

# Öhman Småbolagsfond

Prospectus

## General information

The prospectus for the funds specified above was prepared in compliance with the Swedish UCITS Act (2004:46), Finansinspektionen's Regulations regarding Swedish UCITS (FFFS 2013:10), the Swedish Alternative Investment Fund Managers Act (2013:561) and Finansinspektionen's Regulations on Alternative Investment Fund Managers (FFFS 2013:10). This publication and the fund rules for each fund together constitute the prospectus. The fund rules are available online at <http://www.lannebo.se>

### Fund company

Lannebo Kapitalförvaltning AB  
 Address: Box 7837, 103 98 Stockholm, Sweden  
 Street address: Mäster Samuelsgatan 6, Stockholm  
 Email: [fonder@lannebo.se](mailto:fonder@lannebo.se)  
 Telephone: +46 8 5622 5222  
 Website: <http://www.lannebo.se>  
 Registration Number: 556050-3020  
 Incorporated: 27 January 1994  
 Share capital: SEK 4,200,000

A licence to conduct fund activity in accordance with the Swedish UCITS Act (2004:46) was granted 28 March 1994 and a reauthorised licence was granted 4 May 2005. As of 8 January 2016, the company is also licensed to manage alternative investment funds in accordance with the Swedish Alternative Investment Fund Managers Act (2013:561). Lannebo is also licensed to provide discretionary portfolio management relating to financial instruments and provide investment advice and is authorised to receive funds subject to mandatory reporting.

### Board of Directors

#### Board Chair:

Johan Malm, CEO E. Öhman J:or AB

#### Other Directors:

Ann Öberg, director

Björn Fröling, director E. Öhman J:or AB

Catharina Versteegh, director E. Öhman J:or AB

Johan Lannebo, director

Mats Andersson, director

### Senior management

Jessica Malmfors, CEO

Jamal Abida Norling, Deputy CEO and Head of Fund Management

Anders Johansson, Chief Operating Officer

Jeanette Kangur, IT and Project Manager

Veronica Selander Rosengren, Chief Compliance Officer &

Complaints Manager

Fredrik Lindell, Chief Risk Officer

### Auditors

The fund's audit firm is Ernst & Young AB and Carl Rudin is the auditor-in-charge.

### Funds managed

Lannebo Kapitalförvaltning AB ("Lannebo" or the "fund company") manages UCITS funds and special funds. UCITS funds are investment

funds that comply with the EU UCITS Directive concerning undertakings for collective investments in transferable securities. Special funds are mainly nationally regulated and are not covered by the rules set down in the UCITS Directive. In many respects, however, UCITS and special funds are governed by the same regulations. The rules that apply to special funds may differ in certain respects from the rules applicable to UCITS funds, particularly with regard to investment rules, which may be less restrictive for special funds.

### UCITS

Lannebo Europa Småbolag  
 Lannebo Europe Green Transition  
 Lannebo Fastighetsfond  
 Lannebo High Yield  
 Lannebo Mixfond  
 Lannebo Mixfond Offensiv  
 Lannebo Norden Hållbar  
 Lannebo Räntefond Kort  
 Lannebo Småbolag  
 Lannebo Sustainable Corporate Bond  
 Lannebo Sverige  
 Lannebo Sverige Hållbar  
 Lannebo Sverige Plus  
 Lannebo Teknik  
 Lannebo Teknik Småbolag  
 Lärarfond Balanserad  
 Lärarfond Försiktig  
 Lärarfond Offensiv  
 Nordnet Pensionsfond  
 Öhman Emerging Markets  
 Öhman FRN  
 Öhman Företagsobligationsfond  
 Öhman Global  
 Öhman Global Growth  
 Öhman Global Investment Grade  
 Öhman Global Småbolag  
 Öhman Grön Obligationsfond  
 Öhman Hälsa och Ny Teknik  
 Öhman Investment Grade  
 Öhman Kort Ränta  
 Öhman Marknad Europa  
 Öhman Marknad Global  
 Öhman Marknad Japan  
 Öhman Marknad Pacific  
 Öhman Marknad Sverige  
 Öhman Marknad Sverige Bred  
 Öhman Marknad USA  
 Öhman Navigator  
 Öhman Obligationsfond  
 Öhman Realräntefond  
 Öhman Räntefond Kompass  
 Öhman Småbolagsfond  
 Öhman Sverige  
 Öhman Sweden Micro Cap

### Special funds

Lannebo Fastighetsfond Select  
 Lannebo MicroCap  
 Lannebo NanoCap  
 Lannebo Oligo Global  
 Lannebo Småbolag Select  
 Öhman Sverige Fokus

## Delegations

Lannebo has entered into a contract with Deloitte AB on performance of the internal audit function. Michael Bernhardtz (Partner, Enterprise Risk Services, Deloitte AB) is in charge of internal audit.

Lannebo has entered into a contract under which responsibility for the accounting department have been delegated to E. Öhman J:or AB. Anna Henebratt (Head of Accounting, E. Öhman J:or AB) is the head of the accounting department.

## Depository

Skandinaviska Enskilda Banken AB (publ), 106 40 Stockholm, Sweden. The company's registered office is in Stockholm and its principal business is banking.

The depository shall be responsible for the safekeeping of the fund's assets and manage incoming and outgoing payments pertaining to the fund. The depository shall execute the fund company's instructions in respect of the fund, provided that the instructions do not contravene the provisions of the UCITS Act, the Alternative Investment Fund Managers Act, other statutes or the fund rules, and shall ensure that:

- Sales, redemptions and cancellations of fund units are carried out in compliance with applicable law and the fund rules.
- NAV per unit is calculated in compliance with applicable law and the fund rules.
- Payments for transactions related to fund assets are paid into the fund without delay.
- Fund income is used in compliance with applicable law and the fund rules.

The duties of the depository are specifically regulated in the UCITS Act and Commission Delegated Regulation (EU) No 2016/438 of 17 December 2015 supplementing Directive 2009/65/EC with regard to obligations of depositaries, and the Swedish Alternative Investment Fund Managers Act and Commission Delegated Regulation (EU) No 231/2013 of 19 December 2012 supplementing Directive 2011/61/EU with regard to exemptions, general operating conditions, depositaries, leverage, transparency and supervision.

The depository has a system for managing conflicts of interest in connection with performance of its safekeeping obligation. The depository shall act exclusively in the interests of unitholders and independently of the funds and the fund company. The depository has established procedures for identifying, managing and monitoring any conflicts of interest. The depository is engaged in a wide range of activities and conflicts of interest may consequently arise from time to time. In order to prevent conflicts of interest, different activities are separated and, if conflicts of interest cannot be avoided, internal rules have been established to ensure due and proper treatment of customers. Areas in which conflicts of interest may arise include conflicts between the depository's duties as the depository and when the depository is the counterparty to the fund company with regard to other services such as trading in financial instruments. The depository may under certain circumstances delegate certain of its functions to third parties, including other custodian banks designated by the depository. In order to anticipate potential conflicts of interest resulting from such delegations, the depository provides a list of all custodian banks to the fund company, which is responsible for assessing whether any conflicts of interest exist.

Current information about the depository, its business and the conflicts of interest that may arise is available from the fund company on request.

## Delegation of depository functions

The depository has delegated the performance of safekeeping functions as regards foreign financial instruments to the following custodian banks:

Country	Custodian bank
Belgien	BNP Paribas Belgium
Danmark	Skandinaviska Enskilda Banken, filial i Danmark
Finland	Skandinaviska Enskilda Banken, filial i Finland
Frankrike	Caceis Bank Frankrike
Grekland	BNP Greece (SEB AB)
Irland	HSBC Bank Plc
Italien	BNP Paribas
Japan	MUFG Bank Plc
Kanada	RBC Investor & Treasury Services
Nederländerna	BNP PARIBAS S.A.
Norge	Skandinaviska Enskilda Banken, filial i Norge
Polen	Bank Handlowy
Portugal	BNP Paribas S.A.
Schweiz	UBS (Switzerland) Ltd
Storbritannien	HSBC Bank Plc
Spanien	BNP Paribas Securities Services, Sucursal En Espana
Tyskland	Deutsche Bank AG
USA	Brown Brothers Harriman
Österrike	Unicredit Bank Austria AG
Australien	HSBC Australia LTD
Brasilien	ITAU Unibanco S/A
Chile	Citibank N.A
Filippinerna	The Hongkong and Shanghai Banking Corporation LTD – Philippine Branch
HongKong	Hongkong and Shanghai Banking Corporation
Ungern	Citibank Europe PLC Hungarian Branch
Indien	The Hongkong and Shanghai Banking Corporation Limited
Indonesien	Standard Chartered Bank
Israel	Citibank N.A London Branch, Global Window, Local Custodian: Citibank N.A. Israel

Kina	Hongkong and Shanghai Banking Corporation
Malaysia	HSBC Bank Malaysia Berhad
Mexico	Citibank N.A.
New Zealand	HSBC LTD
Singapore	HSBC LTD
South Africa	Standard Chartered Bank
Sydkorea	Citibank Korea INC
Taiwan	HSBC Bank (Taiwan) Limited
Thailand	The Hongkong and Shanghai Banking Corporation Limited
Tjeckien	Citibank Europe PLC, Organizacni SL
Turkiet	Deutsche Bank A.S Istanbul

## Key legal consequences of investment in a fund

Investors in a fund receive fund units to a value corresponding to the amount invested and thereby become unitholders. A unitholder has the right to have their units redeemed under the conditions specified in the fund rules and, where applicable, to receive dividends. Units are redeemed by paying to the unitholder a sum of money equal to the current value of the fund units redeemed. Lannebo invests the fund's assets based on the fund's objectives and investment strategy. UCITS funds and special funds cannot acquire rights or assume obligations. Nor can the fund institute legal action before a court of law or other public authority. Property included in a UCITS fund or special fund cannot be seized. Unitholders are not liable for obligations incumbent upon the fund. The Swedish Joint Ownership Act (1904:48) does not apply to part ownership of a UCITS or special fund. Lannebo represents the unitholders in all matters relating to a UCITS fund or special fund. Lannebo acts exclusively in the joint interests of unitholders in connection with management of a UCITS fund or special fund. The assets of a UCITS fund or special fund are held for safekeeping by the depositary, Skandinaviska Enskilda Banken AB (publ) thus ensuring that unitholders are not adversely affected if Lannebo encounters financial distress.

