share class to subscribe to with the same dividend and currency conditions when the transfer is to be carried out due to the fact that the unit holder's funds no longer meet the conditions for a share class, the transfer shall take place to the share class that most closely corresponds to the share class whose conditions the unit holder's funds no longer meet.

A transfer shall not take place to or from share class I-K.

Currency hedging will not take place on the basis of which currency the shares are subscribed for and redeemed in.

#### **Limitation of liability**

According to the Act, the fund company and the custodial bank are responsible for damages they have caused the fund or fund unit holders. That mentioned below does not limit the unit holders' rights to damages under Chapter 2, section 21 and Chapter 3, sections 14-16 of the Act.



The fund company and the custodial bank are not liable for damages resulting from Swedish or foreign legislation, measures taken by Swedish or foreign authorities, acts of war, strikes, blockades, boycotts, lockouts, or other similar circumstances. The provision regarding strikes, blockades, boycotts and lockouts shall also apply should the fund company or the custodial bank be the subject of or take such action.

The fund company and custodial bank shall not be liable for losses arising from circumstances not described above if they have acted with reasonable diligence. The fund company and the custodial bank are not responsible in any case for indirect damage, nor for damage caused by the custodial bank or other contractor that has been engaged using the required diligence by the fund company or custodial bank. The fund company and the custodial bank are not responsible for damage that may arise in relation to disposal restrictions which may be applied to the fund company or custodial bank.

Should the fund company or the custodial bank be prevented from taking action due to circumstances mentioned in the second paragraph above, such action must be postponed until the obstacle has been removed.

#### **Permitted investors**

Neither the fund nor the company are or intend to be registered under the applicable version of the United States Securities Act 1933, United States Investment Advisers Act 1940 or other similar legislation in the USA, Canada, Japan, Australia, or other country. The fund rules therefore contain certain restrictions as to the natural persons or legal entities that may be unit holders in the fund. To enable company compliance with these restrictions, all those who want to subscribe to fund units must provide, from time to time, information regarding national residence and other circumstances the fund company considers relevant. Unit holders shall provide notification of changes to these circumstances when necessary. The fund units and their rights may only be re-transferred to a non-U.S. citizen (as defined in Regulation S of the United States Securities Act 1933) and must be executed in a transaction outside the USA that complies with Regulation S of the United States Securities Act 1933.

If the company finds that an investor is not entitled to subscribe to or own units in the fund as specified in these restrictions, then the company is entitled to refuse subscription of the units, and without prior consent redeem units on their account.

#### **Discontinuation of the fund or transfer of fund business**

When the company determines to discontinue the fund or to transfer management of the fund to another fund company, subject to the consent of Finansinspektionen (the Swedish Financial Supervisory Authority), all unit holders will be informed. Management of the fund shall immediately be assumed by the custodial bank if the Swedish Financial Supervisory Authority revokes authorisation for the fund company, or the fund

company enters liquidation or bankruptcy proceedings.

#### **Changes to fund rules**

The company may change the fund rules. Any such changes shall be submitted to the Swedish Financial Supervisory Authority for approval. Changes may affect fund characteristics, such as its investment policy, fees, and risk profile. When such changes are approved, the decision must be made available at the fund company and the custodial bank and must be notified as specified by the Swedish Financial Supervisory Authority.

#### **Tax rules**

##### **Tax paid by Swedish fund unit holders (natural persons, legal persons and estates).**

As of 1 January 2012, Swedish tax laws require that fund unit holders pay a standard withholding tax annually for their fund holdings. The standard tax is based on the fund's capital base which determines the unit holders' fund holding at the start of the tax year. An imputed income of 0.4% is calculated on the capital base. The imputed income is included in totals for income of capital which is then taxed at 30% for natural persons. This gives an actual tax of 0.12 percent of the fund value.

Example: A unitholder owns fund units valued at SEK 100,000 at the start of the tax year. The capital base is SEK 100,000 and the imputed income then SEK 400 (100,000 x 0.004). The imputed income is then included in income of capital which is then taxed at 30%. The tax is then SEK 120 (400 x 0.3).

When the units are sold or redeemed, the capital gain is taxed at 30%, while capital loss is deducted as follows. Capital losses on listed units in Swedish fixed income funds (funds that only invest in Swedish debt instruments) may be offset 100 percent against other capital income. For listed units in other funds, a capital loss may be offset 100% against capital gains in listed equities and other fund units. Otherwise, 70% of capital losses may be offset against capital gains.

The annual imputed income is reported to the Tax Agency (Skatteverket), but no preliminary tax is withheld. Preliminary tax at 30 per cent will be deducted from dividends. The total dividend will be reported to the Swedish Tax Agency. Capital gains and losses arising from sale or redemption of fund units are reported to the Swedish Tax Agency, but no tax deduction is made.

