

**Website Product Disclosures further to art. 10(1) of the Sustainable Finance Disclosure Regulation  
for art. 9 sub-funds**

**Name:** SEB Impact Fund

**Legal entity identifier:** 54930007XTSFTBZ7SS04

**No significant harm to the sustainable investment objective**

This financial product has a sustainable investment objective.

This financial product commits to make sustainable investments.

**Sustainable investment objective of the financial product**

The Fund seeks to achieve capital appreciation over the medium to long term by generating financial returns through sustainable investments, which contribute to positive social, economic and/or environmental "Impact Themes" (as defined below), provided that investee companies follow good governance practices.

"Impact Themes" include (but are not limited to): (i) water availability (improving access to quality water supply and preservation of the resource), (ii) sustainable energy (transition towards affordable and clean energy), (iii) food and agriculture (ensuring a sustainable food supply), (iv) resource efficiency (enhancing resource efficiency and waste reduction) and (v) social improvement (enhancing society's needs such as but not limited to safety, education, health and wellbeing).

The Fund has not designated any benchmark for the purpose of determining whether this financial product meets its sustainable investment objective.

**Proportion of investments**

The Investment Manager will ensure at any time that at least 85% of the securities composing the Fund's portfolio are sustainable investments and the remaining assets will be held in cash and instruments for the purpose of liquidity and portfolio risk management.

The Fund commits to have a minimum of 40% of sustainable investments with an environmental objective and a minimum of 10% of sustainable investments with a social objective.

**Monitoring, methodologies, data sources and their limitations, due diligence and engagement policies**

The Investment Manager's exclusion policy is implemented through an exclusion list of issuers, along with continuous screening for relevant sanction breaches. The Investment Manager implements pre-trade and post-trade controls for all Fund holdings in reference to the exclusion list. All assets classified as sustainable investments are, in addition, monitored regularly to ensure the fulfilment of the Investment Manager's criteria for sustainable investments. This includes DNSH criteria on environmental and social targets as well as minimum social safeguards.

The Fund is comprised of several distinct sleeves, each delegated to a Sub-Investment Manager and following a different Equity Investment Strategy. As such the Investment Manager ensures that the different sleeves comply with the sustainable investment objective of the SubFund and uses metrics such as but not limited to the CO2 emission or amount of materials recovered/waste treated per year by the investee company etc. In addition to the above, the Sub-Investment Managers of the Equity Investment Strategies measures revenues (or in a few instances if not-yet revenue generating, Capex/Opex) attributable to the sought-after theme per company. This number is reported to the Investment Manager who aggregates it to the portfolio level.

The Sub-Investment managers are using a wide variety of sources and apart from direct company communication and proprietary datasets other sources such as sell-side brokers, Bloomberg, SASB, ISS etc are used. On the Investment Manager level, sustainability data is retrieved from external data providers, which provide data on company level.

The methodology limitations are by construction linked to use of ESG data. The ESG data landscape is currently being standardised which can impact data quality; data coverage also is a limitation. Current and future regulation will improve standardized reporting and corporate disclosures on which ESG data rely.

The Investment Manager is aware of this limitations which are mitigated by a combination of approaches: the monitoring of controversies, the use of several data providers, a structured qualitative assessment by the ESG research team of the ESG scores, the implementation of a strong governance.

The Investment Manager conducts ongoing evaluation of the level of impact of the portfolio and compiles a quarterly report which aims to give the investors transparency on the exposures. The Investment Manager has quarterly calls with the selected Sub-Investment Managers with updates on relevant issues for the specific strategy. The Investment Manager also uses external data providers, such as ISS, to test the portfolio from several sustainability angles, such as SDG Rating and Carbon footprint. Any outliers in these reports, e.g. "top ten emission" companies or "Highest negative Impact on SDG" are discussed and further investigated if deemed necessary.

All of the underlying Sub-Investment Managers are active shareholders and engagement and stewardship is a key part of their investment processes. The Fund has therefore outsourced the ongoing engagement activities to the Sub-Investment Managers. If deemed necessary, the Investment Manager can bring up specific issues to be addressed with an investee company by the Sub-Investment Manager.