## Swing pricing (adjusted NAV)

### Background

In the course of fund management, the fund manager handles large net inflows and net outflows by executing securities purchase and sale transactions. If no transactions are made, the composition of the fund changes. These transactions incur costs, both direct (commissions, etc.) and indirect (the bid/ask spread, market impact, etc.). These transaction costs are charged to the entire fund, which affects fund return and dilutes NAV for existing unitholders. To ensure fair treatment of unitholders and safeguard the joint interests of unitholders, Lannebo therefore applies a method (swing pricing) to determine the adjusted NAV per unit for the fund that takes into account transaction costs arising from the sale and redemption of units.

### Affected funds

Lannebo applies swing pricing to the following funds:

- Lannebo High Yield
- Lannebo Räntefond Kort
- Lannebo Sustainable Corporate Bond

The bases for calculating adjusted NAV per unit are stated in the fund rules (§ 8.2). Further information about Lannebo's application of swing pricing is provided below.

### How Lannebo applies swing pricing

Swing pricing is an internationally accepted method of calculating adjusted NAV per unit. The method is based on allocating transaction costs arising from purchase or redemption of fund units to the investors who caused the costs. This protects other current unitholders from dilution through being charged for costs attributable to transactions made by other investors. Swing pricing is also a tool for managing liquidity risks in the fund because the method reduces the incentive to be the first to sell units in order to avoid transaction costs and creates incentives for investors to swim against the tide. For example, the method may provide an incentive to buy units during a period when many other investors are selling because the investor is able to buy the units at a lower price than would have been the case if swing pricing had not been applied. The transaction costs that swing pricing is intended to offset are those that arise when assets must be sold to fulfil requests to buy or redeem fund units, i.e., when net outflows or net inflows occur. The transaction costs may be direct or indirect and include, in relevant cases, commissions, spread, market impact, foreign exchange costs and transaction taxes. The bid/ask spread is the most significant factor with regard to the Lannebo funds to which swing pricing is applied. Swing pricing is used on all days upon which net flows in the fund exceed a predetermined swing threshold. The threshold is determined based on an assessment of when it can be expected that the fund must sell or buy assets to meet the net flow without making a significant change to the composition of the fund or to the lower level that Lannebo deems justified in consideration of unitholders' interests given the transaction costs. Swing pricing is not applied on days when the net flow does not exceed the limit. When small net flows occur, the fund manager might not necessarily have to make any buy or sell transactions but can instead manage the flow by making minor adjustments (increases or decreases) to the fund's cash reserve. In addition, transaction costs for small transaction volumes are generally insignificant under normal market conditions. In the event of market turmoil, however, transaction costs can be significant even for small transactions. Consequently, Lannebo may decide on a lower swing threshold when this is justified to safeguard unitholders' interests. Lannebo regularly reviews the swing threshold. The size of the adjustment to NAV per unit is called the swing factor. The swing factor is determined by Lannebo and may vary over time. The swing factor is determined taking into account historical and estimated transaction costs and other relevant information, such as current bid/ask spreads, and is evaluated by Lannebo on an ongoing basis. The swing factor is positive when net inflows above the threshold occur and negative when net outflows exceed the threshold. All investors who buy or sell fund units on a day when the net flow exceeds the threshold may trade at the NAV per unit determined after the swing price adjustment. It is thus not the size of the individual investor's transaction that determines the matter, but rather whether the transaction is part of a total net flow that exceeds the swing threshold. Swing pricing does not mean that additional costs are charged to the fund. Instead, all unitholders who are involved and in

causing a net flow above the threshold bear the cost through the swing up or down that occurs.

#### Maximum level of the swing factor

The maximum adjustment of NAV per unit that Lannebo can make upon application of swing pricing is specified below.

Fund	Maximum swing factor
Lannebo High Yield	2%
Lannebo Räntefond Kort	1%
Lannebo Sustainable Corporate Bond	1%

#### Swing pricing instruction and council

The Board of Directors of Lannebo have established guidelines establishing the frameworks for application of swing pricing by Lannebo and have appointed a special council that makes decisions concerning application of the method and regular evaluation of the method.

#### Example calculation

The example calculation below illustrates the effect in four different scenarios. Note that the figures stated are illustrative only.

Swing threshold: SEK 10 million

NAV per unit SEK 100

Unitholder A: Buys 1,000 units

Unitholder B: Sells (redeems) 1,000 units

Subscription/Redemption amount, SEK	Scenario 1: Net inflow SEK 20 million	Scenario 2: Net inflow SEK 5 million	Scenario 3: Net outflow SEK 20 million
Unitholder A: Buys 1,000 units	SEK 100,500	SEK 100,000	SEK 99,500
Unitholder B: Sells 1,000 units	SEK 100,500	SEK 100,000	SEK 99,500

#### **Unitholder register**

Lannebo keeps a register of all unitholders and their holdings. Units must be registered to qualify for the right to shares in the fund and associated rights. Unitholders receive reports in the form of annual statements.

#### **Cessation of the fund or transfer of fund operations**

If Lannebo decides that a fund should cease operating or that, upon approval by Finansinspektionen, fund management will be transferred to another fund company, all unitholders will be informed. The information will be published in *Post- och Inrikes Tidningar* and be available for inspection at Lannebo's offices and at the depositary. Finansinspektionen may decide on an exemption from publication if special reason exists. If Finansinspektionen withdraws Lannebo's license or if Lannebo enters into liquidation or is declared bankrupt, management of the funds shall immediately be taken over by the depositary.

## **Marketing in other countries**

Marketing of funds managed by Lannebo is permitted in other countries as follows:

#### Norway

Öhman Emerging Markets, Öhman Företagsobligationsfond, Öhman Global Growth, Öhman Global, Öhman Global Småbolag, Öhman Marknad Europa, Öhman Marknad Global, Öhman Marknad Japan, Öhman Marknad Pacific, Öhman Marknad Sverige Bred, Öhman Marknad USA, Lannebo Europa Småbolag, Lannebo High Yield, Lannebo Räntefond Kort, Lannebo Mixfond, Lannebo Småbolag, Lannebo Sustainable Corporate Bond, Lannebo Sverige, Lannebo Sverige Plus, Lannebo Teknik.

#### Denmark

Lannebo Sustainable Corporate Bond, Lannebo High Yield, Lannebo Europa Småbolag, Lannebo Europe Green Transition, Lannebo Småbolag (SEK C), Lannebo Sverige Plus, Lannebo Teknik.

#### Finland

Lannebo Europa Småbolag, Lannebo High Yield, Lannebo Räntefond Kort, Lannebo Mixfond, Lannebo Småbolag, Lannebo Sustainable Corporate Bond, Lannebo Sverige, Lannebo Sverige Plus, Lannebo Teknik.

#### Luxembourg

Öhman Företagsobligationsfond, Öhman Småbolagsfond, Öhman Sweden Micro Cap.

#### France

Lannebo Småbolag

#### Spain

Lannebo Småbolag

Lannebo has contracted with distributors in the countries where some of the funds are marketed. Under the distribution agreement, the distributor agrees to ensure the purchase/sale of units and to provide information related to the funds.

## **Tax rules**

#### Tax liability of the fund

As of 2012, fund income is not taxable. Funds do, however, pay withholding tax on dividends received on their foreign equity holdings. The withholding tax varies from country to country. For reasons including legal uncertainty about the application of double taxation treaties and developments within the EU in the tax area, the withholding tax may be either higher or lower than the preliminary withholding tax deducted when the dividend is received.

#### Tax liability of fund investors

Swedish unitholders pay income tax on an annual standardised income calculated on the value of the fund units they own at the beginning of the year, as well as on profits and any dividends received on fund units. The annual standardised income corresponds to 0.4 percent of the value of the units at 1 January each year. The standardised income is reported as capital income and taxed at a rate



of 30 percent. Income statements for tax purposes are issued for natural persons and estates taxable in Sweden, while legal persons must independently calculate the standardised income and pay the tax. The tax may be affected by individual circumstances and investors who have questions about possible tax consequences should seek expert advice.

## Investment Savings Accounts (ISK)

Lannebo began offering investment savings accounts (ISK) on 16 September 2024. Information about ISKs, tax rules applicable to ISKs and how to open an ISK is available on our website and from Lannebo Customer Service.

## Income statements for tax purposes

Income statements for tax purposes are submitted to the Swedish Tax Agency for natural persons and estates taxable in Sweden. Statements are issued for dividends, capital gains and capital losses. Statements for tax return purposes are issued to the unitholder in connection with the annual statement.

### Stock lending

Lannebo may lend shares held by the funds to third parties. When this occurs, the fund receives collateral from the borrower and receives remuneration in the form of interest. Stock loans are made to increase fund return. According to fund law, shares corresponding to a maximum of 20 percent of a fund's NAV may be lent, but lending is usually considerably more limited in scope. The annual reports for the funds state the extent to which securities lending occurred in previous years. Loans may be made to Nordic banks approved by the Lannebo Board of Directors following a recommendation by the Lannebo Risk Management function. The bank must have a good credit rating.

The Board of Directors of Lannebo sets guidelines concerning acceptable collateral upon consideration of a recommendation by the Lannebo Risk Management function. The collateral accepted by the funds must have low market risk, credit risk and liquidity risk. The collateral should be issued by a party that is independent of the counterparty and lacks a strong connection to the counterparty's financial performance. The value of collateral from an individual issuer should not exceed 20 percent of fund NAV. Received collateral is market valued daily and additional margin collateral is used when changes in value occur. If the value of the lent shares exceeds the value of the collateral received, there is a counterparty risk. This means there is risk that the counterparty will be unable to return the lent shares. As effective collateral management is important, operational risks must be managed on an ongoing basis. Received collateral is held for safekeeping by the fund depositary. The shares lent are transferred to the counterparty. The funds do not reuse received collateral. The interest charged on securities loans accrues entirely to the fund that lent the shares. No significant operational costs or fees are typically incurred.

