



# Fund prospectus 4/2026

Fondita Fund Management Company Ltd.

## Table of contents

General information .....	3
Fondita Fund Management Company .....	3
Board .....	3
Executive management .....	4
Audit and supervision .....	4
Depository .....	4
Fund units and dividends.....	4
Subscription .....	4
Redemption .....	4
Fees.....	5
Rebates .....	5
External services .....	5
Ownership policies .....	5
Remuneration policy .....	5
Error list .....	5
Reporting .....	5
Right of withdrawal .....	6
Publication of fund unit value .....	6
Other information .....	6
Risk information associated with funds .....	6
SFDR.....	7
Consideration of sustainability risks and potential impact on returns .....	7
Article 8.....	7
Article 9.....	9
Principle Adverse Impacts .....	12
EU Taxonomy Information .....	13
Responsible investment principles.....	13
The goal of responsible investing .....	13
Our method for responsible investing.....	13
Engagement.....	14
Reporting and relevant policies.....	15
Fondita investment funds.....	16
Fondita European Micro Cap.....	17
Fondita Finland Micro Cap.....	18
Fondita Global Megatrends.....	19

Fondita Global Small Cap.....	20
Fondita Healthcare .....	21
Fondita Nordic Micro Cap.....	22
Fondita Nordic Small Cap .....	23
Fondita Sustainable World .....	24
Additional information about the funds .....	25
Price lists.....	26
Appendix 1. Additional Information for Investors in Germany .....	30
Appendix 2. Additional Information for Investors in Austria .....	32
Appendix 3. Additional Information for Investors in Sweden .....	33
Appendix 4. Additional Information for Investors in Norway .....	34
Rules for Fondita Investment Funds.....	35
SFDR Appendix .....	42

## General information

### Fondita Fund Management Company

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

Main office and visiting address:

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

### Board

Chairman of the Board

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

Members

Janna Haahtela, M.Sc. (Econ.)

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

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

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

Gustav Ohlsson, M.Sc. (Econ.)

\* Independent member

## Executive management

Patrik Wickström, CEO

Fredrik von Knorring, deputy CEO

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

## Audit and supervision

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

Fondita is supervised by the Finnish Financial Supervisory Authority.

## Depository

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

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

## Fund units and dividends

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

## Subscription

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

## Redemption

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

day after the order is executed, provided that the fund has sufficient liquidity. A redemption confirmation note is sent to the customer.

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

## Fees

Fees and other costs, are charged according to the price list on page 25.

## Rebates

Total client relationship allow for changes in tariff rates.

## External services

In carrying out investment fund activities, the fund company may use external services such as accounting and data processing services, distribution services and for the receipt of subscription and redemption orders. Fondita has partially outsourced the maintenance of the unit holder register to the following partners: Nordea Bank, Nordnet Bank and United Bankers. The marketing of the funds is managed by Atle Investment Services AB in Sweden, Capatico GmbH in Germany and Montis Finance GmbH in Austria along with Fondita.

## Ownership policies

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

## Remuneration policy

Fondita's remuneration policies apply to the following groups of staff: executive management, fund managers and members of the company's permanent risk control function. When remunerating employees, Fondita follows the provisions on remuneration in Chapter 3 of the Finnish Investment Funds Act. Employees do not receive variable remuneration, as the entire salary consists of a fixed monthly or hourly wage. Due to the nature of the fixed monthly or hourly wage, which applies to all employees at Fondita, Fondita has assessed that the remuneration principles are not linked to sustainability targets nor sustainability risks. In other words, the sustainability targets or risks does not in any way incentivise for certain decision-making or acting in regards of remuneration. Fondita's complete remuneration policy can be found at <https://fondita.fi/en/remuneration-policy/>

## Error list

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

## Reporting

Fondita's online service is available to direct Fondita clients. The service grants access to your fund holdings report and other information about your investments. In addition to the online service, Fondita sends fund

holdings reports and monthly fund reports to clients by e-mail once a month or once a year by mail (31 December).

### Right of withdrawal

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

### Publication of fund unit value

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

### Other information

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

## Risk information associated with funds

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

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

### Information on risks associated with equity funds

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

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

**Sector risk** There is a sector risk with funds which, according to their rules, only invest in a specific sector. This means that the fund cannot reallocate its resources to other sectors if, for example, something happens to negatively affect the fund's sector. The performance of investments in an individual sector may differ significantly from the general performance of the stock market.

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

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

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

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

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

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

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

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

**Sustainability and ESG risk** The risk is defined as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. The consideration for sustainability risks and negative impacts is further elaborated on in the next chapter. The definition of Sustainability and ESG risk is defined on a granular level in our SFDR article 2 publication on the webpage and according to each financial product in the Prospectus.

**Greenwashing risk** Greenwashing is defined as the act of providing misleading information on environmental, social and governance impacts of company operations or underlying assets.

## SFDR

This chapter specifically contains information on considerations of sustainability risks, principle adverse impact on sustainability factors and EU Taxonomy information related to our financial products which comply with article 8 or 9 according to the SFDR.

### Consideration of sustainability risks and potential impact on returns

#### Article 8

This section considers our financial products which comply with SFDR article 8. The disclosures are per financial product according to the product specifications in the start of each section.

**Applies to financial products Fondita European Micro Cap, Fondita Finland Micro Cap and Fondita Nordic Micro Cap**

## Definition

Sustainability and ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. If sustainability risks materialize, the value of an individual investment may be negatively affected. For the financial product, sustainability risks may therefore also reduce the financial products' return in the long term. Sustainability risks are considered as part of the investment decision-making process together with more traditional investment risks such as market and liquidity risks.

## Sustainability and ESG risk integration

First and foremost, Fondita excludes sectors that we believe are associated with high risk from an ESG perspective. There is a high risk of increased regulation, taxation and political opposition in these activities. Public opinion also tends to become more negative towards such activities. These factors make companies in the sectors operate in an uncertain and unfavorable environment. In addition, the activities can easily be considered questionable from an ethical perspective. The sectors in which we do not invest are tobacco, controversial weapons, adult entertainment, fossil fuels, gambling, recreational cannabis, and payday loans. The exclusion applies to companies that are directly active in these sectors (>5% of turnover) or that are suppliers to these sectors (>5% of turnover). We also exclude companies that have violated the UN Global Compact's 10 principles, OECD guidelines for multinational enterprises and EU Taxonomy Do No Significant Harm, because Fondita associates violators of these international norms with high risk from an ESG perspective.

In European Micro Cap, Finland Micro Cap and Nordic Micro Cap, Fondita pays special attention to PAI indicators relevant to the investment strategy (e.g. PAI 1-5 and 10-13) and if anomalies are identified it increases the sustainability risk therefore also the potential negative impact on the investment value and return. Additionally, we monitor the MSCI ESG ratings of the companies, lower than BB increases sustainability risk and therefore also the potential negative impact on the investment value.

An increased sustainability risk relevant in these financial products is the low level of coverage of sustainability related data in our third-party databases (MSCI & Bloomberg), which average around 50%. Fondita retrieves relevant sustainability related information on a best effort basis to be able to assess relevant sustainability risks in the holdings which are not covered by our external databases.

## Action and monitoring

The purpose of our monitoring during the holding period of investments is to ensure the holding continues to operate within an acceptable ESG and sustainability risk level. We conduct monthly screenings of our holdings in MSCI ESG Research to ensure they continue to operate within our ESG risk assessment throughout the holding period. In practice this means, if a company is found to be in violation of an international norm such as UN Global Compact through screening, we take a dialogue with the holdings' investor relations to verify the failure, to ensure the trustworthiness of the flag by MSCI ESG Research, and if verified we divest from the holding. The process is documented as part of our escalation process.

Internal risk management function performs risk monitoring quarterly and the ESG controller provides oversight and escalation on the sustainability integration process in the investment process.

**Applies to financial products Fondita Global Megatrends, Fondita Global Small Cap and Fondita Nordic Small Cap.**

Definition

Sustainability and ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. If sustainability risks materialize, the value of an individual investment may be negatively affected. For the financial product, sustainability risks may therefore also reduce the financial products' return in the long term. Sustainability risks are considered as part of the investment decision-making process together with more traditional investment risks such as market and liquidity risks.

Sustainability and ESG risk integration

First and foremost, Fondita excludes sectors that we believe are associated with high risk from an ESG perspective. There is a high risk of increased regulation, taxation and political opposition in these activities. Public opinion also tends to become more negative towards such activities. These factors make companies in the sectors operate in an uncertain and unfavorable environment. In addition, the activities can easily be considered questionable from an ethical perspective. The sectors in which we do not invest are tobacco, controversial weapons, adult entertainment, fossil fuels, gambling, recreational cannabis, and payday loans. The exclusion applies to companies that are directly active in these sectors (>5% of turnover) or that are suppliers to these sectors (>5% of turnover). We also exclude companies that have violated the UN Global Compact's 10 principles, OECD guidelines for multinational enterprises and EU Taxonomy Do No Significant Harm because Fondita associates violators of these international norms with high risk from an ESG perspective.

In Global Megatrends, Global Small Cap and Nordic Small Cap, Fondita pays special attention to PAI indicators relevant to the investment strategy (e.g. PAI 1-5 and 10-13) and if anomalies are identified it increases the sustainability risk therefore also the potential negative impact on the investment value and return. Additionally, we monitor the MSCI ESG ratings of the companies, lower than BB increases sustainability risk and therefore also the potential negative impact on the investment value.

Action and monitoring

The purpose of our monitoring during the holding period of investments is to ensure the holding continues to operate within an acceptable ESG and sustainability risk level. We conduct monthly screenings of our holdings in MSCI ESG Research to ensure they continue to operate within our ESG risk assessment throughout the holding period. In practice this means, if a company is found to be in violation of an international norm such as UN Global Compact through screening, we take a dialogue with the holdings' investor relations to verify the failure, to ensure the trustworthiness of the flag by MSCI ESG Research, and if verified we divest from the holding. The process is documented as part of our escalation process.

Internal risk management function performs risk monitoring quarterly and the ESG controller provides oversight and escalation on the sustainability integration process in the investment process.

Article 9

This section considers our financial products which comply with SFDR article 9. The disclosures are per financial product accordingly to the product specifications in the start of each section.

## **Applies to financial product Fondita Sustainable World**

### Definition

Sustainability and ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. If sustainability risks materialize, the value of an individual investment may be negatively affected. For the financial product, sustainability risks may therefore also reduce the financial products' return in the long term. Sustainability risks are considered as part of the investment decision-making process together with more traditional investment risks such as market and liquidity risks.

### Sustainability and ESG risk integration

First and foremost, Fondita excludes sectors that we believe are associated with high risk from an ESG perspective. There is a high risk of increased regulation, taxation and political opposition in these activities. Public opinion also tends to become more negative towards such activities. These factors make companies in the sectors operate in an uncertain and unfavorable environment. In addition, the activities can easily be considered questionable from an ethical perspective. The sectors in which we do not invest are tobacco, controversial weapons, adult entertainment, fossil fuels, gambling, recreational cannabis, and payday loans. The exclusion applies to companies that are directly active in these sectors (>5% of turnover) or that are suppliers to these sectors (>5% of turnover). We also exclude companies that have violated the UN Global Compact's 10 principles, OECD guidelines for multinational enterprises and EU Taxonomy Do No Significant Harm because Fondita associates violators of these international norms with high risk from an ESG perspective.

In Sustainable World, Fondita pays special attention to PAI indicators relevant to the investment strategy (e.g. PAI 1-5 and 7-11) and if anomalies are identified it increases the sustainability risk and therefore also the potential negative impact on the investment value and return. Additionally, we monitor the MSCI ESG ratings of the companies, lower than BB increases sustainability risk and therefore also the potential negative impact on the investment value.

Increased sustainability risks related to the sustainable investment objective of the financial product are regulatory complexity within the climate and environmentally smart solutions and lower financial incentives towards green investment opportunities, which can potentially have an increased sustainability risk of the investment universe of the financial product.

### Action and monitoring

The purpose of our monitoring during the holding period of investments is to ensure the holding continues to operate within an acceptable ESG and sustainability risk level. We conduct monthly screenings of our holdings in MSCI ESG Research to ensure they continue to operate within our ESG risk assessment throughout the holding period. In practice this means, if a company is found to be in violation of an international norm such as UN Global Compact through screening, we take a dialogue with the holdings'

investor relations to verify the failure, to ensure the trustworthiness of the flag by MSCI ESG Research, and if verified we divest from the holding. The process is documented as part of our escalation process.

Internal risk management function performs risk monitoring quarterly and the ESG controller provides oversight and escalation on the sustainability integration process in the investment process.

## **Applies to financial product Fondita Healthcare**

### Definition

Sustainability and ESG risks are defined under the SFDR Regulation (Article 2) as an environmental, social or governance event or circumstance which, if it were to occur, would have a significant actual or potential negative impact on the value of the investment. If sustainability risks materialize, the value of an individual investment may be negatively affected. For the financial product, sustainability risks may therefore also reduce the financial products' return in the long term. Sustainability risks are considered as part of the investment decision-making process together with more traditional investment risks such as market and liquidity risks.

### Sustainability and ESG risk integration

First and foremost, Fondita excludes sectors that we believe are associated with high risk from an ESG perspective. There is a high risk of increased regulation, taxation and political opposition in these activities. Public opinion also tends to become more negative towards such activities. These factors make companies in the sectors operate in an uncertain and unfavorable environment. In addition, the activities can easily be considered questionable from an ethical perspective. The sectors in which we do not invest are tobacco, controversial weapons, adult entertainment, fossil fuels, gambling, recreational cannabis, and payday loans. The exclusion applies to companies that are directly active in these sectors (>5% of turnover) or that are suppliers to these sectors (>5% of turnover). We also exclude companies that have violated the UN Global Compact's 10 principles, OECD guidelines for multinational enterprises and EU Taxonomy Do No Significant Harm because Fondita associates violators of these international norms with high risk from an ESG perspective.

In Fondita Healthcare, Fondita pays special attention to PAI indicators relevant to the investment strategy (e.g. PAI 10-13) and if anomalies are identified it increases the sustainability risk and therefore also the potential negative impact on the investment value and return. Additionally, we monitor the MSCI ESG ratings of the companies, lower than BB increases sustainability risk and therefore also the potential negative impact on the investment value.

Increased sustainability risks related to the sustainable investment objective of the financial product are regulatory complexity within the healthcare industry in general, including high demands for quality of product and production, which can potentially have an increased sustainability risk of the investment universe of the financial product.

### Action and monitoring

The purpose of our monitoring during the holding period of investments is to ensure the holding continues to operate within an acceptable ESG and sustainability risk level. We conduct monthly screenings of our holdings in MSCI ESG Research to ensure they continue to operate within our ESG risk assessment throughout the holding period. In practice this means, if a company is found to be in violation of an international norm such as UN Global Compact through screening, we take a dialogue with the holdings' investor relations to verify the failure, to ensure the trustworthiness of the flag by MSCI ESG Research, and if verified we divest from the holding. The process is documented as part of our escalation process.

Internal risk management function performs risk monitoring quarterly and the ESG controller provides oversight and escalation on the sustainability integration process in the investment process.

### Principle Adverse Impacts

**Applies to financial products Fondita European Micro Cap, Fondita Finland Micro Cap, Fondita Global Megatrends, Fondita Global Small Cap, Fondita Nordic Micro Cap, Fondita Nordic Small Cap, Fondita Healthcare and Fondita Sustainable World**

The Portfolio Manager and the Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them throughout the lifetime of the investment. The financial product considers all 14 mandatory and 2 voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, they are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

***The following mandatory PAI indicators are considered and tracked in all financial products.***

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

***The following voluntary PAI indicators are considered and tracked.***

- Investments in companies without carbon emissions reduction initiatives aligned with the Paris agreement
- Number of identified cases of severe human rights issues and incidents.

## EU Taxonomy Information

**Applies to financial products Fondita European Micro Cap, Fondita Finland Micro Cap, Fondita Global Megatrends, Fondita Global Small Cap, Fondita Nordic Micro Cap and Fondita Nordic Small Cap (article 8)**

The investments underlying this financial product do not consider the EU criteria for environmentally sustainable economic activities.

**Applies to financial product Fondita Sustainable World (article 9)**

The investments underlying this financial product do not consider the EU criteria for environmentally sustainable economic activities. The financial product has a global investment universe, which limits the availability of EU Taxonomy related reported data.

