



# Fund prospectus 2/2024

Fondita Fund Management Company Ltd.

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## General information

### Fondita Fund Management Company

Fondita Fund Management Company Ltd. (hereinafter "Fondita") is a company that concentrates on actively managed equity funds. Fondita started fund activities on 7 April 1997. Our investment philosophy is based on stock picking and concentrated portfolios. In our investment process, we concentrate on companies with strong market positions, good prospects and a sustainable focus.

Main office and visiting address:

Fondita Fund Management Company Ltd.  
Aleksanterinkatu 48 A  
00100 Helsinki  
Finland

### Board

Chairman of the Board

Magnus von Knorring, M.Sc. (Econ.)

Members

Fredrik von Knorring, M.Sc. (Econ.)

Gunvor Kronman, M.Sc. (Arts) \*

Markus Larsson, M.Sc. (Econ.)

Timo Luukkainen, MBA, B. Sc. (Econ), M. Sc. (Eng.) \*

Gustav Ohlsson, M.Sc. (Econ.)

\* Independent member

### Executive management

Markus Larsson, CEO

Fredrik von Knorring, deputy CEO

A brief introduction of the management can be found at [www.fondita.com](http://www.fondita.com)

### Audit and supervision

Fondita and Fondita's funds are audited by Ernst & Young Oy. The responsible auditors are Anders Svennas, CPA and Matias Jäntti, CPA.

Fondita is supervised by the Finnish Financial Supervisory Authority.

### Depository

Fondita uses Skandinaviska Enskilda Banken AB (publ) Helsinki branch as depository (FO number 0985469-4, address Eteläesplanadi 18, 00130 Helsinki). The main activity of the Helsinki branch of Skandinaviska Enskilda Banken AB is banking. Skandinaviska Enskilda Banken AB (Company registration number 502032-9081) has its registered office in Stockholm, Sweden (Kungsträdgårdsgatan 8, 111 47 Stockholm). The task of the depository is to ensure that Fondita and its funds comply with the law, the fund's rules and the regulations of the authorities in their activities.

If necessary, the depository may appoint one or more sub-custodians. The depository shall use its best endeavours to segregate the assets of the fund from the assets of the custody or of the sub-custody in the event of bankruptcy. Where necessary, Fondita will provide information on the sub-custodians used.

## Fund units and dividends

Fund units are divided into return units and growth units. The Annual General Meeting of the fund company decides on the annual return of the units. The return on growth units is realised in full upon redemption of the fund units.

## Subscription

Fondita accepts fund unit subscriptions mainly every banking day (in the fund rules “valuation day”). The subscription day is the valuation day on which the subscription amount is at the disposal of the fund company’s appropriate bank account, no later than 13:30 CET. Subscriptions are made by depositing the amount you wish to invest into the bank account of the fund company according to the investment fund of choice. At the time of payment, the name of the subscriber and his/her personal ID number/date of birth are entered in the message field. The fund company is obliged to identify its clients in accordance with the provisions of the Finnish anti-money laundering act. A prerequisite for becoming a client is that the client information form has been completed and that the fund company has been able to verify the identity of the client. The fund company has the right to reject the subscription if the client cannot be reliably identified or if additional investigation reveals something giving a cause for rejection. The number of units subscribed is calculated to four decimal places by dividing the subscription amount by the value of one unit.

## Redemption

The fund company should be notified in writing of the redemption of fund units and any unit certificates should be sent to the fund company. Please note that a prerequisite for the fund company to approve a fund order is that the client has provided the fund company with the information requested in the client information form. Redemption generally takes place at the unit value calculated by the fund company for the same banking day if the order has been received by Fondita no later than 13:30 CET \*. The redemption amount is paid to the account indicated by the client on the client information form, normally one business day after the order is executed, provided that the fund has sufficient liquidity. A redemption confirmation note is sent to the customer.

\*Additional information on redemption restrictions can be found in section 8 of the fund rules.

## Fees

Fees and other costs, are charged according to the price list on page 23.

## Rebates

Total client relationship allow for changes in tariff rates.

## External services

In carrying out investment fund activities, the fund company may use external services such as accounting and data processing services, distribution services and for the receipt of subscription and redemption orders. Fondita has partially outsourced the maintenance of the unit holder register to the following partners: Nordea Bank, Nordnet Bank and United Bankers. Capatico GmbH acts as Fondita’s agent in Germany, RIC Consulting acts as Fondita’s agent in Austria. In Sweden, Fondita has a collaboration with Atle Investment Services AB.

The marketing of the funds is managed by Atle Investment Services AB in Sweden Capatico GmbH in Germany and RIC Consulting in Austria along with Fondita.

## Ownership policies

The Board of directors at Fondita has established principles of corporate governance. Fondita is responsible for ensuring that the interests of the funds and unitholders are protected in the best possible way. This means efforts to increase the value of the fund, taking into account the fund’s investment strategy and level of risk. Even though the funds managed by Fondita always are minority owners, Fondita can through corporate governance affect the decisions made in the company. Fondita presumes that the companies follow good governance and management principles. Fondita endeavours to participate in general meetings where the interests of fund unitholders need to be protected. If necessary, Fondita can also vote by proxy. Fondita is responsible for ensuring that voting rights are

used in accordance with the purpose and strategy of the investment in the company in question. The principles are available in full on the Fondita's website.

### Remuneration policy

Fondita's remuneration policies apply to the following groups of staff: executive management, fund managers and members of the company's permanent risk control function. When remunerating employees, Fondita follows the provisions on remuneration in Chapter 3 of the Finnish Investment Funds Act. Employees do not receive variable remuneration, as the entire salary consists of a fixed monthly or hourly wage. Fondita's remuneration principles are not linked to sustainability targets or sustainability risks. Fondita's complete remuneration policy can be found at [www.fondita.com](http://www.fondita.com).

### Error list

The fund company maintains an error list in accordance with the instructions of the Finnish Financial Supervisory Authority. The error list shows the errors made in valuations and the reasons behind them. The threshold for what the Finnish Financial Supervisory Authority refers to as significant errors is 0,5% of the value of the fund.

### Reporting

Fondita's online service is available to direct Fondita clients. The service grants access to your fund holdings report and other information about your investments. In addition to the online service, Fondita sends fund holdings reports and monthly fund reports to clients by e-mail once a month or once a year by mail (31 December).

### Right of withdrawal

According to Finnish law, an investor cannot withdraw a placed fund order.

### Publication of fund unit value

The unit value is published on our web site by 16.00 CET the banking day following the valuation day. You can also track the unit value of the fund via Morningstar and other data providers' websites.

### Other information

The Fund Management Company was registered on 31 January 1992 and Fondita started fund activities on 7 April 1997. Fondita's share capital is EUR 227,640.00.

## Risk information associated with funds

Fondita applies risk management principles approved by the Board of Directors of the Fund Management Company. These principles describe the procedures for the continuous monitoring and management of risks in the funds and Fund Management Company. Fondita has organised its risk management with a risk management function whose task is to monitor and manage risks that come to light.

Risk refers to the uncertainty associated with the outcome of the investment return. This risk may mean that the return on the investment may be worse or better than expected. The information presented below is not exhaustive, but it includes typical risks associated with equity funds.

### Information on risks associated with equity funds

Risks associated with funds in general are described below. Fund-specific risks can be found in each fund's Key Information Document (KID).

**Equity risk** Equity risk is the risk associated with funds investing in shares where the value of the fund is affected by the market price of the shares in which the fund is invested. Sharp changes in the prices of individual shares may occur.

**Sector risk** There is a sector risk with funds which, according to their rules, only invest in a specific sector. This means that the fund cannot reallocate its resources to other sectors if, for example, something happens to negatively

affect the fund's sector. The performance of investments in an individual sector may differ significantly from the general performance of the stock market.

**Force Majeure risk** Force Majeure risk refers to unforeseeable, unavoidable events that affect the entire business and that are not the fault of the Fund Management Company or its counterparties. These may include natural disasters, general strikes, mobilisations, coups d'état, wars or other armed conflicts. If such an event occurs, it may have a significant impact on the market price of investments and the viability of fund activity, as well as on the continuity of the entire business.

**Sustainability risks** Sustainability risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment.

**Liquidity risk** Liquidity risk refers to the risk that the fund may not be able to convert the invested funds into cash at a reasonable price during the normal trading cycle. Liquidity risk is greater, for example, with the securities of smaller companies, whose turnover is generally smaller than that of large companies. Lower turnover may affect the value of the investment and delay pay-outs.

**Market risk** Market risk refers to risks generally associated with the development of investments, regardless of currency or sector, for example. The investor should note that the value of an investment in the fund may increase or decrease. The redeemed sum may amount to less than the initially invested sum.

**Market area risk and political risk** There is a market area risk for funds which, according to their rules, only invest in a specific geographical area. This means that the fund cannot reallocate its resources to other geographical areas if, for example, something happens to negatively affect the fund's geographical market. Market area risk may be associated with political risk, i.e. political decisions affecting fiscal policy, currency or the political environment, which in turn may affect the market price of the fund's investments. Political risks may also arise in the form of difficulties in transferring means out of a specific country.

**Counterparty and custody risk** Counterparty risk refers to situations where a party does not act as agreed, for example in terms of delivery within an agreed time. Custody risk is the risk that the custodian or sub-custodian of the fund's securities may not comply with the agreements or contracts entered into or other events that prevent the realisation of the securities held in accordance with normal procedures.

**Operational risk** Operational risk refers to the risk of loss that can occur in a fund. Operational risks can arise if there are shortcomings in, for example, personnel, data systems, data protection, the organisation or partners. External cyber attacks or major problems in the banking system may affect trading.

**Strategy risk** Strategy risk or style risk means that the fund's investment strategy has an effect on the fund's performance. For example, the performance of a fund that invests only in growth companies or small companies may deviate significantly from the general market trend. An active and proactive management strategy can have a significant impact on the value of the fund. A concentrated portfolio means that successful or unsuccessful stock selection can have a significant impact.

**Currency risk** There is a currency risk when investments are made in currencies other than EUR. Situations may arise where the currency fluctuates sharply against EUR, and this in turn will either reduce or increase the value of the investment.

## Fondita's responsible investments

### Consideration of sustainability risks and negative impacts

#### Integration of ESG risks in the investment decisions

ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. In order for us to be aware of these risks in our funds, we include this aspect in our investment decisions.

Fondita avoids sectors that we believe are associated with high risk from an ESG perspective. There is a high risk of increased regulation, taxation and political opposition in these activities. Public opinion also tends to become more negative towards these activities. All this makes companies in these sectors operate in an uncertain and unfavourable environment. In addition, these activities can easily be considered questionable from an ethical perspective. The sectors in which we do not invest are fossil fuel, tobacco, cannabis, alcohol, weapons, adult entertainment, nuclear power, uranium, GMO (red), gambling and quick loans. The exclusion applies to companies that are directly active in these sectors (>5% of turnover) or that are suppliers to these sectors (>5% of turnover). We also avoid companies that have violated the UN Global Compact 10 principles. Fondita conducts a monthly screening in MSCI for UN Global Compact violations, DNSH violation, exclusion violation (>5% of turnover), ILO violations and Good Governance Test. In case a holding in one of the funds is found in violation an escalation process is conducted, which in most cases results in a dialogue at least with the holdings Investor Relations. Based on the information retrieved and the assessment conducted a decision is made to hold or sell. The result is documented in Fondita's Escalation list and a follow up is conducted if necessary.

#### Principal Adverse Sustainability Impacts

Fondita take into consideration the investment decisions principal adverse sustainability impacts. Before making an investment, we evaluate the ESG risks associated with the company. If we perceive the risk to be higher, it affects our return requirement on the company. This evaluation is done based on the ESG risk metrics from our own internal database and third-party databases, which influences our decision. This evaluation is based on the company's history, the industry, third-party analysis, and our dialogue with the company. We form an overall picture of the company from an ESG risk perspective. In our small and micro cap funds we do not have access to the same amount of data from the databases, so in these cases we form an overall picture mainly on the basis of a dialogue with management, and through our own ESG analysis on a best effort basis to attain the relevant information from company disclosures or other sources (e.g. research providers, NGOs)

In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector to which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographies are simply associated with a higher risk of ESG-related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG. In addition, we monitor the company's data points regarding CO2 emissions and its ambitions to reduce them. We also clarify management's approach to ESG in the company in general during meetings with them.

As per 30<sup>th</sup> of June 2023 Fondita reports on 14 mandatory and 2 voluntary principle adverse impact indicators for the first reference year of 2022. The data is procured from our third-party data provider MSCI. The report is sectioned according to each quarter of 2022 and assembled into one report for each fund, and a separate report for the whole company. We follow the development of the indicators in order to map our holdings in terms of the ESG criteria presented by the indicators, noting the limitations of currently available data sets as we have significant holdings in small and micro caps which might not be sufficiently covered by third party data.

## Responsible investment principles

The goal of our investment business is to generate the best possible return for our customers. We aim to do this responsibly and in accordance with the chosen investment strategy.

Our principles for responsible investment are based on the belief that companies that act responsibly and work in accordance with sustainable principles are better investments in the long term, as the risks and opportunities related to the environment, society and governance (ESG factors) are more extensively explored. Therefore, it is important to integrate ESG-related factors when performing a company analysis.

We strive to always act responsibly and in accordance with sustainable development in our investment decisions and in our own daily operations. Responsibility is grounded in our employees' values. In our principles for responsible investment, in our sustainability risk assessments and in our operations, we take into account the most common international agreements and standards that guide society and business.

## The goal of responsible investing

We want to own shares in companies where sustainability and ESG factors are integral to a company's strategy and corporate culture. This means the company acts responsibly towards its employees and treats everyone equally, while monitoring, measuring and improving its own environmental footprint. The company's sales come mainly from business operations that we believe are sustainable in the long term, and the end product or service is in line with the overall values of sustainable development. We take our climate responsibility seriously and work to reduce our carbon footprint towards eventual carbon neutrality.

All Fondita funds – both small cap and thematic funds – are actively managed funds based on bottom-up stock picking. They have a consistent investment philosophy and follow the same strategy for responsible investing. Our goal is to be long-term owners in responsible, high-quality growth companies, and our strong thematic drivers are environmental- and climate smart solutions, health and well-being, and digitalization and technological development.

## Our method for responsible investing

Responsible investing includes several methods at different stages of the investment process in order to integrate ESG factors into portfolio management. For Fondita, these methods are:

- Negative screening - exclusion/norm-based screening
- Positive screening - thematic drivers
- Integration of ESG factors into investment analysis
- Active ownership
- Advocate for sustainable development and responsible investment

Through negative screening we exclude from our investment universe certain sectors that we have identified as unsustainable, either because of their climate impact or their broader societal impact. Companies whose operations violate general standards do not belong in our investment funds either.

The purpose of positive screening is to identify companies where a significant part of turnover comes from activities, we consider to be sustainable over time in terms of both the environment and social responsibility. We aim to find companies with good sustainability ratings and low ESG risk. With positive screening, we can improve the responsibility profiles of our funds by prioritising companies with, for example, stronger environmental profiles, better working conditions or a proactive equality strategy. We can also use this to help us find companies that benefit from megatrends that are important to us. Positive screening is a good tool for our thematic funds in particular.

Considering and integrating ESG factors into the analysis of a company is key to responsible investment. This means that ESG factors are integrated into the overall analysis alongside economic analysis of the fundamentals. We use our own internal company-specific analysis tools, as well as ESG analysis from partners and ESG tools and databases



from MSCI and Bloomberg. Our own internal company specific tool integrates the ESG assessment into the fundamental economic analysis and the conclusions are discussed between the portfolio manager and the ESG responsible.

When carrying out our own ESG inquiries with our portfolio companies, we go into detail on various parameters that affect environmental, social and governance aspects. We pay special attention to the following factors:

#### Environment

- Use of renewable energy
- CO2 emissions (scope 1 & 2)
- Carbon dioxide risk
- Energy consumption
- Water use
- Waste management
- Taxonomy

#### Social

- Gender equality and diversity
- Safety
- Health
- Corporate culture
- Measures to prevent human rights violations

#### Governance

- Measures to combat corruption and bribery
- Board independence
- Remuneration policy
- The relationship between ESG factors and remuneration
- The company's risk management

Before we make an investment decision, we strive to discuss with the company's management to ensure that our view of the company and its strategy is in line with the management's vision. We are also active owners during the investment period itself, closely monitoring the company's operations and meeting with company representatives each year. During these meetings we discuss issues that affect operational activities and the business environment, and whenever possible, we strive to encourage responsible and sustainable operations, as well as transparency in reporting. More specifically, these meetings also give us the opportunity to raise issues that are important to us. As from 2022, we identify at least two important sustainability issues that we will consistently discuss with the companies' management.

Our principles for responsible investing and corporate governance are aimed at achieving a long-term increase in the value of the companies held. Fondita assumes that the companies follow good corporate governance and management principles, for example by following the Finnish Securities Market Association's Code of Corporate Governance. In addition, emphasis is placed on environmental and social responsibility. If it is considered that any of the companies' corporate governance is not adequate, Fondita will try to influence the company and/or its leaders to bring about change. In such cases, cooperation with other shareholders may also occur. Fondita may also conclude that it is better for the shareholders to withdraw the holding than to affect the company's proceedings. Fondita strives to participate in the general meetings of companies where the interests of our fund unit holders need to be protected. If necessary, Fondita can also vote with the help of a proxy. Fondita is responsible for ensuring that voting rights are applied in accordance with the purpose and strategy of the investment in the company in question. Each fund votes individually at the Annual General Meeting (AGM).

## Sustainable Finance Disclosures Regulation (SFDR)

### **SFDR classification: Article 8**

**Applies to the following funds: Fondita European Micro Cap, Fondita European Small Cap, Fondita Finland Micro Cap, Fondita Global Megatrends, Fondita Nordic Micro Cap and Fondita Nordic Small Cap**

The funds promote, among other things, environmental and social aspects. As part of the funds' investment process, ESG issues are taken into account in investment decisions. Fondita applies a number of different methods, which are described in detail under the heading "Our method for responsible investing" on page 8. Investment decisions take into account environmental and social issues and the risks associated with them. The funds invest in companies that follow good governance practices. ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. As part of the ESG analysis of an investment object, the manager, together with the ESG team, identifies each investment object's sustainability risks, the likelihood of these risks materialising and the magnitude of the impact. All potential investment targets are subject to both an ESG analysis and a business analysis. We continuously assess the holders' sustainability risks, their likelihood and magnitude as part of our investment process. Any sustainability risks that materialise may have a negative impact on the holding and therefore the fund's returns. We continuously monitor these risks and, based on our assessment, this may have an impact on our investment decisions. We believe that one of the main sustainability risks that may affect the value of the funds' investments is related to environmental and climate issues. We manage these risks by excluding certain controversial sectors and conducting a thorough sustainability risk assessment of the sectors in which we invest. ESG analysis of the companies is performed jointly by the ESG team and the fund managers. The funds do not have an official benchmark.