### Stock borrowing

The Lannebo Sverige Plus, Lannebo Fastighetsfond and Lannebo Fastighetsfond Select funds may borrow shares from third parties to sell on the stock market. At a later date, the fund buys the shares back in order to return them to the party that originally lent the shares. The objective is for the fund to be able to buy back the shares at a lower price than it received when it sold the shares on the stock market and

thus make a profit. This is called short selling and is an opportunity for the fund to generate returns when prices are falling on the stock market. When Lannebo Sverige Plus, Lannebo Fastighetsfond and Lannebo Fastighetsfond Select borrow shares, the funds issue collateral to the counterparty and pay interest on the loan. As a main rule, the maximum exposure of Lannebo Sverige Plus through short selling is 50 percent of fund NAV, but the exposure amount is usually well below the limit. The annual reports for Lannebo Sverige Plus, Lannebo Fastighetsfond and Lannebo Fastighetsfond Select state the extent to which short selling occurred in previous years. Stock borrowing is permitted via Nordic banks approved by the Lannebo Board of Directors upon consideration of a recommendation by the Lannebo Risk Management function. The bank must have a good credit rating. Lannebo Sverige Plus, Lannebo Fastighetsfond and Lannebo Fastighetsfond Select issue collateral, usually shares, to the counterparty for the borrowed securities. The collateral pledged is market valued daily and additional margin collateral is used when changes in value occur. If the value of collateral pledged by Lannebo Sverige Plus, Lannebo Fastighetsfond and Lannebo Fastighetsfond Select exceeds the value of the borrowed shares, there is a counterparty risk. This means there is risk that the counterparty will be unable to return the pledged collateral. As effective collateral management is naturally important, operational risks must be managed on an ongoing basis. Borrowed shares are held for safekeeping by the fund depositary. Collateral pledged by the fund is transferred to the counterparty. The interest that the funds pay on securities loans is charged to Lannebo Sverige Plus, Lannebo Fastighetsfond and Lannebo Fastighetsfond Select. The income generated accrues entirely to the fund.

## Liability regime

Lannebo and the depositary shall not be held liable for loss arising from Swedish or foreign legal enactment, measures taken by the Swedish government or a foreign government, act of war, strike, blockade, boycott, lockout or comparable circumstance. The proviso in respect of strike, blockade, boycott and lockout will apply whether the company or the depositary initiates or is the object of such labour action.

Loss that has arisen in cases other than those referred to in the first paragraph above will not be compensated by the company or the depositary if the company or depositary has exercised due care. Neither the company nor the depositary shall be liable for indirect loss under any circumstances, nor for loss caused by a custodian bank or other contractor that the company or depositary has engaged with due care, nor for loss that may arise by reason of restrictions upon disposition that may be imposed on the company or the depositary.

If Lannebo or the depositary is prevented from taking measures as a consequence of a circumstance set forth in the first paragraph above, these measures may be delayed until the impediment has ceased to exist.

The foregoing limitations of liability do not limit unitholders' rights to damages in accordance with chapter 2, section 21 and chapter 3, sections 14-16 of the Swedish UCITS Act (2004:46).

## Amendments to fund rules

The company is permitted to amend fund rules, subject to approval by Finansinspektionen. Amendments may affect the characteristics of the fund, such as the fund's investment strategy, risk profile and fees. After the amendment has been approved, the decision must be made

available for inspection at the fund company and the depositary and be announced in the manner instructed by Finansinspektionen.

### **Remuneration policy**

The Board of Directors of Lannebo have adopted a remuneration policy that is consistent with and promotes sound and effective risk management. The remuneration policy is designed to discourage risk-taking that is incompatible with the risk profiles of the funds managed by Lannebo. Moreover, the remuneration policy should discourage excessive risk-taking and encourage employees to deliver sustainable performance at all times, as well as sound and effective risk management for unitholders, Lannebo and the funds managed by Lannebo. Information about Lannebo's current remuneration policy is available online at [www.lannebo.se](http://www.lannebo.se). A printed copy of the information will be provided free of charge upon request. Please contact Lannebo.

## Cut-off times for sale and redemption of fund units

Fund	Cut-off
Öhman FRN Öhman Företagsobligationsfond Öhman Global Öhman Global Growth Öhman Global Investment Grade Öhman Global Småbolag Öhman Grön Obligationsfond Öhman Hälsa och Ny Teknik Öhman Investment Grade Öhman Kort Ränta Öhman Marknad Europa Öhman Marknad Global Öhman Marknad Sverige Öhman Marknad Sverige Bred Öhman Marknad USA Öhman Obligationsfond Öhman Realräntefond Öhman Räntefond Kompass Öhman Småbolagsfond Öhman Sverige Öhman Sverige Fokus Öhman Sweden Micro Cap Lärarfond Balanserad Lärarfond Försiktig Lärarfond Offensiv Lannebo High Yield Lannebo Räntefond Kort Lannebo Sustainable Corporate Bond Lannebo Europa Småbolag Lannebo Europe Green Transition Lannebo Fastighetsfond Lannebo Mixfond Lannebo Mixfond Offensiv Lannebo Norden Hållbar Lannebo Oligo Global Lannebo Småbolag Lannebo Sverige Lannebo Sverige Hållbar Lannebo Sverige Plus Lannebo Teknik Lannebo Teknik Småbolag	15:00 same banking day
Öhman Emerging Markets Öhman Marknad Japan Öhman Marknad Pacific Öhman Navigator Nordnet Pensionsfond Lannebo Småbolag Select Lannebo Fastighetsfond Select	15:00 preceding banking day  Purchase requests ("buy orders") received by the fund company before 15:00 (4:00 PM) two banking days before the last banking day of the month or before 12:00 (noon) on half days, are executed on the last banking day of the month. Requests received by the fund company after 15:00 (4:00 PM) two banking days before the last banking day of the month or after 12:00 (noon) on half days, are executed the following month. Redemption requests received by the fund company before 15:00 (4:00 PM) five banking days before the last banking day of the month or before 12:00 (noon) on half days, are executed on the last banking day of the month. Requests received by the fund company after 15:00 (4:00 PM) five banking days before the last banking day of the month or before 12:00 (noon) on half days, are executed the following month.  Begäran om försäljning som kommit fondbolaget tillhanda senast klockan 15:00 två bankdagar innan sista bankdagen i månaden, eller klockan 12:00 halvdagar, verkställs sista bankdagen i månaden. Begäran som kommit fondbolaget tillhanda senare än 15:00 två bankdagar innan sista bankdagen i månaden, eller klockan 12:00 halvdagar, verkställs nästkommande månad. Begäran om inlösen som kommit fondbolaget tillhanda senast klockan 15:00 15 bankdagar innan sista bankdagen i månaden, eller klockan 12:00 halvdagar, verkställs sista bankdagen i månaden. Begäran som kommit fondbolaget tillhanda senare än klockan 15:00 15 bankdagar innan sista bankdagen i månaden, eller klockan 12:00 halvdagar, verkställs nästkommande månad.



Lannebo MicroCap	Purchase requests received by the fund company before 15:00 (4:00 PM) two banking days before the last banking day of the month or before 12:00 (noon) on half days, are executed on the last banking day of the month. Requests received by the fund company after 15:00 (4:00 PM) two banking days before the last banking day of the month or before 12:00 (noon) on half days, are executed the following month. To be executed on the last banking day in June, a redemption request must be received by the fund company no later than the last banking day in March. Requests received by the fund company after the last banking day in March, but before the last banking day in September, will be executed on the next regularly scheduled redemption date. To be executed on the last banking day in December, a redemption request must be received by the fund company no later than the last banking day in September. Requests received by the fund company after the last banking day in September, but before the last banking day in March of the following year, will be executed on the next regularly scheduled redemption date, i.e., the last banking day in June.
Lannebo NanoCap	Purchase requests must be made no later than two banking days before the date of sale and are made by depositing payment in full to the bank account or bank giro account instructed by the fund company and furnishing all documents that may be requested by the fund company at any time. Redemptions (sales by a unitholder) are possible on the last banking day in June and December each year. To be executed on the last banking day in June, a redemption request must be received by the fund company no later than the last banking day in December of the previous year. Requests received by the fund company after the last banking day in December, but before the last banking day in June, will be executed on the next regularly scheduled redemption date. To be executed on the last banking day in December, a redemption request must be received by the fund company no later than the last banking day in June of the same year. Requests received by the fund company after the last banking day in June, but before the last banking day in December, will be executed on the next regularly scheduled redemption date.

Further information about the subscription and redemption of fund units and the necessary forms are available on Lannebo's website. Fund units are purchased by submitting a written purchase request and depositing full payment in the fund's account before the cut-off. Fund units are redeemed by submitting a written redemption request before the fund's cut-off. Purchases and redemptions of units in Nordnetfond are normally possible on all banking days via Nordnet Bank AB, via custody accounts with other companies in the Nordnet Group, or via deposits from funds managed by companies within the Nordnet Group. Lannebo has made agreements with distributors to sell Lannebo's funds. The current list is available online at <https://www.lannebo.se/fonder/distributorer/>

### Order limits

Price limits cannot be set for requests to purchase or redeem fund units.

### Investment in own funds

Lannebo may invest on behalf of the funds in other funds also managed by Lannebo (own funds). The selection among own funds is evaluated in the same way and on the same terms as for external funds.