**Applies to financial product Fondita Healthcare (article 9)**

The investments underlying this financial product do not consider the EU criteria for environmentally sustainable economic activities. The financial product invests in socially sustainable investments.

## Responsible investment principles

The main goal of our investment operations is to generate the best possible long-term returns for our customers. We aim to do this responsibly and in accordance with the chosen investment strategy. The responsible investment principles cover all of our financial products.

Our principles for responsible investments are based on the belief that companies that operate responsibly and in accordance with sustainable standards are better investments in the long term, as the risks and opportunities related to environment, social responsibility, and good governance (ESG factors) are more extensively explored and understood compared to a traditional investment process. Therefore, it is important to integrate ESG-related factors when performing company analysis. A more informed investment decision is a better investment decision.

In our investment decisions, as owners and in our daily operations in general, we always strive to act responsibly and in accordance with sustainable development. In our principles for responsible investment, in our sustainability risk assessments and in our operations, we consider international agreements, norms and standards that guide society and business.

### The goal of responsible investing

We want to invest in companies where sustainability factors are an integral part of the company's strategy and corporate culture. This means the company bears responsibility towards its employees and treats everyone equally, while monitoring, measuring, and improving its own environmental and social footprint. The company's revenue needs to mainly come from activities, which we believe is sustainable in the long term, and the product or service needs to be in line with the overall values of sustainable development.

We take our climate responsibility seriously and work to reduce our investments carbon footprint towards carbon neutrality. As signatories of the Net Zero Asset Manager initiative, we have committed to being carbon neutral as a company by 2050 at the latest. All Fondita funds are actively managed funds based on a bottom-up stock picking strategy. They have a consistent, uniform investment strategy and follow the same principles for responsible investing. Our goal is to be a long-term owner in sustainable, high-quality growth companies.

### Our method for responsible investing

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

- Negative screening - exclusion/norm-based screening
  - We exclude from our investment universe certain sectors which we consider unsustainable and companies which operate in violation of international norms and standards such as UN Global Compact, OECD guidelines for multinational enterprises and EU Taxonomy “Do No Significant Harm” principle.
- Positive screening - thematic drivers
  - The purpose is to look for companies which have enhanced sustainability focus and benefit from various sustainable megatrends.
- Integration of ESG factors into investment analysis
  - ESG integration in the investment analysis is done by using external databases such as MSCI and Bloomberg and counter partners ESG analysis which is then complemented by our internal ESG assessment tool based on financial materiality. The result is integrated into the investment process.
- Active ownership and engagement according to the Fondita engagement policy
- Advocate for sustainable development and responsible investment.
- Monthly screening, including our sustainability indicators, exclusion and PAI indicators.

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

#### Environment

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

#### Social

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

#### Governance

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

More information about our most recent Responsible Investments Policy which is available on our homepage.

### Engagement

As part of our Climate Change policy and Human Rights policy, we have chosen to commit to promote two topics as part of our engagement strategy, in all of the financial products (the engagement policy is not part

of the financial products investment strategy).

a) Fondita has decided to reach out to all our holdings which do not yet have an equality and diversity policy implemented to encourage to implement and publish one publicly. We have identified that we are able to have a significant impact to advance equality and diversity in companies by taking a dialogue with the holdings who do not yet have a policy implemented.

b) Fondita has decided to reach out to all our holdings which do not yet have an emissions reduction target to encourage them to set one. We have identified that we can have a significant impact to promote emissions reduction in companies by taking a dialogue with the holdings who do not yet have a policy implemented.

☞ engagement will be conducted by reaching out to the investor relations of each holding. More information available in our Engagement Policy. Our Engagement Policy also includes our voting guidance as well as how we collaborate with other parties such as UN PRI and CDP.

## Reporting and relevant policies

The financial products report extensively on our sustainability related information. Each financial product produces a quarterly report, available on the home page, which contains carbon emissions development, ESG rating, compliance with our screening methodology (completed monthly) and the development of the sustainability indicators and binding elements of the financial product according to the SFDR classification (article 8 or 9) Furthermore, Fondita produces annual reports on company level in line with TCFD aligned Climate report on our climate risks, an Annual Review of Responsible Investments and regulatory relevant reporting according to SFDR.

Furthermore, Fondita upholds policies on Climate Change and Human Rights, which is available on our homepage (<https://fondita.fi/en/reports-and-documents/>). The policies are strongly connected to the financial products sustainability indicators and binding elements of the financial products according to the SFDR classification (article 8 or 9).

## Fondita investment funds

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

**Table 1: Fondita investment funds**

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

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

## Fondita European Micro Cap

### Theme of the fund

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

### Target group

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

### Information about the fund

Managers	Kenneth Blomqvist and Janna Haahtela
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2025)	0.30
Volatility (2025)	14.6%
Fees	See p. 25
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Timo Eerola, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

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

### Fund risk profile

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

### Fund investment policy

The fund is an equity fund mainly investing its assets in the shares of small listed companies in EU countries, Norway, the UK and Switzerland. Small companies are those with a market capitalisation of less than EUR 800 million. In order to ensure liquidity in the fund, part of the fund's assets may be invested in companies

whose market capitalisation exceeds the threshold for small companies. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Finland Micro Cap

### Theme of the fund

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

### Target group

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

### Information about the fund

Managers	Marcus Björkstén and Kenneth Blomqvist
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2025)	0.26
Volatility (2025)	15.3%
Fees	See p. 25
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svernas, CPA Timo Eerola, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

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

### Fund risk profile

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

### Fund investment policy

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

The fund is an equity fund mainly investing in smaller Finnish-listed companies with a market capitalisation of less than EUR 800 million. In order to ensure liquidity in the fund, part of the fund's assets may be invested in companies whose market capitalisation exceeds the threshold for small companies. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Global Megatrends

### Theme of the fund

Fondita Global Megatrends Investment Fund is a global equity fund that invests in companies that are well positioned for expected significant structural changes in society, so-called megatrends. Examples of these megatrends include an increased demand for climate- and environmentally smart solutions, demographic changes that primarily benefit companies in health and well-being, the continuous digitalization and technological development, and an increased need for investments in defense and security. The Fund was launched on 14 September 1998. The name of the fund has been changed on 19.9.2022. The previous name of the fund was Fondita 2000+.

### Target group

The fund is suitable for all investors looking for exposure to megatrends with a long-term investment perspective. At the same time, investors should be aware of the risks of the stock market. Recommended minimum investment time is 7 years.

### Information about the fund

Managers	Janna Haahtela and Marcus Björkstén
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2025)	0.55
Volatility (2025)	16.7%
Fees	See p. 25
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svernas, CPA Timo Eerola, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

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

### Fund risk profile

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

## Fund investment policy

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

## Fondita Global Small Cap

### Theme of the fund

Fondita Global Small Cap is an equity fund that mainly invests in smaller quality companies with a market capitalisation below EUR 10 billion. The fund invests in smaller niche companies with strong market positions. The fund has a wide sector distribution with investments in, for example, medical technology and consumer and industry-related activities. In these sectors, we find companies that can create value for their owners through good growth prospects. Small and medium-sized quality companies are also attractive targets for acquisition. The fund started its activities on 19 May 2009.

### Target group

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

### Information about the fund

Managers	Janna Haahtela and Kenneth Blomqvist
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2025)	0.60
Volatility (2025)	17.4%
Fees	See p. 25
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Timo Eerola, CPA
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

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

### Fund risk profile

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

## Fund investment policy

The name and investment policy of the fund was changed on 16.8.2024. The previous name of the fund was Fondita European Small Cap.

The fund is an equity fund mainly investing its assets in the shares of small and medium-sized listed companies. Small and medium-sized companies are those with a market capitalisation of less than EUR 10 billion. The fund does not have an official benchmark. The investment fund does not invest its assets in other investment funds or ETFs. Active portfolio management is carried out to achieve the fund's investment objectives.

## Fondita Healthcare

### Theme of the fund

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

### Target group

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

## Information about the fund

Managers	Janna Haahtela and Marcus Björkstén
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 9
Rate of turnover (2025)	0.07
Volatility (2025)	14.2%
Fees	See p. 25
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svernas, CPA Timo Eerola, CPA
Deputy auditors	Ernst & Young Ab

## Investment objectives of the fund

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

### Fund risk profile

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

### Fund investment policy

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

## Fondita Nordic Micro Cap

### Theme of the fund

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

### Target group

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

### Information about the fund

Managers	Kenneth Blomqvist and Marcus Björkstén
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2025)	0.26
Volatility (2025)	15.9%
Fees	See p. 25
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Timo Eerola, CPA
Deputy auditors	Ernst & Young Ab

## Investment objectives of the fund

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

## Fund risk profile

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

## Fund investment policy

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

## Fondita Nordic Small Cap

### Theme of the fund

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

### Target group

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

## Information about the fund

Managers	Kenneth Blomqvist and Marcus Björkstén
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 8
Rate of turnover (2025)	0.46
Volatility (2025)	18.7%
Fees	See p. 25
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CPA Timo Eerola, CPA

### Investment objectives of the fund

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

### Fund risk profile

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

### Fund investment policy

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

## Fondita Sustainable World

### Theme of the fund

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

### Target group

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

### Information about the fund

Managers	Marcus Björkstén and Janna Haahtela
Rules apply as from	15.4.2026
Type of fund	UCITS
Base currency	Euro €
SFDR	Article 9
Rate of turnover (2025)	0.61

Volatility (2025)	19.1%
Fees	See p. 26
Depository institution	Skandinaviska Enskilda Banken Ab, Helsinki branch
Auditors	Anders Svennas, CGR Timo Eerola, CGR
Deputy auditors	Ernst & Young Ab

### Investment objectives of the fund

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

### Fund risk profile

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

### Fund investment policy

The name and investment policy of the fund was changed on 16.8.2024. The previous name of the fund was Fondita Sustainable Europe.

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

### Additional information about the funds

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

This prospectus and appendices of Fondita Fund Management Company Ltd. are not for release, publication nor distribution in or into the United States or any state, territory, or possession thereof, or any estate or trust which is subject to United States tax regulations. This material is not an offer to provide, or a solicitation of any offer to buy or sell, products or services in the United States of America.

## Price lists

Fund	Share class	Share class type	ISIN	Ongoing charges**	Registered for distribution	Transaction costs 2025	Risk indicator	Return 12 M (31.12.2025)	Minimum subscription
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	FI, SE, NO	0,00 %	4/7	4,76 %	-
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	FI, SE, NO	0,00 %	4/7	7,97 %	-
Fondita Global Small Cap	A*	distributing	FI0008814686	2,00 %	FI, SE, NO	0,58 %	4/7	4,29 %	-
Fondita Global Small Cap	B	accumulating	FI0008814694	2,00 %	FI, SE, NO	0,58 %	4/7	7,43 %	-
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	FI, SE, NO	0,10 %	4/7	6,39 %	-
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	FI, SE, NO	0,10 %	4/7	9,58 %	-
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	AT, FI, SE, NO, DE	0,20 %	4/7	-2,86 %	-
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	AT, FI, SE, NO, DE	0,20 %	4/7	-0,03 %	-
Fondita Global Megatrends	I	accumulating	FI4000411178	1,20 %	AT, DE	0,20 %	4/7	0,75 %	250 000
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	AT, FI, SE, NO, DE	0,00 %	4/7	-7,01 %	-
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	AT, FI, SE, NO, DE	0,00 %	4/7	-4,25 %	-
Fondita Healthcare	I	accumulating	FI4000411202	1,20 %	AT, DE	0,00 %	4/7	-3,48 %	250 000
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	AT, FI, SE, NO, DE	0,07 %	4/7	12,85 %	-
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	AT, FI, SE, NO, DE	0,07 %	4/7	16,17 %	-
Fondita Nordic Micro Cap	I	accumulating	FI4000411186	1,20 %	AT, DE	0,07 %	4/7	17,11 %	250 000
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	AT, FI, SE, NO, DE	0,19 %	5/7	-2,33 %	-
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	AT, FI, SE, NO, DE	0,19 %	5/7	0,60 %	-
Fondita Nordic Small Cap	I	accumulating	FI4000411160	1,20 %	AT, DE	0,19 %	5/7	1,41 %	250 000
Fondita Sustainable World	A*	distributing	FI4000024484	2,00 %	AT, FI, SE, NO, DE	0,05 %	5/7	0,34 %	-
Fondita Sustainable World	B	accumulating	FI4000024492	2,00 %	AT, FI, SE, NO, DE	0,05 %	5/7	3,36 %	-
Fondita Sustainable World	I	accumulating	FI4000411194	1,20 %	AT, DE	0,05 %	5/7	4,19 %	250 000

No subscription fee nor redemption fee is charged by the fund management company. A front-end load of maximum 5,00 % may be applied at the time of purchase through a financial intermediary.

\*The A-units pay annual return (dividend) which is decided by the AGM.

\*\* Custodian fee is included in the management fee. Total client relationship allows for changes in tariff rate.

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

Price list for  
customers in  
Finland

Fund	Share class	Share class type	ISIN	Ongoing charges ***	Transaction costs 2025	Risk indicator	Return 12 M (31.12.2025)
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	0,00 %	4/7	4,76 %
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	0,00 %	4/7	7,97 %
Fondita Global Small Cap	A*	distributing	FI0008814686	2,00 %	0,58 %	4/7	4,29 %
Fondita Global Small Cap	B	accumulating	FI0008814694	2,00 %	0,58 %	4/7	7,43 %
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	0,10 %	4/7	6,39 %
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	0,10 %	4/7	9,58 %
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	0,20 %	4/7	-2,86 %
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	0,20 %	4/7	-0,03 %
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	0,00 %	4/7	-7,01 %
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	0,00 %	4/7	-4,25 %
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	0,07 %	4/7	12,85 %
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	0,07 %	4/7	16,17 %
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	0,19 %	5/7	-2,33 %
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	0,19 %	5/7	0,60 %
Fondita Sustainable World	A*	distributing	FI4000024484	2,00 %	0,05 %	5/7	0,34 %
Fondita Sustainable World	B	accumulating	FI4000024492	2,00 %	0,05 %	5/7	3,36 %
Fondita Sustainable World	X**	accumulating	FI4000480363	1,00 %	0,05 %	5/7	4,40 %

No subscription fee nor redemption fee is charged. No minimum subscription.

\*The A-units pay annual return (dividend) which is decided by the AGM.

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

\*\*\* Custodian fee is included in the management fee. Total client relationship allow for changes in tariff rate.

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

## Price list for customers in Sweden

Fund	Share class	Share class type	ISIN	Ongoing charges **	Transaction costs 2025	Risk indicator	Return 12 M (31.12.2025)
Fondita European Micro Cap	A*	distributing	FI4000242847	2,00 %	0,00 %	4/7	4,76 %
Fondita European Micro Cap	B	accumulating	FI4000242854	2,00 %	0,00 %	4/7	7,97 %
Fondita Global Small Cap	A*	distributing	FI0008814686	2,00 %	0,58 %	4/7	4,29 %
Fondita Global Small Cap	B	accumulating	FI0008814694	2,00 %	0,58 %	4/7	7,43 %
Fondita Finland Micro Cap	A*	distributing	FI0008802848	2,00 %	0,10 %	4/7	6,39 %
Fondita Finland Micro Cap	B	accumulating	FI0008802855	2,00 %	0,10 %	4/7	9,58 %
Fondita Global Megatrends	A*	distributing	FI0008802889	2,00 %	0,20 %	4/7	-2,86 %
Fondita Global Megatrends	B	accumulating	FI0008802897	2,00 %	0,20 %	4/7	-0,03 %
Fondita Healthcare	A*	distributing	FI4000321088	2,00 %	0,00 %	4/7	-7,01 %
Fondita Healthcare	B	accumulating	FI4000321096	2,00 %	0,00 %	4/7	-4,25 %
Fondita Nordic Micro Cap	SEK R	accumulating	SE0000347843	1,65 %	0,07 %	4/7	9,74 %
Fondita Nordic Micro Cap	A*	distributing	FI0008810932	2,00 %	0,07%	4/7	12,85 %
Fondita Nordic Micro Cap	B	accumulating	FI0008810940	2,00 %	0,07 %	4/7	16,17 %
Fondita Nordic Small Cap	A*	distributing	FI0008802863	2,00 %	0,19 %	5/7	-2,33 %
Fondita Nordic Small Cap	B	accumulating	FI0008802871	2,00 %	0,19 %	5/7	0,60 %
Fondita Sustainable World	SEK R	accumulating	SE0000347843	1,50 %	0,05 %	4/7	-2,22 %
Fondita Sustainable World	A*	distributing	FI4000024484	2,00 %	0,05 %	5/7	0,34 %
Fondita Sustainable World	B	accumulating	FI4000024492	2,00 %	0,05 %	5/7	3,36 %

No subscription fee nor redemption fee is charged. No minimum subscription.