Special taxation rules apply to funds linked to investment savings accounts, unit-linked policies, IPS, or premium pension system. "For natural persons, the imputed tax rate for income from business operations is currently taxed at 22%". For foreign fund unit holders, other rules apply.

Taxation may be affected by individual circumstances. If you are unsure about tax implications, you should seek expert advice.

#### **Marketing fund units in other EEA countries**

Marketing fund units in other EEA countries

The fund is marketed in:

Estonia  
Latvia  
Lithuania

and the company has employed third-party distributors of the funds to make payments to fund unit holders, redeem units, and provide information. More information about our foreign distributors is available at [www.swedbankrobur.se](http://www.swedbankrobur.se)

#### **Unitholder register**

The company maintains a register of all unit holders and their holdings. The fund company has commissioned Swedbank AB (publ) to maintain this register.

Unitholders' holdings are reported in interim and annual statements, which also contain information necessary for tax reporting purposes.

The right to a share of the fund and the rights deriving therefrom are contingent on registration of units.

#### **Third Party Contract**

The company has mandated third parties to carry out certain demarcated parts of the business:

Internal audit and compliance and registrations in fund unitholder registers are carried out by Swedbank AB (publ). For some OTC derivatives, collateral management, confirmation management, reconciliation and reporting have been entrusted to GlobeOp.

The company has procedures that enable identifying, processing, monitoring, and reporting any conflicts of interest.

#### **The Custodial Bank**

Swedbank AB (publ)

Domicile: Stockholm

Corporate identity number: 502017-7753

Legal form of the custodial bank: Limited company

The principal operations of the custodial bank:

Banking

The Custodian Bank shall monitor money flows in the fund, maintain custody of the fund assets, and execute decisions of the company. The Custodian Bank shall also ensure that the sale and redemption of fund units, valuation of fund units, and the use of fund assets comply with legal requirements and the fund rules.

Swedbank AB (publ) has contracted with JP Morgan NA London Branch to act as securities depository for securities held outside Sweden. Swedbank AB (publ) has procedures that enable identifying, managing, monitoring, and reporting any conflicts of interest. Since the Custodian Bank is part of Swedbank AB, conflicts of interest may arise between the operations of the Custodian Bank and other operations with Swedbank AB, as with trading

financial instruments for our own or for our clients' account, investment advice, and between the customers of these operation. The company and the Custodian Bank are part of the same group, which also may cause conflicts of interest involving control and priorities within the group. To ensure potential conflicts of interest have no negative impact on the fund and its investors, the Custodian Bank is functionally and organisationally separate from the other operations within Swedbank AB and the company. The custodial bank's business is always managed for the purpose of preserving the interests of the fund unit holders, and it complies with applicable market terms and conditions.

### Remuneration policy

The board of directors for Swedbank Robur Fonder have adopted a remuneration policy that is consistent with and promotes sound and efficient risk management. The Swedbank Robur Fonder (the company herein) remuneration policy is designed to counter risk taking that is inconsistent with the risk profiles of the company's managed funds. The remuneration policy shall counteract an excessive risk taking, and stimulate employees to provide sustainable performance, and a sound and efficient risk management for unit holders, the company and the funds managed by the company.

The remuneration policy consists of two variable remuneration programs, and a fixed remuneration (in the form of monthly salary). The fixed portion of remuneration represents a sufficiently large portion of total remuneration to enable setting all variable remuneration to nil. The variable remuneration is limited to a maximum of 12 times the fixed monthly salary.

The remuneration programme is designed to ensure, to the greatest possible extent, avoiding conflicts of interest. Each portfolio manager is monitored and assessed based on all their management assignments. The variable remuneration programme is continually followed and monitored. The variable remuneration is designed to stimulate sound behaviour and desired results, and to create a sound balance between reward and risk exposure in the fund.

The variable remuneration is based on the employee's performance, which is assessed according to the performance criteria set at the beginning of every calendar year, including in the risk mandate for each fund. The assessment is based on a combination of quantitative and qualitative results.

Information on the current remuneration policy can be found at [www.swedbankrobur.se/legal-documents](http://www.swedbankrobur.se/legal-documents) We can provide a paper copy on request, please contact Swedbank Robur Fonder AB.

### Information on the Company and managed funds

#### The company

Swedbank Robur Fonder AB

Malmskillnadsgatan 23  
111 57 Stockholm

Corp. ID no.: 556198-0128.

The company's legal form: Limited company with share capital of SEK 1,250,000.

The company was formed in 1967 with its domicile in Stockholm.