Fund	Management fee	Fee for management administration, safekeeping, supervision and auditing		Subscription fee		Redemption fee	
	Current	Current	Maximum	Current	Maximum	Current	Maximum
Öhman Emerging Markets	0,90%	0,95%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman FRN A och B	0,60%	0,61%	0,75%	0,00%	0,00%	0,00%	0,00%
Öhman FRN C	0,30%	0,31%	0,50%	0,00%	0,00%	0,00%	0,00%
Öhman Företagsobligationsfond A och B	1,00%	1,01%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Företagsobligationsfond C	0,50%	0,51%	1,50%	0,00%	0,00%	0,00%	0,00%
Öhman Global A och B	1,25%	1,26%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Global C	0,75%	0,76%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Global Growth A och B	1,80%	1,81%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Global Growth C	1,00%	1,01%	1,50%	0,00%	0,00%	0,00%	0,00%
Öhman Global Investment Grade A och B	0,85%	0,86%	1,50%	0,00%	0,00%	0,00%	0,00%
Öhman Global Investment Grade C	0,55%	0,61%	1,20%	0,00%	0,00%	0,00%	0,00%
Öhman Global Investment Grade D	0,60%	0,61%	1,25%	0,00%	0,00%	0,00%	0,00%
Öhman Global Småbolag	1,50%	1,53%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Grön Obligationsfond	0,60%	0,61%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Hälsa och Ny Teknik A och B	1,50%	1,55%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Hälsa och Ny Teknik C	1,00%	1,05%	1,50%	0,00%	0,00%	0,00%	0,00%
Öhman Hälsa och Ny Teknik D	1,00%	1,05%	1,50%	0,00%	0,00%	0,00%	0,00%
Öhman Investment Grade A och B	0,60%	0,61%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Investment Grade C	0,30%	0,31%	0,75%	0,00%	0,00%	0,00%	0,00%
Öhman Kort Ränta	0,10%	0,11%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Marknad Europa	0,65%	0,68%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Marknad Global	0,40%	0,42%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Marknad Japan	0,65%	0,68%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Marknad Pacific	0,65%	0,67%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Marknad Sverige	0,30%	0,31%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Marknad Sverige Bred	0,48%	0,49%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Marknad USA	0,65%	0,66%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Navigator <sup>2</sup>	1,50%	1,56%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Obligationsfond	0,30%	0,31%	0,80%	0,00%	0,00%	0,00%	0,00%
Öhman Realräntefond	0,50%	0,51%	0,85%	0,00%	0,00%	0,00%	0,00%
Öhman Räntefond Kompass A och B	0,60%	0,61%	0,70%	0,00%	0,00%	0,00%	0,00%
Öhman Räntefond Kompass C	0,30%	0,31%	0,40%	0,00%	0,00%	0,00%	0,00%
Öhman Småbolagsfond A och B	1,50%	1,50%	1,50%	0,00%	0,00%	0,00%	0,00%

Fund	Management fee	Fee for management administration, safekeeping, supervision and auditing		Subscription fee		Redemption fee	
		Current	Current	Maximum	Current	Maximum	Current
Öhman Småbolagsfond C	0,75%	0,75%	1,00%	0,00%	0,00%	0,00%	0,00%
Öhman Sverige	1,25%	1,26%	1,75%	0,00%	0,00%	0,00%	0,00%
Öhman Sverige Fokus A och B	1,50%	1,51%	2,00%	0,00%	0,00%	0,00%	0,00%
Öhman Sverige Fokus C	0,75%	0,76%	1,50%	0,00%	0,00%	0,00%	0,00%
Öhman Sverige Fokus D	1,00%	1,01%	1,50%	0,00%	0,00%	0,00%	0,00%
Öhman Sweden Micro Cap	1,50%	1,50%	1,50%	0,00%	0,00%	0,00%	0,00%
Lärfond Offensiv	0,55%	0,56%	0,60%	0,00%	0,00%	0,00%	0,00%
Lärfond Balanserad	0,55%	0,56%	0,60%	0,00%	0,00%	0,00%	0,00%
Lärfond Försiktig	0,55%	0,57%	0,60%	0,00%	0,00%	0,00%	0,00%
Nordnet Pensionsfond <sup>2</sup>	0,72%	0,75%	1,00%	0,00%	0,00%	0,00%	0,00%

	Management fee including supervision and auditing	Fee for management administration, safekeeping, supervision and auditing		Subscription fee		Redemption fee	
		Current	Current	Maximum	Current	Maximum	Current
Lannebo Europa Småbolag	1,60%	1,62%	1,80%	0,00%	0,00%	0,00%	0,00%
Lannebo Europe Green Transition	1,60%	1,62%	1,80%	0,00%	0,00%	0,00%	0,00%
Lannebo Fastighetsfond	1,05% <sup>1</sup>	1,10%	1,10%	0,00%	0,00%	0,00%	0,00%
Lannebo Fastighetsfond A SEK F	1,65%	1,70%	1,70%	0,00%	0,00%	0,00%	0,00%
Lannebo Fastighetsfond Select	1,00% <sup>1</sup>	1,02%	1,10%	0,00%	0,00%	0,00%	0,00%
Lannebo High Yield	0,90%	0,92%	1,10%	0,00%	0,00%	0,00%	0,00%
Lannebo Microcap	2,00%	2,02%	2,10%	0,00%	0,00%	0,00%	0,00%
Lannebo Microcap B	2,00%	2,02%	2,10%	0,00%	0,00%	0,00%	0,00%
Lannebo Mixfond	1,60%	1,62%	1,70%	0,00%	0,00%	0,00%	0,00%
Lannebo Mixfond Offensiv	1,60%	1,62%	1,80%	0,00%	0,00%	0,00%	0,00%
Lannebo NanoCap	1,00% <sup>3</sup>	1,02%	1,20%	0,00%	0,00%	10% <sup>4</sup>	0,00%
Lannebo Norden Hållbar	1,60%	1,70%	1,80%	0,00%	0,00%	0,00%	0,00%
Lannebo Oligo Global	1,40%	1,42%	1,60%	0,00%	0,00%	0,00%	0,00%
Lannebo Räntefond Kort	0,20%	0,22%	0,40%	0,00%	0,00%	0,00%	0,00%
Lannebo Räntefond Kort SEK B	0,20%	0,22%	0,40%	0,00%	0,00%	0,00%	0,00%
Lannebo Räntefond Kort SEK C	0,10%	0,12%	0,20%	0,00%	0,00%	0,00%	0,00%
Lannebo Småbolag SEK och EUR	1,60%	1,62%	1,70%	0,00%	0,00%	0,00%	0,00%
Lannebo Smbolag SEK C	0,80%	0,82%	0,90%	0,00%	0,00%	0,00%	0,00%
Lannebo Småbolag Select	0,70% <sup>3</sup>	0,72%	1,10%	0,00%	0,00%	0,00%	0,00%

	Management fee including supervision and auditing	Fee for management, administration, safekeeping, supervision and auditing		Subscription fee		Redemption fee	
	Current	Current	Maximum	Current	Maximum	Current	Maximum
Lannebo Sustainable Corporate Bond A	0,50%	0,52%	1,10%	0,00%	0,00%	0,00%	0,00%
Lannebo Sustainable Corporate Bond B	0,25%	0,27%	0,60%	0,00%	0,00%	0,00%	0,00%
Lannebo Sverige	1,60%	1,62%	1,70%	0,00%	0,00%	0,00%	0,00%
Lannebo Sverige Hållbar A	1,60%	1,62%	1,80%	0,00%	0,00%	0,00%	0,00%
Lannebo Sverige Hållbar B	1,60%	1,62%	1,80%	0,00%	0,00%	< 30 dagar: 2% <sup>5</sup>	< 30 dagar: 2% <sup>5</sup>
Lannebo Sverige Plus	1,00% <sup>1</sup>	1,02%	1,10%	0,00%	0,00%	0,00%	0,00%
Lannebo Sverige Plus C	0,50% <sup>1</sup>	0,52%	0,60%	0,00%	0,00%	0,00%	0,00%
Lannebo Sverige Plus F	1,60%	1,62%	1,70%	0,00%	0,00%	0,00%	0,00%
Lannebo Teknik	1,60%	1,62%	1,70%	0,00%	0,00%	0,00%	0,00%
Lannebo Teknik Småbolag	1,60%	1,62%	1,80%	0,00%	0,00%	0,00%	0,00%

<sup>1</sup> In addition to the fixed management fee, a performance fee corresponding to 20% of the return exceeding the hurdle rate is charged for the unit class D for these funds.

<sup>2</sup> The fund invests a significant portion of fund assets in funds managed by Lannebo. When the fund invests in other funds managed by Lannebo, the fund is compensated for the fixed management fee in the underlying fund.

<sup>3</sup> For these funds, a performance fee applies in addition to the fixed management fee. The performance fee is calculated individually for each unitholder and is charged to the fund annually in connection with redemption or transfer of units; it is charged only when the fund's relative value growth, defined as 30 days STIBOR, monthly on the first banking day of each included month, but no less than 0 percent, plus 5 percentage points. More information and an example calculation are provided below.

<sup>4</sup> Fund units can be redeemed at no charge after they have been held for two years.

<sup>5</sup> If a fund unit has been held for less than 30 days, the redemption price may be reduced by an amount corresponding to a maximum of 2 percent of NAV per unit on the banking day the funds are redeemed. This charge shall accrue to the fund.

The applicable management fee covers Lannebo's costs for management, administration, marketing and distribution. The costs of safekeeping of securities, supervision and auditing are also charged to the fund, as shown in the table above. The term "total costs" is used in the Key Information Document (KID) for each fund. All aforementioned costs, transaction costs and the costs of purchases of external research are included in the total costs. Sales and redemption fees are zero percent for all funds.

## Historical returns

For information on the funds' past performance, see the web pages for each fund at <https://www.lannebo.se/fonder/fondlista>

## Risk information

### Risk profiles of the funds

Each fund has a risk profile that describes the specific risk dimensions to which the fund is exposed and how the fund is affected by derivatives and other techniques used to create risk exposure. The company has a risk management system that allows it to control the risk that the fund has in terms of investment at any given time. The fund management company has its own process for assessing the creditworthiness of the fund's assets for those funds where it constitutes a risk dimension.