\*The A-units pay annual return (dividend) which is decided by the AGM.

\*\* Custodian fee is included in the management fee. Total client relationship allow for changes in tariff rate.

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

# Appendix 1. Additional Information for Investors in Germany

## Right to Distribution in Germany

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

## Available Classes of Shares

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

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

\*Total client relationship allows for changes in tariff rate

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

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

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

## Facility in Germany

In accordance with Directive (EU) 2019/1160 of the European Parliament and of the Council of 20 June 2019 amending Directive 2009/65/EC and 2011/61/EU, Fondita Fund Management Company has appointed FE fundinfo with registered address 6 Boulevard des Lumières, Belvaux, 4369, Luxembourg to provide the facilities to perform the tasks detailed in Article 92(1). For the contact details of the entity who can process subscriptions, repurchase and redemption orders and make other payments to unit-holders relating to the units of the UCITS in the above mentioned country, contact FE fundinfo at the following email address: [fa\\_gfr@fefundinfo.com](mailto:fa_gfr@fefundinfo.com)

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

## Publications

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

In the cases listed in section § 298 sub-section 2 German Investment Code (KAGB) investors will also be informed by means of a "durable medium" within the meaning of section 167 KAGB. In addition,

information may also be published in any other media which the Fund Management Company deems appropriate.

## Appendix 2. Additional Information for Investors in Austria

### Right to Distribution in Austria

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

### Available Classes of Shares

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

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

\*Total client relationship allows for changes in tariff rate

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

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

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

### Facility in Austria

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

**Erste Bank der Oesterreichischen Sparkassen AG**

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

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

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

### Publications

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

### Taxation

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

## Appendix 3. Additional Information for Investors in Sweden

### Right to Distribution in Sweden

The Fund Management Company has notified Finansinspektionen (FI) of its intention to distribute Fund units in Fondita Investment Funds in Sweden and may do so since completion of the notification process.

### Available Classes of Shares

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

Class of Shares Type	A - retail EUR Distributing	B - retail EUR Accumulating	SEK R (SEK)** Accumulating
Minimum Initial Subscription Amount	-	-	-
Minimum subsequent investment	-	-	-
Ongoing charges	2,00 % p.a.*	2,00 % p.a.*	1,50-1,65 % p.a.*

\*Total client relationship allows for changes in tariff rate

\*\*The following funds are available: Fondita Nordic Micro Cap and Fondita Sustainable World. The cost for Fondita Nordic Micro Cap is 1,65 % and for Fondita Sustainable World 1,50 %.

### Facility in Sweden

Facility in Sweden has been assumed by:

Fondbolaget Fondita Ab  
Alexandersgatan 48 A  
00100 Helsingfors  
E-mail: [info@fondita.fi](mailto:info@fondita.fi)

Redemption requests for Units can be submitted to the facility (the Fund Management Company). Investors resident in Sweden shall have access to the same information and documentation made available to investors in Finland. The prospectus, key investor information, articles of association, and annual and semi-annual reports shall be available free of charge in hard copy from the facility. Issue, redemption, and conversion prices shall also be available free of charge from the facility.

### Publications

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

In addition, information may also be published in any other media which the Fund Management Company deems appropriate.

## Appendix 4. Additional Information for Investors in Norway

### Right to Distribution in Norway

The Fund Management Company has notified Finanstilsynet of its intention to distribute Fund units in Fondita Investment Funds in Norway and may do so since completion of the notification process.

### Available Classes of Shares

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

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

\*Total client relationship allows for changes in tariff rate

### Facility in Norway

Facility in Norway has been assumed by:

Fondbolaget Fondita Ab  
Alexandersgatan 48 A  
00100 Helsingfors  
E-mail: info@fondita.fi

Redemption requests for Units can be submitted to the facility (the Fund Management Company). Investors resident in Norway shall have access to the same information and documentation made available to investors in Finland. The prospectus, key investor information, articles of association, and annual and semi-annual reports shall be available free of charge in hard copy from the facility. Issue, redemption, and conversion prices shall also be available free of charge from the facility.

### Publications

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

In addition, information may also be published in any other media which the Fund Management Company deems appropriate.

## Rules for Fondita Investment Funds

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

### FONDITA FUND SPECIFIC RULES

#### FONDITA EUROPEAN MICRO CAP INVESTMENT FUND

##### 1§ NAME OF THE FUND

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Fund must have the liquid assets required for operation.

#### FONDITA FINLAND MICRO CAP INVESTMENT FUND

##### 1§ NAME OF THE FUND

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

Sijoitusrahasto and in Swedish Fondita Finland Micro Cap Placeringsfond.

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

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

The Fund invests its assets in companies that operate responsibly.

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

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

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

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

## 6§ INVESTMENT OF THE ASSETS OF THE FUND

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

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

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

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

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

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

The Fund must have the liquid assets required for operation.

## FONDITA GLOBAL MEGATRENDS INVESTMENT FUND

### 1§ NAME OF THE FUND

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

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

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

resulting in the spreading of investment activity risks. The means of the Fund are primarily invested in securities of such companies that through their activities promote the growing demands of environmental protection and the changing population structure, as well as the growth prospects of the technology sector.

The Fund invests its assets in companies that operate responsibly.

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

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

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

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

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

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

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

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

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

The Fund Company may invest assets of the Fund in the same incorporated company up to a

maximum of one tenth of the issued share capital and one tenth of the total share votes.

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

The Fund must have the liquid assets required for operation.

### **FONDITA GLOBAL SMALL CAP INVESTMENT FUND**

#### 1§ NAME OF THE FUND

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

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

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

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

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

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

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

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

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

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

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

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

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

The Fund must have the liquid assets required for operation.

#### FONDITA HEALTHCARE INVESTMENT FUND

##### 1§ NAME OF THE FUND

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

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

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

The Fund invests its assets in companies that operate responsibly.

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

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

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

In decision-making we use both exclusionary and favourable methods. Details of the Fund's investment activities are available in the fund

prospectus that is in force at that particular point of time.

## 6§ INVESTMENT OF THE ASSETS OF THE FUND

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

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

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

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

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

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

The Fund must have the liquid assets required for operation.

## FONDITA NORDIC MICRO CAP INVESTMENT FUND

### 1§ NAME OF THE FUND

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

Sijoitusrahasto and in Swedish Fondita Nordic Micro Cap Placeringsfond.

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

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

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

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

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

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

## 6§ INVESTMENT OF THE ASSETS OF THE FUND

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

1) stocks and other share-related securities which are publicly traded on security exchanges or traded on other regulated, regularly operating,

certified markets in the Nordic countries open to the public.

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

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

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

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

The Fund must have the liquid assets required for operation.

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

### **1§ NAME OF THE FUND**

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

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

The objective of the Fund's investment activities is to attain the most favourable increase in value possible in the long run through diversifying of the assets in compliance with the law concerning investment funds and with the rules of the Fund.

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

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

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

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

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

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

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

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

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

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

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

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

The Fund must have the liquid assets required for operation.

## **FONDITA SUSTAINABLE WORLD INVESTMENT FUND**

### **1§ NAME OF THE FUND**

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

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

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

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

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

In decision-making we use both exclusionary and favourable methods.

Fondita Sustainable World invests at least 90% of its funds in sustainable investments referred to in Article 2(17) of the SFDR. In addition, at least 90% of the fund's investments meet environmental or social characteristic or sustainable investment objectives in accordance with the binding elements of the investment strategy, which are to be disclosed in Annexes II and III of CDR (EU) 2022/1288. The fund excludes investments in companies referred to in Article 12(1)(a) to (g) of CDR (EU) 2020/1818.

Details of the Fund's investment activities are available in the fund prospectus that is in force at that particular point of time.

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

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

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

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

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

The Fund must have the liquid assets required for operation.

## COMMON RULES FOR ALL FONDITA FUNDS

### 2§ FUND COMPANY

Investment activities and administration of the fund are managed by Fondita Fund Management Ltd (hereinafter referred to as the Fund Company). The Fund Company shall represent the Fund, shall act on its behalf in relevant matters and shall exercise the rights accorded to the assets in the Fund.

### 3§ THE USE OF REPRESENTATIVES

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

### 4§ CUSTODIAN

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

### 7§ FUND UNITS AND REGISTER

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

A fund unit-holder may request the Fund Company to send an investment certificate to a designated person. The investment certificate may cover several fund units or fractions thereof. The Fund Company may charge a separate service

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

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

### 8§ SUBSCRIPTION AND REDEMPTION OF FUND UNITS

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

calculated for the Valuation Day. The fund unit value is published on the banking day following the Valuation Day.

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

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

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

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

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

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

reasons, grant the right to transcend the abovementioned period.

The Fund Company may, when in the best interests of the unit-holders, activate liquidity management tools.

To ensure the Fund's liquidity, the Fund Company may, in order to safeguard the interests of all investors, extend the notification period for redemptions. Where such an extension of the notification period is applied, the Fund Company shall receive redemption requests for execution on the fifth (5th) banking day calculated from the date on which the redemption order was received by the Fund Company. By extending the notification period, the Fund Company can better ensure liquidity in connection with the payment of redemptions. Redemption orders submitted before the introduction of the extended notification period shall be processed under the ordinary redemption timelines.

Irrespective of the measures described above, or as a complementary measure, the Fund Company may, where required and in the best interests of unit-holders, decide to limit the redemptions that may be executed if the redemption orders received on a given day exceed 10 percent of the Fund's value. If the aggregate amount of redemption orders exceeds 10 percent of the Fund's value, the Fund Company may defer the portion of each redemption order exceeding this limit on a pro-rata basis to the next redemption date, or if necessary, to several subsequent redemption dates. The deferred redemptions are executed up to the 10-percent threshold on the next redemption date pro-rata among the unit-holders who submitted redemption requests. On that date, the deferred redemptions are processed first, followed by any other redemptions as provided in the Fund rules. The Fund Company may decide to apply a redemption gate even after redemption orders have been submitted.

The Fund Company may temporarily suspend orders in exceptional circumstances or other extraordinary situations where the interests of unit-holders require so (for example, when

reliable market information from the Fund's main trading venues or a significant portion of them is not available, or in other situations arising under law). Exceptional circumstances include, among other things, unforeseen events or changes in the operating environment or regulatory environment that materially affect the Fund's ability to carry out its normal business operations. If the Fund Company decides to temporarily suspend the redemptions of units, subscriptions of units must also be suspended simultaneously. The Fund Company shall notify the Financial Supervisory Authority without delay of any suspension of orders.

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

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

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

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

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

If an external distributor is responsible for the distribution of fund units, a commission may be charged on subscription. The maximum commission is

five (5) per cent of the subscription amount.

The above commissions are maximum commissions.

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

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

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

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

due to bank holidays or other public holidays abroad. Such public holidays may include religious holidays, National Days or other national

holidays. The above may be the case at least when a minimum of half of the weight of the Fund's investment vehicles are not quoted or they cannot be, in

the Fund Management Company's view, valued in an acceptable way in view of the equality of unitholders. Information on the days when the

Fund's value is not calculated is available from the Fund Management Company.

Information about the fund unit value is also available from the Fund Company.

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

If an above-mentioned price is not available for the Valuation Day, the value is determined in accordance with the objective principles of the Fund Company. The interest of the accounts receivable affects the value of the Fund and is considered in accordance with the bank statement. The value of holdings in the Fund in currency amount is converted into euros

according to the exchange rate published by the European Central Bank on the Valuation Day. Units in the Fund may be issued in currencies other than euro. If units in the Fund have been issued in currencies other than euro, the net asset value of the fund units denominated in foreign currencies will be calculated at the same exchange rates as the Fund's net asset value.

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

#### 11§ ALLOCATION OF RETURN

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

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

#### 12§ PAYMENT TO THE FUND COMPANY

In remuneration for its activities, the Fund Company will receive a management fee amounting to a maximum of two (2) percent per annum of the value of the fund. The sum of the fee shall be calculated daily (per annum percentage fee /365) on the fund value on the previous calculation date and shall be paid to the Fund Company monthly in arrears. The daily fund unit value reflects the deducted management fee. The board of the Fund Company shall confirm the exact management fee. Custodian fee is included in the management fee.

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

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

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

#### 14§ MEETING OF FUND UNIT-HOLDERS

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

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

In order to attend the Ordinary General Meeting, the fund unit-holder must sign up to do so with the Fund Company at the latest on the date specified on the notice. A fund unit-holder is not

allowed to exercise the right which at the meeting belongs to the unit holder before his fund units have been registered or he has given an account of his title to the Fund Company and presented a report thereof. The right to participate in the meeting of fund unit-holders and the number of votes at the meeting will be determined on the basis of the situation prevailing ten days prior to the meeting.

#### 15§ FUND PROSPECTUS

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

#### 16§ AMENDING THE FUND'S BYLAWS

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

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

#### 17§ SUPPLYING INFORMATION

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

#### 18§ REMUNERATION

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

(This is an unofficial translation of the original text in Finnish.)

SFDR Appendix



EUROPEAN  
COMMISSION

Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

## ANNEX

*to the*

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

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

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

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

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

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

## 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 <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>
---	---



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

The investments in the financial product has as it's main environmental characteristics to promote is climate change mitigation and as a social characteristic to promote equality including safeguarding fundamental human rights. Promoting environmental and social characteristics involves considering environmental, social, and governance (ESG) factors alongside traditional financial metrics. This approach aims to generate long-term financial returns while contributing to positive environmental and social outcomes.

The goal of promoting climate change mitigation is important to Fondita since we have signed the Net Zero Asset Manager Initiative at the company level with the interim target to reduce absolute emissions by 60% by 2030. We are well on track to reach the goals, which are reported in our financial products' quarterly report and in our Annual Review of Responsible Investments. The next step is to set net zero targets together with the initiative, by 2030 at the latest, on how we intend to take the next step to reach net zero by 2050 at the latest.

The goal of promoting diversity and/or equality policy is important to Fondita since we want to hold companies accountable to ensure these values are implemented in the company, as we are signatories of the UN Global Compact.

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

The environmental and social characteristics promoted by the financial product are measured with several sustainability indicators: a) ESG assessment with focus on climate change mitigation and equality and diversity initiatives of the companies through third party databases (MSCI and Bloomberg) combined with an inhouse ESG assessment b) SDG alignment towards SDG13 Climate Change and SDG5 Gender equality (alignment reported in financial products quarterly ESG reports available on the webpage) c) Assessment of PAI indicators with special attention towards the indicators relevant to promote the environmental and social characteristics of the financial product.

● ***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 financial product promotes environmental and social characteristics. The financial product has a minimum share of 40% sustainable investments, out of the investments which promote environmental and social characteristics. Fondita considers sustainable investments in the financial product is an economic activity that contribute to an environmental objective, in this financial product a carbon reduction target, and/or social objective, in this financial product a diversity and/or equality policy. Furthermore, such investments may not cause significant harm to any other environmental or social objectives and the companies are to follow good governance practices.

The financial products environmental objective for sustainable investments is climate change mitigation. The sustainable investments contribute to the objective by investing in companies which have a plan or target to reduce CO2 emissions. The minimum threshold is at least 40% of the financial products holdings are to have an plan or target to reduce CO2 emissions.

The financial products social objective for sustainable investments is to promote equality and diversity including safeguarding fundamental human rights. The sustainable investments contribute to the objective by investing in companies which have a equality and/or diversity policy implemented. The minimum threshold is at least 40% of the financial products holdings are to have an equality and/or diversity policy.

