

# ANNUAL REPORT 2023



### The fund company Simplicity AB We manage securities funds according to an efficient and disciplined management model

Simplicity is authorized by the Swedish Financial Supervisory Authority to manage funds and has been under its supervision since 2002. We manage over 24 billion Swedish kronor across six equity funds, five fixed-income funds, and one balanced fund. All our funds are characterized by active management, a strong awareness of risk, sustainability considerations, with a focus on long-term risk-adjusted returns. Our equity management is based on facts and measurable factors with a clear connection to com-panies' performances and prospects. We seek the leading quality companies based on profitability, value, risk, company development, and positive stock trends. Our latest addition among the equity funds, launched in 2022, Simplicity Green Impact, meets the highest sustainability standards and is classified as dark green, Article 9 according to the Disclosure Regulation. The fund invests solely in companies that contribute to and benefit from sustainable transition with a focus on the environ-ment and climate. All other Simplicity funds promote environmental or social characteristics con-tributing

to sustainability, without sustainability being an explicit goal of the investments, and are therefore classified as light green, i.e., Article 8 according to the Disclosure Regulation. Simplicity's portfolio management service, established in the fall of 2023, offers discretionary and advisory management to foundations, institutions, companies, and wealthy individuals. Our experi-enced management team conducts active asset allocation within broad frameworks and the ability to use all asset classes and available financial instruments. Based on market conditions and risk analysis, repositioning is carried out according to a systematic investment process. Since the fall of 2023, Simplicity also offers a tailored comprehensive solution for foundations regarding manage-ment, administration, accounting, board administration, and application management. Our overall goal is to build long-lasting and transparent relationships with both customers and part-ners through good management results with lower risk, continuity in management, and a high de-gree of accessibility.

## **Responsible investments**

#### At Simplicity, responsible investments and sustainability are integral parts of our management approach

At Simplicity, our philosophy is to invest in sustainable and well-managed companies, which we believe is one of the most critical prerequisites for generating high-risk adjusted returns for our clients. One of the key factors in this regard is that companies conduct their operations in a responsible and sustainable manner. Simplicity's work on responsible investments and consideration of sustainability risks occurs in fund management, discretionary portfolio management, and investment advisory services. We are convinced that this approach leads to sustainable and long-term value creation.

Simplicity has identified several sectors where sustainability risks are deemed significant, leading us to completely exclude fund investments in these sectors. The excluded sectors include tobacco, cannabis, alcohol, pornography, commercial gambling services, weapons, fossil fuels, and GICS sector 10. In addition to the mentioned sectors, our funds also have specific requirements regarding energy production based on fossil fuels and nuclear power. Furthermore, norm-based exclusions are made for companies subject to current EU or UN sanctions. Individual funds may have stricter requirements. Thresholds are applied to determine if a company is associated with any of the aforementioned sectors or activities.

Fund management integrates sustainability risks by including assets that positively contribute to a more sustainable society, whether through their business activities or specific characteristics related to sustainability. Our funds work towards promoting the goals of the Paris Agreement, aiming for all fund holdings to have climate targets verified by the Science Based Targets Initiative (SBTi) by 2040. Additionally, we aim for all investments through our funds to be aligned with the UN Global Compact by 2040. Green, social, sustainable, and sustainability-linked bonds have specific conditions attached to them, ensuring that the capital raised through bond issuance is used for projects deemed to have positive impacts in these areas. At least five percent of the capital in our fixed-income funds should consist of one or more types of such bonds.

Investments in companies that do not operate responsibly pose sustainability risks. Therefore, Simplicity uses norm-based screening to identify any violations of international norms, such as the UN Global Compact, OECD Guidelines for Multinational Enterprises, and the UN Guiding Principles on Business and Human Rights (UNGPs), but also to identify other types of environmental, social, and governance-related incidents. All funds are screened regularly.

If it is found that a company in which Simplicity's funds have invested has been involved in an incident or violation, actions must be taken by Simplicity. These actions may include initiating an engagement dialogue to understand the company's perspective on what happened and what actions have been taken or will be taken to address the issue. The dialogue and other information gathered by Simplicity will then form the basis for the actions to be taken by Simplicity, which may include divesting the holding if the actions taken are deemed insufficient.

Simplicity's funds should not invest in companies that systematically violate international norms and conventions without demonstrated willingness to change. Engagement dialogues may also be used here to influence and encourage companies to act more sustainably.

#### Become a customer at Simplicity It's easy to become a shareholder in Simplicity's funds

Investing in our funds is very simple. If you choose to open a fund account or Investringssparkonto (ISK) directly with us at Simplicity, you'll have access to the personalized service that only an independent fund company can provide. In addition to a more personalized contact regarding your investments, we also offer personalized login access directly on simplicity.se. Through this personalized login, you can track the performance of your own, your family's, or your company's fund holdings with us. At the end of each month, you'll receive our monthly reporting on the most significant market events of the past month, along with more specific comments on the performance of our funds.

If you value the convenience of consolidating investments, accounts, and loans in one place, you'll also find our funds available at most Swedish banks and investment platforms. For a complete list of banks and platforms offering our funds, please visit our website – see below. Several of our funds are also available through the pension system. If you're interested in purchasing or switching to our funds in the pension system, this can be done through the Swedish Pensions Agency, which also handles all information dissemination and administers the buying and selling of shares. The Swedish Pensions Agency can be reached most easily through their website (www.pensionsmyndigheten.se) or by phone at 0771-776 776.

More information about Simplicity and our funds can be found at **www.simplicity.se.** 

#### MANAGEMENT REPORT 2023

## SIMPLICITY NORDEN

Fund start date	2002-09-23
Benchmark index	STOXX Nordic Total Market Net Total Return Index
NAV (Net Asset Value) / Trading	Daily
Subscription fee	0%
Redemption fee	0%
Management fee class A	Maximum 1.7% (of which 1.6% is compensation to the fund company).
Management fee class B	Maximum 1.0% (of which 0.8% is compensation to the fund company).
Minimum initial deposit	100
Monthly savings plan	100
One-time deposits	100
Bankgiro (a type of bank payment system in Sweden)	5457-2839
Custodian institution	Skandinaviska Enskilda Banken AB
PPM Fund number	484980

## Management report Simplicity Norden

# DEVELOPMENT OF THE FUND DURING THE YEAR

Simplicity Norden had a return of 9.1% during the year. The performance on the Nordic stock exchanges was unusually divergent, with several listed companies experiencing significant declines while others surged. As the economy remained resilient, several of the large industrial companies performed positively. ABB, Atlas Copco, and Volvo all ranked among the top five contributors to the fund's performance. A high proportion of the fund's holdings performed very well during the year, reporting better sales and earnings than expected. Novo Nordisk, the fund's largest contributor during the year, had an exceptionally good year. Demand for the company's insulin medications was high. Additionally, significant progress was made in the company's weight-loss medications, which are expected to become the company's next major growth area. Along with the index-heavy industrial companies, Novo Nordisk also contributed significantly to the performance of the fund's benchmark index, the STOXX Nordic Total Market Net Return Index, which rose by 14.5%.