### **Information on the EU taxonomy for environmentally sustainable activities**

The EU taxonomy is a classification system that aims to establish common criteria for environmentally sustainable economic activities. The regulatory framework requires each fund to disclose the proportion of its investments that comply with the taxonomy. Although the funds promote environmental aspects, the funds are not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the funds do not have a target of a certain proportion of their investments being sustainable investments.

The framework includes a "do no significant harm" principle, which means that investments that contribute to one sustainability objective must not at the same time cause significant harm in the context of any other sustainability objective. The "do no significant harm" principle only applies to the parts of the fund that consist of investments that either qualify as sustainable under the Sustainability Reporting Regulation or under the EU taxonomy. The other parts of this fund have underlying investments that do not follow the EU criteria for environmentally sustainable economic activities.

### **SFDR classification: Article 9**

#### **Fondita Sustainable Europe**

The objective of Fondita Sustainable Europe is sustainable investments. This objective is primarily achieved through the fund's strategy of investing only in companies that enable, through their products or services, reduced CO<sub>2</sub> emissions in accordance with SFDR article 9.3 and/or more efficient use of natural resources. These are the fund's two focus areas. In addition, the fund excludes all companies active within fossil energy sources. The emissions of the holding (scope 1 & 2) are monitored regularly, and the holdings must have a clear strategy to reduce emissions.

We also require the companies in which the fund invests to act responsibly in terms of their own environmental impact and social responsibility. The fund invests in companies that follow good governance practices.

The companies we invest in do not operate in sectors stated as unsustainable according to Fondita Responsible Investment Policy. The companies' activities are in-line with UN Global Compact criteria and OECD guidelines for multinational enterprises regarding human rights, labour, environment and anti-corruption and they follow good governance practices. Furthermore, the fund does not accept any breaches to the Do No Significant Harm Principle (EU Taxonomy).

All investments meet the requirements for sustainable investments set out in Article 2 of the SFDR Regulation and do not cause significant harm to any of the other environmental or social objectives. Investment decisions take into account environmental and social issues and the risks associated with them. ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. They also refer to a company's vulnerability to the effects of climate change, depending on its geographical location and its overall business. As part of the ESG analysis of an investment object, the manager, together with the ESG team, identifies each investment object's sustainability risks, the likelihood of these risks materialising and the magnitude of the impact. All potential investment targets are subject to both an ESG analysis and a business analysis. We continuously assess the holders' sustainability risks, their likelihood and magnitude as part of our investment process. Any sustainability risks that materialise may have a negative impact on the holding and therefore the fund's returns. We continuously monitor these risks and, based on our assessment, this may have an impact on our investment decisions. We believe that one of the main sustainability risks that may affect the value of the fund's investments is related to environmental and climate issues. We manage these risks by excluding certain controversial sectors and conducting a thorough sustainability risk assessment of the sectors in which we invest.

Fondita applies several methods to ensure that all investments meet the requirements for sustainable investment under the SFDR Regulation. These are described in detail under the heading "Our method for responsible investing" on page 8. ESG analysis of the companies is carried out jointly by the ESG team and the fund manager. The fund does not have an official benchmark.

### **Information on the EU taxonomy for environmentally sustainable activities**

The EU taxonomy is a classification system that aims to establish common criteria for environmentally sustainable economic activities.

The regulatory framework requires each fund to disclose the proportion of its investments that comply with the taxonomy. The taxonomy is under development and criteria for all environmental objectives are not yet complete. Furthermore, there is no established calculation model to assess the proportion of the fund's investments that comply with the taxonomy. The companies in which the fund invests have not yet started to report on the extent to which their activities comply with the EU taxonomy. Therefore, the Fund Management Company believes that it is currently not possible to provide reliable information on the proportion of the fund's investments that is compliant with the taxonomy.

### **Fondita Healthcare**

This global healthcare fund has a social sustainability investment objective. The fund holdings economic activities work toward supporting several UN SDG goals, mainly the fund aims to improve Health and Wellbeing (UN SDG 3) and Gender Equality (SDG 5).

The fund invests in companies that address current and unmet medical needs and provide access to medicine and medical care. This is achieved by investing in companies active in innovation, production and distribution of medicines and healthcare equipment, tools and supplies as well as diagnostics and healthcare services.

Operationally the companies act in a socially and environmentally responsible way. The fund emphasizes an external social sustainability objective that aims for improved access to medicine and an internal social objective of improved diversity, inclusion and equality. The environmental objective targets CO2 neutrality.

The companies we invest in do not operate in sectors stated as unsustainable according to Fonditas Responsible Investment Policy. The companies' activities are in-line with UN Global Compact criteria and OECD guidelines for multinational enterprises regarding human rights, labour, environment and anti-corruption and they follow good governance practices. Furthermore, the fund does not accept any breaches to the Do No Significant Harm Principle (EU Taxonomy).

All investments meet the requirement for sustainable investments set out in Article 2 of the SFDR Regulation and do not cause significant harm to any other environmental or social objective.

Investment decisions take into account environmental and social issues and the risks associated with them. ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. They also refer to a company's vulnerability to the effects of climate change, depending on its geographical location and its overall business. As part of the ESG analysis of an investment object, the fund manager, together with the ESG team, identifies each investment object's sustainability risks, the likelihood of these risks materialising and the magnitude of the impact. All potential investment targets are subject to both an ESG analysis and a business analysis. We continuously assess the sustainability risks of the holdings, their likelihood and magnitude as part of our investment process. Any sustainability risks that materialise may have a negative impact on the holding and therefore the fund's returns. We continuously monitor these risks and, based on our assessment, this may have an impact on our investment decisions. We believe that one of the main sustainability risks that may affect the value of the fund's investments is related to environmental and climate issues. We manage these risks by excluding certain controversial sectors and conducting a thorough sustainability risk assessment of the sectors in which we invest.

Fondita applies a number of methods to ensure that all investments meet the requirements for sustainable investment under the SFDR Regulation. These are described in detail under the heading "Our method for responsible investing" on page 8. ESG analysis of the companies is carried out jointly by the ESG team and the fund manager. The fund does not have an official benchmark.

## Fondita investment funds

Fondita currently manages eight equity funds. Our successful investment philosophy is based on stock picking and concentrated portfolios. In our investment process, we select companies with a strong market position and good future prospects. We are keen to see established profitability and a strong balance sheet. We also attach great importance to company management. Sustainability aspects are a central part of our investment process in all our funds.

**Table 1: Fondita investment funds**

Fund	Theme	Start date	Type of fund	SFDR Article	Other environmental certifications
Fondita European Micro Cap	European small caps	7 Mar 2017	UCITS	Article 8	
Fondita European Small Cap	European small and mid caps	19 May 2009	UCITS	Article 8	
Fondita Finland Micro Cap	Finnish small caps	7 Apr 1997	UCITS	Article 8	
Fondita Global Megatrends	Environment, demographics and technology	14 Sep 1998	UCITS	Article 8	Austrian Ecolabel
Fondita Healthcare	Healthcare	14 June 2018	UCITS	Article 9	
Fondita Nordic Micro Cap	Nordic small caps	29 Aug 2006	UCITS	Article 8	
Fondita Nordic Small Cap	Nordic small and mid caps	10 Sep 1997	UCITS	Article 8	
Fondita Sustainable Europe	Environment	19 May 2011	UCITS	Article 9	Nordic Swan Ecolabel <sup>1</sup> Austrian Ecolabel <sup>2</sup>

<sup>1</sup> Fondita Sustainable Europe, licence number 3101 0046. Read more at [svanen.se](https://svanen.se).

<sup>2</sup> Austrian Ecolabel UW 1367. Read more at [umwelzeichen.at](https://umwelzeichen.at).

## Fondita European Micro Cap

### Theme of the fund

Fondita European Micro Cap is an equity fund that invests in small quality companies in Europe with a market capitalisation of up to EUR 800 million. The fund invests in smaller niche companies with strong market positions and a clear focus on long-term growth and value creation for their owners. These companies are mainly found in sectors such as industrial technology, medical technology, information technology and consumer-related activities. Among Europe's smaller niche companies, we find a number of family-owned companies with good growth opportunities, healthy balance sheets and good profitability. Smaller companies also tend to be the subject of structured deals and acquisitions, providing an extra boost to returns. The fund started its activities on 7 March 2017.

### Target group

The fund is suitable for all long-term investors seeking exposure to Europe's smallest quality companies. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Kenneth Blomqvist and Janna Haahtela
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2023)	0.16
Volatility (2023)	12,0%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svernas, CPA Matias Jäntti, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. General trends in European stock markets have an impact on the fund's performance. The turnover of small companies may be low. The liquidity risk that this may entail is sought to be reduced by investing part of the fund's assets in shares other than those of small companies.

### Fund investment policy

The fund is an equity fund mainly investing its assets in the shares of small listed companies in EU countries, Norway, the UK and Switzerland. Small companies are those with a market capitalisation of less than EUR 800 million. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita European Small Cap

### Theme of the fund

Fondita European Small Cap is an equity fund that invests in smaller European quality companies with a market capitalisation below EUR 4 billion. The fund invests in smaller niche companies with strong market positions. The fund has a wide sector distribution with investments in, for example, medical technology and consumer and industry-related activities. In these sectors, we find companies that can create value for their owners through good growth prospects. Small and medium-sized quality companies are also attractive targets for acquisition. The fund started its activities on 19 May 2009.

### Target group

The fund is suitable for all long-term investors seeking exposure to small and medium-sized quality companies in Europe. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Kenneth Blomqvist and Janna Haahtela
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2023)	0.38
Volatility (2023)	16,4%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Matias Jäntti, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. General trends in European stock markets have an impact on the fund's performance.

### Fund investment policy

The fund is an equity fund mainly investing its assets in the shares of small and medium-sized listed companies in EU countries, Norway, the UK and Switzerland. Small and medium-sized companies are those with a market capitalisation of less than EUR 4 billion. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Finland Micro Cap

### Theme of the fund

Fondita Finland Micro Cap is an equity fund that invests in smaller Finnish-listed companies with a market capitalisation of less than EUR 800 million. We aim to find smaller companies on the Finnish stock exchange that have good opportunities for profitable growth. Among these companies are a lot of new technologies and innovations that have the potential to become international success stories. Through Fondita Finland Micro Cap, we want to give our clients the opportunity to invest in a fund that focuses on promising Finnish companies that are still at a relatively early stage of their journey. The fund started its activities on 7 April 1997.

### Target group

The fund is suitable for all investors seeking exposure to listed Finnish small companies. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Marcus Björkstén and Markus Larsson
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2023)	0.22
Volatility (2023)	12,2%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Matias Jäntti, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund is quoted in EUR and invests exclusively in the shares of euro-denominated companies. Since the fund invests its funds only in Finnish companies, there is a significant country risk. The turnover of small companies may be low. The liquidity risk that this may entail is sought to be reduced by investing part of the fund's assets in shares other than those of small companies.

### Fund investment policy

The name and investment policy of the fund was changed on 1 June 2022. The previous name of the fund was Fondita Equity Spice.

The fund is an equity fund investing in smaller Finnish-listed companies with a market capitalisation of less than EUR 800 million. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.



## Fondita Global Megatrends

### Theme of the fund

Fondita Global Megatrends is a global equity fund that invests in companies which benefit from three megatrends. These are increased demand for climate- and environmentally smart solutions, demographic changes that primarily benefit companies in health and well-being, and the continuous digitalization and technological development throughout our society. Some of the drivers for the investment companies are global population growth, increased purchasing power and rising life expectancy, which increases the need for healthcare. Demand for food and energy is increasing, which also places greater demands on environmentally friendly and energy-efficient solutions. The fund started its activities on 14 September 1998. The name of the fund was changed on 19 September 2022. The previous name of the fund was Fondita 2000+.

### Target group

The fund is suitable for all investors looking for exposure to the three main themes of environment, demographics and information technology with a long-term investment perspective. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Janna Haahtela & Marcus Björkstén
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2022)	0.22
Volatility (2022)	13,9%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svernas, CPA Matias Jäntti, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces the investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies.

### Fund investment policy

The fund is an equity fund, which invests its assets mainly in the shares of publicly listed domestic and foreign companies whose activities benefit from the growing demands of environmental protection and the fight against climate change, changing demographic structures and the growth prospects of the technology sector. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Healthcare

### Theme of the fund

Fondita Healthcare is a global equity fund with a social sustainability investment objective. The fund invests in companies that promote health and well-being. The fund holdings economic activities work toward supporting several UN SDG goals, mainly the fund aims to improve Health and Well-being (UN SDG 3) and Gender Equality (SDG 5). The fund's focus is on innovative, quality companies with a good growth profile that address current and unmet medical needs and provide access to medicine and medical care. The funds main holdings are in companies active in innovation, production and distribution of medicines and healthcare equipment, tools and supplies as well as diagnostics- and healthcare services. The funds growth drivers are the ageing population, increased welfare, innovation and technological developments. The fund started its activities on 14 June 2018.

### Target group

The fund is suitable for all long-term investors seeking exposure to growth companies in the healthcare sector in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Janna Haahtela and Markus Larsson
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 9
Rate of turnover (2023)	0.17
Volatility (2023)	10,9%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svernas, CPA Matias Jäntti, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies.

### Fund investment policy

Fondita Healthcare is an equity fund that invests in shares of publicly listed domestic and foreign companies whose activities promote health and well-being. The fund has a global mandate. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Nordic Micro Cap

### Theme of the fund

Fondita Nordic Micro Cap is an equity fund investing in small quality companies in the Nordic region with a market capitalisation of up to EUR 800 million with established operations. In these sectors, we find companies that can create value for their owners through good growth prospects. In the Nordic small companies market, we find interesting quality companies with both domestic and foreign operations. The companies are often specialists in niches with a strong market position, a strong balance sheet, good profitability and a strong owner behind them. We find interesting companies within the spectrum of manufacturing, technology, consumer-related business and medical technology. The fund started its activities on 29 August 2006.

### Target group

The fund is suitable for all long-term investors seeking exposure to the smallest quality companies in the Nordics in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Markus Larsson and Kenneth Blomqvist
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2023)	0.19
Volatility (2023)	15,4%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Matias Jäntti, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. The fund's assets are efficiently diversified, which means that the impact of individual companies on the level of risk is low. General trends in Nordic stock markets have an impact on the fund's performance. The turnover of small companies may be low. The liquidity risk that this may entail is sought to be reduced by investing part of the fund's assets in shares other than those of small companies.

### Fund investment policy

Fondita Nordic Micro Cap is an equity fund that invests mainly in small, publicly-listed Danish, Finnish, Norwegian and Swedish companies' shares. Small companies are those with a market capitalisation of less than EUR 800 million. In order to ensure liquidity in the fund, part of the fund's assets may be invested in companies whose market capitalisation exceeds the threshold for small companies. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Nordic Small Cap

### Theme of the fund

Fondita Nordic Small Cap is an equity fund investing in quality companies in the Nordic region and with a market capitalisation of up to EUR 3 billion. In the Nordic market we find a number of interesting quality companies with local and global exposure. The companies are often market leaders in their niche, have good profitability, strong balance sheets and often have an influential owner behind them. The companies are active in a wide range of business activities. Everything from medical technology, manufacturing and software technology to consumer-related products and services. The fund started its activities on 10 September 1997.

### Target group

The fund is suitable for all long-term investors seeking exposure to smaller quality companies in the Nordics in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Markus Larsson and Kenneth Blomqvist
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2023)	0.21
Volatility (2023)	18,5%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Matias Jäntti, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital increase by diversifying the fund's assets in accordance with the Finnish Act on Common Funds and the fund's rules.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. The fund's assets are efficiently diversified, which means that the impact of individual companies on the level of risk is low. General trends in Nordic stock markets have an impact on the fund's performance.

### Fund investment policy

Fondita Nordic Small Cap is an equity fund that invests mainly in small and medium-sized publicly listed Danish, Finnish, Norwegian and Swedish companies' shares. Small and medium-sized companies are those with a market capitalisation of less than EUR 3 billion. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Sustainable Europe

### Theme of the fund

Fondita Sustainable Europe is an equity fund that invests mainly in European companies (EU countries, the UK, Norway and Switzerland) that through their services or products 1) facilitate a future with reduced CO<sub>2</sub> emissions and 2) facilitate a future in which natural resources are used in a more efficient way. The fight against climate change will play a central role in all types of businesses over the next 20 to 30 years. We are convinced that the companies that are seen as being part of the solution will perform better in relative terms. The fund started its activities on 19 May 2011.

### Target group

The fund is suitable for all investors who, like us, believe that sustainable companies will be the winners of the future. The Fund is also suitable for those looking for exposure to sustainable companies in Europe in accordance with the fund's investment policy. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Marcus Björkstén and Janna Haahtela
Rules approved in Finland	19.9.2023
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 9
Rate of turnover (2023)	0.27
Volatility (2023)	18,2%
Fees	See p. 23
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svernas, CGR Matias Jäntti, CGR
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

The objective of the fund's portfolio management is to achieve long-term capital appreciation by diversifying the fund's assets in accordance with the Finnish law on investment funds and the fund's statutes.

### Fund risk profile

As the fund's assets are invested in the stock market, the fund's performance can greatly fluctuate. The fund's assets are efficiently diversified, which reduces the investment risk. The fund's value is calculated in EUR, but as it has investments in other currencies, the fund's performance is affected by changes in those currencies. General trends in European stock markets have an impact on the fund's performance.

### Fund investment policy

The name and investment policy of the fund was changed on 19 May 2019. The previous name of the fund was Fondita European Top Picks.

Sustainable Europe is a sustainable investment fund that invests in listed companies in the EU, the UK, Norway and Switzerland whose activities contribute to sustainable development. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Additional information about the funds

The funds are managed by Fondita Fund Management Company Ltd, that carries out investment fund activities. The company is registered in the Finnish Trade Register. Marketing is primarily carried out by Fondita Fund Management Company Ltd. The Funds are not covered by the Investors' Compensation Fund nor the Deposit Guarantee Fund. The fund prospectus and other information such as the annual fund reports are available free of charge from the Fund Management Company at the address Aleksanterinkatu 48 A, 00100 Helsinki or [www.fondita.com](http://www.fondita.com). The Fund Company and the investment funds are supervised by the Finnish Financial Supervisory Authority FIN-FSA, Snellmaninkatu 6, PL 159, 00101 Helsinki. Phone (09) 183 51, [finanssivalvonta@finanssivalvonta.fi](mailto:finanssivalvonta@finanssivalvonta.fi).