### Risk assessment method

Certain funds invest in derivative instruments. To calculate the total exposure of these funds, the so-called "commitment method" is used. The commitment method is used to calculate the global exposure of the funds. The commitment method means that derivative positions are converted to an equivalent position in the underlying assets.

### Risk classification

Each fund is classified according to an EU standard with a risk/return indicator between 1 and 7, where 1 represents the lowest risk and 7 the highest risk. Please note that category 1 is not free from risk. The fund's risk class may change over time as the indicator is based on historical data, which is not a guarantee of future risk and return. The categorization can be found in the respective KIID

# Öhman Småbolagsfond

## Objective and investment strategy

Öhman Småbolagsfond is an equity fund whose objective is to achieve the highest capital growth possible within the confines of the investment strategy.

The fund is managed actively and sustainably. The fund invests in small and medium cap companies, with emphasis on Sweden. The fund invests in companies whose market capitalisation does not exceed 1% of the total market capitalisation on Nasdaq Stockholm. The fund is permitted to invest up to 10 percent of its net asset value in other Nordic equity markets. Sustainability aspects are considered in the context of corporate economic analyses and investment decisions, and play a part, but not necessarily a crucial one, in determining which companies are selected for inclusion in the fund. Sustainability aspects are an explicit component of the investment process, are continuously analysed and affect fund investments. More detailed information about the fund's sustainability programme is provided in the appendix Sustainability-related disclosures in this document.

The Fund is permitted to invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions. The use of derivative instruments is permitted to improve management efficiency in order to: i) reduce management-related costs and risk or, ii) to increase returns by creating leverage in the fund. The fund is permitted to use such derivative instruments referred to in chapter 5, section 12, subsection 2, IFA (OTC derivatives). The fund is permitted to invest a maximum of 10 percent of its net asset value in fund units. The fund is permitted to invest its assets in transferable securities and money market instruments as referred to in chapter 5, section 5 IFA (OTC securities), up to a maximum of 10 percent of the net asset value of the fund.

## Risk profile

The fund is an actively managed equity fund and is consequently exposed to price variations in the form of equity market risk. The fund invests in small and medium cap companies listed on Nasdaq Stockholm, whose share prices are generally characterised by higher price volatility than are large cap companies. The fund invests in securities that may have higher liquidity risk on occasion, such as when the market is unsettled. The fund is permitted to invest up to 10 percent of its net asset value in other Nordic equity markets.

The fund is permitted to keep a certain portion of fund assets in cash and cash equivalents, for example in order to manage unitholders' demands to redeem fund units without delay. The fund is permitted to invest in derivative instruments as part of its investment strategy, which means that the fund can create leverage. The fund is permitted to use other techniques and instruments, except derivative instruments, to reduce management-related costs and risks and to increase returns and create leverage in the fund. This may be accomplished by means including the fund lending securities, which may entail higher risk related to the counterparty suspending payments or otherwise failing to perform its obligations. Management aims to be exposed to the markets corresponding to 100 percent of the net asset value of the fund, but with consideration given to the strategies laid out above, the fund's exposure may both exceed and fall short of this level, where increased exposure involves higher market risk.

The fund does not normally use derivative instruments or other techniques and instruments to create leverage.

The risk is mitigated as Lannebo takes ESG risk – the risk that an environmental, social or governance-related event or circumstance could have impact on the value of the investment – into account in relation to investment and fund management decisions. For more information, please refer to the "Risk information" section earlier in this document.

A number of risks that are particularly relevant to the fund are described below:

- **Market risk** – The risk that the value of securities holdings may fall, which will affect the net asset value of the fund. Market risks may include the following:
  - **Equity market risk** – The risk that the value of equity holdings may fall, which will affect the net asset value of the fund.
  - **Currency risk** – The risk that exchange rate fluctuations will affect the net asset value of the fund expressed in the base currency of the fund, if the fund has securities holdings denominated in another currency.
- **Liquidity risk** – Entails a risk that it will be difficult or impossible to sell fund assets at a particular point in time because the price of the assets is not considered favourable or cannot readily be valued. Small cap equities are generally not traded (turned over) as frequently as large cap equities. In rare cases, assets in small cap funds can therefore be difficult to sell and/or value. If assets cannot be valued or need to be sold at an unfavourable price, this could in the worst case mean that a request for redemption (withdrawal) of fund units cannot be immediately executed.
- **Concentration risk** – The risk that the investment strategy of the fund will entail concentrated exposure to a particular type of investment strategy.
- **Operational risk** – The risk of loss due to inadequate or failed procedures, human error, systems failure, or external events.
- **Counterparty risk** – The risk associated with a counterparty that suspends payments or otherwise fails to perform its obligations, for example when the fund has accepted collateral for derivatives holdings or securities lending.

## Target group

The fund is intended for investors with a long (at least 5 years) investment horizon. The fund is also intended for investors with the ability to absorb losses as it is not certain that an investor will get back all or a certain proportion of the invested capital.

## ESG risks

An ESG risk is defined as an environmental, social or governance-related event or circumstance that could have adverse impact on a company's return. The fund manages ESG risks by integrating ESG into investment decisions (screening in), exclusion (screening out) and engaging in active ownership (advocacy).

ESG risks are integrated by the fund managers, who analyse environmental, social and governance factors into their investment decisions based on relevant ESG information (some of the data is obtained from external parties). In this way, thorough internal ESG analysis and assessment of the investments significant ESG factors are carried out. ESG risks are also managed by excluding certain types of products and services in accordance with the fund company's exclusion criteria. Through active ownership, we also influence companies to work proactively with ESG risks to avoid events and incidents that could have adverse impact on the company's value.

ESG risks can directly or indirectly affect a company's revenues and costs and thus have a significant positive or negative impact on its financial performance as well as value growth in the fund. For example, shortcomings in governance and the control structure could lead to anomalies that have adverse impact on a company's share price. Significant exposure to transitional or physical climate risks can also entail vulnerability that the risks will materialise, leading to a decrease in the value of the fund's underlying assets. Integrating ESG risks into investment decisions is thus critically important to achieving good long-term return.

### The Fund's level of active management

The fund's benchmark index is Carnegie Small Cap Total Return Net, which the fund management company has deemed relevant because the index most closely reflects the fund's investment strategy. The fund's objective is to outperform its benchmark index.

The fund engages in active management in relation to the benchmark index. This means that through its investment process, the fund selects the equities considered as having the greatest potential to outperform their benchmark index. Management of the fund is selective, meaning that the fund owns a limited number of equities compared to its benchmark index. The fund management company believes that long-term stock market performance is controlled by corporate capacity to generate profits and cash flow and our strategy is to own a combination of stable, cash flow-generating companies and high-growth companies. In connection with an investment, growth is evaluated in relation to market pricing based on a GARP analysis (Growth at a Reasonable Price) and the fundamental premise is that companies should aim for growth while maintaining cost control. The fund management company also puts strong emphasis on assessing the capacity of company management to deliver results.

#### Active risk (tracking error) for the past 10 years

	231231	221231	211231	201231	191231
Active risk	6,37	6,43	5,52	4,75	5,36
	181231	171231	161231	151231	141231
	5,36	2,87	2,81	2,67	2,99

The fund applies a stock picking approach, which governs portfolio structure. Depending on the size of the selected companies and the nature of the individual companies, the fund has a varied outcome in active risk. When the active management score rises, this may be due to overweight or underweight compared to the benchmark index in an individual security; it may also be due to changes in the market. The fund's active management score for the past ten years is within the range of the level of active management that the fund is expected to have. The annual variations are explained mainly by market conditions in individual years, application of sustainability criteria and

variations in the fund's active risk-taking due to the fund's prevailing market outlook.

### Unit classes

Dividend policies differ among the unit classes of the fund. Unit Class A and Unit Class C do not distribute dividends. Unit Class B does distribute dividends. Further information about dividend distribution is provided in the fund rules. Distributors, which represent an underlying investor collective, are permitted to acquire units in Unit Class C against a lower fee in lieu of remuneration for distribution. The management fee varies among the unit classes. See "Current and maximum charges" in this prospectus.

### Environmental, Social and Governance, ESG

Information on the environmental and social characteristics of the fund can be found below, in the annex to this document.



# Information concerning fund rules by reason of merger

The two fund companies E. Öhman J:or Fonder AB, CRN 556050-3020 ("Öhman"), and Lannebo Fonder AB, CRN 556584-7042 ("Lannebo") were merged on 16 September 2024. Under the terms of the merger, Öhman assumed all assets and liabilities in Lannebo and Öhman consequently replaced Lannebo in relation to clients and Lannebo was dissolved. The new company name is Lannebo Kapitalförvaltning AB, CRN 556050-3020. According to chapter 4, section 9 of the Swedish UCITS Act (2004:46) all amendments to fund rules are subject to approval by Finansinspektionen. As the fund rules in the the following are published in the current version approved by Finansinspektionen, information about the fund company in section 2 has not yet been updated.

## Fund Rules

### § 1 Name and legal status of the Fund

The name of the fund is Öhman Småbolagsfond ("the Fund"). The Fund is an investment fund as defined in the Swedish Investment Funds Act (2004:46) ("IFA").

Fund assets are owned jointly by the fund unitholders and each fund unit carries equal rights to the property included in the Fund. The Fund cannot acquire rights or assume obligations. The property included in the Fund is not subject to seizure and fund unitholders are not liable for obligations referring to the Fund.

The fund management company specified in section 2 represents the unitholders in all matters concerning the investment fund and takes decisions concerning the property included in the Fund.

The Fund is managed in accordance with these fund rules, the articles of association of the fund management company, IFA and other applicable statutes.

The Fund consists of the following unit classes:

- A) Non-distributing: maximum ongoing charge 1.5 percent
- B) Distributing: maximum ongoing charge 1.5 percent
- C) Non-distributing: maximum ongoing charge 1.0 percent, subject to special conditions of distribution

The implication of the unit classes is that fund units in unit classes A, B and C will differ because the rights to dividends and the

compensation paid to the Fund Management Company vary

(see also sections 9, 11 and 12).