#### EQUITY AND FOREIGN EXCHANGE MARKETS

The development of the stock markets was largely driven by a surprisingly positive development for the world economy. The recession, which was previously expected to come, was absent as GDP growth was generally stronger than expected. Labour markets also remained strong, not least in the United States, where unemployment was low. This development was also driven by monetary policy developments. Inflation continued to fall in most parts of the world and hopes were raised that a soft landing in the economy may materialise despite tightening measures by central banks. After raising their key interest rates until the third quarter, the US Fed, the European ECB and the Swedish Riksbank all paused their rate hikes. The Fed also signalled that interest rate cuts are on the cards next year, which caused market interest rates to fall sharply and give new impetus to stock markets.

The rise in interest rates at the beginning of the year was an underlying reason for three bank collapses in the US and the fact that Credit Suisse was forcibly bought by UBS. The banking turmoil led to high volatility in the markets at the beginning of the year, but the turmoil quickly subsided as the collapses of the banks were seen more as isolated events.

The resilience of the economy was evident in the reports

of listed companies during the year. Cyclical industrial companies in particular performed very well and far exceeded the generally low expectations. Overall, however, company reports were unusually strong in terms of the proportion of listed companies that exceeded expectations. The strong corporate reports were a contributing factor to the positive development of the stock markets. Another reason was the emergence of artificial intelligence (AI) and especially generative AI which had its breakthrough in 2023. Several companies raised their forecasts as a result of increased use of AI, and the technology is considered by many to be able to create value for companies through efficiency improvements and the ability to analyze large amounts of data.

Geopolitical tensions increased somewhat in the world, but at the same time had a limited impact on financial markets. In the Middle East, war broke out between Israel and Hamas, prompting other Iranian-backed rebel groups to attack Israel, U.S. bases and cargo ships in the area.

In the foreign exchange markets, interest rate developments largely determined currency movements and the Swedish krona had a volatile year. Since the Riksbank was somewhat more cautious about interest rate hikes than, for example, the ECB, the krona weakened until September, when the relationship turned abruptly and other Nordic currencies fell against the krona. At the end of the year, the fall in the euro and the Danish krone had compensated for the entire weakening of the krona and was largely unchanged for the year, while the Norwegian krone had weakened. The currency effect on the fund was thus slightly negative.

#### RISK MANAGEMENT AND KEY PERFORMANCE INDICATORS

Over the past two years, Simplicity Norden standard deviation has been 14.1%, which is lower than the corresponding figure for the STOXX Nordic Total Market Net Return Index, which is 15.8%. The Fund has managed market, sector, country and regional risk by investing in a number of highly liquid, stable and profitable stocks in different industries, countries and regions. The fund has chosen not to hedge against currency risk. The currency risk is almost the size of the investment in each country.

The fund's level of activity is described using the key figure active risk, a measure of how much the difference in the performance of the fund and its benchmark index varies over time. The fund's benchmark index is relevant as it provides a good representation of the Nordic stock market as well as the fund's long-term return and risk profile. Over the past two years, the Fund's active risk has been 6.8%. The level of activity is high as the fund is actively managed and often deviates greatly from its benchmark index in terms of sector distribution, geographical allocation and weighting in specific stocks. Compared to the index, for example, the fund has had a significantly higher weighting in the banking sector over the past two years. On occasions when the performance of bank shares has deviated significantly from the index, the fund's return has often deviated significantly from the index, which has contributed to a high active risk for the fund.

#### HOLDINGS AND POSITIONS

The country distribution in the fund changed relatively much as Swedish companies increased from 46% to 57%. The change can partly be explained by the fact that the industrial sector has been weighted up, from 18% to 27%, as the major export companies in particular have had tailwinds from a resilient economy and a weak krona for much of the year. The weight in Finland decreased broadly across sectors from 20% to 12%. Sampo and Orion were among the Finnish companies that decreased the most in the portfolio. The weight of healthcare companies decreased from 14% to 9%, mainly due to the exit of Orion and the weight of AstraZeneca reduced from a high level. At the end of the year, Investor was the fund's largest holding, followed by Novo Nordisk and Volvo. SEK 1,525 million at the end of December 2023. The Fund had a net outflow of SEK 97 million during the year.

#### DERIVATIVES AND SECURITIES LENDING

During the year, the Fund conducted securities lending, which contributed SEK 632 thousand to the Fund's income. In order to streamline management and protect the Fund's assets against exchange rate and currency risks, the Fund may trade in options and forward contracts. The Fund has not made use of this option during the year.

#### SIGNIFICANT EVENTS

No significant events occurred during the year.

#### DEVELOPMENT OF FUND ASSETS

Fund assets increased by SEK 32 million and amounted to

## Follow-up of sustainability work

The fund is an Article 8 fund under the SFDR framework and promotes environmental or social characteristics but does not have sustainable investments as its objective. At least 20% of the Fund shall be made up of sustainable investments. At year-end, this type of investment accounted for [40 %] of the Fund's assets.

The full description of the Fund's sustainability performance can be found below under 'Template for periodic disclosure of the financial products referred to in points 1, 2 and 2a of Article 8 of Regulation (EU) 2019/2088 and the first paragraph of Article 6 of Regulation (EU) 2020/852'.

#### INFORMATION ON THE EU TAXONOMY FOR ENVIRONMENTALLY SUSTAINABLE ACTIVITIES

The fund made investments that are aligned with the EU Taxonomy.

For more information, see below under 'Periodic disclosure template for the financial products referred to in Article 8(1), (2) and (2a) of Regulation (EU) 2019/2088 and the first paragraph of Article 6 of Regulation (EU) 2020/852'.

#### METHODS USED TO INTEGRATE SUSTAINABI-LITY RISKS, PROMOTE ENVIRONMENTAL OR SOCIAL CHARACTERISTICS, OR TO ACHIEVE A SUSTAINABILITY-RELATED OBJECTIVE

#### THE FUND INCLUDES

To a certain extent, the Fund's investments have been made in securities issued by companies that are deemed to have environmentally sustainable activities in line with the EU Taxonomy and in companies that are deemed to contribute to meeting the UN's climate and environment-related goals. At year-end, sustainable investments accounted for [40%] of the fund's assets.

For more information, see below under 'Periodic disclosure template for the financial products referred to in Article 8(1), (2) and (2a) of Regulation (EU) 2019/2088 and the first paragraph of Article 6 of Regulation (EU) 2020/852'.

#### THE FUND EXCLUDES

The fund company's exclusion policy excludes companies in certain operations and industries. The exclusion process has been conducted in accordance with the pre-purchase information regarding the fund company's sustainability work.

# THE FUND MANAGEMENT COMPANY HAS HAD AN IMPACT ON

The fund's holdings have been screened in MSCI's databases for incidents related to environmental, social and governance issues. The impact has been conducted in accordance with the pre-purchase information regarding the fund company's sustainability work.

# OVERALL COMMENT ON SUSTAINABILITY WORK

More information about sustainability-related criteria can be found in the fund's information brochure and on the website.