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## Price lists

Fund	Share class	Share class type	ISIN	Ongoing charges** ,***	Redemption fee***	Registered for distribution	Transaction costs 2023	Risk indicator	Return 12 M (31.12.2023)	Minimum subscription
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	1,00 %	FI, SE, NO	0,09 %	4/7	-6,36 %	-
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	1,00 %	FI, SE, NO	0,09 %	4/7	-1,68 %	-
Fondita European Small Cap	A*	distributing	FI0008814686	2,00 %	1,00 %	FI, SE, NO	0,13 %	5/7	-1,42 %	-
Fondita European Small Cap	B	accumulating	FI0008814694	2,00 %	1,00 %	FI, SE, NO	0,13 %	5/7	3,31 %	-
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	1,00 %	FI, SE, NO	0,08 %	4/7	7,21 %	-
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	1,00 %	FI, SE, NO	0,08 %	4/7	12,42 %	-
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,07 %	4/7	10,75 %	-
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,07 %	4/7	16,12 %	-
Fondita Global Megatrends	I	accumulating	FI4000411178	1,20 %	1,00 %	AT, DE	0,07 %	4/7	16,99 %	250 000
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,07 %	4/7	2,87 %	-
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,07 %	4/7	7,92 %	-
Fondita Healthcare	I	accumulating	FI4000411202	1,20 %	1,00 %	AT, DE	0,07 %	4/7	8,78 %	250 000
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	1,00 %	FI, SE, NO, DE	0,05 %	5/7	-0,53 %	-
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	1,00 %	FI, SE, NO, DE	0,05 %	5/7	4,14 %	-
Fondita Nordic Micro Cap	I	accumulating	FI4000411186	1,20 %	1,00 %	DE	0,05 %	5/7	4,98 %	250 000
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,10 %	5/7	1,97 %	-
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,10 %	5/7	7,00 %	-
Fondita Nordic Small Cap	I	accumulating	FI4000411160	1,20 %	1,00 %	AT, DE	0,10 %	5/7	7,93 %	250 000
Fondita Sustainable Europe	A*	distributing	FI4000024484	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,11 %	5/7	-11,39 %	-
Fondita Sustainable Europe	B	accumulating	FI4000024492	2,00 %	1,00 %	AT, FI, SE, NO, DE	0,11 %	5/7	-6,99 %	-
Fondita Sustainable Europe	I	accumulating	FI4000411194	1,20 %	1,00 %	AT, DE	0,11 %	5/7	-6,25 %	250 000

No subscription fee is charged by the fund management company. A front-end load of maximum 5,00 % may be applied at the time of purchase through a financial intermediary.

\*The A-units pay annual return (dividend) which is decided by the AGM (historically around 5 % of the fund unit value).

\*\* Custodian fee is included in the management fee.

\*\*\* Total client relationship allows for changes in tariff rate.

The formulas behind the calculations can be obtained at the Fund Management Company.

## Price list for customers in Finland

Fund	Share class	Share class type	ISIN	Ongoing charges <sup>***,****</sup>	Redemption fee <sup>****</sup>	Transaction costs 2023	Risk indicator	Return 12 M (31.12.2023)
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	1,00 %	0,09 %	4/7	-6,36 %
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	1,00 %	0,09 %	4/7	-1,68 %
Fondita European Small Cap	A*	distributing	FI0008814686	2,00 %	1,00 %	0,13 %	5/7	-1,42 %
Fondita European Small Cap	B	accumulating	FI0008814694	2,00 %	1,00 %	0,13 %	5/7	3,31 %
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	1,00 %	0,08 %	4/7	7,21 %
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	1,00 %	0,08 %	4/7	12,42 %
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	1,00 %	0,07 %	4/7	10,75 %
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	1,00 %	0,07 %	4/7	16,12 %
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	1,00 %	0,07 %	4/7	2,87 %
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	1,00 %	0,07 %	4/7	7,92 %
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	1,00 %	0,05 %	5/7	-0,53 %
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	1,00 %	0,05 %	5/7	4,14 %
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	1,00 %	0,10 %	5/7	1,97 %
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	1,00 %	0,10 %	5/7	7,00 %
Fondita Sustainable Europe	A*	distributing	FI4000024484	2,00 %	1,00 %	0,11 %	5/7	-11,39 %
Fondita Sustainable Europe	B	accumulating	FI4000024492	2,00 %	1,00 %	0,11 %	5/7	-6,99 %
Fondita Sustainable Europe	X**	accumulating	FI4000480363	1,00 %	0,00 %	0,11 %	5/7	-6,06 %

No subscription fee is charged. No minimum subscription.

\*The A-units pay annual return (dividend) which is decided by the AGM (historically around 5 % of the fund unit value).

\*\*Only available for Finnish distributors (under the scope of MiFID II) with whom Fondita has engaged an agreement.

\*\*\* Custodian fee is included in the management fee.

\*\*\*\* Total client relationship allow for changes in tariff rate regarding ongoing charges and redemption fee.

The formulas behind the calculations can be obtained at the Fund Management Company.



## Price list for customers in Sweden

Fund	Share class	Share class type	ISIN	Ongoing charges **,***	Redemption fee***	Transaction costs 2023	Risk indicator	Return 12 M (31.12.2023)
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	1,00 %	0,09 %	4/7	-6,36 %
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	1,00 %	0,09 %	4/7	-1,68 %
Fondita European Small Cap	A*	distributing	FI0008814686	2,00 %	1,00 %	0,13 %	5/7	-1,42 %
Fondita European Small Cap	B	accumulating	FI0008814694	2,00 %	1,00 %	0,13 %	5/7	3,31 %
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	1,00 %	0,08 %	4/7	7,21 %
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	1,00 %	0,08 %	4/7	12,42 %
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	1,00 %	0,07 %	4/7	10,75 %
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	1,00 %	0,07 %	4/7	16,12 %
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	1,00 %	0,07 %	4/7	2,87 %
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	1,00 %	0,07 %	4/7	7,92 %
Fondita Nordic Micro Cap	SEK R	accumulating	SE0000347843	1,65 %	1,00 %	0,05 %	5/7	4,16 %
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	1,00 %	0,05 %	5/7	-0,53 %
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	1,00 %	0,05 %	5/7	4,14 %
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	1,00 %	0,10 %	5/7	1,97 %
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	1,00 %	0,10 %	5/7	7,00 %
Fondita Sustainable Europe	SEK R	accumulating	SE0000347843	1,50 %	1,00 %	0,11 %	5/7	-6,77 %
Fondita Sustainable Europe	A*	distributing	FI4000024484	2,00 %	1,00 %	0,11 %	5/7	-11,39 %
Fondita Sustainable Europe	B	accumulating	FI4000024492	2,00 %	1,00 %	0,11 %	5/7	-6,99 %

No subscription fee is charged. No minimum subscription.

\*The A-units pay annual return (dividend) which is decided by the AGM (historically around 5 % of the fund unit value).

\*\* Custodian fee is included in the management fee.

\*\*\* Total client relationship allow for changes in tariff rate regarding ongoing charges and redemption fee.

The formulas behind the calculations can be obtained at the Fund Management Company.

## Appendix 1. Additional Information for Investors in Germany

### Right to Distribution in Germany

The Fund Management Company has notified the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) of its intention to distribute Fund units in Fondita Investment Funds in Germany and may do so since completion of the notification process.

### Available Classes of Shares

The following classes of shares are available for all Fondita's funds registered for distribution in Germany

Class of Shares	A - retail EUR	B - retail EUR	I - Institutional EUR
Type	Distributing	Accumulating	Accumulating
Minimum Initial Subscription Amount	-	-	EUR 250 000**
Minimum subsequent investment	-	-	-
Ongoing charges	2,00 % p.a.*	2,00 % p.a.*	1,20 % p.a.*

\*Total client relationship allows for changes in tariff rate

\*\*Exemptions from the minimum initial investment can be made for distributors for justifiable reasons

With respect to the following Fondita Investment Funds no registration notification has been filed with BaFin and consequently Shares in the following Sub-fund must not be distributed in Germany:

- Fondita Finland Micro Cap
- Fondita European Small Cap
- Fondita European Micro Cap

### Paying and Information Agent in Germany

The function of paying and information agent in the Federal Republic of Germany has been assumed by:

Marcard, Stein & Co. AG  
Ballindamm 36  
20095 Hamburg

Redemption requests for Units can be submitted to the paying and information agent for forwarding to the Fund Management Company. Investors resident in Germany may request that all payments (redemption proceeds, any dividends and other payments) be forwarded to them via the paying and information agent. Investors resident in Germany shall, via the paying and information agent, have access to the same information and documentation made available to investors in Finland. The prospectus, key investor information, articles of association, and annual and semi-annual reports shall be available free of charge in hard copy from the paying and information agent. Issue, redemption, and conversion prices shall also be available free of charge from the paying and information agent.

### Publications

The issue and redemption prices are published on trading days in Germany on [www.fondita.com](http://www.fondita.com). Notices to investors are also published on this website.

In the cases listed in section § 298 sub-section 2 German Investment Code (KAGB) investors will also be informed by means of a "durable medium" within the meaning of section 167 KAGB. In addition, information may also be published in any other media which the Fund Management Company deems appropriate.

## Appendix 2. Additional Information for Investors in Austria

### Right to Distribution in Austria

The Fund Management Company has notified the Austrian Financial Market Authority (FMA) of its intention to distribute Fund units in Fondita Investment Funds in Austria and may do so since completion of the notification process.

### Available Classes of Shares

The following classes of shares are available for all Fondita's funds registered for distribution in Austria

Class of Shares	A - retail EUR	B - retail EUR	I - Institutional EUR
Type	Distributing	Accumulating	Accumulating
Minimum Initial Subscription Amount	-	-	EUR 250 000**
Minimum subsequent investment	-	-	-
Ongoing charges	2,00 % p.a.*	2,00 % p.a.*	1,20 % p.a.*

\*Total client relationship allows for changes in tariff rate

\*\*Exemptions from the minimum initial investment can be made for distributors for justifiable reasons

With respect to the following Fondita Investment Funds no registration notification has been filed with the Austrian Financial Market Authority (FMA) and consequently Shares in the following Fund must not be distributed in Austria:

- Fondita Finland Micro Cap
- Fondita Nordic Micro Cap
- Fondita European Small Cap
- Fondita European Micro Cap

### Facility in Austria

Facility in Austria according to EU directive 2019/1160 article 92 has been assumed by:

**Erste Bank der Oesterreichischen Sparkassen AG**

**Am Belvedere 1, A-1100 Wien, Austria**

**E-Mail: [foreignfunds0540@erstebank.at](mailto:foreignfunds0540@erstebank.at)**

Redemption requests for Units can be submitted to the facility for forwarding to the Fund Management Company. Investors resident in Austria may request that all payments (redemption proceeds, any dividends and other payments) be forwarded to them via the facility. Investors resident in Austria shall, via the facility, have access to the same information and documentation made available to investors in Finland. The prospectus, key investor information, articles of association, and annual and semi-annual reports shall be available free of charge in hard copy from the facility. Issue, redemption and conversion prices shall also be available free of charge from the facility.

### Publications

The issue and redemption prices are published on trading days in Austria on [www.fondita.com](http://www.fondita.com). Notices to investors are also published on this website. In addition, information may also be published in any other media which the Fund Management Company deems appropriate.

### Taxation

Fondita Fund Management Company Ltd. has appointed Erste Bank der oesterreichischen Sparkassen AG, Am Belvedere 1, 1100 Wien, Austria ([austriatax0991@erstebank.at](mailto:austriatax0991@erstebank.at)) as its tax representative in accordance with InvFG.

## Rules for Fondita Investment Funds

(This is an unofficial translation of the official rules in Finnish)

### FONDITA FUND SPECIFIC RULES

#### FONDITA EUROPEAN MICRO CAP INVESTMENT FUND

##### 1§ NAME OF THE FUND

The name of the fund is Fondita European Micro Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita European Micro Cap Sijoitusrahasto and in Swedish Fondita European Micro Cap Placeringsfond.

##### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small-sized European companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small-sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in EU countries, Switzerland, Norway and Great Britain open to the public. The investments are mostly made outside the Nordic countries.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

#### FONDITA EUROPEAN SMALL CAP INVESTMENT FUND

##### 1§ NAME OF THE FUND

The name of the fund is Fondita European Small Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita European Small Cap Sijoitusrahasto and in Swedish Fondita European Small Cap Placeringsfond.

##### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small and medium - sized European companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small and medium -sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

- 1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in EU countries, Switzerland, Norway and Great Britain open to the public. The investments are mostly made outside the Nordic countries.
- 2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

### **FONDITA FINLAND MICRO CAP INVESTMENT FUND**

#### 1§ NAME OF THE FUND

The name of the fund is Fondita Finland Micro Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Finland Micro Cap Sijoitusrahasto and in Swedish Fondita Finland Micro Cap Placeringsfond.

#### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are invested primarily in securities that of small-sized Finnish companies. The board of the Fund Company will establish the upper limit for the trading value of small-sized companies.

The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in Finland open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

#### FONDITA GLOBAL MEGATRENDS INVESTMENT FUND

##### 1§ NAME OF THE FUND

The name of the fund is Fondita Global Megatrends Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Global Megatrends Sijoitusrahasto and in Swedish Fondita Global Megatrends Placeringsfond.

##### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in securities of such companies that through their activities promote the growing demands of environmental protection and the changing population structure, as well as the growth prospects of the technology sector.

The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

##### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets globally that are open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## **FONDITA HEALTHCARE INVESTMENT FUND**

### **1§ NAME OF THE FUND**

The name of the fund is Fondita Healthcare Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Healthcare Sijoitusrahasto and in Swedish Fondita Healthcare Placeringsfond.

### **5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES**

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of

investment activity risks. The means of the Fund are primarily invested in securities of such companies that through their activities enhance health and wellbeing.

The Fund invests its assets in companies that operate responsibly.

The aim of the Fund is sustainable investment in accordance with Article 9 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

## **6§ INVESTMENT OF THE ASSETS OF THE FUND**

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets globally that are open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus

amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## **FONDITA NORDIC MICRO CAP INVESTMENT FUND**

### **1§ NAME OF THE FUND**

The name of the fund is Fondita Nordic Micro Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Nordic Micro Cap Sijoitusrahasto and in Swedish Fondita Nordic Micro Cap Placeringsfond.

### **5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES**

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small sized Nordic companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small-sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment

activities are available in the fund prospectus that is in force at that particular point of time.

## **6§ INVESTMENT OF THE ASSETS OF THE FUND**

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in the Nordic countries open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## **FONDITA NORDIC SMALL CAP INVESTMENT FUND**

### **1§ NAME OF THE FUND**

The name of the fund is Fondita Nordic Small Cap Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Nordic Small Cap Sijoitusrahasto and in Swedish Fondita Nordic Small Cap Placeringsfond.

### **5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES**



The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in stocks of small and medium - sized Nordic companies. The company size is measured according to the company's trading value. The board of the Fund Company will establish the upper limit for the trading value of small and medium -sized companies. The Fund invests its assets in companies that operate responsibly.

The Fund promotes sustainability factors in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management.

The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

#### 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

- 1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in the Nordic countries open to the public.
- 2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.
- 3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

### **FONDITA SUSTAINABLE EUROPE INVESTMENT FUND**

#### 1§ NAME OF THE FUND

The name of the fund is Fondita Sustainable Europe Investment Fund (hereinafter referred to as the Fund), in Finnish Fondita Sustainable Europe Sijoitusrahasto and in Swedish Fondita Sustainable Europe Placeringsfond.

#### 5§ OBJECTIVE OF THE FUND'S INVESTMENT ACTIVITIES

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund. The means of the Fund are invested, taking into account the limitations present in the law concerning investment funds, and thereby resulting in the spreading of investment activity risks.

The aim of the Fund is sustainable investment in accordance with Article 9 of the Sustainable Finance Disclosure Regulation (SFDR).

When making investment decisions, the Fund considers sustainability factors as part of its analysis of investment objectives and risk management. The fund's investment decisions take the environmental and social impacts of companies, as well as governance into account.

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

## 6§ INVESTMENT OF THE ASSETS OF THE FUND

The assets of the Fund shall be invested in the following:

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating, certified markets in EU countries, Switzerland, Norway and Great Britain open to the public.

2) stocks and in other stock-related securities where a commitment is made in the issue terms to have the securities listed for trading in the above-mentioned subparagraph 1) trading systems within one year of their being issued.

3) a maximum of one tenth of the assets of the Fund in securities other than those mentioned in subparagraphs 1 and 2 above.

The Fund Company may invest assets of the Fund in the same incorporated company up to a maximum of one tenth of the issued share capital and one tenth of the total share votes.

The Fund may invest assets of the Fund in the same issuer's securities up to a combined maximum value of 10% of the fund's assets. Of the Fund's assets only a maximum of 20% may be invested in the same issuer's securities and deposits received by the association in question. The risk opponent thus amounts to a maximum of 20% of the Fund's assets. Such investments in the same issuer's securities which exceed 5% of the assets of the Fund may amount to no more than 40% of the fund's total assets.

The Fund must have the liquid assets required for operation.

## COMMON RULES FOR ALL FONDITA FUNDS

### 2§ FUND COMPANY

Investment activities and administration of the fund are managed by Fondita Fund Management Ltd (hereinafter referred to as the Fund Company). The Fund Company shall represent the Fund, shall act on

its behalf in relevant matters and shall exercise the rights accorded to the assets in the Fund.

### 3§ THE USE OF REPRESENTATIVES

The Fund Company may delegate its activities to representatives. The fund prospectus will notify as to which parts the Fund Company will engage representatives.

### 4§ CUSTODIAN

The custodian of the Fund is Skandinaviska Enskilda Banken AB (publ), Helsinki branch. (hereinafter referred to as the Custodian).

### 7§ FUND UNITS AND REGISTER

The Fund Company shall maintain a register of all fund units and shall register transfers of ownership.

A fund unit-holder may request the Fund Company to send an investment certificate to a designated person. The investment certificate may cover several fund units or fractions thereof. The Fund Company may charge a separate service tariff for the safekeeping and delivery of a written investment certificate. The service tariff is given in the fund prospectus that is in force at that particular point of time. If no request is made for an investment certificate, the unit-holder's holdings shall be based on the register of fund units maintained by the Fund Company. The numbers of fund units are calculated at least to the nearest four (4) decimals.

The board of the Fund Company may decide that the Fund is made up of both return units and growth units. The board of the Fund Company may decide that there are fund unit classes that differ in terms of management fee or denomination currency. The board of the Fund Company decides on the minimum subscription amount or other prerequisites such as client classification required for of subscription in each unit class and these are stated in the relevant fund prospectus and KIDs. The Board of Directors of the Management Company may provide more detailed instructions on how fund units are subscribed from outside of Finland, or by using a currency other than that used in Finland at any given time.

### 8§ SUBSCRIPTION AND REDEMPTION OF FUND UNITS

Fund units may be subscribed to (bought) and redeemed (sold) at the Fund Company on the Funds opening days as stated in the §10 of the Fund rules (hereinafter "Valuation Day"). Information regarding subscription and redemption prices are available to the public from the Fund Company on every banking day. The subscription date is the Valuation Day on which the subscription sum is cleared into the appropriate Fund Company bank account by 2.30 p.m. (Finnish time). The Fund Company can make an exception to the 2.30 p.m. (Finnish time) rule only if the Fund Company can assure that the subscription amount will be received within the time limit that is considered as market practice (T+2). This exception can only be made with substantial reasons and it requires a separate approval given by the management of the Fund Company. The subscription price (fund unit value) is the value calculated for the Valuation Day. The fund unit value is published on the banking day following the Valuation Day.