#### *Transfer of units between unit classes*

A unitholder cannot meet the conditions for two different unit classes with the same assets. This means that Class A units must be transferred to Unit Class C when the conditions for holdings in Unit Class C are met. Correspondingly, Class C units must be transferred to Unit Class A when the criteria for holdings in Unit Class C, in accordance with the terms and conditions, no longer apply. The

above-mentioned shall apply regardless of whether the unitholder's holdings are directly registered or nominee registered (at one or more levels) with the Fund Management Company. Transfer does not entail any change with regard to dividend distribution conditions.

### § 2 Fund management company

The Fund is managed by E. Öhman J:or Fonder AB, corporate registration number 556050-3020 ("the Fund Management Company").

### § 3 The depositary and its duties

The depositary for the Fund's assets is Skandinaviska Enskilda Banken AB (publ), corporate registration number 502032-9081 ("the Depositary"). The Depositary is required to act independently of the Fund Management Company and exclusively in the joint interests of unitholders.

The Depositary must execute the Fund Management Company's decisions pertaining to the Fund if they do not conflict with the provisions of the IFA or these fund rules. The Depositary must furthermore accept and hold in custody the property included in the Fund and ensure that:

- a) subscriptions and redemptions of fund units comply with the provisions of IFA and these fund rules;
- b) the net asset value per fund unit is calculated in compliance with the provisions of IFA and these fund rules;
- c) the assets in the Fund are delivered to the Depositary without delay; and
- d) Fund assets are used in compliance with the provisions of IFA and these fund rules.

### § 4 Fund characteristics

The Fund is an equity fund oriented towards small and medium cap companies in Sweden, with limited scope to invest in other Nordic countries.

The objective of the management of Fund assets is to achieve good long-term growth in value.

### § 5 Investment strategy

The Fund is permitted to invest its assets in transferable securities, money market instruments, derivative instruments, fund units and accounts with credit institutions.

The Fund's equity investments are oriented towards small and medium cap companies, which are defined as companies whose market capitalisation as of acquisition date does not exceed one (1) percent of total market capitalisation for all equities listed on Nasdaq OMX Stockholm (the Stockholm Stock Exchange).

The Fund's equity investments must have a Swedish connection through the companies' domicile or through listing on a Swedish marketplace. Fund assets, not to exceed 10 percent of the net asset value of the Fund, may also be invested in equities with other Nordic connections through the companies' domicile or through listing on another Nordic marketplace.

In connection with investments in derivative instruments, the underlying assets must consist of or be attributable to such assets referred to in chapter 5, section 12, first paragraph IFA.

No more than 10 percent of Fund assets is permitted to be invested in fund units

## § 6 Marketplaces

The Fund's investments in transferable securities and money market instruments must be:

- a) admitted to trading on a regulated market in accordance with chapter 5, section 3 IFA or an equivalent market outside the EEA; or
- b) regularly traded on another regulated marketplace open to the public.

The Fund's investments in derivative instruments must be open for trading on a regulated market in accordance with chapter 5, section 3 IFA.

Fund assets may also be invested in transferable securities intended for trading, within one year of issue, on such a marketplace referred to in the first paragraph of this section 6 and in unlisted transferable securities and money market instruments and OTC derivatives in accordance with that set forth in section 7 below.

## § 7 Special investment strategy

### A) *Transferable securities and money market instruments*

The Fund is permitted to invest its assets in transferable securities and money market instruments as referred to in chapter 5, section 5 IFA (unlisted securities), up to a maximum of 10 percent of the net asset value of the Fund.

### B) *The use of derivative instruments*

The use of derivative instruments is permitted in connection with management of the Fund to improve management efficiency, in order to:

- i) reduce management-related costs and risks, or
- ii) increase returns by creating leverage in the Fund.

### C) *OTC derivatives*

On behalf of the Fund, the Fund Management Company is permitted to make derivative contracts directly with a counterparty (OTC derivatives) as provided in chapter 5, section 12, second paragraph IFA.

### D) *Other management techniques and instruments*

In connection with management of the Fund, such techniques and instruments, except derivative instruments, as referred to in chapter 25, section 21 FFFS 2013:9 may also be used to create leverage in the Fund.

## § 8 Valuation

The net asset value of the Fund is calculated each banking day ("Valuation Day").

The net asset value (NAV) of the Fund is calculated by deducting liabilities related to the Fund, taking into account any estimated deferred tax liability.

NAV per fund unit is calculated by dividing the NAV of the Fund by the number of outstanding fund units. The differences inherent to each unit class will be taken into account in the calculation.

The financial instruments included in the Fund are measured at current market value, i.e., the last known price paid at Valuation Date. If no price paid is available, the valuation will be based on the last known bid price at Valuation Date. If no such bid price is available either, financial instruments may be measured at the value based on objective grounds determined by the Fund Management Company.

The market value based on objective grounds of such transferable securities and money market instruments referred to in chapter 5 section 5 IFA is determined according to special valuation. The special valuation is based on the following factors in due order:

- a) Market prices from unregulated markets, independent brokers or other independent sources;
- b) Discounted cash flows (present value method of valuation);
- c) Other financial instruments or indices admitted to trading, adjusted for differences in, for example, credit risk and liquidity (benchmark method of valuation);
- d) The volatility in the financial instrument and/or e) share of equity (reporting date method of valuation).

OTC derivatives are valued according to generally accepted valuation models such as Black & Scholes and Black 76 or at the price determined by an independent party.

## § 9 Subscription and redemption of fund units

The Fund is normally open for subscription and redemption of fund units on all banking days. The Fund is, however, not open for subscription and redemption on banking days when the Fund's assets cannot be valued in a manner that assures fair treatment of all unitholders due to the partial or full closure of one or more of the marketplaces, as set forth in section 6, on which the Fund trades.

Unit Class C is available only to:

- Investors that, within the framework of an agreement on any of the investment services of receipt and transmission of orders or execution of orders in accordance with chapter 2, sections 1 and 2, portfolio management in accordance with chapter 2, sections 1 and 4 or investment advice in accordance with chapter 2, sections 1 and 5 of the Swedish Securities Market Act (2007:528) or equivalent Swedish or foreign regulation, invest in the Fund and where the Fund Management Company does not pay distribution inducements (see below) to the entity that provides the investment service, and

*Investment advice and portfolio management in the Fund Management Company*

Unit Class C is not available to investors that invest in the Fund within the framework of an agreement with the Fund Management Company pertaining to any of the investment services of portfolio management or investment advice

### *Distribution inducements and platform charges*

"Distribution inducements" refers to compensation based on ongoing charges taken out of the Fund where the Fund Management Company takes out the ongoing charge and pays a specified percentage of the same to the distributor. Compensation intended to pay for a platform service, where the Fund gains access to a trading platform and the charge is based on the value of the fund units registered with the platform are not considered to constitute distribution inducements in this context (platform charge). A platform charge is paid by the Fund Management Company for the platform's provision of fund units through the investment services of receipt and transmission of orders or execution of orders in accordance with chapter 2, sections 1 and 2, Swedish Securities Market Act or equivalent Swedish or foreign regulation.

Requests to subscribe for fund units are made by transferring payment to the Fund's bank account or bank giro account. Requests to redeem fund units must be made to the Fund Management Company in writing, or in a comparable manner approved in advance by the Fund Management Company. Requests for subscriptions and redemptions of fund units may be withdrawn only if the Fund Management Company consents

Subscriptions and redemptions are executed at a price unknown to the unitholder when the subscription or redemption request is made. If requests for subscription or redemption are received by the Fund Management Company when the Fund is closed in accordance with this provision or in accordance with section 10, the fund unit value is normally determined on the next banking day. Redemption may be delayed if funds to pay the proceeds of the redemption must be acquired through the sale of assets in the Fund.

Information about cut-off times for requests for subscriptions and redemptions and cut-off times for remittance of payment is provided in the prospectus.

### **§ 10 Closure of the Fund in extraordinary circumstances**

The Fund Management Company has the right to close the Fund for subscription (purchases by investors) and redemption (sales by investors) of fund units if extraordinary circumstances have occurred that prevent valuation of the Fund's assets in a manner that assures fair treatment of all unitholders

### **§ 11 Fees and charges**

Compensation will be paid from the Fund's assets to

- a) The Fund Management Company, for management and administration. Compensation is paid as an ongoing charge based on the net asset value of the Fund. The charge is calculated daily and is taken out of the Fund by the Fund Management Company at the end of each month.
- b) The Depository, for administration and safekeeping of the Fund's assets and other services provided by the Depository in accordance with IFA.
- c) Finansinspektionen, for costs related to supervisory activities in accordance with IFA.
- d) The audit firm, for auditing the Fund.

### *Unit Classes A and B*

Total compensation in accordance with a), b), c) and d) above must not exceed 1.5 percent of the net asset value of the Fund per year. Charges in accordance with b), c) and d) are taken out of the Fund on an ongoing basis.

### *Unit Class C*

Total compensation in accordance with a), b), c) and d) above must not exceed 1.0 percent of the net asset value of the Fund per year. Charges in accordance with b), c) and d) are taken out of the Fund on an ongoing basis.

The ongoing charge in effect is specified in the prospectus. Costs in addition to that set forth above are also incurred for commissions, currency exchange, taxes, etc., arising from the Fund's purchases and sales of financial instruments. These costs are taken out of the Fund.

Value added tax and other taxes applicable from time to time will be charged in addition to payments as set forth above.

### **§ 12 Dividends**

Fund units in Unit Classes A and C do not distribute dividends to unitholders.

Dividends are distributed every year to unitholders recorded in the unitholder register as holders of Class B fund units on the date determined by the Fund Management Company ("Record Date"). Dividends are determined by the Fund Management Company and are paid in May. Dividends are linked to the Fund's performance in the preceding financial year, but the Fund Management Company may decide to distribute dividends from the Fund based solely on the net asset value of the Fund.