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

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed. More information about the exclusion list on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

The Portfolio Manager and Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The financial product considers all 14 mandatory and two voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, the relevant are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

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

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



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

- x Yes, this financial product considers principal adverse impact on sustainability factors in the investment process. We use MSCI to screen for the relevant PAI indicators presented below and compliment potential missing coverage in the external database by manual requests of data from the holdings, if the data is possible to retrieve. The financial product pays special attention to data points related to the environmental and social characteristics promoted by the financial product, climate change mitigation (PAI 1, PAI 2, PAI 3, PAI 4, PAI 5, PAI 15) and equality and diversity (PAI 10, PAI 11, PAI 12, PAI 13, PAI 16). In case anomalies are identified in the PAI indicators in our assessments, the Portfolio Manager and the Head of ESG takes it into account in the company level assessment and the the investment decision.

The following mandatory PAI indicators are considered and tracked.

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

The following voluntary PAI indicators are considered and tracked.

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

**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.

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



All presented PAI indicators are monitored throughout the investment period. The PAI-reports are published in the Fondita's annual reports per financial product and on Fondita's webpage <https://fondita.fi/en/reports-and-documents/>.

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

Fondita European Micro Cap is an actively managed mutual fund with a concentrated portfolio of approximately 35-40 holdings. The fund invests, with a 3-5 year time horizon or longer, in the smallest European listed micro cap companies. The investment philosophy is stock picking with a focus on quality growth companies. More information about the investment strategy on the financial product can be found in the KID and relevant documentation on the webpage <https://fondita.fi/en/reports-and-documents/>.

- ***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 investment strategy used to select the investments to attain each of the environmental and social characteristic is the result of the ESG assessment of the company with a focus on climate change mitigation and equality and diversity, the alignment towards SDG13 Climate Change and SDG5 Gender equality and assessment of the PAI indicators with special attention to the indicators relevant to promoting the environmental and social characteristics of the financial product.

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

The scope of investments is reduced by our screening criteria in our exclusion list and the good governance practices test prior to the application of the investment strategy. Companies which have breached any of the criteria is not a viable investment target of the investment strategy.

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

All companies are to follow good governance practices according to MSCI 'good governance test'. MSCI's test considers strong governance practices and structures, and a rating of the company above BB in MSCI. We do our best to cover the holdings outside MSCI's coverage on a best effort basis by reaching out to them and manually requesting relevant datapoints.

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



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

The investments asset allocation (excluding cash management, as cash is not considered as investments) is 80% towards #1 Aligned with E/S characteristics and 20% towards #2 Other. Out of the allocation towards #1 Aligned with E/S characteristics, #1B 60% is to promote other E/S characteristics according to previously mentioned indicators. The other #1A 40% is towards a minimum proportion of sustainable investments, which

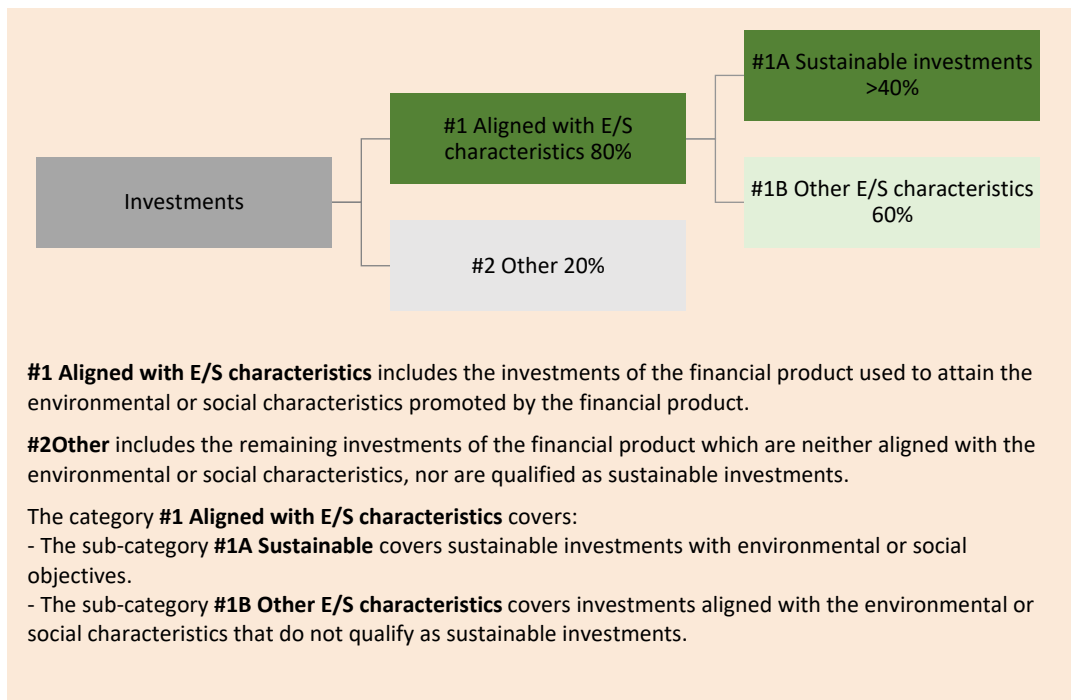
**Asset allocation** describes the share of investments in specific assets.

To comply with the EU Taxonomy, the criteria for **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.

requires at least 40% of the holdings to have a carbon reduction target and 40% of the holdings to have an equality and/or diversity policy implemented.



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

No derivatives are used in the portfolio management of the financial product.



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

Although the financial product aims to have a minimum proportion of 40% towards sustainable investments it does not have an environmental objective aligned with the EU Taxonomy.

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

- Yes:
  - In fossil gas  In nuclear energy
- No

The financial product does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

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

The financial product does not have a minimum share of investments in transitional or enabling activities.



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%. The financial product requires at least 40% of the holdings to have a carbon reduction target.



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

The minimum share of sustainable investments with a social objective is 40%. The financial product requires at least 40% of the holdings to have an equality and/or diversity policy.



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

The financial product’s purpose for investment under “#2 Other” is to include investments that do not promote environmental or social characteristics according to the financial product’s sustainability indicators and do not contribute to the minimum proportion of sustainable investments. The minimum environmental and social safeguards for the allocation towards “#2 Other” are the screening criteria according to Fondita’s previously mentioned exclusion list, which is applied to all holdings of the financial product. The exclusion list includes certain controversial sectors as well as breaches of specific international norms. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.



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



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

The financial product does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

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

<https://fondita.fi/en/fund/european-micro-cap/>



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



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

**ANNEX**

*to the*

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

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

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

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

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

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

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

The investments in the financial product has as it's main environmental characteristics to promote is climate change mitigation and as a social characteristic to promote equality including safeguarding fundamental human rights. Promoting environmental and social characteristics involves considering environmental, social, and governance (ESG) factors alongside traditional financial metrics. This approach aims to generate long-term financial returns while contributing to positive environmental and social outcomes.

The goal of promoting climate change mitigation is important to Fondita since we have signed the Net Zero Asset Manager Initiative at the company level with the interim target to reduce absolute emissions by 60% by 2030. We are well on track to reach the goals, which are reported in our financial products' quarterly report and in our Annual Review of Responsible Investments. The next step is to set net zero targets together with the initiative, by 2030 at the latest, on how we intend to take the next step to reach net zero by 2050 at the latest.

The goal of promoting diversity and/or equality policy is important to Fondita since we want to hold companies accountable to ensure these values are implemented in the company, as we are signatories of the UN Global Compact.

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

The environmental and social characteristics promoted by the financial product are measured with several sustainability indicators: a) ESG assessment with focus on climate change mitigation and equality and diversity initiatives of the companies through third party databases (MSCI and Bloomberg) combined with an inhouse ESG assessment b) SDG alignment towards SDG13 Climate Change and SDG5 Gender equality (alignment reported in financial products quarterly ESG reports available on the webpage) c) Assessment of PAI indicators with special attention towards the indicators relevant to promote the environmental and social characteristics of the financial product.

● ***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 financial product promotes environmental and social characteristics. The financial product has a minimum share of 40% sustainable investments, out of the investments which promote environmental and social characteristics. Fondita considers sustainable investments in the financial product is an economic activity that contribute to an environmental objective, in this financial product a carbon reduction target, and/or social objective, in this financial product a diversity and/or equality policy. Furthermore, such investments may not cause significant harm to any other environmental or social objectives and the companies are to follow good governance practices.

The financial products environmental objective for sustainable investments is climate change mitigation. The sustainable investments contribute to the objective by investing in companies which have a plan or target to reduce CO2 emissions. The minimum threshold is at least 40% of the financial products holdings are to have an plan or target to reduce CO2 emissions.

The financial products social objective for sustainable investments is to promote equality and diversity including safeguarding fundamental human rights. The sustainable investments contribute to the objective by investing in companies which have a equality and/or diversity policy implemented. The minimum threshold is at least 40% of the financial products holdings are to have an equality and/or diversity policy.

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

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed. More information about the exclusion list on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

The Portfolio Manager and Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The financial product considers all 14 mandatory and two voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, the relevant are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

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

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



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

- x Yes, this financial product considers principal adverse impact on sustainability factors in the investment process. We use MSCI to screen for the relevant PAI indicators presented below and compliment potential missing coverage in the external database by manual requests of data from the holdings, if the data is possible to retrieve. The financial product pays special attention to data points related to the environmental and social characteristics promoted by the financial product, climate change mitigation (PAI 1, PAI 2, PAI 3, PAI 4, PAI 5, PAI 15) and equality and diversity (PAI 10, PAI 11, PAI 12, PAI 13, PAI 16). In case anomalies are identified in the PAI indicators in our assessments, the Portfolio Manager and the Head of ESG takes it into account in the company level assessment and the the investment decision.

The following mandatory PAI indicators are considered and tracked.

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

The following voluntary PAI indicators are considered and tracked.

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

**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.

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



All presented PAI indicators are monitored throughout the investment period. The PAI-reports are published in the Fondita's annual reports per financial product and on Fondita's webpage <https://fondita.fi/en/reports-and-documents/>.

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

Fondita Finland Micro Cap is an equity fund that invests in smaller Finnish-listed companies with a market capitalisation of less than EUR 800 million. The investment philosophy is stock picking with a focus on quality growth companies. More information about the investment strategy on the financial product can be found in the KID and relevant documentation on the webpage <https://fondita.fi/en/reports-and-documents/>.

- ***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 investment strategy used to select the investments to attain each of the environmental and social characteristic is the result of the ESG assessment of the company with a focus on climate change mitigation and equality and diversity, the alignment towards SDG13 Climate Change and SDG5 Gender equality and assessment of the PAI indicators with special attention to the indicators relevant to promoting the environmental and social characteristics of the financial product.

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

The scope of investments is reduced by our screening criteria in our exclusion list and the good governance practices test prior to the application of the investment strategy. Companies which have breached any of the criteria is not a viable investment target of the investment strategy.

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

All companies are to follow good governance practices according to MSCI 'good governance test'. MSCIs test considers strong governance practices and structures, and a rating of the company above BB in MSCI. We do our best to cover the holdings outside MSCIs coverage on a best effort basis by reaching out to them and manually requesting relevant datapoints.

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

The investments asset allocation (excluding cash management, as cash is not considered as investments) is 80% towards #1 Aligned with E/S characteristics and 20% towards #2 Other. Out of the allocation towards 1# Aligned with E/S characteristics, #1B 60% is to promote other E/S characteristics according to previously mentioned indicators. The other #1A 40% is towards a minimum proportion of sustainable investments, which

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



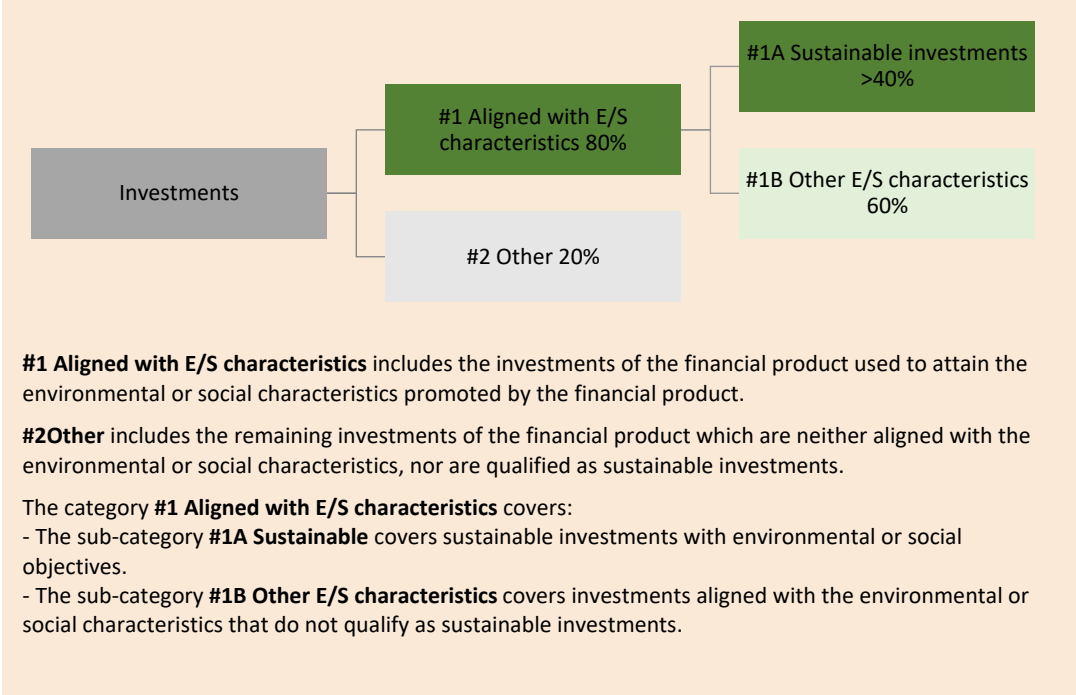
**Asset allocation** describes the share of investments in specific assets.

To comply with the EU Taxonomy, the criteria for **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.

requires at least 40% of the holdings to have a carbon reduction target and 40% of the holdings to have an equality and/or diversity policy implemented.



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

No derivatives are used in the portfolio management of the financial product.



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

Although the financial product aims to have a minimum proportion of 40% towards sustainable investments it does not have an environmental objective aligned with the EU Taxonomy.

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

- Yes:
  - In fossil gas
  - In nuclear energy
- No

The financial product does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

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

The financial product does not have a minimum share of investments in transitional or enabling activities.



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%. The financial product requires at least 40% of the holdings to have a carbon reduction target.



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

The minimum share of sustainable investments with a social objective is 40%. The financial product requires at least 40% of the holdings to have an equality and/or diversity policy.



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

The financial product’s purpose for investment under “#2 Other” is to include investments that do not promote environmental or social characteristics according to the financial product’s sustainability indicators and do not contribute to the minimum proportion of sustainable investments. The minimum environmental and social safeguards for the allocation towards “#2 Other” are the screening criteria according to Fondita’s previously mentioned exclusion list, which is applied to all holdings of the financial product. The exclusion list includes certain controversial sectors as well as breaches of specific international norms. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.

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.



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



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

The financial product does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

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

<https://fondita.fi/en/fund/finland-micro-cap/>



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



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

**ANNEX**

*to the*

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

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

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

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

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

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

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

The investments in this financial product has as it's main environmental characteristic to promote climate change mitigation and as a social characteristic to promote equality including safeguarding fundamental human rights. Promoting environmental and social characteristics involves considering environmental, social, and governance (ESG) factors alongside traditional financial metrics. This approach aims to generate long-term financial returns while contributing to positive environmental and social outcomes.

The goal of promoting climate change mitigation is important to Fondita since we have signed the Net Zero Asset Manager Initiative at company level with the interim target to reduce our managed funds absolute emissions by 60% by 2030. We are well on track to reach this goal, which is reported in our financial products' quarterly report and in our Annual Review of Responsible Investments. The next step is to set net zero targets in collaboration with the initiative, by 2030 at the latest, on how we intend to achieve net zero by 2050 at the latest.

The goal of promoting diversity and/or equality policies is important to Fondita because we want to hold companies accountable for implementing these values. As signatories of the UN Global Compact, we are committed to ensuring these principles are upheld within companies.

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

The environmental and social characteristics promoted by the financial product are measured using several sustainability indicators: a) ESG assessment with focus on climate change mitigation and equality and diversity initiatives of the companies, utilizing third party databases (MSCI and Bloomberg) combined with a manual inhouse ESG assessment, b) SDG alignment towards SDG13 Climate Action and SDG5 Gender equality (with alignment reported in financial product's quarterly ESG reports available on the webpage) and c) Assessment of PAI indicators, with special attention towards the indicators relevant for promoting the environmental and social characteristics of the financial product.