#### Board members and senior executives

Joachim Spetz, Chairman of the Board, former CEO

Erik Penser Bank, former CEO Handelsbanken

Fonder, self-employed

Lennart Jacobsen, M.Sc., VD Invesi Investment AB

Evert Carlsson, Senior Lecturer School of Economics Gothenburg

Marianne Flink, MBA

Monica Åsmyr, self-employed, former Managing

Director Almi Stockholm Sörmland

#### CEO

Liza Jonson

#### Deputy CEO

Adam Wastå

#### Senior executives

Head of Business & Product Development, Morgan Andersson

Compliance Manager, Pia Gisgård

Head of Development Operations, Fredrik Ulfhjelm

Head of Finance & Controlling, Adam Wastå

Head of HR, Helena von Koch

Head of Investment Management, Erik Andersson

Risk Manager, Ida Gustavsson

Head of Legal & Complaints, Pia Sodemann

Head of Sales, Jens Grebäck

#### Auditors

The fund's auditing company is PwC Sverige AB and the designated auditor is Peter Nilsson.

#### Funds managed by Swedbank Robur Fonder AB

Folksam LO Obligation

Folksam LO Sverige

Folksam LO Världen

Folksam LO Västfonden

KPA Etisk Aktiefond

KPA Etisk Blandfond 2

Swedbank Ethica Obligation Utd.

Swedbank Humanfond

Swedbank Robur Access Asien

Swedbank Robur Access Edge Emerging Markets

Swedbank Robur Access Edge Sweden

Swedbank Robur Access Europa

Swedbank Robur Access Global

Swedbank Robur Access Japan

Swedbank Robur Access Mix

Swedbank Robur Access Sverige

Swedbank Robur Access USA

Swedbank Robur Aktiefond Pension

Swedbank Robur Allemansfond Komplet

Swedbank Robur Asienfond

Swedbank Robur Bas Action

Swedbank Robur Bas Aktier

Swedbank Robur Bas Mix

Swedbank Robur Bas Ränta

Swedbank Robur Bas Solid

Swedbank Robur Dynamic

Swedbank Robur Ethica Företagsobligationsfond

Swedbank Robur Ethica Obligation

Swedbank Robur Europafond

Swedbank Robur Exportfond

Swedbank Robur Fastighet

Swedbank Robur Fokus

Swedbank Robur Förbundsfond

Swedbank Robur Förbundsranterfond

Swedbank Robur Förbundsranterfond Kort

Swedbank Robur Företagsobligationsfond

Swedbank Robur Företagsobligationsfond High Yield

Swedbank Robur Företagsobligationsfond Mix

Swedbank Robur Global Emerging Markets

Swedbank Robur Global High Dividend

Swedbank Robur Global Impact

Swedbank Robur Globalfond

Swedbank Robur Japanfond

Swedbank Robur Kapitalinvest

Swedbank Robur Kinafond

Swedbank Robur Medica

Swedbank Robur Microcap

Swedbank Robur Mixfond Pension

Swedbank Robur Nordenfond

Swedbank Robur Ny Teknik

Swedbank Robur Obligationfond

Swedbank Robur Realranterfond

Swedbank Robur Rysslandsfond

Swedbank Robur Råvarufond

Swedbank Robur Ränterfond Flexibel

Swedbank Robur Ränterfond Kort

Swedbank Robur Ränterfond Kort Plus

Swedbank Robur Selection 25

Swedbank Robur Selection 50

Swedbank Robur Selection 75

Swedbank Robur Small Cap Emerging Markets

Swedbank Robur Small Cap USA

Swedbank Robur Småbolagsfond Europa

Swedbank Robur Småbolagsfond Global

Swedbank Robur Småbolagsfond Norden

Swedbank Robur Småbolagsfond Sverige

Swedbank Robur Stiftelsefond

Swedbank Robur Stiftelsefond Utd.

Swedbank Robur Sverigefond

Swedbank Robur Sverigefond MEGA

Swedbank Robur Sweden High Dividend

Swedbank Robur Talenten Aktiefond MEGA

Swedbank Robur Talenten Ränterfond MEGA

Swedbank Robur Technology

Swedbank Robur Transfer 50

Swedbank Robur Transfer 60

Swedbank Robur Transfer 70

Swedbank Robur Transfer 80

Swedbank Robur Transfer 90

Swedbank Robur Transition Global

Swedbank Robur Transition Global MEGA

Swedbank Robur Transition Sverige

Swedbank Robur Transition Sverige MEGA

Swedbank Robur USA

Swedbank Robur Östeuropafond

### About the Information Brochure

This information brochure was produced in accordance with Act on Securities Funds (LVF);

2004:46) and the Swedish Financial Supervisory Authority Directives (2013:9) on securities funds.

This brochure and the fund rules together form the Full Prospectus.

The Swedish information brochure takes precedence in issues of interpretation

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