Subscription sums cleared to the Fund Company after 2.30 p.m. (Finnish time) shall be subscribed on the next Valuation Day.

The Fund Company reserves the right to approve or reject subscriptions, redemptions and other Fund orders if sufficient information for the order has not been obtained.

The number of subscribed fund units is calculated at the Fund Company at least to the fourth decimal point by dividing the subscription payment (from which any subscription fees have been deducted) by the unit value.

In order to redeem fund units, any investment certificate must duly be submitted to the headquarters of the Fund Company.

Redemption orders shall be executed in the order received. The redemption price (fund unit value) is the fund value calculated for the fund unit for the Valuation Day, given that the redemption orders have been received by 2.30 p.m. (Finnish time). Redemption orders received after 2.30 p.m. (Finnish time) shall be executed at the value of the next Valuation Day. The funds provided by the redemption minus any redemption fees is credited to the client normally on the banking day following the Valuation Day, if the Fund Company does not have to sell securities in order to be able to carry out the redemption order.

If the resources required for redemption must be procured by selling securities, the Fund Company shall execute the sale of securities without undue delay, however at the latest within two (2) weeks of the request for redemption. In such a case, redemption is executed at the rate on the Valuation Day on which the redemption order was received by 2.30 p.m. (Finnish time) by the Fund Company. The redemption price shall be paid at the latest on the banking day following the day on which the funds from the sale of securities have been received. The Finnish Financial Supervision authority may, for special reasons, grant the right to transcend the abovementioned period.

The Fund Company may decide to limit redemptions if the total of all received redemption assignments exceed 10% of the Fund's assets. The Fund Company may move the exceeding portion of the redemptions to the following redemption date or, if necessary, to several subsequent redemption dates if the total of all received redemption assignments exceed 10% of the Fund's assets. The Fund Company may decide on restrictions even after the redemption assignments have been submitted to the Fund Company.

Under exceptional circumstances, if a fund unit-holder's interest so requires, the Fund Company may interrupt the execution of fund unit orders (for example, when reliable market information is not obtainable from the Fund's primary market or its integral parts).

The board of the Fund Company may decide how many units or for what sum units may be bought or sold at one time.

Fund unit-holders have the right to swap all or part of their fund units to the other investment funds managed by the Fund Company. Fund unit-holders may also swap between unit classes within the Fund. Fund units may be transferred. The ownership is registered in the fund unit-holder register after reliable documentation of the transfer has been provided.

When a fund unit-holder swaps fund units in other funds managed by the Fund Company and that at the same time are offered for subscription, the Valuation Day that the order of the fund swapping was received and approved at the latest at 2.30 p.m. (Finnish time) by the Fund Company will be regarded as the

redemption and subscription day, providing the Fund has the cash means needed for the fund exchange.

#### 9§ SUBSCRIPTION AND REDEMPTION PRICE OF FUND UNITS

The Fund Company may charge a maximum 1% fee for redemption of fund units.

If an external distributor is responsible for the distribution of fund units, a commission may be charged on subscription. The maximum commission is five (5) per cent of the subscription amount.

The above commissions are maximum commissions.

More detailed information about the fees for the different fund unit classes is found in the fund prospectus in force at that particular time.

The board of the Fund Company may decide to charge unit-holders a fee for the printing and delivery of paper investment certificates as well as for their safekeeping at the Fund Company.

#### 10§ CALCULATION OF THE FUND UNIT VALUE

It is possible not to calculate the NAV on Business Days when the value of the Fund or its investment vehicles cannot be determined precisely

due to bank holidays or other public holidays abroad. Such public holidays may include religious holidays, National Days or other national holidays. The above may be the case at least when a minimum of half of the Fund's investment vehicles are not quoted or they cannot be, in the Fund Management Company's view, valued in an acceptable way in view of the equality of unitholders. Information on the days when the

Fund's value is not calculated is available from the Fund Management Company. Information about the fund unit value is also available from the Fund Company.

The value of the fund is calculated so that the liabilities of the Fund are deducted from its assets. The value of the Fund's securities shall be established on the basis of their market value, which is the official closing price at the closing of the market in a public price tracking system

If an above-mentioned price is not available for the Valuation Day, the value is determined in accordance with the objective principles of the Fund Company. The interest of the accounts receivable affects the

value of the Fund and is considered in accordance with the bank statement. The value of holdings in the Fund in currency amount is converted into euros according to the exchange rate published by the European Central Bank on the Valuation Day. Units in the Fund may be issued in currencies other than euro. If units in the Fund have been issued in currencies other than euro, the net asset value of the fund units denominated in foreign currencies will be calculated at the same exchange rates as the Fund's net asset value.

The value of a fund unit is calculated by dividing the value of the Fund with the number of shares issued, noting however, that the value of the return units reflects yield paid to those units. The proportional values of the return and growth units are determined by the return allocated to the owners of return units. The allocation payment changes the accounting number between the return and growth units. This accounting number is used for the following decision in case there is a lack of allocation of return.

#### 11§ ALLOCATION OF RETURN

The Ordinary General Meeting shall decide the return to be allocated and paid to holders of return units. The aim is to keep the return on a stable and predictable level. Return paid out to return unit-holders shall be deducted from the calculated fund capital for return unit-holders. Return is not paid out to growth unit-holders, rather their share of the return is added to the value of the units and reinvested in accordance with the investment strategy of the Fund.

Return is paid out to holders of return units who are registered in the Fund Company's unit register on the date of the Ordinary General Meeting. The payment will take place at the latest one (1) month after the General Meeting. After notice of the meeting, the unit holders can obtain information about the date of the General Meeting from the Fund Company during its opening hours. The return is paid to the bank account designated by the unit-holder, unless otherwise decided.

#### 12§ PAYMENT TO THE FUND COMPANY

In remuneration for its activities, the Fund Company will receive a management fee amounting to a maximum of two (2) percent per annum of the value of the fund. The sum of the fee shall be calculated

daily (per annum percentage fee /365) on the fund value on the previous calculation date and shall be paid to the Fund Company monthly in arrears. The daily fund unit value reflects the deducted management fee. The board of the Fund Company shall confirm the exact management fee. Custodian fee is included in the management fee.

More detailed information about the fees for the different fund unit classes is found in the fund prospects in force at the respective point in time.

#### 13§ ACCOUNTING PERIOD OF THE FUND COMPANY AND FUND

The accounting period of the Fund Company and the Fund shall be one calendar year.

#### 14§ MEETING OF FUND UNIT-HOLDERS

The Fund Company does not convene for ordinary General Meetings of fund unit-holder. An Extraordinary meeting of the fund unit-holders shall be held when considered justified by the board of the Fund Company, or if the auditors or holders of fund units amounting to at least one twentieth of all the fund units issued request this in writing in order to deal with a specific matter.

The General Meeting shall be convened by the board of the Fund Company. Notice of the meeting must be conveyed to the fund unit-holders at the earliest four weeks prior and at the latest two weeks prior to the meeting. This shall be done by way of an announcement which shall be published in at least one national newspaper appearing in Finland. Other announcements to fund unit-holders shall be notified in verifiable form either in writing or as an announcement to be published in at least one national newspaper published in Finland.

In order to attend the Ordinary General Meeting, the fund unit-holder must sign up to do so with the Fund Company at the latest on the date specified on the notice. A fund unit-holder is not allowed to exercise the right which at the meeting belongs to the unit holder before his fund units have been registered or he has given an account of his title to the Fund Company and presented a report thereof. The right to participate in the meeting of fund unit-holders and the number of votes at the meeting will be determined on the basis of the situation prevailing ten days prior to the meeting.

#### 15§ FUND PROSPECTUS

The fund prospectus of the Fund, the KID, the interim report and the annual reports of the Fund Company will be published in compliance with the law concerning investment funds. The biannual interim report must be issued within two months of the end of the interim reporting period and the Fund's annual report within three months of the end of the accounting period. The above mentioned documents are available at the Fund Company during its opening hours.

#### 16§ AMENDING THE FUND'S BYLAWS

The board of the Fund Company shall decide on any amendment to the bylaws of the Fund. Amendments must be ratified by the Finnish Financial Supervision Authority.

Amendments to the bylaws shall come into effect one month after the Finnish Financial Supervision Authority has given its confirmation and the fund unit-holders have been informed of the amendment, unless otherwise instructed by the Finnish Financial Supervision Authority. A written notice sent by post shall be regarded as having come to the knowledge of the unit-holder on the fifth (5th) day after having been posted or on the day that the notice has been published in a national newspaper appearing in Finland. After coming into effect, amendments to the bylaws shall apply to all unit-holders.

#### 17§ SUPPLYING INFORMATION

The Fund Company has the right to supply information on the unit-holders in compliance with the legislation in force at the respective period of time.

#### 18§ REMUNERATION

Fund Company staff who fall under the scope of the remuneration policy of the Fund Company according to the Finnish Act on Common Funds, shall to the variable part be paid in fund units of the relevant UCITS fund to a minimum of 50 per cent of this variable payment must be paid in fund units.

SFDR Appendix



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

**ANNEX**

*to the*

**Commission Delegated Regulation (EU) .../....**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Fondita European Micro Cap  
**Legal entity identifier:** 743700LC5T1S23ZTBS72

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> %	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



**What environmental and/or social characteristics are promoted by this financial product?**

The financial product has as its main environmental objective to promote climate change mitigation and as a social objective to promote equality including safeguarding fundamental human rights.

For Fondita, sustainable investments in an Article 8 fund are investments that contribute to sustainable development in environmental, social and economic terms.



Several aspects are considered. Fondita has defined the main criteria for a sustainable investment as follows; an environmentally sustainable investment means that the company has in its strategy set CO2 reduction initiative and/or has a plan for CO2 neutrality.

In terms of socially sustainable investments, the company should have a equality and/or diversity policy in place. All companies are to follow good governance practices.

The company can not have violations of UN Global Compact, OECD guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita views as fundamental environmental, social and governance aspects which serves as a minimum requirement. A screen is conducted monthly against all of Fondita’s exclusion criteria and if a company is found in violation, a escalation process is conducted which if verified results in selling the company from our holding.

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

Fondita conducts, at least quarterly, screens towards data points on CO2 reduction initiatives and targets, including if the company has a equality related work policy. The fund promotes sustainable investments and has a minimum requirement of 50% out of the total allocation. The screening is dependent on the coverage provided in MSCI ESG research, which is complimented by manual ESG assessments.

Furthermore, Fondita conducts monthly screens towards the exclusion criteria to ensure there is not an over 5% of revenue exposure for our excluded sectors or norm violations. The monthly screen also includes a good governance test. The screen is conducted in MSCI.

In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The funds environmental objective is climate change mitigation. The funds main objective related to climate change focus both on companies CO2 reduction targets and the exclusion of environmentally unsustainable sectors from the funds investment universe. The funds environmental objective is aligned with UN SDG 13 Climate Action and SDG 7 Affordable and Clean Energy.

The social objective of the fund is to improve gender equality and support fair human and employee rights. By promoting companies that comply with international norms and standards, and companies which have a equality policy in place the funds social objective is aligned with the UN SDG 5 Gender Equality SDG 16 Peace & Justice.

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



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

All companies are screened before investing, and during the hold of the company towards international norms and standards such as UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The PAI map is updated at least annually of all holdings. The fund considers all 14 mandatory and two voluntary factors which have been chosen based on relevance for all of our funds, which can be reviewed on our homepage (published on a fund level and company level.). Fondita uses data from several sources to make the assessment, mainly MSCI data. If data is not attainable from MSCI we search company public disclosures and use thirdparty providers for estimates. We expect more reliable data availability when regulation such as CSRD enter into force.

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

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

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

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

The fund conducts a monthly screen towards UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “ In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

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



- x Yes, this fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made we look at the the principal adverse impacts of the company. In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector in which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographical areas are associated with a higher risk of ESG related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG.

The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity of investee company
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

15. Investments in companies without carbon emissions reduction initiatives.
16. Number of identified cases of severe human rights issues and incidents.

The PAI-reports are published in the Fondita Fund Management Company's annual report and on Fondita's webpage.

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

### **What investment strategy does this financial product follow?**

Fondita European Micro Cap is an actively managed mutual fund with a concentrated portfolio of approximately 35-40 holdings. The fund invests, with a 3-5 year time horizon or longer, in the smallest European listed micro cap companies. The investment philosophy is stock picking with a focus on quality growth companies. ESG is an essential part of the investment process, including a manual ESG assessment, as well as excluding controversial sectors and companies which have violated international norms and standards, as well as monitoring external databases, such as MSCI, with regards to sustainability measures. ESG risks and opportunities are also discussed extensively with company's management, as ESG data is poorly available for the micro and small companies.

On a monthly basis we monitor that our holdings fulfill exclusion criteria. Furthermore, we have regular meetings with portfolio companies regarding ESG issues and the company's ESG agenda. If we notice that some of our holdings don't meet our ESG criteria we conduct an escalation process, which ultimately results in a sell if the company is found in violation of our requirements.



- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The investment strategy of stock picking aims at holding a concentrated portfolio consisting of responsible, high quality growth companies. Besides pursuing value added returns in the selected asset class the companies need to fill the ESG criteria set up by Fondita.

The sustainability factors which are binding in the investment strategy is that at least 75% of the sustainable investments (50% out of total allocation) should have a carbon reduction initiative and at least 25% equality or/and diversity related policy, in order to fulfill our Article 8 sustainable investment requirement to be environmentally and/or socially sustainable investments. The binding elements contribute towards SDG 8 Climate Change and SDG 5 Gender Equality.

Furthermore, the companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

**Asset allocation** describes the share of investments in specific assets.

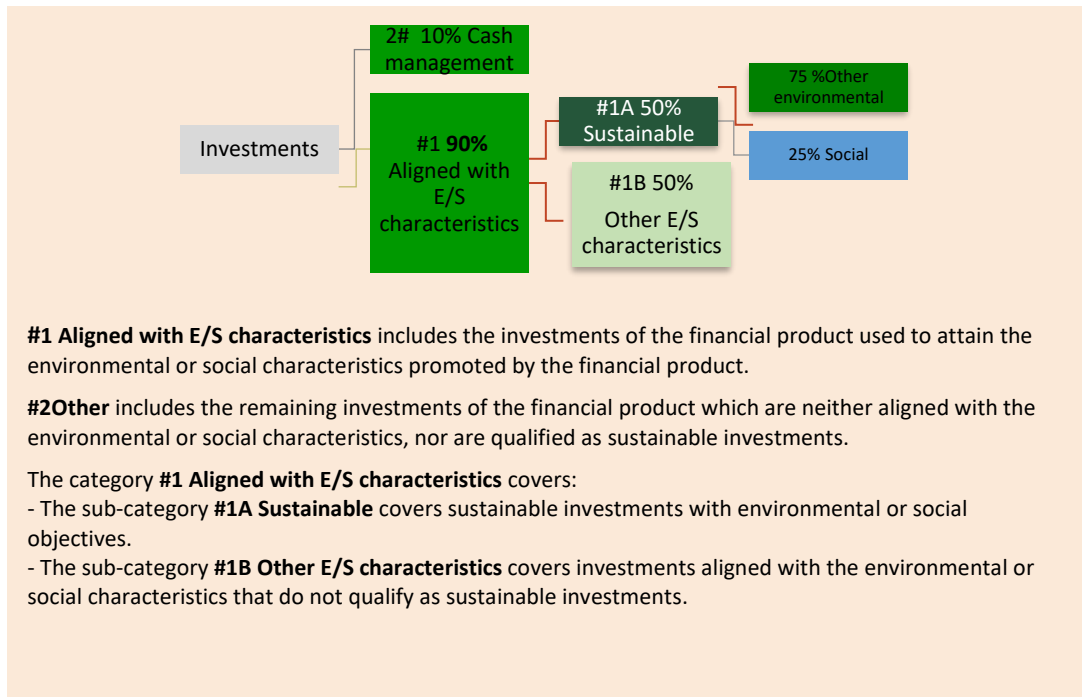
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

We conduct a good governance test screen in MSCI, and for smaller companies with limited public data we rely on the dialogue with the company completely to assess the situation (which for cases with public data serves to compliment the public information, when discussing with the company.)

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



Out of the total asset allocation a maximum of 10% is reserved for cash management. Out of the total investments, a minimum 50% of the funds holdings will promote sustainable investments which environmental objective aim for climate change mitigation and social objective targets equality.

All holdings consider ESG aspects but the fund does not have a sustainable investment as an objective according to SFDR. It however integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and considers principal adverse impacts for all holdings.

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

No derivatives are used in the portfolio management of the fund. Therefore the fund does not use derivatives to attain the environmental and social characteristics promoted by the financial product.



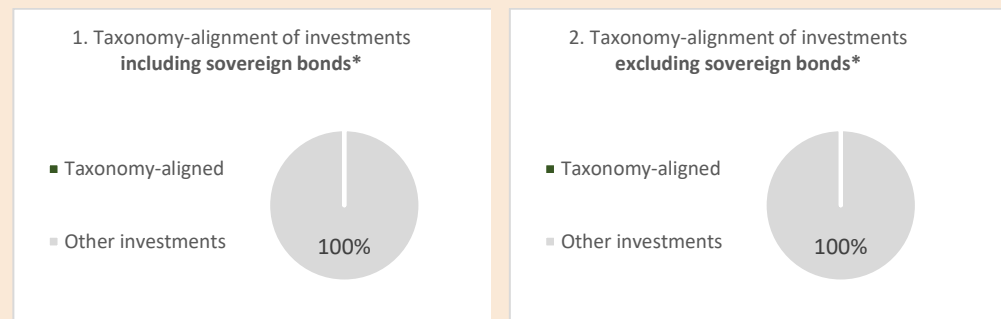
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Although the fund promotes environmental aspects, the fund is not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the fund do not have a target of a certain proportion of investments being sustainable investments according to Taxonomy.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

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

We do not have a set minimum regarding the share of investments in transitional and enabling activities.

### ● What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund should have at least 75% of sustainable investments which are environmentally sustainable investments according to aforementioned parameters.

### ● What is the minimum share of socially sustainable investments?

25% of the sustainable investments are to be socially sustainable according to aforementioned parameters.

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

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.