● ***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 financial product promotes environmental and social characteristics. It has a minimum share of 40% sustainable investments, out of the investments that promote these characteristics. Fondita considers sustainable investments in the financial product as economic activities that contribute to an environmental objective, which in this financial product is a carbon reduction target, and/or a social objective, which in this financial product is a set diversity and/or equality policy. Furthermore, such investments may not cause significant harm to any other environmental or social objectives, and the companies must follow good governance practices.

The financial product's environmental objective for sustainable investments is climate change mitigation. The sustainable investments contribute to this objective by investing in companies that have a plan or target to reduce CO2 emissions. The minimum threshold is that at least 40 % of the financial product's holdings must have a plan or target to reduce CO2 emissions.

The financial product's social objective for sustainable investments is to promote equality and diversity, including safeguarding fundamental human rights. The sustainable investments contribute to this objective by investing in companies that have an equality and/or diversity policy implemented. The minimum threshold is that at least 40% of the financial product's holdings are to have an equality and/or diversity policy.

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

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

All companies are screened before investing and monthly during the holding period against Fondita's exclusion list. The companies cannot operate within the excluded sectors and can not have violations towards the following international norms a) UN Global Compact, b) OECD Guidelines for Multinational Enterprises and c) EU Taxonomy "Do no significant harm". If a company is found in violation of our exclusion criteria, an escalation process is conducted, and if the violation is verified with the company, the holding is removed. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

The Portfolio Manager and Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them throughout the lifetime of the investment. The financial product considers all 14 mandatory and 2 voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, they are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

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

All companies are screened before investing and monthly during the holding period against Fondita's exclusion list. The companies can not operate within the excluded sectors and must not have violations towards the following international norms a) UN Global Compact b) OECD guidelines for Multinational Enterprises c) EU Taxonomy "Do no significant harm". If a company is found in violation of our exclusion criteria, an escalation process is conducted, and if the violation is verified with the company, the holding is removed.

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

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

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



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

- x Yes, this financial product considers principal adverse impacts on sustainability factors in the investment process. We use MSCI to screen for the relevant PAI indicators listed below and complement any potential missing coverage in the external database by manually requesting data from the holdings, if the data is available. The financial product pays special attention to data points related to the environmental and social characteristics it promotes, specifically climate change mitigation (PAI 1, PAI 2, PAI 3, PAI 4, PAI 5, PAI 15) and equality and diversity (PAI 10, PAI 11, PAI 12, PAI 13, PAI 16). If anomalies are identified in the PAI indicators during our assessments, the Portfolio Manager and the Head of ESG take them into account in the company level assessment and the investment decision.

The following mandatory PAI indicators are considered and tracked.

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

The following voluntary PAI indicators are considered and tracked.

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

**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.

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



All presented PAI indicators are monitored throughout the investment period. The PAI-reports are published in the Fondita's annual reports per financial product and on Fondita's webpage <https://fondita.fi/en/reports-and-documents/>.

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

Fondita Global Megatrends is an actively managed thematic global equity fund that invests in companies that are well positioned for expected significant structural changes in society, so-called megatrends. Examples of these megatrends include an increased demand for climate- and environmentally smart solutions, demographic changes that primarily benefit companies in health and well-being, the continuous digitalization and technological development, and an increased need for investments in defense and security. More information about the investment strategy of the financial product can be found in the KID and relevant documentation on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

- ***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 investment strategy used to select investments to attain each of the environmental and social characteristic are the results of the ESG assessment of the company, with a focus on climate change mitigation and equality and diversity. This includes alignment with SDG13 Climate Action and SDG5 Gender Equality, and the assessment of the PAI indicators, with special attention to the indicators relevant for promoting the environmental and social characteristics of the financial product.

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

The scope of investments is reduced by our screening criteria in our exclusion list and the good governance practices test, which are applied prior to the investment strategy. Companies that have breached any of the criteria are not viable investment targets for the investment strategy.

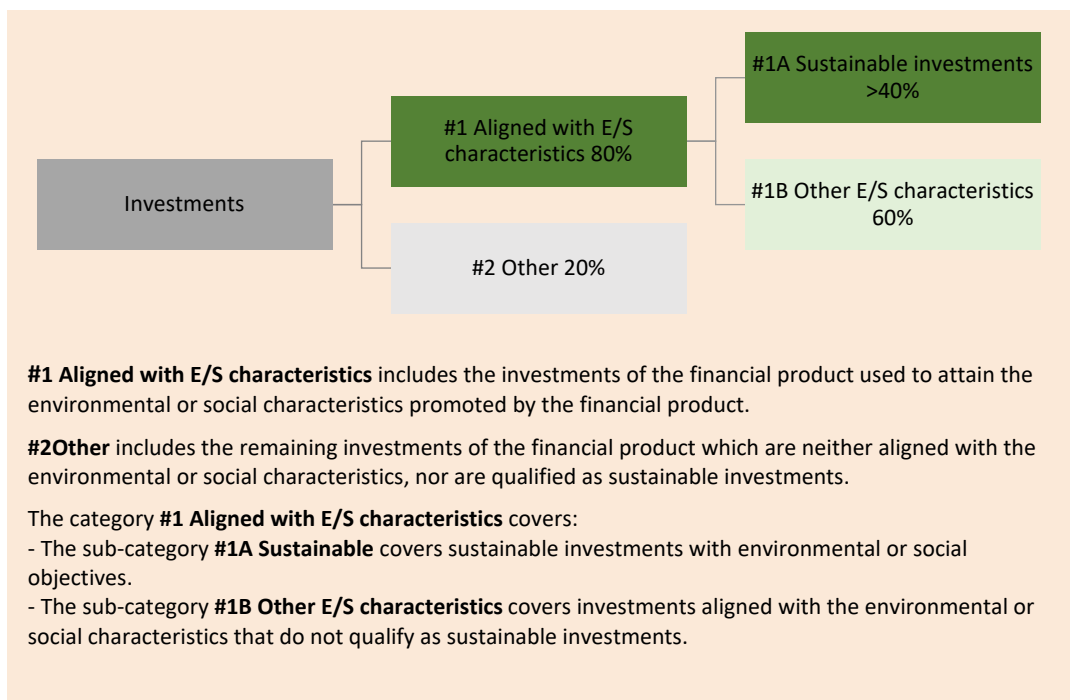
- ***What is the policy to assess good governance practices of the investee companies?***

All companies are to follow good governance practices according to MSCI 'good governance test'. MSCIs test considers strong governance practices and structures, and a rating of the company above BB in MSCI. We do our best to cover the holdings outside MSCIs coverage on a best effort basis by reaching out to them and manually requesting relevant datapoints.



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

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



The investments asset allocation (excluding cash management, as cash is not considered an investment) is 80% towards #1 Aligned with E/S characteristics and 20% towards #2 Other. Out of the allocation towards 1# Aligned with E/S characteristics, 60 % #1B is to promote other E/S characteristics according to the previously mentioned indicators. The remaining other 40 % #1A is allocated to a minimum proportion of sustainable investments, which requires at least 40 % of the holdings to have a carbon reduction target and 40 % of the holdings to have an equality and/or diversity policy implemented.

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

No derivatives are used in the portfolio management of the financial product.



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

Although the financial product aims to have a minimum proportion of 40% towards sustainable investments, it does not have an environmental objective aligned with the EU Taxonomy.

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

Yes:

In fossil gas

In nuclear energy



No

To comply with the EU Taxonomy, the criteria for **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.

The financial product does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. These sectors are excluded from the investment process according to Fondita’s responsible investment policy and exclusion list.

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

The financial product does not have a minimum share of investments in transitional or enabling activities.



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%. The financial product requires at least 40% of the holdings to have a carbon reduction target.




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

The minimum share of sustainable investments with a social objective is 40%. The financial product requires at least 40% of the holdings to have an equality and/or diversity policy.



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

The financial product’s purpose for investment under “#2 Other” is to include investments that do not promote environmental or social characteristics according to the financial product’s sustainability indicators and do not contribute to the minimum proportion of sustainable investments. The minimum environmental and social safeguards for the allocation towards “#2 Other” are the screening criteria according to Fondita’s previously mentioned exclusion list, which is applied to all holdings of the financial product. The exclusion list includes certain controversial sectors as well as breaches of specific international norms. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.

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



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

The financial product does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

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

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



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



EUROPEAN  
COMMISSION

Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

## ANNEX

*to the*

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

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

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

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

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

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

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

The investments in the financial product has as it's main environmental characteristics to promote is climate change mitigation and as a social characteristic to promote equality including safeguarding fundamental human rights. Promoting environmental and social characteristics involves considering environmental, social, and governance (ESG) factors alongside traditional financial metrics. This approach aims to generate long-term financial returns while contributing to positive environmental and social outcomes.

The goal of promoting climate change mitigation is important to Fondita since we have signed the Net Zero Asset Manager Initiative at the company level with the interim target to reduce absolute emissions by 60% by 2030. We are well on track to reach the goals, which are reported in our financial products' quarterly report and in our Annual Review of Responsible Investments. The next step is to set net zero targets together with the initiative, by 2030 at the latest, on how we intend to take the next step to reach net zero by 2050 at the latest.

The goal of promoting diversity and/or equality policy is important to Fondita since we want to hold companies accountable to ensure these values are implemented in the company, as we are signatories of the UN Global Compact.

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

The environmental and social characteristics promoted by the financial product are measured with several sustainability indicators: a) ESG assessment with focus on climate change mitigation and equality and diversity initiatives of the companies through third party databases (MSCI and Bloomberg) combined with an inhouse ESG assessment b) SDG alignment towards SDG13 Climate Change and SDG5 Gender equality (alignment reported in financial products quarterly ESG reports available on the webpage) c) Assessment of PAI indicators with special attention towards the indicators relevant to promote the environmental and social characteristics of the financial product.

● ***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 financial product promotes environmental and social characteristics. The financial product has a minimum share of 40% sustainable investments, out of the investments which promote environmental and social characteristics. Fondita considers sustainable investments in the financial product is an economic activity that contribute to an environmental objective, in this financial product a carbon reduction target, and/or social objective, in this financial product a diversity and/or equality policy. Furthermore, such investments may not cause significant harm to any other environmental or social objectives and the companies are to follow good governance practices.

The financial products environmental objective for sustainable investments is climate change mitigation. The sustainable investments contribute to the objective by investing in companies which have a plan or target to reduce CO2 emissions. The minimum threshold is at least 40% of the financial products holdings are to have an plan or target to reduce CO2 emissions.

The financial products social objective for sustainable investments is to promote equality and diversity including safeguarding fundamental human rights. The sustainable investments contribute to the objective by investing in companies which have a equality and/or diversity policy implemented. The minimum threshold is at least 40% of the financial products holdings are to have an equality and/or diversity policy.

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

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed. More information about the exclusion list on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

The Portfolio Manager and Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The financial product considers all 14 mandatory and two voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, the relevant are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

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

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



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

- x Yes, this financial product considers principal adverse impact on sustainability factors in the investment process. We use MSCI to screen for the relevant PAI indicators presented below and compliment potential missing coverage in the external database by manual requests of data from the holdings, if the data is possible to retrieve. The financial product pays special attention to data points related to the environmental and social characteristics promoted by the financial product, climate change mitigation (PAI 1, PAI 2, PAI 3, PAI 4, PAI 5, PAI 15) and equality and diversity (PAI 10, PAI 11, PAI 12, PAI 13, PAI 16). In case anomalies are identified in the PAI indicators in our assessments, the Portfolio Manager and the Head of ESG takes it into account in the company level assessment and the the investment decision.

The following mandatory PAI indicators are considered and tracked.

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

The following voluntary PAI indicators are considered and tracked.

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

**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.

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



All presented PAI indicators are monitored throughout the investment period. The PAI-reports are published in the Fondita's annual reports per financial product and on Fondita's webpage <https://fondita.fi/en/reports-and-documents/>.

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

Fondita Global Small Cap is an actively managed mutual fund with a concentrated portfolio of approximately 35-40 holdings. The fund invests, with a 3-5 year time horizon or longer, in small and medium sized global listed companies. The investment philosophy is stock picking with a focus on quality growth companies. More information about the investment strategy on the financial product can be found in the KID and relevant documentation on the webpage <https://fondita.fi/en/reports-and-documents/>.

- ***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 investment strategy used to select the investments to attain each of the environmental and social characteristic is the result of the ESG assessment of the company with a focus on climate change mitigation and equality and diversity, the alignment towards SDG13 Climate Change and SDG5 Gender equality and assessment of the PAI indicators with special attention to the indicators relevant to promoting the environmental and social characteristics of the financial product.

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

The scope of investments is reduced by our screening criteria in our exclusion list and the good governance practices test prior to the application of the investment strategy. Companies which have breached any of the criteria is not a viable investment target of the investment strategy.

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

All companies are to follow good governance practices according to MSCI 'good governance test'. MSCIs test considers strong governance practices and structures, and a rating of the company above BB in MSCI. We do our best to cover the holdings outside MSCIs coverage on a best effort basis by reaching out to them and manually requesting relevant datapoints.

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



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

The investments asset allocation (excluding cash management, as cash is not considered as investments) is 80% towards #1 Aligned with E/S characteristics and 20% towards #2 Other. Out of the allocation towards 1# Aligned with E/S characteristics, #1B 60% is to promote other E/S characteristics according to previously mentioned indicators. The other #1A 40% is towards a minimum proportion of sustainable investments, which

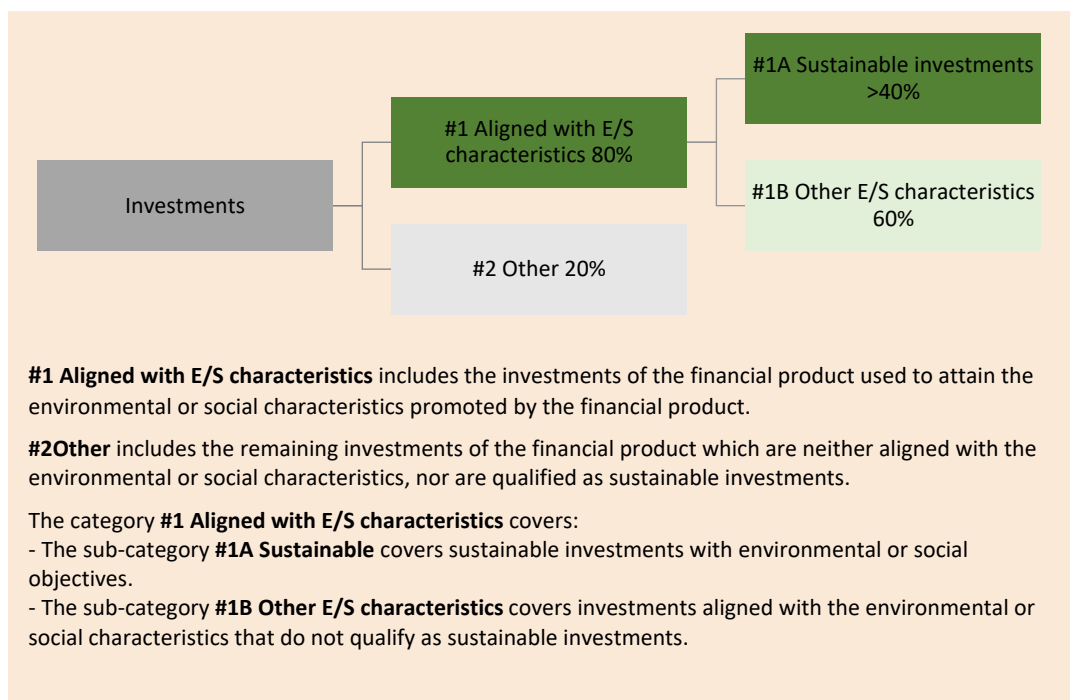
**Asset allocation** describes the share of investments in specific assets.

requires at least 40% of the holdings to have a carbon reduction target and 40% of the holdings to have an equality and/or diversity policy implemented.

To comply with the EU Taxonomy, the criteria for **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.



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

No derivatives are used in the portfolio management of the financial product.