The dividend must correspond to the Fund's return during the preceding financial year, where the return is calculated as the sum of dividends and interest income reported in the Fund's income statement for the preceding financial year. After the end of the financial year, the Fund Management Company determines the return by dividing the sum of the aforementioned income by the average net asset value of the Fund during the financial year. Return is expressed as a percentage rounded off to two decimal places. Thereafter, the Fund Management Company determines a dividend per fund unit as of Record Date. This amount is calculated by multiplying the set return by the Class B fund unit price as of the Record Date.

The dividend is limited to ten percent of the net asset value of Class B fund units as of the Record Date.

If the calculations above result in a dividend that is below three percent of the net asset value of Class B fund units as of the Record Date, the Fund Management Company may decide that dividends will be distributed notwithstanding in an amount equal to three percent of fund unit value.

The Fund Management Company will deduct taxes from dividends as required by law. The Fund Management Company will use the remaining amount to acquire new fund units on behalf of unitholders. Each unitholder will then receive the additional number of units equal to the amount due to the unitholder. Upon the written request of a unitholder, the dividend, after any deduction for tax, will instead be paid to a bank account owned by the unitholder. Such payment requests must be presented to the Fund Management Company in writing not later than the last day of April in each year.

notwithstanding that the Depositary initiates or is the object of such labour action.

The Depositary will not be liable for any loss other than such loss referred to in the first paragraph, provided that the depositary has not intentionally or negligently caused such other loss. Nor will the Depositary be liable for such other loss if circumstances as set forth in the first paragraph exist.

The Fund Management Company will not be liable for loss arising from Swedish or foreign legal enactment, measures taken by a Swedish or foreign governmental authority, act of war, strike, lockout, boycott, blockade or comparable circumstance. The proviso in respect of strike, blockade, boycott and lockout will apply notwithstanding that the Fund Management Company initiates or is the object of such labour action. The Fund Management Company will not pay compensation for losses arising in other cases if the Fund Management Company has acted with customary prudence. Compensation will not be paid for indirect losses under any circumstances.

If a unitholder sustains a loss due to breach of IFA or the fund rules by the Fund Management Company, the Fund Management Company must compensate the loss. If a fund unitholder or a Fund Company sustains a loss due to breach of IFA or the fund rules by the Depositary, the Depositary must compensate the loss.

The Fund Management Company or the Depositary will not be liable for loss caused by a – Swedish or foreign – stock exchange or other marketplace, custodian bank, central securities depositary, clearing organisation, or other entities – as regards losses other than those set forth in the first paragraph – that provide equivalent services, nor other delegates retained by the Depositary with due care or as instructed by the Fund Management Company. The same will apply to loss caused by the insolvency of the aforementioned organisations or delegates. Nor will the Fund Management Company and the depositary be liable for loss arising as a consequence of any restrictions on the right of disposition that may be imposed upon the Fund Management Company or the depositary in respect of the assets in the Fund.

If the Fund Management Company or the Depositary is prevented partially or entirely from executing measures as a consequence of a circumstance set forth above, these measures may be delayed until the obstacle no longer exists. If payment is consequently delayed, no penalty interest will be paid.

The foregoing limitations of liability do not affect the unitholder's right to damages in accordance with chapter 2, section 21 and chapter 3, sections 14–16 IFA.

### **§ 17 Obligation to provide information**

Upon request by the Fund Management Company, fund unitholders must provide to the Fund Management Company all such information that the Fund Management Company needs to perform such obligations that are incumbent or imposed upon the Fund Management Company in accordance with Swedish or foreign law, ordinance, regulation or official decision (such as obligations related to customer identification and submission of income statements to tax authorities, etc.)

### **§ 13 Financial year**

The financial year for the Fund is the calendar year.

### **§ 14 Annual reports, half yearly reports and amendment of fund rules**

The Fund Management Company must present annual and half yearly reports for the Fund. The annual report must be presented within four months of the end of the financial year and half yearly reports within two months of the end of the reporting period.

The annual report and half yearly report must be sent to unitholders in the Fund upon request and free of charge. After they have been presented, the annual report and half yearly report must be made available for inspection at the Fund Management Company and the Depositary.

Amendments to fund rules are decided by the board of directors of the Fund Management Company. After the decision has been approved by Finansinspektionen, the decision must be made available for inspection at the Fund Management Company and published in the manner instructed by Finansinspektionen.

### **§ 15 Pledges and transfers**

The Fund Management Company must be informed in writing of pledges of fund units for which the pledger is recorded in the unitholder register. The notice must state the identity of the unitholder, the identity of the pledge holder, the fund units covered by the pledge and any restrictions on the scope of the pledge.

The Fund Management Company will record the pledge in the unitholder register. The pledge holder must inform the Fund Management Company in writing when the pledge expires.

Unitholders are permitted to transfer fund units. The transferor must inform the Fund Management Company of the transfer in writing. The notice must identify the transferor and the transferee and specify the fund units covered by the transfer. The transferee is required to disclose information to the Fund Management Company in accordance with the terms and conditions applicable to investors' subscriptions for fund units as set forth in section 9 above.

The Fund Management Company will charge a fee not to exceed SEK 1,000 for administering a pledge or transfer.

### **§ 16 Limitation of liability**

If the Depositary or a custodian bank has lost financial instruments held in custody at the Depositary or a custodian bank, the Depositary must without undue delay return financial instruments of identical type or pay an amount equal to the value thereof to the Fund Management Company on the Fund's behalf. The Depositary will, however, not be held liable if the loss of the Financial Instruments was caused by an external event beyond the reasonable control of the Depositary and whose consequences were impossible to avoid, even though all reasonable efforts were made to do so, such as losses arising from Swedish or foreign legal enactment, measures taken by Swedish or foreign governmental authorities, act of war, strike, blockade, boycott, lockout or comparable circumstance. The proviso in respect of strike, blockade, boycott and lockout will apply

If a unitholder fails to provide such information referred to in the preceding paragraph to the Fund Management Company, the Fund Management Company will have the right to redeem the unitholder's units in the Fund. Such redemptions may be executed notwithstanding the unitholder's objections and if the Fund Management Company is unable to obtain information from the unitholder because the unitholder cannot be reached at the address the unitholder has provided to the Fund Management Company, or, for unitholders who reside in Sweden, the address at which the unitholder is registered in the public population registry, companies register, etc.

### **§ 18 Permitted investors**

The circumstance that the Fund is directed at the general public does not mean that it is directed at such investors whose subscriptions for units in the Fund or participation in the Fund otherwise would contravene the provisions of Swedish or foreign law or regulation. Nor is the Fund directed at such investors whose purchase or holdings of units in the Fund would obligate the Fund or the Fund Management Company to take registration measures or other measures that the Fund or the Fund Management Company would not otherwise be obligated to perform. The Fund Management Company has the right to refuse to execute subscriptions for such investors referred to above in this paragraph.

The Fund Management Company may redeem a unitholder's units in the Fund – notwithstanding the objections of such a unitholder – if it proves that the unitholder has subscribed for shares in the Fund in contravention of the provisions of Swedish or foreign law, ordinance, regulation or official decision or that the Fund Management Company has, by reason of a unitholder's sale of units or holdings in the Fund, become obligated to take registration measures or other measures for the Fund or the Fund Management Company that the Fund or the Fund Management Company would not be obligated to perform if the unitholder did not hold units in the Fund.

Redemption in accordance with the foregoing paragraph will be executed immediately. That stipulated concerning payment of proceeds for redeemed fund units in accordance with section 9 above will also apply in respect of redemption in accordance with this section 18.

*Adopted by the Board of Directors 13 February 2018*

*Approved by Finansinspektionen 17 July 2018*

*Effective 31 August 2018*

Pre-contractual disclosure for the financial products referred to in Article 8 of Regulation (EU) 2019/2088 and Article 6 of Regulation (EU) 2020/852

Product name: Öhman Småbolagsfond

Legal entity identifier: 549300BD2S214JUMTI52

**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.

## Environmental and/or social characteristics

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

Yes

No

<input type="checkbox"/>	It will make a minimum of sustainable investments with an environmental objective:	<input checked="" type="checkbox"/>	It promotes Environmental/Social (E/S) characteristics and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 35% of sustainable investments.
<input type="checkbox"/>	in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input type="checkbox"/>	with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/>	in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/>	with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/>	It will make a minimum of sustainable investments with a social objective:	<input checked="" type="checkbox"/>	with a social objective
<input type="checkbox"/>	It will make a minimum of sustainable investments with a social objective:	<input type="checkbox"/>	It promotes E/S characteristics, but will not make any sustainable investments



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

The fund promotes:

1. The transition to a low-carbon economy to limit global warming to 1.5°C
2. Good governance and sustainable business practices through active ownership and advocacy
3. Contribution to an environmental or social objective through sustainable investments
4. Compliance with international standards and conventions on environment, human rights, labor and diversity
5. Minimization of negative environmental and social impact through product-based exclusion (weapons, alcohol, tobacco, pornography, gambling, cannabis and fossil fuels)

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

1. To measure the transition to a low-carbon economy, the following indicators are used:

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



- Share of fund's total investments that have set science-based emission reduction targets and had them approved by the Science Based Target initiative
- The fund's carbon footprint measured as the holdings' greenhouse gas emissions (scope 1 & 2) divided by the company value [tCO<sub>2</sub>e/ EVIC million EUR]
- The fund's implied temperature rise, i.e. the future temperature rise to which the fund contributes based on each holding's projected carbon emissions

**2. To measure good governance and sustainable business practices through active ownership, the following indicators are used:**

- Number of annual general meetings at which the fund has voted
- Number of engagement dialogues in the fund
- Average gender distribution on the Boards of investee companies

**3. To measure contribution to an environmental or social objective through sustainable investments, the following indicator is used:**

- Proportion of the fund in sustainable investments

**4. To measure compliance with international standards and conventions on environment, human rights, labor and diversity, the following indicator is used:**

- Exclusion of companies that fail to comply with international standards and conventions

**5. To measure minimization of environmental and social impact through product-based exclusion, the following indicators are used:**

- The fund's consideration of principal adverse impacts (PAI)
- Exclusion of companies that violate the fund company's product-based exclusion criteria, as outlined in the fund company's Responsible Investment Policy available at [lannebo.se](http://lannebo.se).