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

The fund integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and it considers principal adverse impacts for all holdings. The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*
- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*
- *How does the designated index differ from a relevant broad market index?*
- *Where can the methodology used for the calculation of the designated index be found?*



## Where can I find more product specific information online?

More product-specific information can be found on the website:  
<https://fondita.fi/en/fund/european-micro-cap/>



Brussels, 6.4.2022  
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ANNEX 2

**ANNEX**

*to the*

**Commission Delegated Regulation (EU) .../....**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**



**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Fondita European Small Cap  
**Legal entity identifier:** 743700250XW1G45XK174

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



**What environmental and/or social characteristics are promoted by this financial product?**

The financial product has as its main environmental objective to promote climate change mitigation and as a social objective to promote equality including safeguarding fundamental human rights.

For Fondita, sustainable investments in an Article 8 fund are investments that contribute to sustainable development in environmental, social and economic terms.

Several aspects are considered., Fondita has defined the main criteria for a sustainable investment as follows; an environmentally sustainable investment means that the company has in its strategy set CO2 reduction initiative and/or has a plan for CO2 neutrality.

In terms of socially sustainable investments, the company should have a equality and/or diversity policy in place. All companies are to follow good governance practices.

The company can not have violations of UN Global Compact, OECD guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita views as fundamental environmental, social and governance aspects which serves as a minimum requirement. A screen is conducted monthly against all of Fondita’s exclusion criteria and if a company is found in violation, a escalation process is conducted which if verified results in selling the company from our holding.

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



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

Fondita conducts, at least quarterly, screens towards data points on CO2 reduction initiatives and targets, including if the company has a equality related work policy. The fund promotes sustainable investments and has a minimum requirement of 50% out of the total allocation. The screening is dependent on the coverage provided in MSCI ESG research.

Furthermore, Fondita conducts monthly screens towards the exclusion criteria to ensure there is not an over 5% of revenue exposure for our excluded sectors or norm violations. The monthly screen also includes a good governance test. The screen is conducted in MSCI.

In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The funds environmental objective is climate change mitigation. The funds main objective related to climate change focus both on companies CO2 reduction targets and the exclusion of environmentally unsustainable sectors from the funds investment universe. The funds environmental objective is aligned with UN SDG 13 Climate Action.

The social objective of the fund is to improve gender equality and support fair human and employee rights. By promoting companies that comply with international norms and standards, and companies which have a equality and/or

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

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

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

diversity policy in place the funds social objective is aligned with the UN SDG 5 Gender Equality.

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

All companies are screened before investing, and during the hold of the company towards international norms and standards such as UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The PAI map is updated at least annually of all holdings. The fund considers all 14 mandatory and two voluntary factors which have been chosen based on relevance for all of our funds, which can be reviewed on our homepage (published on a fund level and company level.). Fondita uses data from several sources to make the assessment, mainly MSCI data. If data is not attainable from MSCI we search company public disclosures and use thirdparty providers for estimates. We expect more reliable data availability when regulation such as CSRD enter into force.

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

The fund conducts a monthly screen towards UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “ In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



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

- x Yes, this fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made we look at the the principal adverse impacts of the company. In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector in which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographical areas are associated with a higher risk of ESG related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG.

The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity of investee company
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

15. Investments in companies without carbon emissions reduction initiatives.
16. Number of identified cases of severe human rights issues and incidents.

The PAI-reports are published in the Fondita Fund Management Company's annual report and on Fondita's webpage

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

### **What investment strategy does this financial product follow?**

Fondita European Small Cap is an actively managed mutual fund with a concentrated portfolio of approximately 30-35 holdings. The fund invests, with a 3-5 year time horizon or longer, in small and medium European listed companies. The investment philosophy is stock picking with a focus on quality growth companies. ESG is part of the investment process, both in terms of excluding controversial sectors and norm breakers in line with UN Global Compact, as well as monitoring external databases, such as MSCI, regarding sustainability measures. ESG risks and opportunities are also discussed with company's management, as ESG data is poorly available for the micro and small companies and own assessments are necessary.

On a monthly basis we monitor that our holdings fulfill exclusion criteria. Furthermore, we have regular meetings with portfolio companies regarding ESG issues and the company's ESG agenda. If we notice that some of our holdings don't meet our ESG criteria we conduct an escalation process, which ultimately results in a sell if the company is found in violation of our requirements.



- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The investment strategy of stock picking aims at holding a concentrated portfolio consisting of responsible, high quality growth companies. Besides pursuing value added returns in the selected asset class the companies need to fill the ESG criteria set up by Fondita.

The sustainability factors which are binding in the investment strategy is that at least 75% of the sustainable investments (50% of total allocation) should have an carbon reduction initiative and at least 25% equality or/and diversity related policy, in order to fulfill our Article 8 sustainable investment requirement to be environmentally and/or socially sustainable investments. The binding elements contribute towards SDG 8 Climate Change and SDG 5 Gender Equality.

Furthermore, the companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

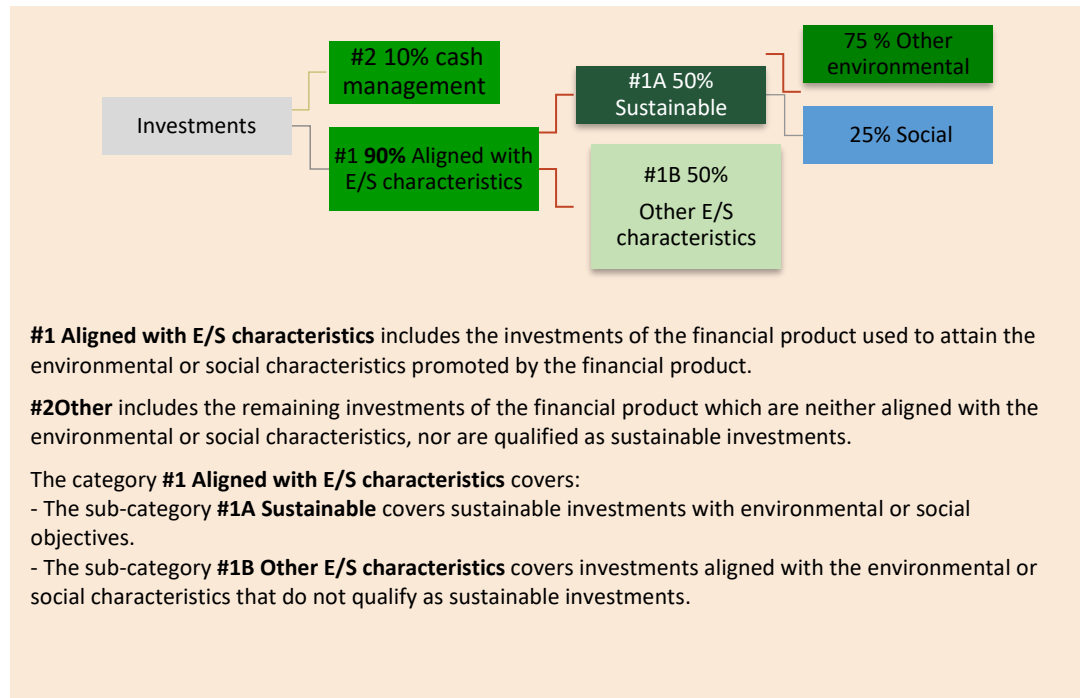
**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

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

We conduct a good governance test screen in MSCI, and for smaller companies with limited public data we rely on the dialogue with the company completely to assess the situation (which for cases with public data serves to compliment the public information, when discussing with the company.)



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

Out of the total asset allocation a maximum of 10% is reserved for cash management. Out of the total investments, a minimum 50% of the funds holdings will promote sustainable investments which environmental objective aim for climate change mitigation and social objective targets equality.

All holdings consider ESG aspects but the fund does not have a sustainable investment as an objective according to SFDR. It however integrates ESG factors equally for all holdings in the investmentprocess, promotes environmental and social characteristics, excludes unsustainable sectors and considers principal adverse impacts for all holdings.

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**



No derivatives are used in the portfolio management of the fund. Therefore the fund does not use derivatives to attain the environmental and social characteristics promoted by the financial product.

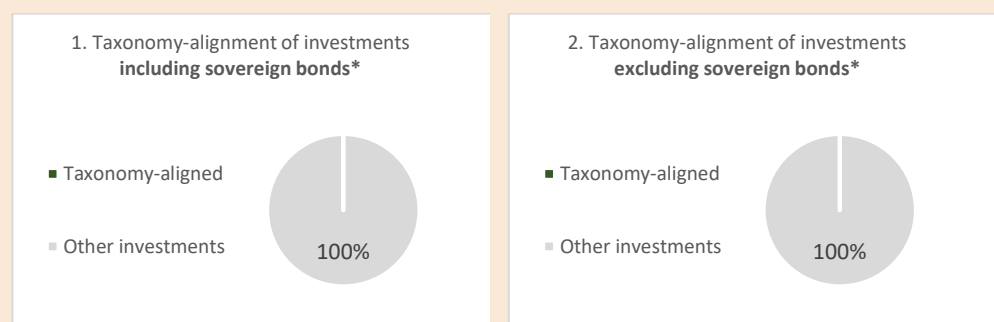
**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

Although the fund promotes environmental aspects, the fund is not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the fund does not have a target of a certain proportion of investments being sustainable investments according to Taxonomy.

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

No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

- **What is the minimum share of investments in transitional and enabling activities?**  
 We do not have a set minimum regarding the share of investments in transitional and enabling activities.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The fund should have at least 75% of sustainable investments which are environmentally sustainable investments according to aforementioned parameters.



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

25% of the sustainable investments are to be socially sustainable according to aforementioned parameters.



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

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

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

The fund integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and it considers principal adverse impacts for all holdings. The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*
- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*
- *How does the designated index differ from a relevant broad market index?*
- *Where can the methodology used for the calculation of the designated index be found?*

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Where can I find more product specific information online?**

More product-specific information can be found on the website:  
<https://fondita.fi/en/fund/european-micro-cap/>





Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

**ANNEX**

*to the*

**Commission Delegated Regulation (EU) .../....**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Fondita Finland Micro Cap  
**Legal entity identifier:** 743700HNRJ1L3CO4X179

## Environmental and/or social characteristics

**Does this financial product have a sustainable investment objective?**

**Yes**                         **No**

<p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___%</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%</p>	<p><input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>
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**What environmental and/or social characteristics are promoted by this financial product?**

The financial product has as its main environmental objective to promote climate change mitigation and as a social objective to promote equality including safeguarding fundamental human rights.

For Fondita, sustainable investments in an Article 8 fund are investments that contribute to sustainable development in environmental, social and economic terms.

Several aspects are considered., Fondita has defined the main criteria for a sustainable investment as follows; an environmentally sustainable investment means that the company has in its strategy set CO2 reduction initiative and/or has a plan for CO2 neutrality.

In terms of socially sustainable investments, the company should have a equality and/or diversity policy in place. All companies are to follow good governance practices.

The company can not have violations of UN Global Compact, OECD guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita views as fundamental environmental, social and governance aspects which serves as a minimum requirement. A screen is conducted monthly against all of Fondita’s exclusion criteria and if a company is found in violation, a escalation process is conducted which if verified results in selling the company from our holding.

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

Fondita conducts, at least quarterly, screens towards data points on CO2 reduction initiatives and targets, including if the company has a equality related work policy. The fund promotes sustainable investments and has a minimum requirement of 50% out of the total allocation. The screening is dependent on the coverage provided in MSCI ESG research.

Furthermore, Fondita conducts monthly screens towards the exclusion criteria to ensure there is not an over 5% of revenue exposure for our excluded sectors or norm violations. The monthly screen also includes a good governance test. The screen is conducted in MSCI.

In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The funds environmental objective is climate change mitigation. The funds main objective related to climate change focus both on companies CO2 reduction targets and the exclusion of environmentally unsustainable sectors from the funds investment universe. The funds environmental objective is aligned with UN SDG 13 Climate Action.

The social objective of the fund is to improve gender equality and support fair human and employee rights. By promoting companies that comply with international norms and standards, and companies which have a equality policy in place the funds social objective is aligned with the UN SDG 5 Gender Equality.

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



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

All companies are screened before investing, and during the hold of the company towards international norms and standards such as UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The PAI map is updated at least annually of all holdings. The fund considers all 14 mandatory and two voluntary factors which have been chosen based on relevance for all of our funds, which can be reviewed on our homepage (published on a fund level and company level.). Fondita uses data from several sources to make the assessment, mainly MSCI data. If data is not attainable from MSCI we search company public disclosures and use thirdparty providers for estimates. We expect more reliable data availability when regulation such as CSRD enter into force.

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

The fund conducts a monthly screen towards UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “ In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

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

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

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

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

- x Yes, this fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made we look at the the principal adverse impacts of the company. In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector in which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographical areas are associated with a higher risk of ESG related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG.



The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity of investee company
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

15. Investments in companies without carbon emissions reduction initiatives.
16. Number of identified cases of severe human rights issues and incidents.

The PAI-reports are published in the Fondita Fund Management Company's annual report and on Fondita's webpage.

**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance. decisions based on factors such as investment objectives and risk tolerance.



## What investment strategy does this financial product follow?

Fondita Finland Micro Cap is an equity fund that invests in smaller Finnish-listed companies with a market capitalisation of less than EUR 800 million. The investment philosophy is stock picking with a focus on quality growth companies. ESG is part of the investment process, both in terms of excluding controversial sectors and norm breakers in line with UN Global Compact, as well as monitoring external databases, such as MSCI, with regards to sustainability measures. ESG risks and opportunities are also discussed with company's management, as ESG data is poorly available for the micro and small companies and own assessments are necessary.

On a monthly basis we monitor that our holdings fulfill exclusion criteras. Furthermore, have regular meetings with portfolio companies regarding ESG issues and the companies ESG agenda. If we notice that some of our holdings don't meet our ESG criteras we conduct an escalation process, which ultimately results in a sell if the company is found in violation of our requirements.

- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The investment strategy of stock picking aims at holding a concentrated portfolio consisting of responsible, high quality growth companies. Besides pursuing value added returns in the selected asset class the companys need to fill the ESG criterias set up by Fondita.

The sustainability factors which are binding in the investment strategy is that at least 75% of the sustainable investments (50% of total allocation) should have an carbon reduction initiative and at least 25% equality or/and diversity related policy, in order to fullfill our Article 8 sustainable investment requirement to be environmentally and/or socially sustainable investments. The binding elements contribute towards SDG 8 Climate Change and SDG 5 Gender Equality.

Furthermore, the companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

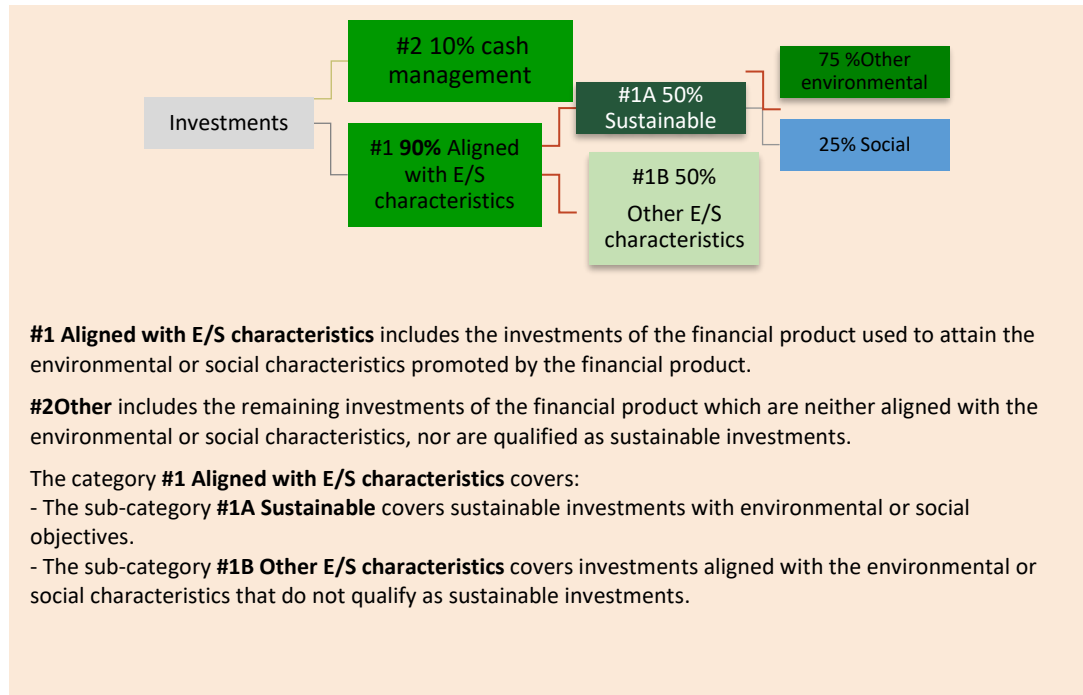
- ***What is the committed minimum rate to reduce the scope of the investments considered prior to the application of that investment strategy?***

The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

We conduct a good governance test screen in MSCI, and for smaller companies with limited public data we rely on the dialogue with the company completely to assess the situation (which for cases with public data serves to compliment the public information, when discussing with the company.)

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



Out of the total asset allocation a maximum of 10% is reserved for cash management. Out of the total investments, a minimum 50% of the funds holdings will promote sustainable investments which environmental objective aim for climate change mitigation and social objective targets equality.

All holdings consider ESG aspects but the fund does not have a sustainable investment as an objective according to SFDR. It however integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and considers principal adverse impacts for all holdings.

### ● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

No derivatives are used in the portfolio management of the fund. Therefore the fund does not use derivatives to attain the environmental and social characteristics promoted by the financial product.



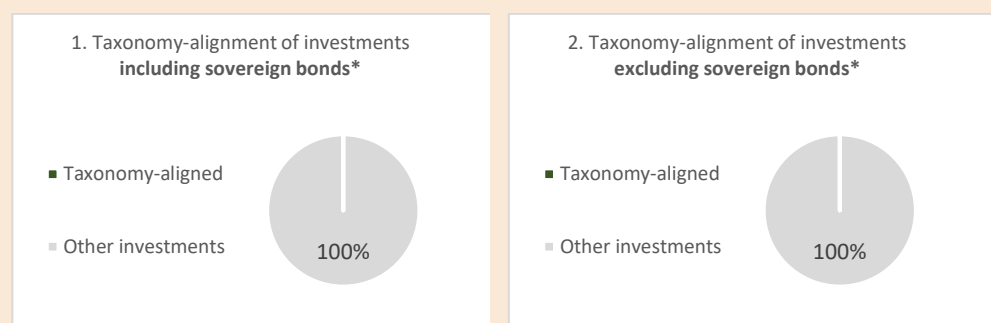
### **To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

Although the fund promotes environmental aspects, the fund is not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the fund do not have a target of a certain proportion of investments being sustainable investments according to Taxonomy.

## Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

- **What is the minimum share of investments in transitional and enabling activities?**  
We do not have a set minimum regarding the share of investments in transitional and enabling activities.



## What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund should have at least 75% of sustainable investments which are environmentally sustainable investments according to aforementioned parameters.



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

25% of the sustainable investments are to be socially sustainable according to aforementioned parameters.



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

The fund integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and it considers principal adverse impacts for all holdings. The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.



are

sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.





Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*
- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*
- *How does the designated index differ from a relevant broad market index?*
- *Where can the methodology used for the calculation of the designated index be found?*



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

**Where can I find more product specific information online?**

More product-specific information can be found on the website:  
<https://fondita.fi/en/fund/european-micro-cap/>



Brussels, 6.4.2022  
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ANNEX 2

**ANNEX**

*to the*

**Commission Delegated Regulation (EU) .../....**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Fondita Global Megatrends  
**Legal entity identifier:** 743700E4KQ44WD5AWM97

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



**What environmental and/or social characteristics are promoted by this financial product?**

The financial product has as its main environmental objective to promote climate change mitigation and as a social objective to promote equality including safeguarding fundamental human rights.

For Fondita, sustainable investments in an Article 8 fund are investments that contribute to sustainable development in environmental, social and economic terms.

Several aspects are considered., Fondita has defined the main criteria for a sustainable investment as follows; an environmentally sustainable investment means that the company has in its strategy set CO2 reduction targets and has a vision for CO2 neutrality.

In terms of socially sustainable investments, the company should have a equality and/or diversity policy in place. All companies are to follow good governance practices.

The company can not have violations of UN Global Compact, OECD guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita views as fundamental environmental, social and governance aspects which serves as a minimum requirement. A screen is conducted monthly against all of Fondita’s exclusion criteria and if a company is found in violation, a escalation process is conducted which if verified results in selling the company from our holding.

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

Fondita conducts, at least quarterly, screens towards data points on CO2 reduction initiatives and targets, including if the company has a equality related work policy. The fund promotes sustainable investments and has a minimum requirement of 50% out of the total allocation. The screening is dependent on the coverage provided in MSCI ESG research.

Furthermore, Fondita conducts monthly screens towards the exclusion criteria to ensure there is not an over 5% of revenue exposure for our excluded sectors or norm violations. The monthly screen also includes a good governance test. The screen is conducted in MSCI.

In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The funds environmental objective is climate change mitigation. The funds main objective related to climate change focus both on companies CO2 reduction targets and the exclusion of environmentally unsustainable sectors from the funds investment universe. The funds environmental objective is aligned with UN SDG 13 Climate Action.

The social objective of the fund is to improve gender equality and support fair human and employee rights. By promoting companies that comply with international norms and standards, and companies which have a equality policy in place the funds social objective is aligned with the UN SDG 5 Gender Equality.

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



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

All companies are screened before investing, and during the hold of the company towards international norms and standards such as UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

— — The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The PAI map is updated at least annually of all holdings. The fund considers all 14 mandatory and two voluntary factors which have been chosen based on relevance for all of our funds, which can be reviewed on our homepage (published on a fund level and company level.). Fondita uses data from several sources to make the assessment, mainly MSCI data. If data is not attainable from MSCI we search company public disclosures and use thirdparty providers for estimates. We expect more reliable data availability when regulation such as CSRD enter into force*How are the sustainable investments aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights?* The fund conducts a monthly screen towards UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “ In case a company is found in violation of our exclusion criteria, an escalation process is

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

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

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

conducted and if the violation is verified with the company, the holding is removed.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



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

- x Yes, this fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made we look at the the principal adverse impacts of the company. In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector in which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographical areas are associated with a higher risk of ESG related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG.

The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity of investee company
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

15. Investments in companies without carbon emissions reduction initiatives.

16. Number of identified cases of severe human rights issues and incidents.

The PAI-reports are published in the Fondita Fund Management Company's annual report and on Fondita's webpage.

### **What investment strategy does this financial product follow?**

Fondita Global Megatrends is an actively managed thematic global equity fund that invests in shares of publicly traded companies that are well positioned towards three topical megatrends; Climate change, Demographic change and Technological development. The investment philosophy is stock picking with a focus on quality growth companies.

ESG is an essential part of the investment process, including a manual ESG assessment, as well as excluding controversial sectors and companies which have violated international norms and standards, as well as monitoring external databases, such as MSCI, with regards to sustainability measures. ESG risks and opportunities are also discussed extensively with company's management, as ESG data is poorly available for the micro and small companies.

On a monthly basis we monitor that our holdings fulfill exclusion criteria. Furthermore, we have regular meetings with portfolio companies regarding ESG issues and the company's ESG agenda. If we notice that some of our holdings don't meet our ESG criteria we conduct an escalation process, which ultimately results in a sell if the company is found in violation of our requirements.

● ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The sustainability factors which are binding in the investment strategy is that at least 75% of the sustainable investments should have a carbon reduction initiative and at least 25% equality or/and diversity related policy, in order to fulfill our Article 8 sustainable investment requirement to be environmentally and/or socially sustainable investments. The binding elements contribute towards SDG 8 Climate Change and SDG 5 Gender Equality.

Furthermore, the companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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



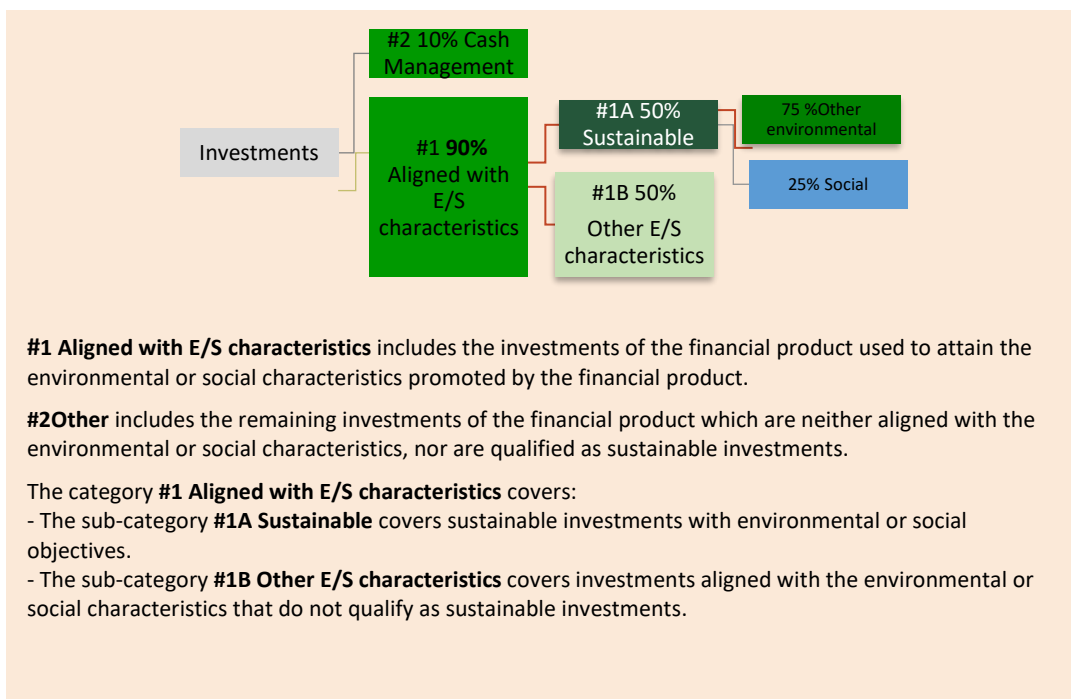
**Good governance** practices include sound management structures, employee relations, remuneration of staff and tax compliance.

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

We conduct a good governance test screen in MSCI, and for smaller companies with limited public data we rely on the dialogue with the company completely to assess the situation (which for cases with public data serves to compliment the public information, when discussing with the company.)

**Asset allocation** describes the share of investments in specific assets.

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



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

**#2Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

Out of the total asset allocation a maximum of 10% is reserved for cash management. Out of the total investments, a minimum 50% of the funds holdings will promote sustainable investments which environmental objective aim for climate change mitigation and social objective targets equality.

All holdings consider ESG aspects but the fund does not have a sustainable investment as an objective according to SFDR. It however integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and it considers principal adverse impacts for all holdings.

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

No derivatives are used in the portfolio management of the fund. Therefore the fund does not use derivatives to attain the environmental and social characteristics promoted by the financial product



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

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.



**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.

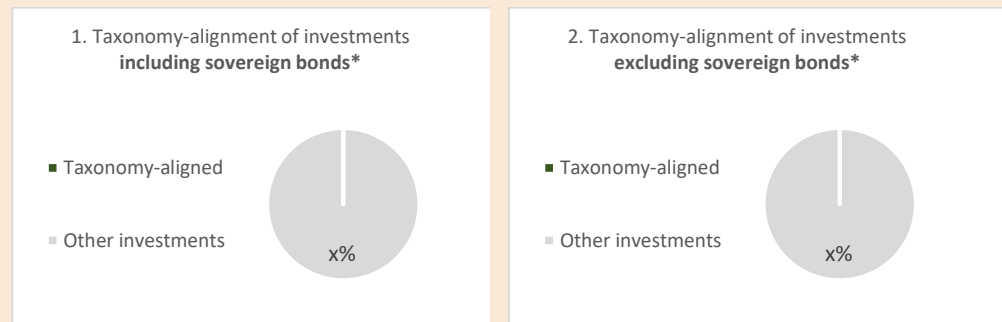
Although the fund promotes environmental aspects, the fund is not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the fund do not have a target of a certain proportion of investments being sustainable investments according to Taxonomy.

Although the fund promotes environmental aspects, the fund is not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the fund do not have a target of a certain proportion of investments being sustainable investments according to Taxonomy.

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

No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

- **What is the minimum share of investments in transitional and enabling activities?**  
We do not have a set minimum regarding the share of investments in transitional and enabling activities.

**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The fund should have at least 75% of sustainable investments which are environmentally sustainable investments according to aforementioned parameters.

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

are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

25% of the sustainable investments are to be socially sustainable according to aforementioned parameters.



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

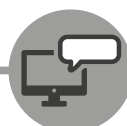
The fund integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and it considers principal adverse impacts for all holdings. The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*
- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*
- *How does the designated index differ from a relevant broad market index?*
- *Where can the methodology used for the calculation of the designated index be found?*



**Where can I find more product specific information online?**

More product-specific information can be found on the website:

<https://fondita.fi/en/fund/global-megatrends/>



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 3

**ANNEX**

*to the*

**Commission Delegated Regulation (EU) .../...**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

**Template pre-contractual 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**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** FONDITA HEALTHCARE  
**Legal entity identifier:** 743700ANX0373RNFF208

## Sustainable investment objective

<b>Does this financial product have a sustainable investment objective?</b>	
<span style="color: green;">●●</span> <input checked="" type="checkbox"/> <b>Yes</b>	<span style="color: green;">●</span> <span style="color: gray;">●</span> <input type="checkbox"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: %</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 90 %</b>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



### **What is the sustainable investment objective of this financial product?**

This global healthcare fund has a social sustainability investment objective. The fund holdings economic activities work toward supporting several UN SDG goals, mainly the fund aims to improve Health and Well-being (UN SDG 3) and Gender Equality (SDG 5).

The fund invests in companies that address current and unmet medical needs and provide access to medicine and medical care. This is achieved by investing in companies active in innovation, production and distribution of medicines and

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

healthcare equipment, tools and supplies as well as diagnostics and healthcare services.

Operationally the companies are to act in a socially and environmentally responsible way. The holdings are to focus on social sustainability aspects such as improved diversity, inclusion and equality and environmental objectives should have targets such as CO2 neutrality, which are in line with Fonditas targets for the Net Zero Asset Manager initiative.

The companies do not operate in sectors stated as not sustainable according to Fonditas Responsible Investment Policy. The companies' activities are required to be in line with UN Global Compact and OECD Guidelines for Multinational Enterprises criteria regarding human rights, labor, environment and anti-corruption. All companies in the fund follow good governance practices and need to comply with the EU Taxonomy DNSH (Do no significant harm) principle.

● ***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

Sustainability indicators to measure how the funds holdings aim at ensuring healthy lives and promote well-being for all, regardless of age (SDG 3) and help achieve gender equality and empower women (SDG 5) are the following:

- 1) At least 90 % of the investments are made in companies that address and prevent current and unmet medical needs. This is done by investing in companies active in R&D, production and distribution of medicines and healthcare equipment, tools and supplies as well as diagnostics and healthcare services primarily for humans but also animals.
- 2) At least 80 % of holdings have a strategy or policy for increased access to medicine or healthcare
  - a. a proprietary framework based on the Access to Medicine index for pharma companies and an internal qualitative framework for other subsectors in the Healthcare sector is applied
- 3) (Diversity, Equality & Inclusion)
  - a. At least 75 % of the holdings have a minimum 50 % share of female to male ratio in board composition
  - b. At least 50 % of holdings have a stated anti-discrimination policy and/or diversity policy
- 4) Social and environmental responsibility
  - a. No UN Global Compact or OECD Guidelines for Multinational Enterprises breaches allowed (human rights, labor, environment and anti-corruption)

- b. At least 75 % have a stated CO2 reduction target
  - c. All holdings are required to comply with EU Taxonomy DNSH principle
- 5) All holdings follow good governance practices

***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

The funds thematic and geographical focus including the investment process results in a portfolio of companies that do not cause any significant harm to any environmental or social sustainable investment objective.

- 1) We exclude certain non-sustainable/controversial sectors.
- 2) We exclude companies breaching international norms and conventions (UN Global Compact and OECD Guidelines for Multinational Enterprises) The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita considers as the minimum requirement in each fund.
- 3) We assess all companies PAI (Principle Adverse Impacts) indicators
- 4) We run a monthly screening of the portfolios holdings against the MSCI EU Taxonomy DNSH (Do No Significant Harm) indicators.

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

The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitors them during the lifetime of the investment. The fund considers all 14 mandatory and two voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment, if available MSCI data is used as the main source. If data is not attainable from MSCI we search company disclosures and use third party providers for estimates. We expect more reliable data will be used when CSRD reporting standards will come into force.

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

The holdings are aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We base this assessment on the fact that we exclude companies that have breached any of the UN Global Compact Principles and OECD Guidelines for Multinational Enterprises. We also

strengthen this assessment on our thematic and geographical focus, sector exclusion policy and the criteria in the funds investment process.

**Principal adverse impacts** are the most significant

negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



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

Yes

This fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made, we assess the principal adverse impacts of the company. As part of the assessment of the principle adverse sustainability impacts on a potential investment, we pay close attention to the sector in which the holding operates in, the geographical location of production, and what the company offers in terms of service or products. Certain sectors and geographics are associated with a higher inherited ESG risk, such as corruption (first hand assessment based on Transparency Index assessment). We also take into account a number of qualitative and quantitative indicators of the company, including management and their priorities in regards of ESG.

The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity

14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

15. Companies without carbon emissions reduction initiatives.

~~16.~~ Number of identified cases of severe human rights issues and incidents.

~~17.~~ 16.

The PAI-reports are published in the Fondita Fund Management Company's annual report and on Fondita's webpage.

No



### What investment strategy does this financial product follow?

Fondita Healthcare is an actively managed equity fund with a global mandate that invests in companies whose operations improve health and well-being. The investment philosophy is stock picking with a focus on innovative quality growth companies. Our responsible investment process covers negative and positive screening, integration of ESG factors in the assessment process, engagement and active ownership.

The companies have to operate in a socially and environmentally responsible way and have good corporate governance. The companies also have to fulfill certain criterias regarding valuation, expected growth and financial performance.

- ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

We identify companies active in the different subsectors of the healthcare sector. This includes Pharmaceuticals, Healthcare Equipment, Biotechnology, Managed Healthcare, Life Science Tools & Services, Healthcare services, supplies, distributors, facilities and technology.

Sustainability indicators to measure how the funds holdings aim at ensuring healthy lives and promote well-being for all at all ages (SDG 3) and help achieve gender equality and empower women (SDG 5) are the following:

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



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

**Asset allocation** describes the share of investments in specific assets.

- 1) At least 90 % of the investments are made in companies that address and prevent current and unmet medical needs. This is done by investing in companies active in R&D, production and distribution of medicines and healthcare equipment, tools and supplies as well as diagnostics and healthcare services primarily for humans but also animals.
- 2) At least 80 % of holdings have a strategy or policy for increased access to medicine or healthcare
  - a. a proprietary framework based on the Access to Medicine index for pharma companies and an internal qualitative framework for other subsectors in the healthcare sector is applied
- 3) Diversity, Equality & Inclusion)
  - a. At least 75 % of the holdings have a minimum 50 % share of female to male ratio in board composition
  - b. At least 50 % of holdings have a stated anti-discrimination policy and/or diversity policy
- 4) Social and environmental responsibility
  - a. No UN Global compact or OECD Guidelines for Multinational Enterprises breaches allowed (human rights, labor, environment and anti-corruption)
  - b. At least 75 % have a stated CO2 reduction target
  - c. All holdings are required to comply with EU Taxonomy DNSH principle
- 5) All holdings follow good governance practices

Besides these binding elements the ESG integration phase in the investment process includes Principle Adverse Impact assessment, including a diligent analysis of the fundamental ESG characteristics based on materiality as set up in the Fondita Internal ESG Framework.

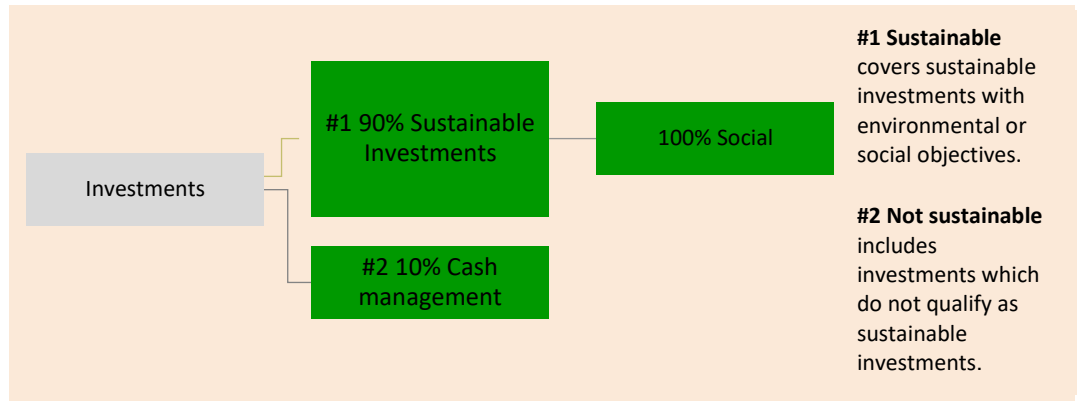
● **What is the policy to assess good governance practices of the investee companies?**

Exclusion of companies with UN Global Compact or OECD Guidelines for Multinational Enterprises breaches regarding for example taxation, employee rights and anti-corruption also sets a base for good governance.

Besides exclusion criterias the assessment of good governance is analysed on a company specific level where we focus on the following datapoints: governance risk score (MSCI), implemented diversity programs, anti-discrimination policy implementation, bribery & corruption controversies and tax transparency.