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

Although the financial product aims to have a minimum proportion of 40% towards sustainable investments it does not have an environmental objective aligned with the EU Taxonomy.

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

- Yes:
- In fossil gas     In nuclear energy
- No

The financial product does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

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

The financial product does not have a minimum share of investments in transitional or enabling activities.



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%. The financial product requires at least 40% of the holdings to have a carbon reduction target.



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

The minimum share of sustainable investments with a social objective is 40%. The financial product requires at least 40% of the holdings to have an equality and/or diversity policy.




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

The financial product’s purpose for investment under “#2 Other” is to include investments that do not promote environmental or social characteristics according to the financial product’s sustainability indicators and do not contribute to the minimum proportion of sustainable investments. The minimum environmental and social safeguards for the allocation towards “#2 Other” are the screening criteria according to Fondita’s previously mentioned exclusion list, which is applied to all holdings of the financial product. The exclusion list includes certain controversial sectors as well as breaches of specific international norms. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.

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.

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



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

The financial product does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

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

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



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



EUROPEAN  
COMMISSION

Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 3

**ANNEX**

*to the*

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

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

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

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

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

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

## Sustainable investment objective

Does this financial product have a sustainable investment objective?	
<input checked="" type="radio"/> <input checked="" type="radio"/> <b>X</b> <b>Yes</b>	<input type="radio"/> <input type="radio"/> <b>No</b>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: %</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of ___% of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: 80 %</b>	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

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

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

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

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

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

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

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

- 1) At least 90 % of the investments are made in companies that address and prevent current and unmet medical needs. This is done by investing in companies active in R&D, production and distribution of medicines and healthcare equipment, tools and supplies as well as diagnostics and healthcare services primarily for humans but also animals.
- 2) At least 80 % of holdings have a strategy or policy for increased access to medicine or healthcare
  - a. a proprietary framework based on the Access to Medicine index for pharma companies and an internal qualitative framework for other subsectors in the Healthcare sector is applied
- 3) (Diversity, Equality & Inclusion)
  - a. 40% female to male ratio in Board of Directors of holdings
  - b. At least 50 % of holdings have a stated equality policy and/or diversity policy
- 4) Social and environmental responsibility
  - a. No UN Global Compact or OECD Guidelines for Multinational Enterprises breaches allowed (human rights, labor, environment and anti-corruption)
  - b. At least 75 % have a stated CO2 reduction target
  - c. All holdings are required to comply with EU Taxonomy DNSH principle
- 5) All holdings follow good governance practices

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

All companies are screened before investing and monthly during the holding period against Fondita's exclusion list. The companies cannot operate within the excluded sectors and can not have violations towards the following international norms a) UN Global Compact b) OECD Guidelines for Multinational Enterprises c) EU Taxonomy "Do no significant harm". If a company is found in violation of our exclusion criteria, an escalation process is conducted, and if the violation is verified with the company, the holding is removed. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

The Portfolio Manager and Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them throughout the lifetime of the investment. The financial product considers all 14 mandatory and 2 voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, they are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

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

All companies are screened before investing and monthly during the holding period against Fondita's exclusion list. The companies cannot operate within the excluded sectors and can not have violations towards the following international norms a) UN Global Compact b) OECD Guidelines for Multinational Enterprises c) EU Taxonomy "Do no significant harm". If a company is found in violation of our exclusion criteria, an escalation process is conducted, and if the violation is verified with the company, the holding is removed. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.

*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?

- x Yes. this financial product considers principal adverse impacts on sustainability factors in the investment process. We use MSCI to screen for the relevant PAI indicators listed below and complement any potential missing coverage in the external database by manually requesting data from the holdings, if the data is available. The financial product pays special attention to data points related to the sustainable objective of the financial product (PAI 10-13). If anomalies are identified in the PAI indicators during our assessments, the Portfolio Manager and the Head of ESG take them into account in the company level assessment and the investment decision.

The following mandatory PAI indicators are considered and tracked.

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

The following voluntary PAI indicators are considered and tracked.

**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.

15. Companies without carbon emissions reduction initiatives.

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

All presented PAI indicators are monitored throughout the investment period. The PAI-reports are published in the Fondita's annual reports per financial product and on Fondita's webpage <https://fondita.fi/en/reports-and-documents/>



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

Fondita Healthcare is an actively managed equity fund with a global mandate that invests in companies whose operations improve health and well-being. The investment philosophy is stock picking with a focus on innovative quality growth companies. More information about the investment strategy of the financial product can be found in the KID and relevant documentation on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

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

Sustainability indicators, to measure how the funds holdings aim at ensuring healthy lives and promoting well-being for all at all ages (SDG 3) and helping achieving gender equality and empowering women (SDG 5), are the following:

- 1) At least 90 % of the investments are made in companies that address and prevent current and unmet medical needs. This is done by investing in companies active in R&D, production and distribution of medicines and healthcare equipment, tools and supplies as well as diagnostics and healthcare services primarily for humans but also animals.
- 2) At least 80 % of holdings have a strategy or policy for increased access to medicine or healthcare
  - a. a proprietary framework based on the Access to Medicine index for pharma companies and an internal qualitative framework for other subsectors in the healthcare sector is applied
- 3) Diversity, Equality & Inclusion)
  - a. 40% female to male ratio in Board of Directors of holdings At least 50 % of holdings have a stated equality policy and/or diversity policy
- 4) Social and environmental responsibility
  - a. No UN Global compact or OECD Guidelines for Multinational Enterprises breaches allowed (human rights, labor, environment and anti-corruption)

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

### 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.



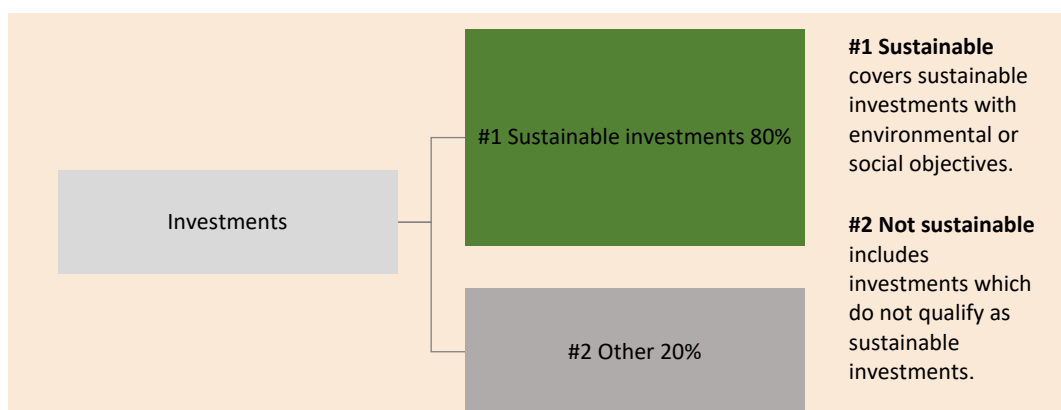
- b. At least 75 % have a stated CO2 reduction target
- c. All holdings are required to comply with EU Taxonomy DNSH principle

5) All holdings follow good governance practices

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

All companies are to follow good governance practices according to MSCI 'good governance test'. MSCI's test considers strong governance practices and structures, and a rating of the company above BB in MSCI. We do our best to cover the holdings outside MSCI's coverage on a best effort basis by reaching out to them and manually requesting relevant datapoints.

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



A minimum of 80 % of the financial products assets under management is considered #1 sustainable investments while 20% is allocated towards #2 Other.

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

No derivatives are used in the portfolio management of the financial product.



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

The financial product does not have a minimum requirement of sustainable investments with an environmental objective aligned with the EU Taxonomy.

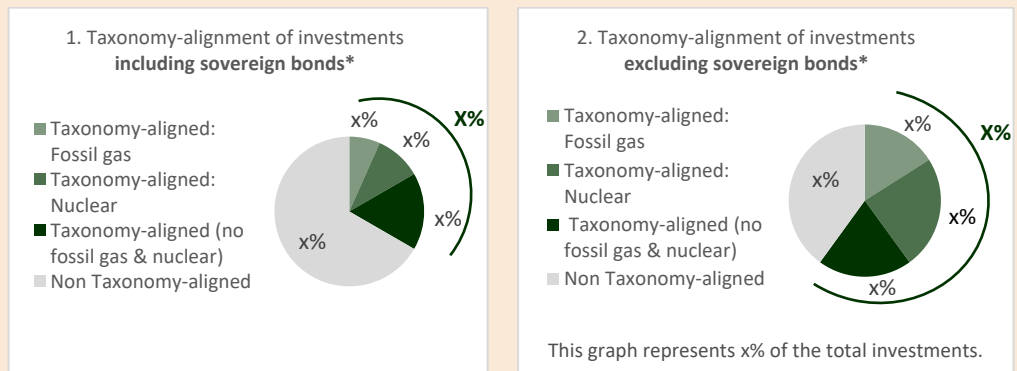
#### ● **Does the financial product invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy?**

- Yes:
  - In fossil gas
  - In nuclear energy
- No

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

The financial product does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. These sectors are excluded in the investment process according to Fonditas responsible investment policy.

**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.

Taxonomy-aligned activities are expressed as a share of:

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

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

The financial product does not have a minimum share of investments in transitional or enabling activities.



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

The financial product requires at least 75% of the holdings to have a carbon reduction target as part of the sustainable investment targets.



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

The minimum share of sustainable investments with a social objective is 80 % according to previously mentioned parameters.



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

The financial product’s purpose for investment under “#2 Other” is investments which do not contribute to the minimum proportion of sustainable investments. The minimum environmental and social safeguards for the allocation towards “#2 Other” is the screening criteria according to Fondita’s previously mentioned exclusion list which is applied to all holdings of the financial product. The exclusion list includes exclusion of certain controversial

sectors as well as breaches towards certain international norms. More information about the exclusion list on the webpage <https://fondita.fi/en/reports-and-documents/>.



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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

**Reference benchmarks** are indexes to measure whether the financial product attains the sustainable investment objective.



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

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

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



EUROPEAN  
COMMISSION

Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

## ANNEX

*to the*

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

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

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

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

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

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

## Environmental and/or social characteristics

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

<p><input checked="" type="radio"/> <input type="radio"/> <b>Yes</b></p> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective: ___%</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul> <p><input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective: ___%</b></p>	<p><input checked="" type="radio"/> <input type="radio"/> <input checked="" type="checkbox"/> <b>No</b></p> <p><input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul> <p><input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b></p>
--	---



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

The investments in the financial product has as it's main environmental characteristics to promote is climate change mitigation and as a social characteristic to promote equality including safeguarding fundamental human rights. Promoting environmental and social characteristics involves considering environmental, social, and governance (ESG) factors alongside traditional financial metrics. This approach aims to generate long-term financial returns while contributing to positive environmental and social outcomes.

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

The goal of promoting climate change mitigation is important to Fondita since we have signed the Net Zero Asset Manager Initiative at the company level with the interim target to reduce absolute emissions by 60% by 2030. We are well on track to reach the goals, which are reported in our financial products' quarterly report and in our Annual Review of Responsible Investments. The next step is to set net zero targets together with the initiative, by 2030 at the latest, on how we intend to take the next step to reach net zero by 2050 at the latest.

The goal of promoting diversity and/or equality policy is important to Fondita since we want to hold companies accountable to ensure these values are implemented in the company, as we are signatories of the UN Global Compact.

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

The environmental and social characteristics promoted by the financial product are measured with several sustainability indicators: a) ESG assessment with focus on climate change mitigation and equality and diversity initiatives of the companies through third party databases (MSCI and Bloomberg) combined with an manual inhouse ESG assessment b) SDG alignment towards SDG13 Climate Change and SDG5 Gender equality (alignment reported in financial products quarterly ESG reports available on the webpage) c) Assessment of PAI indicators with special attention towards the indicators relevant to promote the environmental and social characteristics of the financial product.

● ***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 financial product promotes environmental and social characteristics. The financial product has a minimum share of 40% sustainable investments, out of the investments which promote environmental and social characteristics. Fondita considers sustainable investments in the financial product is an economic activity that contribute to an environmental objective, in this financial product a carbon reduction target, and/or social objective, in this financial product a diversity and/or equality policy. Furthermore, such investments may not cause significant harm to any other environmental or social objectives and the companies are to follow good governance practices.

The financial products environmental objective for sustainable investments is climate change mitigation. The sustainable investments contribute to the objective by investing in companies which have a plan or target to reduce CO2 emissions. The minimum threshold is at least 40% of the financial products holdings are to have an plan or target to reduce CO2 emissions.

The financial products social objective for sustainable investments is to promote equality and diversity including safeguarding fundamental human rights. The sustainable investments contribute to the objective by investing in companies which have a equality and/or diversity policy implemented. The minimum threshold is at least 40% of the financial products holdings are to have an equality and/or diversity policy.

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed. More information about the exclusion list on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

The Portfolio Manager and Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The financial product considers all 14 mandatory and two voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, the relevant are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

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

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



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

- x Yes, this financial product considers principal adverse impact on sustainability factors in the investment process. We use MSCI to screen for the relevant PAI indicators presented below and compliment potential missing coverage in the external database by manual requests of data from the holdings, if the data is possible to retrieve. The financial product pays special attention to data points related to the environmental and social characteristics promoted by the financial product, climate change mitigation (PAI 1, PAI 2, PAI 3, PAI 4, PAI 5, PAI 15) and equality and diversity (PAI 10, PAI 11, PAI 12, PAI 13, PAI 16). In case anomalies are identified in the PAI indicators in our assessments, the Portfolio Manager and the Head of ESG takes it into account in the company level assessment and the the investment decision.

The following mandatory PAI indicators are considered and tracked.

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

The following voluntary PAI indicators are considered and tracked.

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

**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.

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



All presented PAI indicators are monitored throughout the investment period. The PAI-reports are published in the Fondita's annual reports per financial product and on Fondita's webpage <https://fondita.fi/en/reports-and-documents/>.

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

Fondita Nordic Micro Cap is an equity fund investing in small Nordic quality companies with a market capitalisation of up to EUR 800 million. The investment philosophy is stock picking with a focus on quality growth companies. More information about the investment strategy on the financial product can be found in the KID and relevant documentation on the webpage <https://fondita.fi/en/reports-and-documents/>.

- ***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 investment strategy used to select the investments to attain each of the environmental and social characteristic is the result of the ESG assessment of the company with a focus on climate change mitigation and equality and diversity, the alignment towards SDG13 Climate Change and SDG5 Gender equality and assessment of the PAI indicators with special attention to the indicators relevant to promoting the environmental and social characteristics of the financial product.

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

The scope of investments is reduced by our screening criteria in our exclusion list and the good governance practices test prior to the application of the investment strategy. Companies which have breached any of the criteria is not a viable investment target of the investment strategy.

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

All companies are to follow good governance practices according to MSCI 'good governance test'. MSCIs test considers strong governance practices and structures, and a rating of the company above BB in MSCI. We do our best to cover the holdings outside MSCIs coverage on a best effort basis by reaching out to them and manually requesting relevant datapoints.