## Performance

	2023.12.31	2022.12.31	2021.12.31	2020.12.31	2019.12.31	2018.12.31	2017.12.31	2016.12.31	2015.12.31	2014.12.31
Net assets, SEK thousands	1,524,566	1,493,165	1,706,508	1,486,992	1,694,546	1,341,183	598,384	575,121	556,546	443,370
Share class A	1,449,583	1,395,449	1,640,224	1,359,796	1,590,985	1,341,183	598,384	575,121	556,546	443,370
Share class B	74,983	97,716	66,284	127,196	103,561					
NAV, SEK class A	851.10	779.88	889.04	700.38	716.67	551.78	576.33	524.87	485.98	416.86
NAV, SEK class B	126.33	114.75	129.80	101.45	103.01					
Trading NAV*, SEK class A	851.46	780.65	887.92	700.41	716.70	551.86	576.38	524.90	485.82	416.29
Trading NAV*, SEK class B	126.38	114.86	129.64	101.45	103.02					
Number of outstanding units										
Share class A	1,703,192	1,789,319	1,844,934	2,106,360	2,341,996	2,447,771	1,039,940	1,093,871	1,145,200	1,066,141
Share class B	593,567	851,582	510,645	197,030	152,447					
Annual return, %	-	-	-	-	-	-	-	-	-	-
Share class A	9.1%	-12.1%	26.8%	-2.3%	29.9%	-4.3%	9.8%	8.0%	16.7%	21.0%
Share class B	10.0%	-11.4%	27.8%	-1.5%	4.1%					
Annual return benchmark, %	14.5%	-9.6%	31.3%	14.0%	28.4%	-4.3%	12.4%	6.1%	12.5%	15.4%
Active risk**	6.8%	6.6%	6.3%	8.0%	5.9%	3.3%	4.8%	5.7%	4.8%	3.9%

\*NAV for the last trading day of the period. \*\*The portfolios Active Risk is high as a result of active management and large deviations between the fund portfolio and its benchmark index concerning both sectors and specific bonds. The ways in which the portfolio deviates from its benchmark index will also vary over time.

## **Key ratios**

	2023.12.31
Average net assets, SEK thousands	1,470,603
Total return since inception	1013.6%
Average annual return last 2 years	-2.1%
Average annual return last 5 years	9.1%
Turnover ratio	1.0
Benchmark*	STOXX Nordic Total Market Net Total Return Index
Benchmarks return since the fund's inception	825.3%
Average annual return last 2 years benchmark	1.7%
Average annual return last 5 years benchmark	14.6%
RISK**	
Standard deviation	14.1%
Standard deviation benchmark	15.8%

\*STOXX Nordic Total Market Net Total Return Index is calculated in SEK and is a total return index that takes into account dividends. \*\*The key ratios are calculated using the last 24 months data, in accordance with the Swedish Investment Fund Associations guidelines.

## Change in net assets

	2023.12.31
Net assets in the beginning of the year, SEK thousands	1,493,165
Unit issue, SEK thousands	135,827
Unit redemption, SEK thousands	-232,570
Net result according to income statement, SEK thousands	128,144
Net assets, SEK thousands	1,524,566

## Income statement

	Not	2023
INCOME AND VALUE CHANGES		tkr
Value changes on transferable securities	1	95,958
Total value changes		95,958
Interest income		1,614
Dividends		53,749
Net gains and losses on currency exchange		205
Other financial income		6
Total income and value changes		151,532
EXPENSES		
Management expenses		
Compensation to the company operating the fund management		-22,887
Compensation to the custodian institution		-135
Compensation to regulatory authorities		-21
Compensation to auditors		-83
Total management expenses		-23,126
Other expenses		-258
Interest expenses		-4
Total expenses		-23,388
Annual result		128,144

## **Balance sheet**

	Not	2023.12.31
ASSETS		tkr
Transferable securities		1,521,627
Total financial instruments with a positive market value		1,521,627
Total investments with a positive market value		1,521,627
Cash and cash equivalents		5,045
Prepayments and accrued income	2	44
Other assets		26
Total assets		1,526,742
Liabilities		
Accrued expenses and prepaid income	3	1,975
Other liabilities		201
Total liabilities		2,176
NETASSET		1,524,566
Memorandum		
Lent financial instruments	4	220,007
Collateral received for lent financial instruments	5	220,012
Note 1 Value Changes		
Value changes on transferable securities		
Realized gains		109,207
Realized losses		-122,807
Unrealized gains/losses		109,558
Total		95,958
Note 2 Prepaid expenses and accrued revenues		
Accrued interest		44
Accrued dividends		0
Total		44
Note 3 Accrued expenses and prepaid revenues		
Accrued management fees	1975	1,975
Accrued expense interest	-	
Total	1975	1,975
Note 4 Lent financial instruments		
Exposure		220,007
Share of total lendable assets		14.46%
Counterparty		SEB

#### Accounting and valuation principles

This annual report has been prepared in accordance with the Swedish Investment Funds Act (2004:46), the Swedish Financial Supervisory Authority's regulations FFFS 2013:9 and the Swedish Investment Fund Associations guidelines.

#### **Financial instruments**

Realized earnings consist of the difference between the sales value and the original acquisition value. When calculating realized earnings, the average method has been used. Transaction costs are included in the acquisition value and are deducted from the sales value. Financial instruments have been valued at market value corresponding to the current closing price on the closing date.

#### Note 5 Received collateral for lent instruments

## Collateral received for lent financial instrument 2023.12.31

	Quantity	Market value (tSEK)	Currency	Туре	lssuer
KOMINS 1 11/12/26 #2611	11,810,000	11,263	SEK	Municipal Bond	Kommuninvest I Sverige
NDASS 1 06/16/27 #5537	58,000,000	54,890	SEK	Residential Bond	Nordea Hypotek AB
SEK 3 1/4 04/13/26	1,302,000	14,881	EUR	Government Bond	Svensk Exportkredit AB
SGBI 0 1/8 06/01/26 #3112	22,145,000	28,310	SEK	Government Bond	Swedish State
SGBI 1 06/01/25	57,920,000	75,319	SEK	Government Bond	Swedish State
SHBASS 1 09/03/25 #1590	24,000,000	23,248	SEK	Residential Bond	Stadshypotek AB
SWEDA 1 03/17/27 #197	12,700,000	12,101	SEK	Residential Bond	Swedbank Hypotek AB
Total Collateral received		220,012			

## Collateral received for lent financial instrument 2022.12.31

	Quantity	Market value (tSEK)	Currency	Туре	lssuer
KOMINS 0 3/4 02/04/26 #2602	4,610,000	4,276	SEK	Municipal bond	Kommuninvest I Sverige
KOMINS 0 5/8 06/01/23	3,570,000	3,552	SEK	Municipal bond	Kommuninvest I Sverige
KOMINS 3 09/01/25	5,240,000	5,223	SEK	Municipal bond	Kommuninvest I Sverige
NDASS 1 06/16/27 #5537	16,000,000	14,362	SEK	Residential bond	Nordea Hypotek AB
SGB 1 1/2 11/13/23 #1057	15,510,000	15,366	SEK	Government Bond	Swedish State
SGB 1 11/12/26 #1059	4,195,000	3,955	SEK	Government Bond	Swedish State
SGB 2 ½ 05/12/25 #1058	4,965,000	5,016	SEK	Government Bond	Swedish State
SGBI 0 1/8 06/01/26 #3112	14,490,000	17,946	SEK	Government Bond	Swedish State
SGBI 0 1/8 12/01/27	26,105,000	31,671	SEK	Government Bond	Swedish State
SGBI 1 06/01/25	1,465,000	1,863	SEK	Government Bond	Swedish State
SHBASS 2.54 04/27/37	28,000,000	26,846	SEK	Residential bond	Stadshypotek AB
SWEDA 1 03/17/27 #197	6,200,000	5,616	SEK	Residential bond	Swedbank Hypotek AB
SWTB 0 02/15/23	29,840,000	29,773	SEK	Government Bond	Swedish State
SWTB 0 06/21/23	25,885,000	25,588	SEK	Government Bond	Swedish State
Total Collateral received		191,053			