We also conduct a monthly screening on our holdings in MSCI according to the “Good Governance test” which is escalated for further investigation if necessary. For smaller companies where there is limited coverage in third party data bases we make our assessment based on data we can collect ourselves from the company.

## What is the asset allocation and the minimum share of sustainable investments?



A minimum of 90 % of the funds assets under management is considered sustainable investments (while a maximum of 10 % is reserved for cash management).

### ● *How does the use of derivatives attain the sustainable investment objective?*

No derivatives are used in the portfolio management of the fund.



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

The fund does not have a set minimum for the aggregate revenue of the portfolio due to the sector in focus of the investment strategy is not part of the EU Taxonomy and the general lack of data at this point in time.

### **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

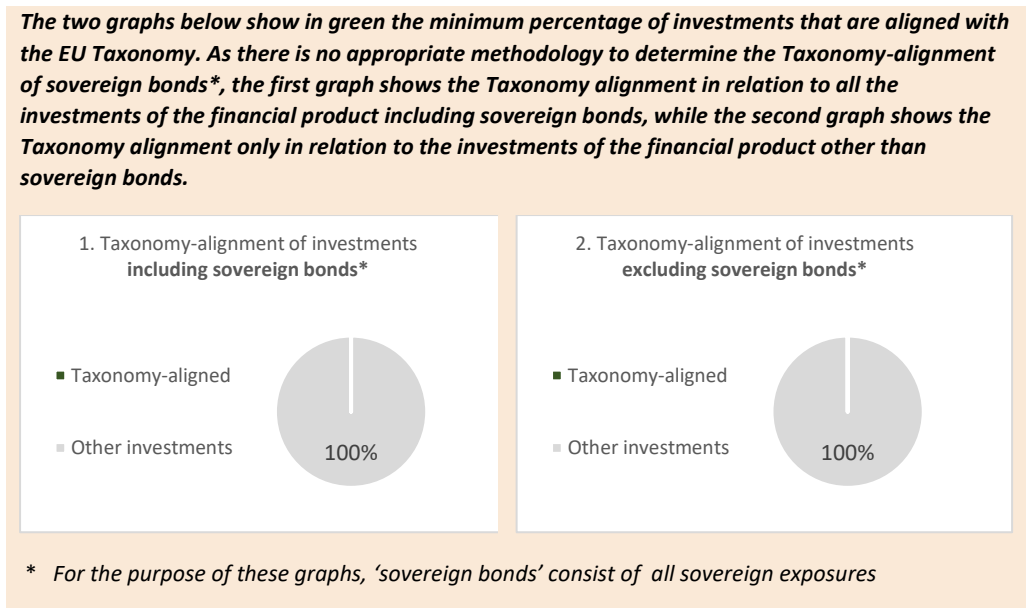
No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded from the investment process according to Fondita’s responsible investment policy.

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.

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

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



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

The fund does not have a minimum regarding the share of investments in transitional and enabling activities.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

75 % of the funds holdings have set a CO2 reduction target, no breaches to UN Global Compact principles or OECD Guidelines for Multinational Enterprises is allowed and all holdings need to comply with the EU Taxonomy DNSH principle.



**What is the minimum share of sustainable investments with a social objective?**

The minimum share of sustainable investments with a social objective is 90 %.



**What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?**

No investments are in the “#2 Not Sustainable” allocation. The 10 % taken into account in the allocation table is for cash management of the fund.

**Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

are environmentally sustainable investments that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



No. The fund uses as an unofficial reference index the MSCI Global Healthcare Index. No sustainable investment is linked to the index.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

-

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

We only use the reference benchmark as a comparison, we are in no way tied to the methodology of the index.

- ***How does the designated index differ from a relevant broad market index?***

The index is focused on the different subsectors of the Global Healthcare market.

- ***Where can the methodology used for the calculation of the designated index be found?***

<https://www.msci.com/our-solutions/indexes>



**Where can I find more product specific information online?**

**More product-specific information can be found on the website:**

<https://fondita.fi/en/fund/healthcare/>



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

**ANNEX**

*to the*

**Commission Delegated Regulation (EU) .../....**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Fondita Nordic Micro Cap  
**Legal entity identifier:** 743700DDK0NQQZFQD549

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



**What environmental and/or social characteristics are promoted by this financial product?**

The financial product has as its main environmental objective to promote climate change mitigation and as a social objective to promote equality including safeguarding fundamental human rights.

For Fondita, sustainable investments in an Article 8 fund are investments that contribute to sustainable development in environmental, social and economic terms.

Several aspects are considered., Fondita has defined the main criteria for a sustainable investment as follows; an environmentally sustainable investment means that the company has in its strategy set CO2 reduction initiative and/or has a plan for CO2 neutrality.

In terms of socially sustainable investments, the company should have a equality and/or diversity policy in place. All companies are to follow good governance practices.

The company can not have violations of UN Global Compact, OECD guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita views as fundamental environmental, social and governance aspects which serves as a minimum requirement. A screen is conducted monthly against all of Fondita’s exclusion criteria and if a company is found in violation, a escalation process is conducted which if verified results in selling the company from our holding.

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

Fondita conducts, at least quarterly, screens towards data points on CO2 reduction initiatives and targets, including if the company has a equality related work policy. The fund promotes sustainable investments and has a minimum requirement of 50% out of the total allocation. The screening is dependent on the coverage provided in MSCI ESG research.

Furthermore, Fondita conducts monthly screens towards the exclusion criteria to ensure there is not an over 5% of revenue exposure for our excluded sectors or norm violations. The monthly screen also includes a good governance test. The screen is conducted in MSCI.

In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The funds environmental objective is climate change mitigation. The funds main objective related to climate change focus both on companies CO2 reduction targets and the exclusion of environmentally unsustainable sectors from the funds investment universe. The funds environmental objective is aligned with UN SDG 13 Climate Action.

The social objective of the fund is to improve gender equality and support fair human and employee rights. By promoting companies that comply with international norms and standards, and companies which have a equality policy in place the funds social objective is aligned with the UN SDG 5 Gender Equality.

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



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

All companies are screened before investing, and during the hold of the company towards international norms and standards such as UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The PAI map is updated at least annually of all holdings. The fund considers all 14 mandatory and two voluntary factors which have been chosen based on relevance for all of our funds, which can be reviewed on our homepage (published on a fund level and company level.). Fondita uses data from several sources to make the assessment, mainly MSCI data. If data is not attainable from MSCI we search company public disclosures and use thirdparty providers for estimates. We expect more reliable data availability when regulation such as CSRD enter into force.

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

The fund conducts a monthly screen towards UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “ In case a

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

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

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

company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.





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

- X Yes, this fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made we look at the the principal adverse impacts of the company. In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector in which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographical areas are associated with a higher risk of ESG related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG.

The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity of investee company
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

15. Investments in companies without carbon emissions reduction initiatives.
16. Number of identified cases of severe human rights issues and incidents.

The PAI-reports are published in the Fondita Fund Management Company's annual report and on Fondita's webpage.

No

### What investment strategy does this financial product follow?

Fondita Nordic Micro Cap is an equity fund investing in small Nordic quality companies with a market capitalisation of up to EUR 800 million. The investment philosophy is stock picking with a focus on quality growth companies. ESG is part of the investment process, both in terms of excluding controversial sectors and norm breakers in line with UN Global Compact, as well as monitoring external databases, such as MSCI, with regards to sustainability measures. ESG risks and opportunities are also discussed with company's management, as ESG data is poorly available for the micro and small companies and own assessments are necessary.

On a monthly basis we monitor that our holdings fulfill exclusion criteras. Furthermore, have regular meetings with portfolio companies regarding ESG issues and the companyes ESG agenda. If we notice that some of our holdings don't meet our ESG criteras we conduct an escalation process, which ultimately results in a sell if the company is found in violation of our requirements.



- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The investment strategy of stock picking aims at holding a concentrated portfolio consisting of responsible, high quality growth companies. Besides pursuing value added returns in the selected asset class the companyes need to fill the ESG criteras set up by Fondita.

The sustainability factors which are binding in the investment strategy is that at least 75% of the sustainable investments should have an carbon reduction initiative and at least 25% equality or/and diversity related policy, in order to fullfill our Article 8 sustainable investment requirement to be environmentally and/or socially sustainable investments. The binding elements contribute towards SDG 8 Climate Change and SDG 5 Gender Equality.

Furthermore, the companies are not allowed to have revenue streams of over 5% from our exluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

The companies are not allowed to have revenue streams of over 5% from our exluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

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

**Asset allocation** describes the share of investments in specific assets.

Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflecting the share of revenue from green activities of investee companies
- **capital expenditure** (CapEx) showing the green investments made by investee companies, e.g. for a transition to a green economy.
- **operational expenditure** (OpEx) reflecting green operational activities of investee companies.

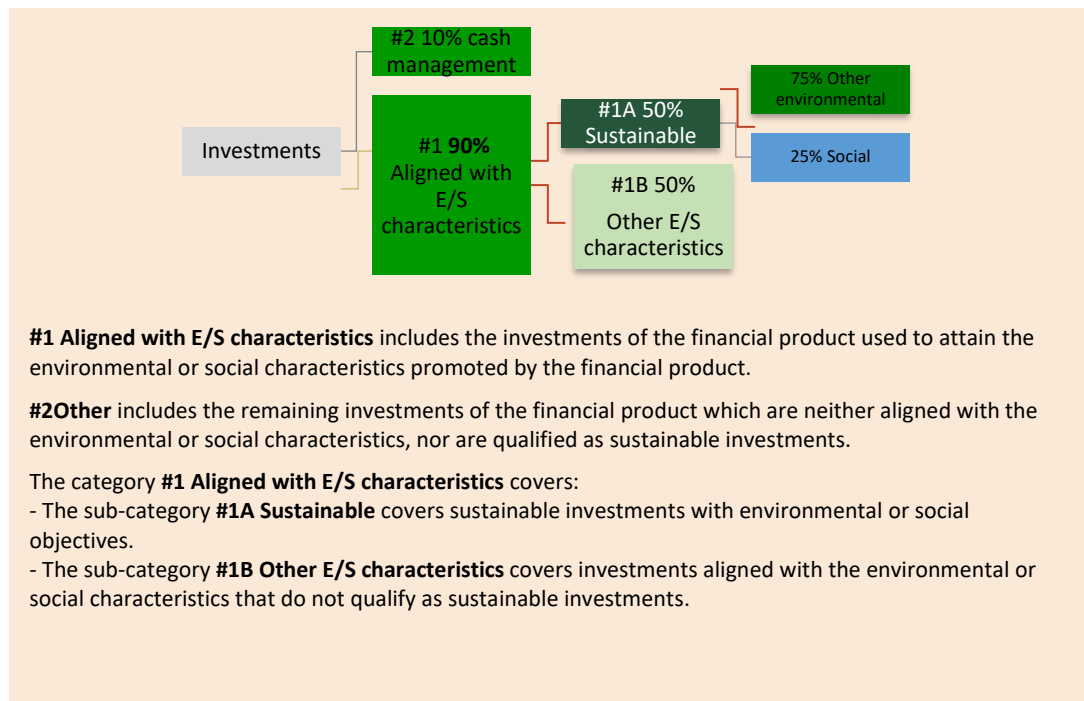
● **What is the policy to assess good governance practices of the investee companies?**

We conduct a good governance test screen in MSCI, and for smaller companies with limited public data we rely on the dialogue with the company completely to assess the situation (which for cases with public data serves to compliment the public information, when discussing with the company.)

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

Out of the total asset allocation a maximum of 10% is reserved for cash management. Out of the total investments, a minimum 50% of the funds holdings will promote sustainable investments which environmental objective aim for climate change mitigation and social objective targets equality.

All holdings consider ESG aspects but the fund does not have a sustainable investment as an objective according to SFDR. It however integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes



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

**#2 Other** includes the remaining investments of the financial product which are neither aligned with the environmental or social characteristics, nor are qualified as sustainable investments.

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

- The sub-category **#1A Sustainable** covers sustainable investments with environmental or social objectives.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

unsustainable sectors and considers principal adverse impacts for all holdings.

● **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**

No derivatives are used in the portfolio management of the fund. Therefore the fund does not use derivatives to attain the environmental and social characteristics promoted by the financial product.



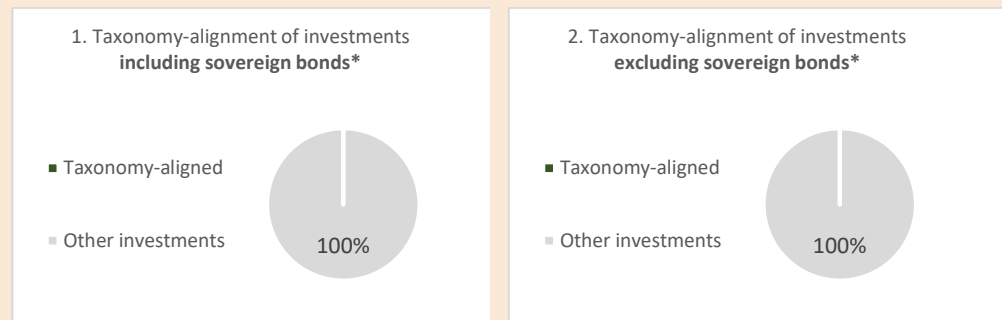
## To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?

Although the fund promotes environmental aspects, the fund is not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the fund do not have a target of a certain proportion of investments being sustainable investments according to Taxonomy.

### Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?

No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

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

We do not have a set minimum regarding the share of investments in transitional and enabling activities.



### What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?

The fund should have at least 75% of sustainable investments which are environmentally sustainable investments according to aforementioned parameters.



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

25% of the sustainable investments are to be socially sustainable according to aforementioned parameters.



are

sustainable investments with an environmental objective that do not take into account the criteria for environmentally sustainable economic activities under the EU Taxonomy.



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

The fund integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and it considers principal adverse impacts for all holdings. The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

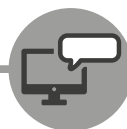


## Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?

The fund does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*
- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*
- *How does the designated index differ from a relevant broad market index?*
- *Where can the methodology used for the calculation of the designated index be found?*

Reference benchmarks are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



## Where can I find more product specific information online?

More product-specific information can be found on the website: <https://fondita.fi/en/fund/european-micro-cap/>



EUROPEAN  
COMMISSION

Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

## ANNEX

*to the*

**Commission Delegated Regulation (EU) .../....**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

**Template pre-contractual disclosure for the financial products referred to in Article 8, paragraphs 1, 2 and 2a, of Regulation (EU) 2019/2088 and Article 6, first paragraph, of Regulation (EU) 2020/852**

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not lay down a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.

**Product name:** Fondita Nordic Small Cap

**Legal entity identifier:** 743700XG8BG0I1WL9C57

## Environmental and/or social characteristics

### Does this financial product have a sustainable investment objective?

<p><input checked="" type="radio"/> <input type="checkbox"/> <b>Yes</b></p> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b></p>	<p><input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> <b>No</b></p> <p><input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 50 % of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>
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### What environmental and/or social characteristics are promoted by this financial product?

The financial product has as its main environmental objective to promote climate change mitigation and as a social objective to promote equality including safeguarding fundamental human rights.

For Fondita, sustainable investments in an Article 8 fund are investments that contribute to sustainable development in environmental, social and economic terms.

Several aspects are considered., Fondita has defined the main criteria for a sustainable investment as follows; an environmentally sustainable investment means that the company has in its strategy set CO2 reduction initiative and/or has a plan for CO2 neutrality.

In terms of socially sustainable investments, the company should have a equality and/or diversity policy in place. All companies are to follow good governance practices.

The company can not have violations of UN Global Compact, OECD guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita views as fundamental environmental, social and governance aspects which serves as a minimum requirement. A screen is conducted monthly against all of Fondita’s exclusion criteria and if a company is found in violation, a escalation process is conducted which if verified results in selling the company from our holding.

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



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

Fondita conducts, at least quarterly, screens towards data points on CO2 reduction initiatives and targets, including if the company has a equality related work policy. The fund promotes sustainable investments and has a minimum requirement of 50% out of the total allocation. The screening is dependent on the coverage provided by MSCI ESG Research.

Furthermore, Fondita conducts monthly screens towards the exclusion criteria to ensure there is not an over 5% of revenue exposure for our excluded sectors or norm violations. The monthly screen also includes a good governance test. The screen is conducted in MSCI.

In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

● ***What are the objectives of the sustainable investments that the financial product partially intends to make and how does the sustainable investment contribute to such objectives?***

The funds environmental objective is climate change mitigation. The funds main objective related to climate change focus both on companies CO2 reduction targets and the exclusion of environmentally unsustainable sectors from the funds investment universe. The funds environmental objective is aligned with UN SDG 13 Climate Action.

The social objective of the fund is to improve gender equality and support fair human and employee rights. By promoting companies that comply with international norms and standards, and companies which have a equality policy in place the funds social objective is aligned with the UN SDG 5 Gender Equality.



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

All companies are screened before investing, and during the hold of the company towards international norms and standards such as UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The PAI map is updated at least annually of all holdings. The fund considers all 14 mandatory and two voluntary factors which have been chosen based on relevance for all of our funds, which can be reviewed on our homepage (published on a fund level and company level.). Fondita uses data from several sources to make the assessment, mainly MSCI data. If data is not attainable from MSCI we search company public disclosures and use thirdparty providers for estimates. We expect more reliable data availability when regulation such as CSRD enter into force.

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

The fund conducts a monthly screen towards UN Global Compact, OECD multinational guidelines for enterprises and the EU Taxonomy “ In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

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

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

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.

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

- Yes, this fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made we look at the the principal adverse impacts of the company. In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector in which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographical areas are associated with a higher risk of ESG related incidents. We also take into account a number of qualitative and quantitative indicators of the company's management and their prioritisation of ESG.



The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity of investee company
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio
10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
12. Unadjusted gender pay gap
13. Board gender diversity
14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

15. Investments in companies without carbon emissions reduction initiatives.
16. Number of identified cases of severe human rights issues and incidents.

The PAI-reports are published in the Fondita Fund Management Company's annual report and on Fondita's webpage.

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

### **What investment strategy does this financial product follow?**

Fondita Nordic Small Cap is an equity fund that invests in Nordic small and medium-sized quality companies with a market capitalisation of up to EUR 3 billion. ESG is part of the investment process, both in terms of excluding controversial sectors and norm breakers in line with UN Global Compact, as well as monitoring external databases, such as MSCI, with regards to sustainability measures. ESG risks and opportunities are also discussed with company's management, as ESG data is poorly available for the micro and small companies and own assessments are necessary.

On a monthly basis we monitor that our holdings fulfill exclusion criterias. Furthermore, have regular meetings with portfolio companies regarding ESG issues and the companies ESG agenda. If we notice that some of our holdings don't meet our ESG criterias we conduct an escalation process, which ultimately results in a sell if the company is found in violation of our requirements.