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

The investments asset allocation (excluding cash management, as cash is not considered as investments) is 80% towards #1 Aligned with E/S characteristics and 20% towards #2 Other. Out of the allocation towards 1# Aligned with E/S characteristics, #1B 60% is to promote other E/S characteristics according to previously mentioned indicators. The other #1A 40% is towards a minimum proportion of sustainable investments, which

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



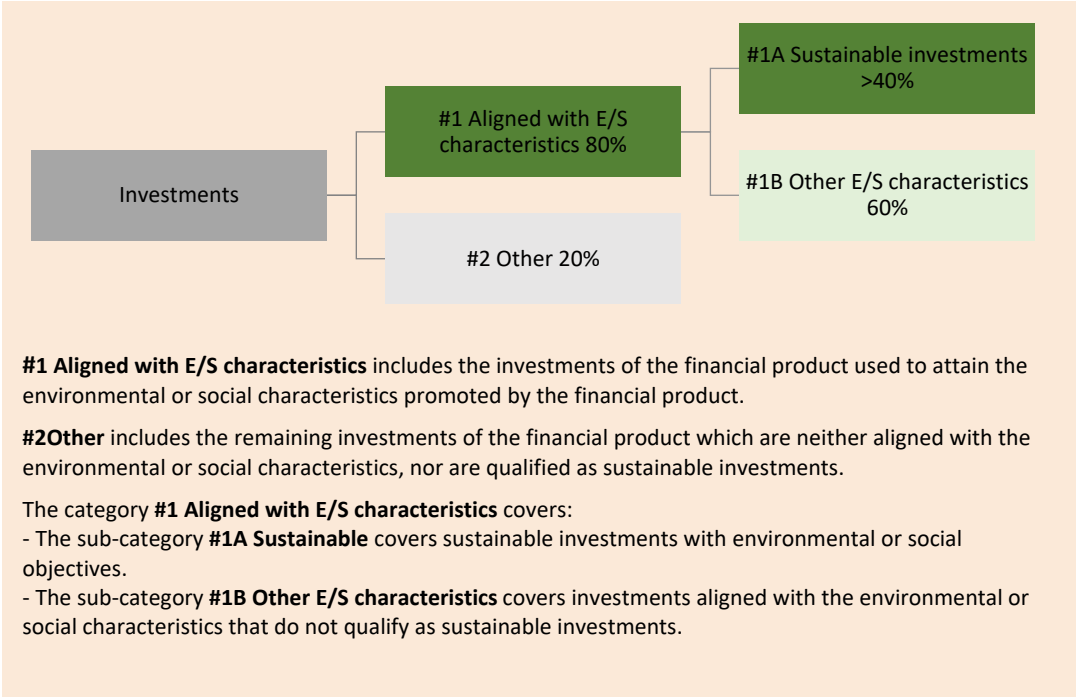
**Asset allocation** describes the share of investments in specific assets.

To comply with the EU Taxonomy, the criteria for **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.

requires at least 40% of the holdings to have a carbon reduction target and 40% of the holdings to have an equality and/or diversity policy implemented.



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

No derivatives are used in the portfolio management of the financial product.



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

Although the financial product aims to have a minimum proportion of 40% towards sustainable investments it does not have an environmental objective aligned with the EU Taxonomy.

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

- Yes:
  - In fossil gas     In nuclear energy
- No

The financial product does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

Taxonomy-aligned activities are expressed as a share of:

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

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

The financial product does not have a minimum share of investments in transitional or enabling activities.



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%. The financial product requires at least 40% of the holdings to have a carbon reduction target.



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

The minimum share of sustainable investments with a social objective is 40%. The financial product requires at least 40% of the holdings to have an equality and/or diversity policy.



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

The financial product’s purpose for investment under “#2 Other” is to include investments that do not promote environmental or social characteristics according to the financial product’s sustainability indicators and do not contribute to the minimum proportion of sustainable investments. The minimum environmental and social safeguards for the allocation towards “#2 Other” are the screening criteria according to Fondita’s previously mentioned exclusion list, which is applied to all holdings of the financial product. The exclusion list includes certain controversial sectors as well as breaches of specific international norms. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.



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



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

The financial product does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

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

<https://fondita.fi/en/fund/nordic-micro-cap/>



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



EUROPEAN  
COMMISSION

Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 2

## ANNEX

*to the*

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

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

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

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

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

**Product name:** Fondita Nordic Small Cap  
**Legal entity identifier:** 743700XG8BG0I1WL9C57

## Environmental and/or social characteristics

Does this financial product have a sustainable investment objective?	
●● <input type="checkbox"/> Yes	●● <input checked="" type="checkbox"/> No
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with an environmental objective:</b> ___% <ul style="list-style-type: none"> <li><input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> </ul>	<input checked="" type="checkbox"/> It <b>promotes Environmental/Social (E/S) characteristics</b> and while it does not have as its objective a sustainable investment, it will have a minimum proportion of 40 % of sustainable investments <ul style="list-style-type: none"> <li><input type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy</li> <li><input checked="" type="checkbox"/> with a social objective</li> </ul>
<input type="checkbox"/> It will make a minimum of <b>sustainable investments with a social objective:</b> ___%	<input type="checkbox"/> It promotes E/S characteristics, but <b>will not make any sustainable investments</b>



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

The investments in the financial product has as it's main environmental characteristics to promote is climate change mitigation and as a social characteristic to promote equality including safeguarding fundamental human rights. Promoting environmental and social characteristics involves considering environmental, social, and governance (ESG) factors alongside traditional financial metrics. This approach aims to generate long-term financial returns while contributing to positive environmental and social outcomes.

The goal of promoting climate change mitigation is important to Fondita since we have signed the Net Zero Asset Manager Initiative at the company level with the interim target to reduce absolute emissions by 60% by 2030. We are well on track to reach the goals, which are reported in our financial products' quarterly report and in our Annual Review of Responsible Investments. The next step is to set net zero targets together with the initiative, by 2030 at the latest, on how we intend to take the next step to reach net zero by 2050 at the latest.

The goal of promoting diversity and/or equality policy is important to Fondita since we want to hold companies accountable to ensure these values are implemented in the company, as we are signatories of the UN Global Compact.

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

The environmental and social characteristics promoted by the financial product are measured with several sustainability indicators: a) ESG assessment with focus on climate change mitigation and equality and diversity initiatives of the companies through third party databases (MSCI and Bloomberg) combined with an inhouse ESG assessment b) SDG alignment towards SDG13 Climate Change and SDG5 Gender equality (alignment reported in financial products quarterly ESG reports available on the webpage) c) Assessment of PAI indicators with special attention towards the indicators relevant to promote the environmental and social characteristics of the financial product.

● ***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 financial product promotes environmental and social characteristics. The financial product has a minimum share of 40% sustainable investments, out of the investments which promote environmental and social characteristics. Fondita considers sustainable investments in the financial product is an economic activity that contribute to an environmental objective, in this financial product a carbon reduction target, and/or social objective, in this financial product a diversity and/or equality policy. Furthermore, such investments may not cause significant harm to any other environmental or social objectives and the companies are to follow good governance practices.

The financial products environmental objective for sustainable investments is climate change mitigation. The sustainable investments contribute to the objective by investing in companies which have a plan or target to reduce CO2 emissions. The minimum threshold is at least 40% of the financial products holdings are to have an plan or target to reduce CO2 emissions.

The financial products social objective for sustainable investments is to promote equality and diversity including safeguarding fundamental human rights. The sustainable investments contribute to the objective by investing in companies which have a equality and/or diversity policy implemented. The minimum threshold is at least 40% of the financial products holdings are to have an equality and/or diversity policy.

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

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed. More information about the exclusion list on the webpage <https://fondita.fi/en/reports-and-documents/>.

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

The Portfolio Manager and Head of ESG consider the adverse impacts on sustainability factors before making an investment decision and monitor them during the lifetime of the investment. The financial product considers all 14 mandatory and two voluntary adverse sustainability impact factors. Fondita uses data from several sources to make the assessment; if available, MSCI data is used as the main source. If data is not attainable from MSCI, we search for company disclosures. In case anomalies are identified in the principal adverse impacts data, the relevant are thoroughly investigated and highlighted in the ESG assessment of the company, which impacts the investment decision.

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

All companies are screened before investing and monthly during the holding period towards Fondita's exclusion list. The companies can not operate within the excluded sectors and can not have violation towards the following international norms a) UN Global Compact b) OECD guidelines for multinational enterprises c) EU Taxonomy "Do no significant harm". In case a company is found in violation of our exclusion criteria, an escalation process is conducted and if the violation is verified with the company, the holding is removed.

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

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

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



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

- x Yes, this financial product considers principal adverse impact on sustainability factors in the investment process. We use MSCI to screen for the relevant PAI indicators presented below and compliment potential missing coverage in the external database by manual requests of data from the holdings, if the data is possible to retrieve. The financial product pays special attention to data points related to the environmental and social characteristics promoted by the financial product, climate change mitigation (PAI 1, PAI 2, PAI 3, PAI 4, PAI 5, PAI 15) and equality and diversity (PAI 10, PAI 11, PAI 12, PAI 13, PAI 16). In case anomalies are identified in the PAI indicators in our assessments, the Portfolio Manager and the Head of ESG takes it into account in the company level assessment and the the investment decision.

The following mandatory PAI indicators are considered and tracked.

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

The following voluntary PAI indicators are considered and tracked.

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

**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.

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



All presented PAI indicators are monitored throughout the investment period. The PAI-reports are published in the Fondita's annual reports per financial product and on Fondita's webpage <https://fondita.fi/en/reports-and-documents/>. **What investment strategy does this financial product follow?**

Fondita Nordic Small Cap is an equity fund that invests in Nordic small and medium-sized quality companies with a market capitalisation of up to EUR 3 billion. More information about the investment strategy on the financial product can be found in the KID and relevant documentation on the webpage <https://fondita.fi/en/reports-and-documents/>.

- ***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 investment strategy used to select the investments to attain each of the environmental and social characteristic is the result of the ESG assessment of the company with a focus on climate change mitigation and equality and diversity, the alignment towards SDG13 Climate Change and SDG5 Gender equality and assessment of the PAI indicators with special attention to the indicators relevant to promoting the environmental and social characteristics of the financial product.

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

The scope of investments is reduced by our screening criteria in our exclusion list and the good governance practices test prior to the application of the investment strategy. Companies which have breached any of the criteria is not a viable investment target of the investment strategy.

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

All companies are to follow good governance practices according to MSCI 'good governance test'. MSCIs test considers strong governance practices and structures, and a rating of the company above BB in MSCI. We do our best to cover the holdings outside MSCIs coverage on a best effort basis by reaching out to them and manually requesting relevant datapoints.

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

The investments asset allocation (excluding cash management, as cash is not considered as investments) is 80% towards #1 Aligned with E/S characteristics and 20% towards #2 Other. Out of the allocation towards 1# Aligned with E/S characteristics, #1B 60% is to promote other E/S characteristics according to previously mentioned indicators. The other #1A 40% is towards a minimum proportion of sustainable investments, which

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



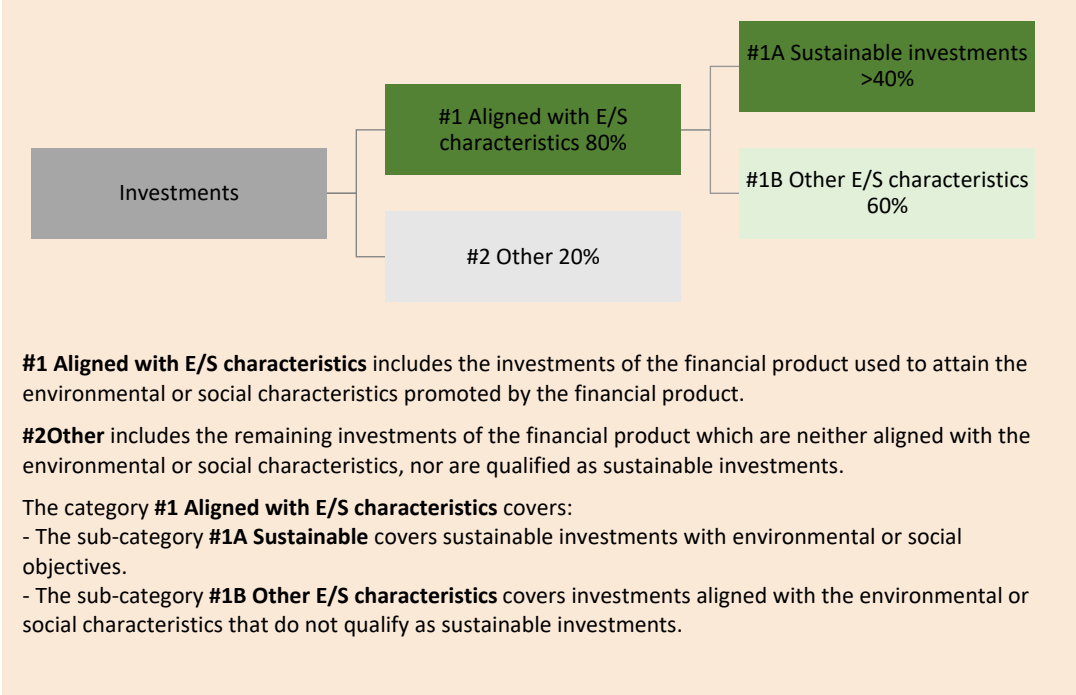
**Asset allocation** describes the share of investments in specific assets.

To comply with the EU Taxonomy, the criteria for **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.

requires at least 40% of the holdings to have a carbon reduction target and 40% of the holdings to have an equality and/or diversity policy implemented.



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

No derivatives are used in the portfolio management of the financial product.



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

Although the financial product aims to have a minimum proportion of 40% towards sustainable investments it does not have an environmental objective aligned with the EU Taxonomy.

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

- Yes:
  - In fossil gas  In nuclear energy
- No

The financial product does not invest in fossil gas and/or nuclear energy related activities that comply with the EU Taxonomy. These sectors are excluded in the investment process according to Fonditas responsible investment policy and Fonditas exclusion list.

Taxonomy-aligned activities are expressed as a share of:

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

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

The financial product does not have a minimum share of investments in transitional or enabling activities.



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

The minimum share of sustainable investments with an environmental objective that are not aligned with the EU Taxonomy is 40%. The financial product requires at least 40% of the holdings to have a carbon reduction target.



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

The minimum share of sustainable investments with a social objective is 40%. The financial product requires at least 40% of the holdings to have an equality and/or diversity policy.



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

The financial product’s purpose for investment under “#2 Other” is to include investments that do not promote environmental or social characteristics according to the financial product’s sustainability indicators and do not contribute to the minimum proportion of sustainable investments. The minimum environmental and social safeguards for the allocation towards “#2 Other” are the screening criteria according to Fondita’s previously mentioned exclusion list, which is applied to all holdings of the financial product. The exclusion list includes certain controversial sectors as well as breaches of specific international norms. More information about the exclusion list is available on the webpage <https://fondita.fi/en/reports-and-documents/>.



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



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

The financial product does not have an official benchmark.

- *How is the reference benchmark continuously aligned with each of the environmental or social characteristics promoted by the financial product?*

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

The financial product does not have an official benchmark.

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

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

<https://fondita.fi/en/fund/nordic-small-cap/>



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



Brussels, 6.4.2022  
C(2022) 1931 final

ANNEX 3

**ANNEX**

*to the*

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

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

Mall som avser upplysningar som lämnas innan avtal ingås för finansiella produkter enligt artikel 9, stycke 1 till 4a i förordning (EU) 2019/2088 och i artikel 5, första stycket i förordning (EU) 2020/852.

Product name: Fondita Sustainable World Legal entity identifier: 743700MVNRFJ15WVIB93

**Hållbar investering:** en investering i ekonomisk verksamhet som bidrar till ett miljömål eller socialt mål, förutsatt att investeringen inte orsakar betydande skada för något annat miljömål eller socialt mål och att investeringsobjekten följer praxis för god styrning

**EU-taxonomin** är ett klassificeringssystem som läggs fram i förordning (EU) 2020/852, där det fastställs en förteckning över miljömässigt hållbara ekonomiska verksamheter. Förordningen fastställer inte någon förteckning över socialt hållbara ekonomiska verksamheter. Hållbara investeringar med ett miljömål kan vara förenliga med kraven i taxonomin eller inte.

## Hållbart investeringsmål

Har denna finansiella produkt ett mål för hållbar investering?

Ja

Nej

Den kommer att göra ett minimum av **hållbara investeringar med ett miljömål: 80%**

- i ekonomiska verksamheter som anses vara miljömässigt hållbara enligt EU-taxonomin
- i ekonomiska verksamheter som inte anses vara miljömässigt hållbara enligt EU-taxonomin

Den kommer att göra ett minimum av **hållbara investeringar med ett socialt mål: \_\_\_%**

Den **främjar miljörelaterade och sociala egenskaper** och kommer, även om den inte har en hållbar investering som sitt mål, att ha en minimiandel på \_\_\_ % hållbara investeringar.

- i ekonomiska verksamheter som anses vara miljömässigt hållbara enligt EU-taxonomin
- med ett miljömål i ekonomiska verksamheter som inte anses vara miljömässigt hållbara enligt EU-taxonomin
- med ett socialt mål

Den **främjar miljörelaterade och sociala egenskaper, men kommer inte att göra några hållbara investeringar**



### Vilket är målet för hållbar investering för denna finansiella produkt?

Det hållbara investeringsmålet för finansiella produkten är att investera i företag som erbjuder klimat- och miljösmarta produkter eller tjänster. Dessa produkter och tjänster minskar antingen koldioxidutsläppen eller assisterar oss att använda våra naturresurser på ett mer effektivt sätt. Med andra ord är målet med hållbara investeringar inte att minska utsläppen till ett visst mål eller en viss nivå, utan målet är att investera i företag som antingen erbjuder en produkt eller tjänst (t.ex. teknik) som hjälper till att antingen minska utsläppen eller använda naturresurserna mer effektivt.