#### Accounting and valuation principles

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#### Financial instruments

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## Holdings as of 2023.12.31

#### FINANCIAL INSTRUMENTS

	Quantity	Market value (tSEK)	% of net asset
TRANSFERABLE SECURITIE: REGULATED MARKET	S ADMITTED T		ONA
MATERIAL			
Boliden (SE)	10,000	3,145	0.2%
Borregaard ASA (NO)	10,500	1,785	0.1%
Christian Hansen Holding (DK)	10,821	9,152	0.6%
Holmen B (SE)	13,000	5,534	0.4%
Huhtamäki OYJ (FI)	13,000	5,318	0.3%
Kemira (FI)	39,600	7,405	0.5%
Lundin Gold INC (CA)	22,000	2,763	0.2%
Novozymes (DK)	19,000	10,532	0.7%
SCA B (SE)	120,000	18,132	1.2%
UPM-Kymmene Corporat (FI)	36,000	13,656	0.9%
Total Material	,	77,422	5.1%
INDUSTRIALS		,	
ABB (SE)	91,401	40,701	2.7%
AP Moeller Maersk B (DK)	300	5,440	0.4%
AQ Group AB (SE)	8,700	4,411	0.3%
Assa Abloy B (SE)	93,000	26,998	1.8%
Atlas Copco A (SE)	399,077	69,260	4.5%
Cargotec B (FI)	6,000	3,522	0.2%
Epiroc AB-A (SE)	70,000	14,154	0.9%
Flsmidth & CO (DK)	8,000	3,432	0.2%
Gram Car Carriers ASA (NO)	11,000	2,269	0.1%
Indutrade (SE)	12,000	3,142	0.2%
Kone (FI)	12,000	6,036	0.4%
Konecranes (FI)	15,000	6,813	0.4%
Lifco AB (SE)	33,100	8,182	0.5%
Lico AB (SE)	8,000	2,141	0.1%
Outotec (FI)	41,000	4,187	0.17
MPC Container Ships (NO)			0.3 %
	110,000	1,454	
Munters (SE)		2,027	0.1%
NCC B (SE)	27,000	3,391	0.2%
Nibe Industrier B (SE)	123,000	8,708	0.6%
Per Aarsleff (DK)	10,500	5,058	0.3%
Rockwool A/S (DK)	1,450	4,280	0.3%
Sandvik (SE)	125,000	27,263	1.8%
Securitas B (SE) SKF B (SE)	62,000	6,112	0.4%
	50,000	10,065	0.7%
Traton SE (DE)	25,000	5,910	0.4%
Trelleborg B (SE)	115,000	38,824	2.5%
Veidekke (NO)	30,000	3,041	0.2%
Volvo B (SE)	280,000	73,276	4.8%
Wärtsilä (FI)	147,300	21,532	1.4%
Total Industrials		411,628	27.0%
CONSUMER DISCRETIONARY			
Europris ASA (NO)	166,380	12,665	0.8%
Hennes & Mauritz B (SE)	46,000	8,125	0.5%
Matas A/S (DK)	7,000	1,207	0.1%
Pandora (DK)	4,600	6,412	0.4%