- ***What are the binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by this financial product?***

The investment strategy of stock picking aims at holding a concentrated portfolio consisting of responsible, high quality growth companies. Besides pursuing value added returns in the selected asset class the companies need to fill the ESG criterias set up by Fondita.

The sustainability factors which are binding in the investment strategy is that at least 75% of the sustainable investments should have an carbon reduction initiative and at least 25% equality or/and diversity related policy, in order to fulfill our Article 8 sustainable investment requirement to be environmentally and/or socially sustainable investments. The binding elements contribute towards SDG 8 Climate Change and SDG 5 Gender Equality.

Furthermore, the companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy "Do No Significant Harm" principle.

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

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

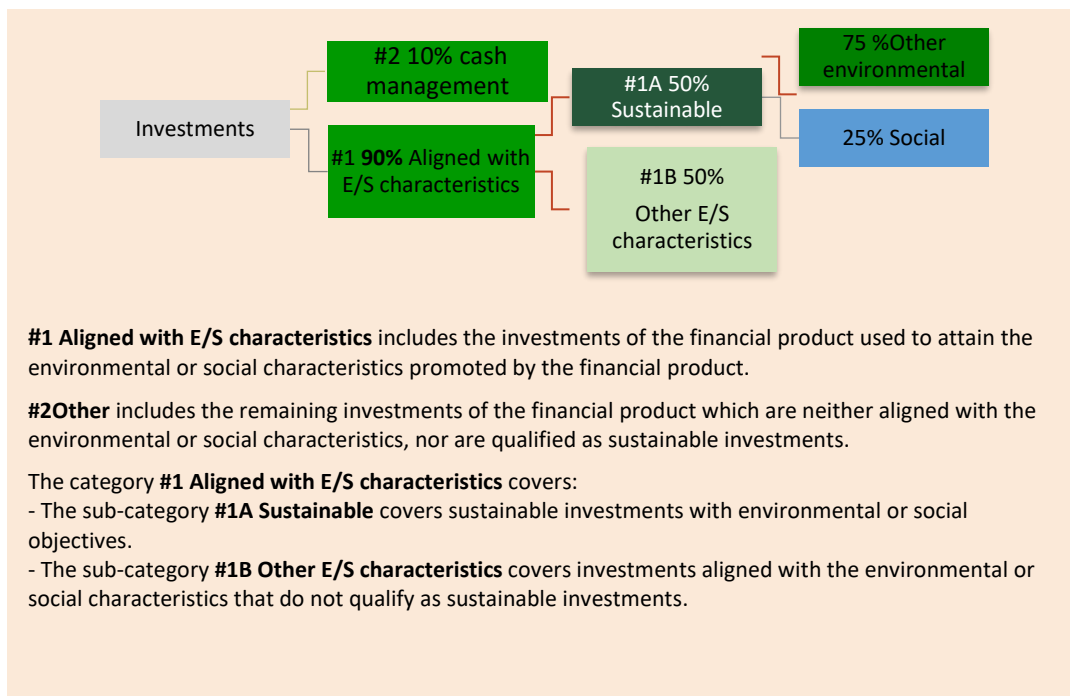
**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.

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.

- **What is the policy to assess good governance practices of the investee companies?**  
We conduct a good governance test screen in MSCI, and for smaller companies with limited public data we rely on the dialogue with the company completely to assess the situation (which for cases with public data serves to compliment the public information, when discussing with the company.)

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



Out of the total asset allocation a maximum of 10% is reserved for cash management. Out of the total investments, a minimum 50% of the funds holdings will be in sustainable investments which environmental objective aim for climate change mitigation and social objective targets equality.

All holdings consider ESG aspects but the fund does not have a sustainable investment as an objective according to SFDR. It however integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and considers principal adverse impacts for all holdings.

- **How does the use of derivatives attain the environmental or social characteristics promoted by the financial product?**  
No derivatives are used in the portfolio management of the fund. Therefore the fund does not use derivatives to attain the environmental and social characteristics promoted by the financial product.



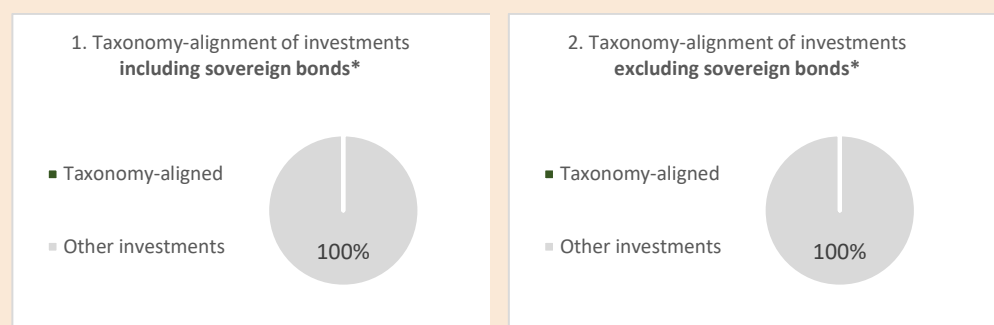
**To what minimum extent are sustainable investments with an environmental objective aligned with the EU Taxonomy?**

Although the fund promotes environmental aspects, the fund is not committed to making sustainable investments or investments in environmentally sustainable activities that meet the requirements of the EU Taxonomy Regulation and therefore the fund do not have a target of a certain proportion of investments being sustainable investments according to Taxonomy.


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

No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

*The two graphs below show in green the minimum percentage of investments that are aligned with the EU Taxonomy. As there is no appropriate methodology to determine the Taxonomy-alignment of sovereign bonds\*, the first graph shows the Taxonomy alignment in relation to all the investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy alignment only in relation to the investments of the financial product other than sovereign bonds.*



\* For the purpose of these graphs, 'sovereign bonds' consist of all sovereign exposures

 are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

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

We do not have a set minimum regarding the share of investments in transitional and enabling activities.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

The fund should have at least 75% of sustainable investments which are environmentally sustainable investments according to aforementioned parameters.



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

25% of the sustainable investments are to be socially sustainable according to aforementioned parameters.



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

The fund integrates ESG factors equally for all holdings in the investment process, promotes environmental and social characteristics, excludes unsustainable sectors and it considers principal adverse impacts for all holdings. The companies are not allowed to have revenue streams of over 5% from our excluded sectors or violation of UN Global Compact, OECD Guidelines for multinational enterprises or the EU Taxonomy “Do No Significant Harm” principle. In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

**Reference benchmarks** are indexes to measure whether the financial product attains the environmental or social characteristics that they promote.



**Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?**

The fund does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*
- *How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?*
- *How does the designated index differ from a relevant broad market index?*
- *Where can the methodology used for the calculation of the designated index be found*



**Where can I find more product specific information online?**

More product-specific information can be found on the website:  
<https://fondita.fi/en/fund/european-micro-cap/>



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 3

## ANNEX

*to the*

**Commission Delegated Regulation (EU) .../...**

**supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports**

**Template pre-contractual 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:** FONDITA SUSTAINABLE EUROPE  
**Legal entity identifier:** 743700MVNRFJISWVIB93

## Sustainable investment objective

**Does this financial product have a sustainable investment objective?**

<input checked="" type="radio"/> <input checked="" type="radio"/> <input checked="" type="checkbox"/> <b>Yes</b>	<input type="radio"/> <input type="radio"/> <input type="checkbox"/> <b>No</b>
<input checked="" type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: 90%</b> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>

**Sustainable investment** means an investment in an economic activity that contributes to an environmental or social objective, provided that the investment does not significantly harm any environmental or social objective and that the investee companies follow good governance practices.

The **EU Taxonomy** is a classification system laid down in Regulation (EU) 2020/852, establishing a list of **environmentally sustainable economic activities**. That Regulation does not include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



**What is the sustainable investment objective of this financial product?**

The sustainable investment objective is to solely invest in companies that provide climate and environmentally smart products or services. These products and services either reduce CO2 emissions or help us to use our natural resources more efficiently, including high EU Taxonomy eligible revenue. The companies we invest in also need to be socially responsible and follow good governance practices.



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

● ***What sustainability indicators are used to measure the attainment of the sustainable investment objective of this financial product?***

We identify companies that have a significant part of the revenue originating from a product or service that enables CO2 reduction or a more efficient use of natural resources. The fund identified several factors as part of the screening process but the main sustainability indicator a) at least 80% EU taxonomy eligible revenue of the holdings and b) at least 40% EU taxonomy aligned revenue of the holdings, which screening is dependent on the MSCI ESG Research database.

The fund excludes unsustainable sectors, if they attain over 5% of their revenues from sectors which are part of Fondita exclusion list. Furthermore, the holdings are aligned with the OECD Guidelines for Multinational Enterprises and the UN Global Compact principles. We base this assessment on the fact that we exclude companies that have breached any of the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and EU DNSH principles. The screening is conducted on a monthly basis. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita sees as the minimum requirement in each fund.

● ***How do sustainable investments not cause significant harm to any environmental or social sustainable investment objective?***

The funds exclusion strategy, thematic and geographical focus and investment process results in a portfolio with companies that do not cause any significant harm to any environmental or social sustainable investment objective. We also run the portfolios holdings against the MSCI DNSH (Do No Significant Harm) indicators in our monthly screening.

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

The portfolio manager takes into account the adverse impacts on sustainability factors before making an investment decision and monitors them during the lifetime of the investment. The fund considers all 14 mandatory and two voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment. If available MSCI data is used. If data is not attainable from MSCI we search company disclosures and use third party providers for estimates to be able to conduct our ESG assessment according to best effort basis. More reliable data will be used when CSRD reporting standards will come into force.

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

The holdings are aligned with the OECD Guidelines for Multinational Enterprises and the UN Global Compact principles. We base this assessment on the fact that we exclude companies that have breached any of the UN Global Compact Principles, OECD Guidelines for Multinational Enterprises and EU DNSH principles. The screening is conducted on a monthly basis. The screening process also conducts a Good Governance test. The international norms consider human rights, labour, environment, anti corruption, taxation and more which Fondita sees as the minimum requirement in each fund.

**Principal adverse impacts** are the most significant negative impacts of investment decisions on sustainability factors relating to environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters.



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

Yes

This fund considers principal adverse impact on sustainability factors in the investment process. Before investment decisions are made, we look at the principal adverse impacts of the company. In order to assess the potential principle adverse sustainability impacts on an investment, we pay close attention to the sector in which the holding belongs, the geographical location of production, and what the company produces. Certain sectors and geographical areas are associated with a higher risk of ESG related incidents. We also consider a number of qualitative and quantitative indicators of the company's management and their prioritization of ESG.

The following mandatory PAI indicators are considered and tracked.

1. GHG Emissions (Scope 1, Scope 2, Scope 3 and Total GHG Emissions)
2. Carbon Footprint
3. GHG intensity of investee company
4. Exposure to companies active in the fossil fuel sector
5. Share of non-renewable energy consumption and production
6. Energy consumption intensity per high impact climate sector (NACE A-L)
7. Activities negatively affecting biodiversity-sensitive areas
8. Emissions to water
9. Hazardous waste ratio

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

**Asset allocation** describes the share of investments in specific assets.

- 10. Violations of UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises
- 11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises
- 12. Unadjusted gender pay gap
- 13. Board gender diversity
- 14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

The following voluntary PAI indicators are considered and tracked.

- 15. Investments in companies without carbon emissions reduction initiatives.
- 16. Number of identified cases of severe human rights issues and incidents.

The PAI-reports are published in the Fondita Fund Management Company’s annual report and on Fondita’s webpage.

**What investment strategy does this financial product follow?**



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

The investment strategy is to invest in 30-40 european companies with climate- and environmentally smart products and services. The investments are made in companies with products and services that enable CO2 reduction or a more efficient use of natural resources. The companies have to operate in a socially responsible way and have good corporate governance. The companies also have to fulfill certain criterias regarding valuation, expected growth and financial performance.

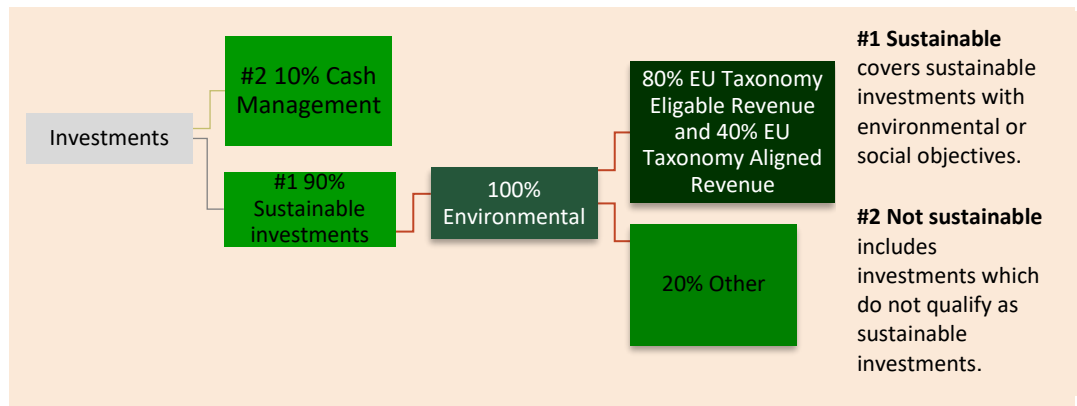
● ***What are the binding elements of the investment strategy used to select the investments to attain the sustainable investment objective?***

The binding element of the investment strategy is a) at least 80% EU taxonomy eligible revenue of the holdings and b) at least 40% EU taxonomy aligned revenue of the holdings, which screening is dependent on the MSCI ESG Research database.

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

We conduct a monthly screening towards our exclusion list which includes UN Global Compact, OECD guidelines for multinational enterprises and EU Taxonomy Do No Significant Harm compliance, including a good governance test. We are dependent on MSCI to be able to conduct the screening, the current coverage is around 85%.

## What is the asset allocation and the minimum share of sustainable investments?



All investments that are in our view sustainable investments with an environmental objective. The allocation of the sustainable investments are required to be a) at least 80% EU taxonomy eligible revenue of the holdings and b) at least 40% EU taxonomy aligned revenue of the holdings, which screening is dependent on the MSCI ESG Research database.

### ● **How does the use of derivatives attain the sustainable investment objective?**

No derivatives are used in the portfolio management of the fund. Therefore the fund does not use derivatives to attain the environmental and social characteristics promoted by the financial product.

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

The minimum requirement is 40% Taxonomy aligned revenues. Noteworthy is the dependency to screen this requirement towards the MSCI data point (estimated EU Taxonomy Alignment – Maximum percentage of Revenue) which in some holdings might lack coverage. The holdings not part of the MSCI coverage are on a best effort basis covered manually.

### ● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

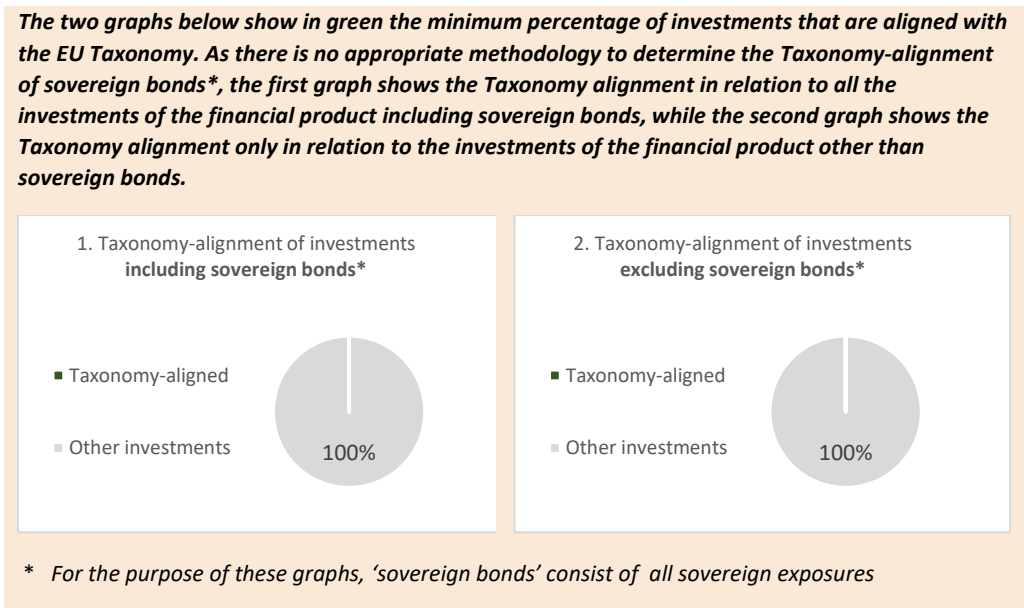
No, the fund does not invest in fossil fuels or nuclear energy. These sectors are excluded in the investment process according to Fondita responsible investment policy and exclusion list.

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.

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

**Transitional activities** are activities for which low-carbon alternatives are not yet available and among others have greenhouse gas emission levels corresponding to the best performance.



The sustainable investments need to be a) 80% EU taxonomy eligible revenue of the holdings and b) 40% EU taxonomy aligned revenue of the holdings, which screening is dependent on the MSCI ESG Research database.

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

We do not have a set minimum regarding the share of investments in transitional and enabling activities but the share of investments is high as the target of the fund is 80% EU taxonomy eligible revenues from the companies.



**What is the minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy?**

We do not have a minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy.



**What is the minimum share of sustainable investments with a social objective?**

The fund invests in companies that have an environmental objective primarily. We have not specified any thresholds in the fund regarding investments with a social objective.



**What investments are included under “#2 Not sustainable”, what is their purpose and are there any minimum environmental or social safeguards?**

are environmentally sustainable investments that **do not take into account the criteria** for environmentally sustainable economic activities under the EU Taxonomy.

No investments are in the “Not Sustainable” - category.



### **Is a specific index designated as a reference benchmark to meet the sustainable investment objective?**

The fund uses as a reference index the MSCI Climate Paris Aligned Index. This is the index we believe is the best reference index. This reference index is used when the fund is presented to existing and potential investors. This is however not an official benchmark index as the fund does not have one.

- ***How does the reference benchmark take into account sustainability factors in a way that is continuously aligned with the sustainable investment objective?***

The index excludes fossil fuels, takes into account GHG emissions, screens UNGC, accounts for climate risk management, accounts for emissions targets and meets PAB/CTB standards.

- ***How is the alignment of the investment strategy with the methodology of the index ensured on a continuous basis?***

We only use the reference benchmark as a comparison, we are in no way tied to the methodology of the index.

- ***How does the designated index differ from a relevant broad market index?***

The index excludes fossil fuels, takes into account GHG emissions, screens UNGC, accounts for climate risk management, accounts for emissions targets and meets PAB/CTB standards.

- ***Where can the methodology used for the calculation of the designated index be found?***

<https://www.msci.com/our-solutions/indexes/climate-indexes>



### **Where can I find more product specific information online?**

More product-specific information can be found on the website:

<https://fondita.fi/en/fund/sustainable-europe/>