**Hållbarhetsindikatorer** mäter uppnåendet av de miljörelaterade eller sociala egenskaperna som den finansiella produkten främjar.

● ***Vilka hållbarhetsindikatorer används för att mäta uppnåendet av den finansiella produktens mål för hållbar investering?***

Vi identifierar bolag som har en betydande del av sina intäkter från en produkt eller tjänst som möjliggör en minskning av koldioxidutsläpp eller mer effektiv användning av naturresurser. Innehaven identifieras genom att ha hög anpassning av produkt eller tjänst till SDG12 Ansvarsfull konsumtion och produktion och SDG9 Industriell innovation och infrastruktur samt hög verksamhetsanpassning till SDG13 Klimatåtgärder.

Den finansiella produkten identifierade flera faktorer som en del av hållbarhetsindikatorernas bedömningsprocess, till exempel ESG-betyg i MSCI, koldioxidutsläpp, mångfalds- och jämställdhetsanvisning, miljöpåverkan, gröna intäkter och andra. Den viktigaste hållbarhetsindikatorn för denna finansiella produkt är datapunkten i MSCI som beaktar "Exponering mot miljölösningar" Exponeringen måste existera i minst 80% av innehaven. Datapunkten beaktar företag som har intäcksströmmar från produkter eller tjänster som bidrar till att lösa världens mest relevanta miljöproblem, samtidigt som de inte orsakar negativa externa effekter i samband med sin verksamhet. Negativa externa effekter är ESG-betyg under BB, etiskt problematiska lån och andra kontroverser.

● ***På vilket sätt orsakar inte de hållbara investeringarna någon betydande skada för några miljörelaterade eller sociala mål för hållbar investering?***

Alla företag granskas före investering och månatligen under innehavstiden mot Fonditas exkluderingslista. Företagen får inte vara verksamma inom de utslutna sektorerna och får inte ha brutit mot följande internationella normer a) FN:s Global Compact b) OECD:s riktlinjer för multinationella företag c) EU:s taxonomi "Orsaka inte märkbar skada". Om ett företag bryter mot våra exkluderingskriterier genomförs en eskaleringsprocess och om överträdelsen verifieras med företaget självs innehavet.

— ***Hur har indikatorerna för negativa konsekvenser för hållbarhetsfaktorer beaktats?***

Portföljförvaltaren och personen ansvarig för ESG beaktar de negativa konsekvenserna för hållbarhetsfaktorer innan portföljförvaltaren fattar ett investeringsbeslut och följer upp dem under investeringens löptid. Den finansiella produkten beaktar alla 14 obligatoriska och två frivilliga PAI-indikatorer. Fondita använder data från flera källor för att göra bedömningen, ifall tillgängligt används MSCI-data som huvudkälla. Om informationen inte kan erhållas från MSCI, söker vi efter information publicerat av bolagen. Om avvikelser identifieras i uppgifterna om de huvudsakliga negativa konsekvenserna, undersöks de noggrant och lyfts fram i ESG-bedömningen av bolaget, vilket påverkar investeringsbeslutet.

- — Hur är de hållbara investeringarna anpassade till OECD:s riktlinjer för multinationella företag och FN:s vägledande principer för företag och mänskliga rättigheter?

Alla företag granskas före investering och månatligen under innehavstiden mot Fonditas exkluderingslista. Företagen får inte vara verksamma inom de uteslutna sektorerna och får inte ha brutit mot följande internationella normer a) FN:s Global Compact b) OECD:s riktlinjer för multinationella företag c) EU:s taxonomi "Orsaka inte märkbar skada". Om ett företag bryter mot våra exkluderingskriterier genomförs en eskaleringsprocess och om överträdelserna verifieras med företaget självs innehavet.

*Principen "inte orsaka betydande skada" är fastställd i EU-Taxonomin och innebär att investeringar inte får orsaka betydande skada för EU-taxonomin. Principen åtföljs av särskilda EU-kriterier.*

Principen om att inte orsaka betydande skada är endast tillämplig på de av den finansiella produktens underliggande investeringar som beaktar EU-kriterierna för miljömässiga hållbara ekonomiska verksamheter.

*Andra eventuella hållbara investeringar får inte heller orsaka betydande skada för några av taxonomins miljömål eller sociala mål.*

### **Beaktas i denna finansiella produkt huvudsakliga negativa konsekvenser för hållbarhetsfaktorer?**

- x Ja, denna finansiella produkt tar i hänsyn de huvudsakliga negativa konsekvenserna för hållbarhetsfaktorer i investeringsbeslutet. Vi använder MSCI för att söka information om de relevanta PAI-indikatorerna som presenteras nedan och kompletterar potentiellt saknad täckning i den externa databasen genom manuella förfrågningar om data av innehaven, ifall uppgifterna finns tillgängliga. Den finansiella produkten ägnar särskild uppmärksamhet åt datapunkter relaterade till miljön (PAI 1, PAI 2, PAI 3, PAI 4, PAI 5, PAI 15) Om avvikelser identifieras i PAI-indikatorerna i vår analys tar portföljförvaltaren och ESG ansvariga hänsyn till detta i ESG bedömningen av bolaget och i investeringsbeslutet.

Följande obligatoriska PAI-indikatorer beaktas och följs upp.

1. *Utsläpp av växthusgaser (Scope 1, Scope 2, Scope 3 och totala utsläpp av växthusgaser)*
2. *Koldioxidfotavtryck*
3. *Växthusgasintensitet*
4. *Exponering mot företag verksamma inom sektorn för fossila bränslen*
5. *Andel av icke-förnybar energiförbrukning och energiproduktion*



**Huvudsakliga negativa konsekvenser** är investeringsbesluts mest negativa konsekvenser för hållbarhetsfaktorer som rör miljö, sociala frågor och personalfrågor, respekt för mänskliga rättigheter samt frågor rörande bekämpning av korruption och mutor

**Tillgångsfördelningen** beskriver andelen investeringar i specifika tillgångar.

**Praxis för god styrning** omfattar sunda förvaltningsstrukturer, förhållandet mellan anställda, personalsättning och efterlevnad av skatteregler.

**Investeringsstrategin** styr investeringsbeslut på grundval av faktorer som investeringsmål och risktolerans.

6. *Energiförbrukningsintensitet per sektor med hög klimatpåverkan (NACE A-L)*
7. *Verksamhet som negativt påverkar områden med känslig biologisk mångfald*
8. *Utsläpp i vatten*
9. *Andel farligt avfall*
10. *Brott mot FN:s Global Compact principer och Organisationen för ekonomiskt samarbete och utvecklings (OECD) riktlinjer för multinationella företag*
11. *Brist på processer och mekanismer för att övervaka FN:s Global Compact-principer och OECD:s riktlinjer för multinationella företag*
12. *Ojusterad löneskillnad mellan könen*
13. *Könsfördelning i styrelsen*
14. *Exponering mot kontroversiella vapen (infanteriminor, klustervapen, kemiska vapen och biologiska vapen)*

Följande frivilliga PAI-indikatorer beaktas och följs upp.

15. *Företag utan initiativ för att minska koldioxidutsläppen.*
16. *Antal identifierade fall av allvarliga människorättsfrågor och incidenter*

Alla presenterade PAI-indikatorer övervakas under hela investeringsperioden. PAI-rapporterna publiceras i Fonditas årsrapporter per finansiell produkt och på Fonditas hemsida <https://fondita.fi/sv/rapporter-och-dokument/>.



### **Vilken investeringsstrategi följer denna finansiella produkt?**

Strategin i finansiella produkten är att investera i 25–35 globala bolag som erbjuder klimat- och miljösmarta produkter eller tjänster. Dessa produkter eller tjänster möjliggör att vi får ner våra CO2-utsläpp eller att vi kan använda våra naturresurser på ett mera effektivt sätt. Bolagen vi investerar i följer därutöver principerna för god bolagsstyrning samt agerar ansvarsfullt socialt. Bolagen skall därtill uppfylla vissa krav gällande värdering, tillväxtutsikter och finansiella resultat. Mera information om finansiella produktens investeringsstrategi i KID dokumentet och på hemsidan <https://fondita.fi/sv/fond/sustainable-world/>.

- ***Vilka är de bindande delarna i investeringsstrategin som används för att välja investeringar för att uppnå målet om hållbara investeringar?***

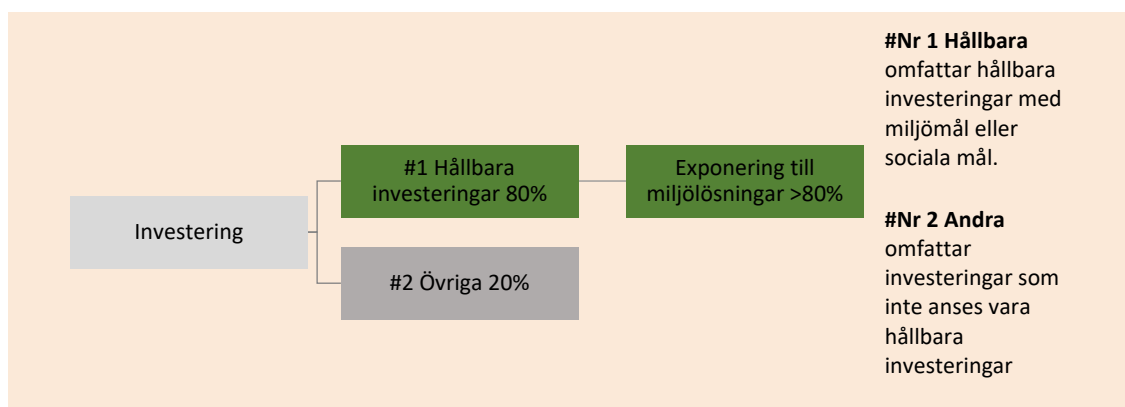
De bindande elementen i investeringsstrategin som används för att välja investeringar är att företaget måste ha ett "SANT" värde till datapunkten i MSCI

som beaktar "Exponering mot miljölösningar" Exponeringen bör vara i minst 80% av alla innehaven.

● **Vad är policyn för att bedöma praxis för god styrning i investeringsobjekten?**

Alla bolag ska följa god bolagsstyrningspraxis enligt MSCI:s "good governance test". MSCI:s test tar hänsyn till starka styrningsrutiner och strukturer, och ett ESG betyg av bolaget över BB i MSCI. Ifall bolaget inte är under MSCI:s täckning gör vi vårt bästa för att samla in den relevanta informationen.

**Vad är tillgångsfördelningen samt minimum andelen av hållbara investeringar?**



Tillgångsfördelningen omfattar endast investeringar, eftersom kontanthantering inte betraktas som investeringar. Fördelningen är följande, #1 Hållbara investeringar är minst 80%, vilket kräver att 80% av innehaven har ett värde som är "SANT" till datapunkten i MSCI som beaktar "Exponering mot miljölösningar". Resterande #2 Övriga 20% är för innehav som inte bidrar till eller kvalificerar sig som en hållbar investering.

● **Hur nås målet med hållbara investeringar via användningen av derivatinstrument?**

Inga derivatinstrument används i förvaltningen av finansiella produkten.



**Vilken är minimiandelen hållbara investeringar med ett miljömål som är förenliga med EU-taxonomin?**

Även om finansiella produktens hållbara investeringar har ett miljömål, har finansiella produkten inte ett miljömål som är förenligt med EU-taxonomin.

**Investerar fonden fossil gas och/eller kärnkraft relaterade verksamheter som är i linje med EU-taxonomin?**

Taxonomiförenliga verksamheter uttrycks som en andel av följande:

- **omsättning**, vilket återspeglar andelen av intäkterna från investeringsobjektens gröna verksamheter
- **kapitalutgifter**, som visar de gröna investeringar som gjorts av investeringsobjekten, t.ex. för en omställning till en grön ekonomi
- **driftsutgifter**, som återspeglar investeringsobjektens gröna operativa verksamheter.

**Möjliggörande verksamheter** gör det direkt möjligt för andra verksamheter att bidra väsentligt till ett miljömål.

**Omställningsverksamheter** är verksamheter som det ännu inte finns koldioxidsnåla alternativ tillgängliga för och som bland annat har växthusgasutsläpp på nivåer som motsvarar bästa prestanda.



är miljömässigt hållbara investeringar med ett miljömål som inte beaktar kriterierna för miljömässigt hållbara ekonomiska verksamheter enligt EU-taxonomin.

Finansiella produkten exkluderar bolag verksamma inom kärnkraft eller fossila bränslen och investerar därav inte i dessa sektorer.

Ja

Fossila bränslen

Kärnkraft

Nej

● **Vad är minimum andelen av investeringar verksamheter som möjliggör en övergång från fossil energi till hållbara alternativ?**

Finansiella produkten har inte en minimum andel av investeringar i verksamhet som möjliggör en övergång från fossil energi till hållbara alternativ.



**Vilken är minimiandelen hållbara investeringar med ett miljömål som inte är enhetligt med EU-Taxonomin?**

Den huvudsakliga hållbarhetsindikatorn och målet för hållbara investeringar för denna finansiella produkten är datapunkten i MSCI som beaktar "Exponering mot miljölösningar" Exponeringen bör vara minst 80 procent av alla innehaven, vilket är ett miljömål som inte är i linje med EU:s taxonomi.

Den finansiella produkten följer innehavsbolagens mål för koldioxidminskning, som ett sekundärt mål som inte ingår i målet för hållbara investeringar.



**Vad är minimiandelen av hållbara investeringar med ett socialt mål?**

Denna finansiella produkten har inte en minimiandel av hållbara investeringar med ett socialt mål.

Finansiella produkten följer innehavens jämställdhets- och mångfaldsavisningar, som ett sekundärt mål som inte är en del av målet för hållbara investeringar.



**Vilka investeringar är inkluderade i "Nr 2 Annat", vad är deras syfte och finns det några miljörelaterade eller sociala minimiskyddsåtgärder?**

Finansiella produktens syfte för investeringar under "#2 Övrigt" är investeringar som inte främjar miljömässiga eller sociala egenskaper enligt finansiella produktens hållbarhetsindikatorer och investeringar som inte bidrar till minimiandelen hållbara investeringar. Minimikraven för miljömässiga och sociala skyddsåtgärder för allokeringen till "#2 Övrigt" är kriterierna enligt Fonditas tidigare nämnda exkluderingslista som tillämpas på alla innehav i finansiella produkten. Exkluderingslistan inkluderar uteslutning av vissa kontroversiella sektorer samt brott mot vissa internationella normer. Mer information om exkluderingslistan finns på webbsidan <https://fondita.fi/sv/rapporter-och-dokument/>.



### Har fonden ett specifikt referensindex som tar i beaktande hållbarhetsfaktorer på ett sätt som är i linje med målet för hållbara investeringar?

Finansiella produkten har inget officiellt marknadsindex. Det finns inget tillgängligt index som mäter eller kan jämföras med investeringsstrategin för finansiella produkten. Investeringsstrategin är att investera i företag som erbjuder en produkt eller tjänst som minskar koldioxidutsläppen eller erbjuder en produkt eller tjänst som möjliggör en mer effektiv användning av naturresurser.

- **På vilket sätt tar indexet i beaktande hållbarhetsfaktorer på ett sätt som kontinuerligt är i linje med målet för hållbara investeringar?**

Finansiella produkten har inget officiellt marknadsindex.

- **På vilket sätt är fondens strategi kontinuerligt i linje med referensindexets metodologi?**

Finansiella produkten har inget officiellt marknadsindex.

- **Hur skiljer sig referensindexet från ett brett marknadsindex?**

Finansiella produkten har inget officiellt marknadsindex.

- ***Var kan man hitta den metod som används för beräkningen av det valda indexet?***

Finansiella produkten har inget officiellt marknadsindex.



### Var kan jag hitta mer produktspecifik information på nätet?

Mer produktspecifik information finns på

<https://fondita.fi/sv/fond/sustainable-world/>