Lab. Of S (*)      Lab. Oct 3      Or And        Thule Group (SE)      6,000      1,647      0.1%        Takmanni Group (FI)      5,000      814      0.1%        CONSUMER STAPLES      23,033      1.5%        Austevoil Seafood (NO)      10,000      735      0.0%        Essity (SE)      7,500      1,875      0.1%        Mowi ASA (NO)      64,000      11,552      0.8%        Orkla (NO)      65,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        HEALTH CARE	Puuilo OYJ (FI)	62,000	6,163	0.4%
Totkmanni Group (F)      5,000      814      0.1%        Totalt Consumer discretionary      37,032      2,4%        CONSUMER STAPLES				
Totalt Consumer discretionary      37,032      2,4%        CONSUMER STAPLES			,	
CONSUMER STAPLES        AAK (SE)      103,661      23,303      1.5%        Austevoll Seafood (NO)      10,000      735      0.0%        Essity (SE)      7,500      1.875      0.1%        Mowi ASA (NO)      64,000      11,552      0.8%        Orkla (NO)      65,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE				
AAK (SE)      103,661      23,303      15%        Austevoll Seafood (NO)      10,000      735      0.0%        Esrity (SE)      7,500      1,875      0.1%        Mowi ASA (NO)      64,000      11,552      0.8%        Orkla (NO)      65,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4,5%        HEALTH CARE		9	57,052	<b>2.1</b> 70
Austevoll Seafood (NO)      10,000      735      0.0%        Essity (SE)      7,500      1,875      0.1%        Mowi ASA (NO)      20,000      830      0.1%        Mowi ASA (NO)      64,000      11,552      0.8%        Orkla (NO)      5,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE		103 661		15%
Essity (SE)      7,500      1,875      0.1%        Leroy Seafood Group (NO)      20,000      830      0.1%        Mowi ASA (NO)      64,000      11,552      0.8%        Orkla (NO)      65,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE				
Lergy Seafood Group (NO)      20,000      830      01%        Mowi ASA (NO)      64,000      11,552      0.8%        Orkla (NO)      65,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE				
Movi ASA (NO)      64,000      11,552      0.8%        Orkla (NO)      65,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE				
Orkla (NO)      65,000      5,083      0.3%        Salmar ASA (NO)      35,000      19,759      1.3%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE				
Salmar ASA (NO)      35,000      19,759      13%        Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE				
Schouw (DK)      5,740      4,741      0.3%        Totalt Consumer staples      67,878      4.5%        HEALTH CARE			,	
Totalt Consumer staples      67,878      4.5%        HEALTH CARE				
HEALTH CARE        Astrazeneca PLC (SE)      9,506      12,866      0.8%        Demand A/S (DK)      14,000      6,190      0.4%        Elekta B (SE)      49,900      4,108      0.3%        H Lundbeck A/S (DK)      108,000      5,285      0.3%        Novo Nordisk B (DK)      99,500      103,754      6.8%        Swedish Orphan Biovi (SE)      42,000      11,214      0.7%        Total Health care      143,417      9.4%        FINANCIALS       10700      45,000      3.0%        Danske Bank (DK)      167,000      45,000      3.0%      1.271      0.1%        Danske Bank (NO)      166,400      35,648      2.3%      104,950      1.5%      1.04,976        Industrivàrden C (SE)      167,000      54,826      3.6%      1.0%      1.214      0.8%        Mandatum Holding OYJ (FI)      150,000      6,799      0.4%      0.0%      Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      19,411      1.3%      SEB A (SE)      500,000      54,725		5,740		
Astrazeneca PLC (SE)      9,506      12,866      0.8%        Demand A/S (DK)      14,000      6,190      0.4%        Elekta B (SE)      49,900      4,108      0.3%        H Lundbeck A/S (DK)      108,000      5,285      0.3%        Novo Nordisk B (DK)      99,500      103,754      6.8%        Swedish Orphan Biovi (SE)      42,000      11,214      0.7%        Total Health care      143,417      9.4%      FinAncials        ALM Brand (DK)      71,300      1,271      0.1%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivārden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      2,444      0.8%        Nordnet AB (SE)      4,000      68/4      0.0%        Protector Forsikring (NO)      60			0/,8/8	4.3%
Demand A/S (DK)      14,000      6,190      0.4%        Elekta B (SE)      49,900      4,108      0.3%        H Lundbeck A/S (DK)      108,000      5,285      0.3%        Novo Nordisk B (DK)      99,500      103,754      6.8%        Swedish Orphan Biovi (SE)      42,000      11,214      0.7%        Total Health care      143,417      9.4%        FINANCIALS       167,000      45,000      3.0%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivarden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      6,799      0.4%        Nordea (FI)      4,000      68/4      0.0%        Protector Forsikring (NO)      60,520		0.50/		0.00/
Elekta B (SE)      49,900      4,108      0.3%        H Lundbeck A/S (DK)      108,000      5,285      0.3%        Novo Nordisk B (DK)      99,500      103,754      6.8%        Swedish Orphan Biovi (SE)      42,000      11,214      0.7%        Total Health care      143,417      9.4%        FINANCIALS        1.271      0.1%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivärden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      89%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      62,515      4.1%        Nordnet AB (SE)      4,000      64,40      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      <				
H Lundbeck A/S (DK)      108,000      5,285      0.3%        Novo Nordisk B (DK)      99,500      103,754      6.8%        Swedish Orphan Biovi (SE)      42,000      11,214      0.7%        Total Health care      143,417      9.4%        FINANCIALS       167,000      1,271      0.1%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      15%        Industrivarden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      89%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      6,2515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      500,000				
Novo Nordisk B (DK)      99,500      103,754      6.8%        Swedish Orphan Biovi (SE)      42,000      11,214      0.7%        Total Health care      143,417      9,4%        FINANCIALS           ALM Brand (DK)      71,300      1,271      0.1%        Danske Bank (DK)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivarden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OVJ (FI)      150,000      6,799      0.4%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      500,000      54,725      3.6%        Sparebank 1 Nord -Nor (NO)      53,800      5,507				
Swedish Orphan Biovi (SE)      42,000      11,214      0.7%        Total Health care      143,417      9,4%        FINANCIALS      ALM Brand (DK)      71,300      1,271      0.1%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      15%        Industrivärden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OVJ (FI)      150,000      6,799      0.4%        Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      19,411      13%        SEB A (SE)      470,000      65,236      4.3%        SHB A (SE)      500,000      54,725      3.6%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord (DK)      48,000				
Total Health care      143,417      9,4%        FINANCIALS      ALM Brand (DK)      71,300      1,271      0.1%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivarden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OVJ (FI)      150,000      6,799      0.4%        Nordnea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Sampo A (FI)      44,000      19,411      13%        SHB A (SE)      500,000      54,725      3.6%        Sparebank 1 Nord (DK)      48,000      7,643      0.5%        Sparebank 1 Nord (NO)      13,800 <td></td> <td></td> <td></td> <td></td>				
FINANCIALS        ALM Brand (DK)      71,300      1,271      0.1%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivàrden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      1.2%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      17%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      500,000      54,725      3.6%        Sparebank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%		42,000		
ALM Brand (DK)      71,300      1,271      0.1%        Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivärden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      1.2%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      1.3%        SEB A (SE)      500,000      54,725      3.6%        Sparebank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)			143,417	9.4%
Danske Bank (DK)      167,000      45,000      3.0%        DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivärden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      1.2%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OVJ (FI)      150,000      62,515      4.1%        Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      17%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      500,000      54,725      3.6%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Smn (NO)      67,200		71 200	ודר ו	0.30/
DNB Bank (NO)      166,400      35,648      2.3%        EQT AB (SE)      80,000      22,800      1.5%        Industrivarden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      1.2%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OVJ (FI)      150,000      6,799      0.4%        Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      500,000      54,725      3.6%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord -Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord -Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Smn (NO)      <				
EQT AB (SE)      80,000      22,800      1.5%        Industrivården C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      6,799      0.4%        Nordnea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      470,000      65,236      4.3%        ShB A (SE)      500,000      54,725      3.6%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 (NO)      93,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      33,409      0.2%      5        Sparebank 1 Smn (NO)      67,200				
Industrivärden C (SE)      167,000      54,826      3.6%        Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      1.2%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      6,799      0.4%        Nordae (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      1.3%        SEB A (SE)      500,000      54,725      3.6%        Spare Bank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      31,420      3,409      0.2%        Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebank 1 Smn (NO) <td></td> <td></td> <td></td> <td></td>				
Investor B (SE)      581,820      135,855      8.9%        Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      6,799      0.4%        Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      1.3%        SEB A (SE)      470,000      65,236      4.3%        ShB A (SE)      500,000      54,725      3.6%        Spare Bank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      31,420      3,409      0.2%        Storebrand (NO)      140,000      12,502      0.8%        Swedbank A (SE)      330,0				
Jyske Bank (DK)      25,100      18,146      12%        Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OVJ (FI)      150,000      6,799      0.4%        Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      470,000      65,236      4.3%        SHB A (SE)      500,000      54,725      3.6%        Spare Bank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      31,420      3,409      0.2%        Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebank N (SE)				
Lundbergs B (SE)      22,700      12,444      0.8%        Mandatum Holding OYJ (FI)      150,000      6,799      0.4%        Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      13%        SEB A (SE)      470,000      65,236      4.3%        SHB A (SE)      500,000      54,725      3.6%        Spar Bank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebank 1 Smn (NO)      140,000      12,502      0.8%        Swedbank A (SE)      330,000      67,089      4.4%        Sydbank (DK)      62,500				
Mandatum Holding OYJ (FI)      150,000      6,799      0,4%        Nordea (FI)      500,000      62,515      4,1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      1.3%        SEB A (SE)      470,000      65,236      4.3%        SHB A (SE)      500,000      54,725      3.6%        Spar Bank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      10,000      1,315      0.1%        Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebank 1 Smn (NO)      140,000      12,502      0.8%        Swedbank A (SE)      330,000      67,089      4.4%        Sydbank (DK)      62,500      27,409      1.8%        Topdanmark (DK)      1				
Nordea (FI)      500,000      62,515      4.1%        Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      1.3%        SEB A (SE)      470,000      65,236      4.3%        SHB A (SE)      500,000      54,725      3.6%        Spare Bank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Nord-Nor (NO)      10,000      1,315      0.1%        Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebank 1 Smn (NO)      31,420      3,409      0.2%        Storebrand (NO)      140,000      12,502      0.8%        Swedbank A (SE)      330,000      67,089      4.4%        Sydbank (DK)      62				
Nordnet AB (SE)      4,000      684      0.0%        Protector Forsikring (NO)      60,520      10,804      0.7%        Ringkjöbing LND (DK)      18,000      26,658      1.7%        Sampo A (FI)      44,000      19,411      1.3%        SEB A (SE)      470,000      65,236      4.3%        SHB A (SE)      500,000      54,725      3.6%        Spar Bank Nord (DK)      48,000      7,643      0.5%        Sparebank 1 (NO)      93,180      11,912      0.8%        Sparebank 1 Nord-Nor (NO)      53,800      5,507      0.4%        Sparebank 1 Oestland (NO)      10,000      1,315      0.1%        Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebank 1 Smn (NO)      31,420      3,409      0.2%        Storebrand (NO)      140,000      12,502      0.8%        Sydbank (DK)      62,500      27,409      1.8%        Topdanmark (DK)      16,100      7,753      0.5%				
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Sparebank 1 Smn (NO)      67,200      9,451      0.6%        Sparebanken Vest (NO)      31,420      3,409      0.2%        Storebrand (NO)      140,000      12,502      0.8%        Swedbank A (SE)      330,000      67,089      4.4%        Sydbank (DK)      62,500      27,409      1.8%        Topdanmark (DK)      16,100      7,753      0.5%			5,507	0.4%
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Sydbank (DK)      62,500      27,409      1.8%        Topdanmark (DK)      16,100      7,753      0.5%	Storebrand (NO)	140,000	12,502	0.8%
Topdanmark (DK) 16,100 7,753 0.5%	Swedbank A (SE)	330,000	67,089	4.4%
	Sydbank (DK)	62,500	27,409	1.8%
Total Financials 726,813 47.7%	Topdanmark (DK)	16,100	7,753	0.5%
	Total Financials		726,813	47.7%