● **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 objective of the sustainable investments is to contribute to an environmental or social objective. For an investment to be considered as contributing, it must meet at least one of the following criteria:

- At least 20 % of the company's turnover contributes to one of the 17 UN Sustainable Development Goals (SDGs)
- At least 20 % of the company's revenue, capital expenditure or operating expenditure is taxonomy aligned\*
- The company has approved science-based emission reduction targets (SBT) in line with the Paris Agreement
- The investment is a sustainability-labeled bond, such as green, social or sustainable

\*The fund's sustainable investments can contribute to one or more of the six EU taxonomy objectives (i) climate change mitigation, (ii) climate change adaptation, (iii) sustainable use and protection of water and marine resources, (iv) transition to a circular economy, (v) pollution prevention and control, and (vi) protection and restoration of biodiversity and ecosystems.

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

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

To ensure that the sustainable investments do not cause significant harm (DNSH), principal adverse impacts (PAIs) are analyzed. In addition, it is ensured that the investment meets the fund company's product and norm-based exclusion criteria. The investment is also assessed to cause significant harm and thus cannot be classified as sustainable if it meets any of the criteria below:

- The business is involved in serious ongoing or recent controversies that could lead to violations of the UN Global Compact guiding principles
- The business emits significant amounts of greenhouse gases and lacks science-based emission reduction targets (SBT)
- The business is involved in thermal coal power generation at more than 1% of turnover

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

The principal adverse impact indicators (PAI) have been considered to ensure that a sustainable investment does not cause significant harm (DNSH). The investment is deemed to cause significant harm if it meets any of the criteria below:

- The company emits significant amounts of greenhouse gas emissions while not having SBT (PAI 1)
- The business is exposed to the fossil fuel sector, that violate Lannebo's exclusion criteria (PAI 4)
- The business violates any of the UN Global Compact Principles or the OECD Guidelines for Multinational Enterprises (PAI 10)
- Operations are exposed to controversial weapons (PAI 14)

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

A sustainable investment must comply with the above-mentioned international guidelines and principles related to the environment, human rights, labor, tax or anti-corruption and anti-bribery. This is analyzed and evaluated in the investment process. Companies that systematically breach these guidelines and principles are excluded. The fund's compliance with these requirements is ensured through daily monitoring.

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

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

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



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

**Yes,** the fund managers consider PAI indicators for all investments in the sustainability analysis. The analysis of the PAI indicators is conducted using a proprietary tool "ESG Studio". The selection of relevant PAI indicators is based on data availability, data quality and the indicator's relevance to the company's sector. Exclusion criteria are applied to indicators related to fossil fuels, violations of international conventions and controversial weapons. For the remaining indicators, thresholds are established to define an increased sustainability risk. When an increased sustainability risk is identified, a more detailed analysis of the potential negative impact associated with the sustainability factor is conducted. Information on how the fund has considered PAI is presented in the fund's annual report, which is available on Lannebo's website.

**No**



## What investment strategy does this financial product follow?

Sustainability is integrated into the investment process through three main strategies: sustainability analysis (include), exclusions (exclude) and active ownership (engage).

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

**Sustainability analysis (include):** As a part of the investment process, the fund managers integrate environmental, social and governance (ESG) factors into their investment decisions using ESG Studio, a tool for conducting sustainability analysis based on relevant sustainability information. Before making an investment, the portfolio managers ensure that it meets Lannebo's exclusion criteria. The main purpose with the sustainability analysis is to:

- Identify the company's key sustainability risks and opportunities
- Ensure good governance practices
- Assess whether the investment meets the criteria for a sustainable investment
- Consider principal adverse impacts (PAI)

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

The portfolio managers are responsible for conducting a sustainability analysis and incorporating its results into their investment decisions. This analysis covers various factors, such as the company's greenhouse gas emissions and whether it has science-based targets, the quality of working conditions, respect for human rights and the risk of corruption. The insights gained from this analysis provide the portfolio managers with key environmental, social and governance considerations.

**Exclusions (exclude):** The fund will not invest in companies involved in sectors or activities with significant sustainability challenges. This includes companies that violate international norms and conventions related to the environment, human rights, labor law, or anti-corruption and anti-bribery efforts, as well as companies active in fossil fuels or controversial weapons. Additionally, the fund will not invest in tobacco, cannabis, alcohol, weapons, gambling or pornography. Detailed exclusion criteria are outlined in Lannebo's Policy for Responsible Investments, available at [lannebo.se](http://lannebo.se). Compliance with these criteria is ensured through screening of all companies both prior to investment and throughout the holding period, with daily monitoring.

**Active ownership (engage):** Lannebo's commitment as active owners is a central part of Lannebo's work. The goal of Lannebo's active ownership is to promote long-term sustainable business practices within the holdings while minimizing negative impacts on the environment and people. Lannebo works with active ownership through three strategies:

- Participation in Nomination Committees
- Voting at General Meetings

- Engagement dialogues

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

The binding elements of the fund's investment strategy are the fund's norm- and product-based exclusion criteria and the requirement to invest a minimum proportion in sustainable investments. The Fund is also bound to a minimum proportion of investments that promote environmental or social characteristics. These binding elements are monitored daily.

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

The fund had no minimum rate before the investment strategy was applied.

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

The fund's investments policy as regards good governance practices i

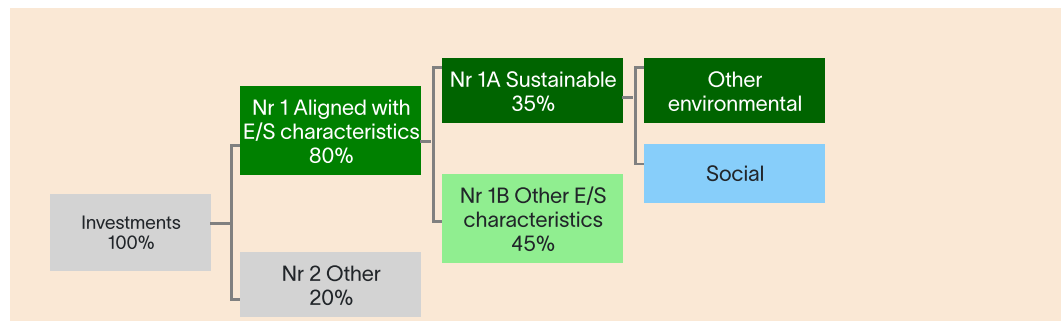
### What is the asset allocation planned for this financial product?



**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.



**Nr 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.

**Nr 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 Nr 1 Aligned with E/S characteristics covers:

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

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

The use of derivatives is unrelated to promoting the funds' environmental or social characteristics.

To comply with the EU Taxonomy, the criteria for

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

**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.



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

The fund commits to a minimum proportion of sustainable investments as per Article 2.17 of the SFDR. These sustainable investments can be either taxonomy aligned, other environmental or social. The distribution between the different categories of sustainable investments will vary over time. The fund does therefore not commit to achieving a minimum proportion of sustainable investments with an environmental objective consistent with the requirements of the EU taxonomy.

The compliance of investments with the requirements set out in the EU Taxonomy will not be subject to auditors' approval or third-party verification. However, the information is based on companies' reported data and provided by a third-party provider.

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

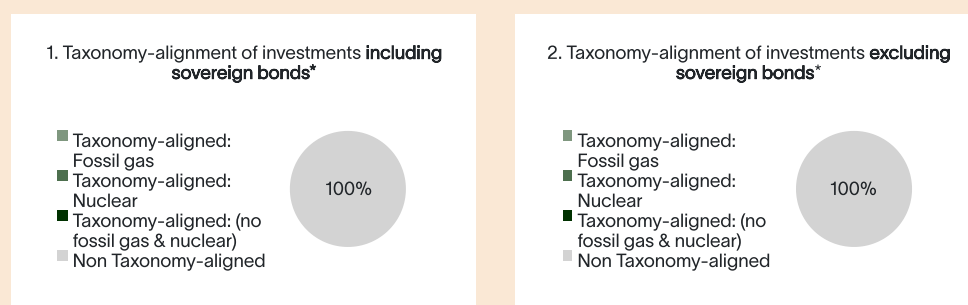
Yes:

In fossil gas  In nuclear energy

No

<sup>1</sup>Fossil gas and/or nuclear related activities will only comply with the EU Taxonomy where they contribute to limiting climate change ("climate change mitigation") and do not significantly harm any EU Taxonomy objective - see explanatory note in the left hand margin. The full criteria for fossil gas and nuclear energy economic activities that comply with the EU Taxonomy are laid down in Commission Delegated Regulation (EU) 2022/1214.

*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?**

The fund does not commit to a certain minimum proportion of investments in transitional or enabling activities, although the fund may invest in those activities.



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



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

The fund commits to a minimum proportion of sustainable investments as per Article 2.17 of the SFDR. These sustainable investments can be either taxonomy aligned, other environmental or social. The distribution between the different categories of sustainable investments will vary over time. The fund does not commit to achieving a certain minimum share of sustainable investments with environmental objectives that are not aligned with the EU taxonomy.



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

The fund commits to a minimum proportion of sustainable investments as per Article 2.17 of the SFDR. These sustainable investments can be either taxonomy aligned, other environmental or social. The distribution between the different categories of sustainable investments will vary over time. The fund does not commit to achieving a minimum percentage of socially sustainable investments.



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

This includes the fund's cash and cash equivalents, which are used to supplement and/or balance risk and may vary over time. A certain amount of cash is required to manage the daily trades of fund units by unitholders. Derivative instruments may also be used as part of the investment policy to improve the efficiency of management. The proportion of cash and cash equivalents held with institutions and any derivatives complies with Lannebo's requirements for good governance practices and meets minimum social safeguards.



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

More product-specific information is available at <https://www.lannebo.se/hallbarhetsupplysningar/>