#### INFORMATION TECHNOLOGY

	1		
Ericsson B (SE)	60,000	3,787	0.2%
Lagercrantz Group B (SE)	12,000	1,621	0.1%
Nokia SE (FI)	250,000	8,498	0.6%
Tieto EUR (FI)	10,000	2,399	0.2%
Total Information Technology	J	16,305	1.1%
TELECOMMUNICATIONS			
Elisa (FI)	22,711	10,591	0.7%
Hemnet Group AB (SE)	8,000	1,931	0.1%
Telenor (NO)	95,000	10,986	0.7%
Total Telecommunications		23,508	1.5%
REAL ESTATE			
Balder (SE)	50,000	3,576	0.2%
Castellum (SE)	50,000	7,165	0.5%
Entra ASA (NO)	10,000	1,145	0.1%
Fabege (SE)	15,000	1,623	0.1%
Kojamo OYJ (FI)	15,000	1,988	0.1%
Total Real Estate		15,497	1.0%
Total Transferable securities			
to trading on a regulated mar	Ket	1,519,500	99.7%
TRANSFERABLE SECURITIE SUBJECT TO REGULAR TRADE ON ANOTHER MARKET THAT IS REGULATED AND OPEN FOR THE PUBLIC	D		
REAL ESTATE			
Kempower OYJ (FI)	6,000	2,126	0.1%
Total Real Estate		2,126	0.1%
Total Transferable securities subject to regular trade on an other market that is regulate and open for the public		2,126	0.1%
TOTAL FINANCIAL INSTRUMENTS		1,521,627	99.8%
OTHER ASSETS AND LIABILITIES, NET		2,939	0.2%
TOTAL NET ASSET		1,524,566	100.0%

(CA) Canada, (DE) Germany, (DK) Denmark, (FI) Finland, (NO) Norway (SE) Sweden

#### ANNEX IV

#### ANNEX V

#### 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 Taxonon a classification system laid dow Regulation (EU) 2020/852 establishing a lis environmentally sustainable economic activit **That Regulation** does not include list of socially sustainable economic activit Sustainable investments wit environmental objective might aligned with the Taxonomy or no

# Template periodic disclosure for the financial products referred to in Article 9, paragraphs 1 to 4a, of Regulation (EU) 2019/2088 and Article 5, first paragraph, of Regulation (EU) 2020/852

Product name: Simplicity Norden

Legal entity identifier: 549300YRUJPOV584VD37

## Sustainable investment objective

rm	Did this financial product have a sustainable investment objective?							
ntal or and	•• Yes	No No						
ee ow ce	It made sustainable investments with an environmental objective:%	It promoted Environmental/Social (E/S) characteristics and while it did not have as its objective a						
<b>my</b> is	in economic activities that qualify as environmentally	sustainable investment, it had a proportion of <b>46,0</b> % of sustainable investments .						
wn in )	sustainable under the EU Taxonomy	with an environmental objective in economic activities that qualify as environmentally						
ist of <b>ly</b>	in economic activities that do not qualify as environmentally sustainable under the EU	sustainable under the EU Taxonomy.						
r <b>ities</b> . n le a	Taxonomy	with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy						
ities.		with a social objective						
th an	It made <b>sustainable investments</b>	It promoted E/S characteristics, but <b>did not</b>						
t be e ot.	with a social objective:%	make any sustainable investments						

# To what extent was the sustainable investment objective of this financial product met?

The fund promoted environmental and social characteristics through exclusion, inclusion, normbased screening, and engagement. Additionally, the fund made investments with sustainability goals. More information about the goals of sustainable investments is provided below under the heading "What were the objectives of the sustainable investments partially made by the financial product, and how did the sustainable investment contribute to these goals? The fund promoted the following environmental characteristics:

- **Combatting climate change (UN Goal 13)** by selecting companies with scientifically anchored climate goals. Proactive dialogues were conducted to encourage companies to adopt climate goals verified by the Science Based Targets initiative (SBTi). The fund also contributed to combating climate change by excluding fossil fuels.
- Sustainable energy for all (UN Goal 7) by excluding companies with more than 25% of their energy production based on fossil fuels. The fund only invested in companies that produce or distribute electricity that is largely generated by nuclear power, considered to be a leader in sustainability in their industry.

The fund promotes the following social characteristics:

- **Responsible business** conduct by selecting companies affiliated with the UN Global Compact. Proactive dialogues were conducted to encourage companies to join the UN Global Compact.
- **Global health and well-being (UN Goal 3)** by excluding companies involved in alcohol, tobacco, and cannabis.
- **Reducing violence in the world (UN Goal 16)** by excluding companies that produce or distribute weapons.
- Social responsibility by excluding companies involved in pornography and commercial gambling.
- **Good governance** practices by excluding companies that systematically violate international conventions and norms without demonstrated willingness to change.

Under the heading "What investment strategy does this financial product follow" in the fund's information brochure, further details are provided on how the fund promoted environmental and social characteristics.

#### How did the sustainability indicators perform?

The table below shows the results for the sustainability indicators during the year. The measurement is based on the fund's holdings at each quarterly interval throughout the year.

Sustainability Indicator	Description of Indicator	Result 2023	Result 2022
Sustainable Investments	The proportion of the fund that meets the fund company's definition of a sustainable investment according to Article 2(17) of the EU's Disclosure Regulation (SFDR). See the definition in the fund's information brochure under "What investment strategy does this financial product follow?" <b>Task</b> : At least 20% of holdings should meet the fund's thresholds for sustainable investment.	46,0 % of the fund.	37,1 % of the fund.
Exclusion	Refer to the current exclusion criteria in the fund's information brochure under the section "What	The fund has excluded this type of companies.	The fund has excluded this type of companies.

Sustainability indicators measure how the sustainable objectives of this financial product are attained.

1		·	1
	investment strategy does this financial product follow?". <b>Task</b> : The fund should not have any exposure to companies that exceed the fund's exclusion criteria.		
Norm-Based Screening	Exposure to companies that violate, for example, the UN Global Compact, the UN Global Compact, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises, or other types of environmental, social, and governance-related incidents. <b>Task</b> : The fund excludes companies that systematically violate international conventions and norms without demonstrated willingness to change.	The fund has excluded companies that systematically violate international conventions and norms without demonstrated willingness to change.	The fund has excluded companies that systematically violate international conventions and norms without demonstrated willingness to change.
Scientifically Anchored Climate Goals	Proportion of holdings with climate goals verified by the Science Based Targets Initiative (SBTi). SBTi is an organization that guides and ensures companies set scientific climate goals to reduce their greenhouse gas emissions in line with the Paris Agreement to limit global warming to 1.5 degrees Celsius. Adopting climate goals according to SBTi signals high climate ambitions and credibility as the climate efforts have been validated by an independent third party. <b>Task</b> : Simplicity, as a fund company, has set a goal that all investments through Simplicity's funds should have climate goals verified by SBTi by 2040. By 2025, the interim goal is 50%, and by 2030, the interim goal is 75%. The goals are company- wide, meaning the proportion may be lower than the interim goals for an individual fund. Proactive dialogues are conducted to encourage companies to adopt climate goals verified by SBTi.	42,3% of the fund. 9 of the fund's portfolio companies have been contacted with the aim of encouraging the company to adopt a scientifically anchored climate goal.	NA.
FN:s Global Compact	Proportion of holdings that have joined the UN Global Compact and thus committed to ten principles regarding human rights, labor rights, the environment, and anti- corruption. As a member of the Global Compact, companies are required to annually report on their efforts related to the ten principles and how they contribute to the UN's global goals. <b>Task</b> : Simplicity, as a fund company, has set a goal that all investments	91,8% of the fund. 9 of the fund's portfolio companies has been contacted with the aim of encouraging the company to join the UN Global Compact.	77,9 % of the fund.

through Simplicity's funds should	
be aligned with the UN Global	
Compact by 2040. By 2025, the	
interim goal is 50%, and by 2030,	
the interim goal is 75%. The goals	
are company-wide, meaning the	
proportion may be lower than the	
interim goals for an individual fund.	
Proactive dialogues are conducted	
to encourage companies to join the	
UN Global Compact.	
	Compact by 2040. By 2025, the interim goal is 50%, and by 2030, the interim goal is 75%. The goals are company-wide, meaning the proportion may be lower than the interim goals for an individual fund. Proactive dialogues are conducted to encourage companies to join the

#### ...and compared to previous periods?

See above under the column 'Results 2022'. Note that since the previous period, the fund company's exclusion criteria and thresholds for sustainable investment according to Article 2(17) of the EU's Disclosure Regulation (SFDR) have been updated. Results for the indicator 'Scientifically Anchored Climate Goals' for the year 2022 are not included in the table as the method has changed since then.

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

A sustainable investment is an investment in an economic activity that contributes to an environmental or social objective, provided that the investments do not cause significant harm to any of these objectives and that the investment objects adhere to good governance practices. All sustainable investments in the fund are aligned with a social or environmental objective. The company has established thresholds to assess whether an investment substantially contributes to an environmental or social objective in accordance with Article 2(17) of the EU Disclosure Regulation (SFDR). At least one of the criteria below has been met for the fund's sustainable investments.

- Contribution to the environmental objectives of the EU taxonomy. Refers to investments in companies where at least 10% of the company's revenues are reported or estimated to be environmentally sustainable according to the EU taxonomy regulation. These investments contribute to the taxonomy's environmental objectives of **limiting climate change**.

- **Contribution to the UN's global goals**. Refers to investments in companies where at least 10% of the company's revenue is linked to activities assessed to contribute to one or more of the UN's 17 global goals for sustainable development.

- Contribution to the Paris Agreement and the UN's Global Compact. Refers to investments in companies that have climate goals verified by the Science Based Targets initiative (SBTi) and are also signatories to the UN's Global Compact. These investments contribute to UN goal 13 (combatting climate change) and the fulfillment of the climate goals in the Paris Agreement while promoting responsible business practices.

# How did the sustainable investments not cause significant harm to any sustainable investment objective?

The Fund took into account indicators of adverse impacts on sustainability factors in order to ensure that the Fund's sustainable investments do not cause significant harm to any environmental or social objective. More information can be found under the headings below.

# How were the indicators for adverse impacts on sustainability factors taken into account?

By analyzing the indicators of adverse impacts on sustainability factors (PAI indicators) outlined in the section below titled "How were the main adverse impacts on sustainability factors considered in this financial product?", the criterion of not causing significant harm to any environmental or social objective for the fund's sustainable investments was met.

In addition to considering PAI indicators, the fund excluded a further number of different sectors and activities deemed to contribute to negative consequences for environmental and social sustainability, are ethically controversial, or for other reasons, in our view, are not considered to positively contribute to a sustainable society. The fund's exclusion criteria are available in the fund's information brochure under the heading "What investment strategy does this financial product follow?".

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

All sustainable investments adhere to the aforementioned guidelines and principles. All holdings in Simplicity's funds have been regularly screened to ensure compliance. The norm-based screening has been conducted by a third party. The screening forms the basis for assessing the good governance practices of the fund's holdings.

In the EU taxonomy, a principle is established regarding not causing significant harm, under which taxonomy-compliant investments must not cause significant harm to the objectives of the EU taxonomy, and is accompanied by specific union criteria.

The principle of not causing significant harm applies only to the underlying investments of the financial product that consider the EU criteria for environmentally sustainable economic activities. The remaining portion of this financial product has underlying investments that do not consider the EU criteria for environmentally sustainable economic activities.

No other potential sustainable investments may cause significant harm to any environmental or social objectives either.

Principal adverse impacts are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anticorruption and antibribery matters.



The fund considered the main negative impacts on sustainability factors when making investment decisions. The fund mitigated the negative impacts on sustainability factors caused by the activities of the fund's holdings through two main methods: exclusion and norm-based screening.

In the first step, the Company's exclusion criteria were used, meaning that companies with particularly negative characteristics are excluded from the Company's funds (see more in the fund's information brochure under the section "What investment strategy does this financial product follow?"). The funds excluded fossil fuels (PAI factor 1.4), companies with more than 25% of their energy production based on fossil fuels (PAI factor 1.5), and controversial weapons (PAI factor 1.14). The funds excluded additional types of activities, but these are not directly linked to any PAI factor.

Norm-based screening was used to identify potential violations of international norms, such as the UN Global Compact, OECD guidelines for multinational enterprises, and the UN Guiding Principles on Business and Human Rights (UNGPs). Simplicity's funds should not invest in companies that systematically violate international norms and conventions without demonstrated willingness to change (PAI factor 1.10).

Other PAI factors were considered based on the likelihood of the negative impact associated with the area occurring and its severity if it does occur. Investments were analyzed based on data availability. The analysis and assessment also varied depending on the companies' industry, geography, and business model. Significant negative impacts on the other PAI factors may have resulted in investments being omitted, even if the Company did not have set thresholds for these PAI factors.

#### What were the top investments of this financial product?



Below table shows the fund's key investments during the year. The measurement is based on the fund's holdings at each quarterly turnover during the year.

Largest investments	Sector	% Assets	Country
INVESTOR B	Finance	8,3%	Sweden
NOVO NORDISK B	Healthcare	7,1%	Denmark
VOLVO B	Industry	3,8%	Sweden
SWEDBANK A	Finance	3,7%	Sweden
ATLAS COPCO A	Industry	3,6%	Sweden
SEB A	Finance	3,5%	Sweden
NORDEA BANK ABP EUR	Finance	3,3%	Finland
SHB A	Finance	3,2%	Sweden
ASTRAZENECA	Healthcare	2,9%	Sweden
ABB	Industry	2,6%	Sweden
INDUSTRIVÄRDEN C	Finance	2,6%	Sweden
SAMPO A	Finance	2,3%	Finland
DANSKE BANK	Finance	2,3%	Denmark
DSV	Industry	2,1%	Denmark
TRELLEBORG B	Industry	2,1%	Sweden

The list includes the investments constituting **the** greatest proportion of investments of the financial product during the reference period which is: 2023



#### What was the proportion of sustainability-related investments?

All measurements in this section are based on the fund's holdings at each quarterly turnover during the year.

Asset allocation describes the share of investments in specific assets.

#### What was the asset allocation?

**Nr 1 Adapted to Environmental or Social Characteristics** All direct investments in stocks.

#### Nr 1A. Sustainable

These investments are divided between taxonomy-aligned investments and other sustainable investments with environmental or social goals.

In the diagram below, "Taxonomy-aligned" sustainable investments only include the portion of holdings with a reported taxonomy-aligned turnover of at least 10%. Other sustainable investments with environmental goals are categorized as "Other environmentally related" sustainable investments. "Social" sustainable investments are those that solely contribute to the fund's social objectives.

#### Nr 1B. Other Environmentally-Related or Social Characteristics

Investments that align with environmental or social characteristics but do not qualify as sustainable investments according to the fund's definition.

#### Nr 2. Other

Cash for liquidity management as well as derivatives. According to the fund regulations, the fund may hold cash for liquidity management up to a maximum of 10%.



**No 1:** Customized to environmental or social characteristics, the financial product includes investments used to achieve the environmental or social characteristics promoted by the financial product.

**Nr 2** Otherwise, the financial product includes remaining investments that are neither customized to the environmental or social characteristics nor considered sustainable investments.

Category Number 1: Customized to environmental or social characteristics includes: - Subcategory Number 1A: Sustainable encompasses environmentally and socially sustainable investments.

- Subcategory **Number 1B: Other environmental or social characteristics** include investments tailored to environmental or social characteristics that are not considered sustainable investments.

#### **Enabling activities**

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

#### Transitional activities are economic activities for which low-carbon alternatives are not yet available and that have greenhouse gas emission levels corresponding to the

best performance.

#### In which economic sectors were the investments made?

The fund has not invested in companies engaged in the extraction of fossil fuels or any other company within sector 10 according to the GICS classification.

Sektor	Vikt
Räntefond	32,9%
Aktiefond	20,0%
Finans	12,6%
Dagligvaror	5,3%
Industri	4,5%
Fastigheter	4,4%
Sällanköpsvaror	3,6%
IT	2,0%
Kommunikationsservice	1,1%
Material	0,5%



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

All calculations in this section are based on the fund's holdings at each quarter-end during the year. The calculations are based on reported company data made public at the beginning of 2024. Estimated taxonomy compatibility is not included in the calculations. No further checks have been performed by a third party.

## The proportion of sustainable investments according to Article 2(17) of the SFDR with an environmental objective compatible with the EU taxonomy.

The fund's share of sustainable investments aligned with EU taxonomy environmental objectives was 6.5%. This percentage includes holdings in companies with at least 10% of their revenues reported as environmentally sustainable according to the EU taxonomy (which is the fund's threshold for sustainable investments aligned with EU taxonomy environmental objectives). Estimated taxonomy compatibility is not included in this calculation, even though revenues exceed the threshold for sustainable investment.

#### The fund's average taxonomy compatibility

The bars in the chart below represent the fund's taxonomy alignment for all holdings, meaning the sum of each holding's weight multiplied by the holding's taxonomy-aligned share of turnover, capital expenditures, and operational expenses. Only reported taxonomy alignment is used. Companies estimated to have environmental objectives aligned with the EU taxonomy are not included in the compilation below.

Reported taxonomy alignment currently covers two of the taxonomy regulation's six environmental objectives: Mitigation of climate change and Adaptation to climate change. Based on reported taxonomy alignment, the fund's investments contribute to the environmental objectives as follows:

	Climate change mitigation	Climate change adaptation
Operating expenses	2,1%	0,0%
Capital expenditures	3,9%	>0,0%
Turnover	1,4%	0,2%

# Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy<sup>1</sup>?



The graphs below show in green the percentage of investments that were aligned with the EU Taxonomy. As there is no appropriate methodology to determine the taxonomy-alignment of sovereign bonds<sup>\*</sup>, 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.

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.

<sup>&</sup>lt;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 no significant harm to 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.

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

The figures in the table below represent the sum of all holdings' weights multiplied by each holding's reported taxonomy-aligned turnover, capital expenditures, and operating expenses from transition activities and enabling activities. Companies with only estimated taxonomy-aligned contributions to environmental objectives are not included in the compilation.

	Transition activities	Enabling activities
Operating expenses	0,2%	1,5%
Capital expenditures	0,8%	1,3%
Turnover	0,2%	0,8%

# How did the percentage of investments aligned with the EU Taxonomy compare with previous reference periods?

#### The fund's average taxonomy compatibility for 2022

The figures in the table below represent the sum of each holding's weight multiplied by each holding's taxonomy-aligned share of turnover, capital expenditures, and operating expenses for the year 2022. Only reported taxonomy alignment from companies has been used. No additional checks have been performed by third parties. The measurement was based on reported data made public at the beginning of 2023. The figure is low as most companies had not yet reported the extent to which their operations were aligned with the EU taxonomy at that time. Companies estimated to have environmental objectives aligned with the EU taxonomy were not included.

Data was missing to disaggregate the contributions of investments to respective environmental objectives in the taxonomy and to indicate the proportion of investments made in transition activities versus enabling activities.

	Taxonomy-compliant investments (excluding fossil gas or nuclear energy)
Operating expenses	0,25 %
Capital expenditures	0,17 %
Turnover	0,21 %



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

The proportion of sustainable investments with an environmental objective that are not aligned with the EU taxonomy for the fund is 35.7%. This proportion is calculated by subtracting the share of investments in companies with at least 10% of their revenue reported as environmentally sustainable according to the EU taxonomy (sustainable investments with an environmental objective aligned with the EU taxonomy as defined by the fund) from the total share of sustainable investments with an environmental objective.

are sustainable investments with an environmental objective that **de** 

objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy. The fund made sustainable investments with an environmental objective that were not aligned with the EU taxonomy. Examples of investments in this group include companies with scientifically grounded climate goals or companies whose products and services contribute to achieving one or more of the UN's environmentally related global goals.



#### What was the share of socially sustainable investments?

The fund's share of socially sustainable investments was 3.8%. This portion represents investments in companies that contribute to achieving one or more of the UN's social sustainable development goals.

To avoid overlap, investments that contribute to both the fund's social and environmental goals are primarily counted as environmental sustainable investments, and therefore are not included in the figure for the fund's share of socially sustainable investments.



# What investments were included under "Other", what was their purpose and were there any minimum environmental or social safeguards?

Investments included in the "Other" category consisted solely of cash for liquidity management. According to the fund's regulations, the fund may hold cash for liquidity management up to a maximum of 10%. The fund company has assessed that cash does not represent either environmental or social risks.



# What actions have been taken to attain the sustainable investment objective during the reference period?

The fund has taken the following actions during the year:

• The fund has divested holdings that are no longer deemed to meet the fund's environmental or social criteria.

• The fund has selected sustainable investments to meet the minimum threshold of sustainable investments at 20%.

• Holdings have been discussed in the Sustainability Committee. The focus has been on assessing whether the holdings comply with good governance practices. Some holdings are currently under surveillance by the sustainability committee.

• Proactive engagement efforts have been carried out to encourage the fund's portfolio companies to adopt scientifically grounded climate goals and to join the UN's Global Compact.

• Holdings have been regularly screened for norm-based incidents. A dialogue has been initiated.



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