

ANNEX IV

Periodic 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.

Product name: XACT Nordic High Dividend Low Volatility (UCITS ETF)

Legal entity identifier: 549300FEPREBSBV2XX18

**Sustainable investment**

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

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

**Environmental and/or social characteristics**

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

<input checked="" type="radio"/> <input type="radio"/> <b>Yes</b>	<input checked="" type="radio"/> <input checked="" type="radio"/> <input type="checkbox"/> <b>No</b>
<input type="checkbox"/> It made <b>sustainable investments with an environmental objective: ____ %</b>	<input checked="" type="checkbox"/> It promoted <b>Environmental/Social (E/S) characteristics</b> and while it did not have as its objective a sustainable investment, it had a proportion of 46.18% of sustainable investments
<input type="checkbox"/> in economic activities that qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy	<input checked="" type="checkbox"/> with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy
<input type="checkbox"/> It made <b>sustainable investments with a social objective: ____ %</b>	<input checked="" type="checkbox"/> with a social objective
	<input type="checkbox"/> It promoted E/S characteristics, but <b>did not make any sustainable investments</b>



**To what extent were the environmental and/or social characteristics promoted by this financial product met?**

**Sustainability indicators**

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

The fund promotes environmental and social characteristics through sustainable investments, meaning investments in companies whose economic activities are deemed to contribute to an environmental or social objective in line with the Sustainable Development Goals of the 2030 Agenda and/or activities aligned with the EU Taxonomy.

The fund's share of sustainable investments in 2023 amounted to 46.18%, based on an average outcome of the fund's sustainable investments per quarter.

Through these sustainable investments, the fund contributed to the following objectives:

**Environmental objectives defined in the EU Taxonomy with technical screening criteria**

Climate change mitigation., Climate change adaption.

**Other environmental objectives**

Achieving Sustainable Agriculture and Forestry (SDG 2 & 15), Conserving Water (SDG 6), , Contributing to Sustainable Energy Use (SDG 7), Promoting Sustainable Buildings (SDG 11), Optimizing Material Use (SDG 12), Mitigating Climate Change (SDG 13), Preserving Terrestrial Ecosystems (SDG 15).

**Social objectives**

Alleviating Poverty (SDG 1), Providing Basic Services (SDG 1, 8, 9, 10 & 11), Combating Hunger and Malnutrition (SDG 2), Ensuring Health (SDG 3), Attaining Gender Equality (SDG 5), Safeguarding Peace (SDG 16).

Furthermore, during the reference period, the fund has promoted environmental and/or social characteristics through its criteria for excluding companies whose operations are linked to controversial weapons, military equipment, fossil fuels, alcohol, tobacco, cannabis, pornography and commercial gambling, as well as by excluding companies that have confirmed violations of international norms and conventions related to the environment, human rights, employee rights or anti-corruption and anti-bribery.

The fund has also promoted environmental and/or social characteristics through considering the principal adverse impact on sustainability factors (PAI) related to environment, climate, human rights, employee rights and anti-corruption and anti-bribery.

The fund is an index fund, and the fund’s index has been selected with the purpose of achieving the environmental or social characteristics that the fund promotes through its exclusion criteria described above. Concerning promotion via sustainable investments, these investments are included in the fund and its index as stated above but are not an explicit part of the index methodology.

● **How did the sustainability indicators perform?**

Metric	Value 2023	Value 2022
Share of sustainable investments (%)	46.18%	43.81%
Carbon footprint (Scope 1,2,3) (tCO2eq/EURm)	920.04	1,360.72
GHG Intensity (Scope 1, 2, 3) (tCO2eq/EURm)	1,469.07	1,821.56
UN Global Compact principles and OECD Guidelines for Multinational Enterprises: Share of investments in investee companies that have been involved in violations of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises (%)	0.00%	0.00%
Share of investments in companies that are active within the fossil fuels sector (%)	0.00%	0.00%

● **...and compared to previous periods?**

The fund company does not invest in companies deemed to have verified violations of the UN Global Compact and the OECD Guidelines for Multinational Enterprises, nor does the fund company make investments with exposure to banned or controversial weapons or companies with revenue in excess of 5% that is derived from activities (production/distribution) linked to weapons and military equipment, alcohol, tobacco, cannabis, pornography, commercial gambling and fossil fuels, with the exception of any investments in approved transition companies. In exceptional cases, an existing holding can obtain a modified analysis, in which case the holding will be sold as soon as possible, although an exposure may exist during the short period between the changed signal and the sale.

Refer to the table above for a comparison to previous periods.

● **What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?**

The objective of the sustainable investments was to invest in companies whose economic activities are assessed to make a positive contribution to an environmental or social objective, or alternatively companies whose activities are aligned with the EU Taxonomy. The environmental objectives and the social objectives are defined on the basis of the Sustainable Development Goals of the 2030 Agenda.

The objectives the fund contributed to by the end of the reference period are listed above. The contribution to the environmental objectives defined in the EU Taxonomy have been measured through the companies' estimated alignment with the taxonomy in terms of revenue. In regard to the other environmental and social objectives, the contribution to these goals has been measured through the companies' revenue from products and services that, according to the fund company's assessment, can be considered to contribute to the Sustainable Development Goals of the 2030 Agenda. Qualifying as a sustainable investment requires an estimated 20% taxonomy aligned revenue, or a 25% revenue from products and services that contribute to the Sustainable Development Goals of the 2030 Agenda. In certain cases, the assessment of the company's contribution to environmental or social objectives is based on different criteria than a minimum level of revenue, such as capital expenditure or operational expenditure (CAPEX/OPEX).

***How did the sustainable investments that the financial product partially made not cause significant harm to any environmental or social sustainable investment objective?***

Through the application of the principles stated below during the reference period, the sustainable investments have been ensured to not cause significant harm to any environmental or social sustainable investment objective.

- Criteria for excluding companies with activities linked to controversial sectors as well as specific PAI-indicators, such as fossil fuels and controversial weapons.
- Criteria for excluding companies with confirmed violations of international norms and conventions.
- Assessment of the investment not causing significant adverse impacts on sustainability factors (PAI). The assessment is conducted in the fund company's internal PAI tool.
- Assessment of which products and services the company is otherwise involved with, and if these could be deemed to significantly counteract sustainable development.

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

Through the usage of the fund company's internal PAI tool, indicators of adverse impacts on sustainability factors have been analysed and evaluated. Investments that are considered to cause significant adverse impacts are, in accordance with the fund company's assessment method, not deemed as meeting the requirements concerning not causing significant harm within the framework of sustainable investment.

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

**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.

During the reference period, the fund's investments have been aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. This has been ensured through applying the fund company's exclusion strategy.

*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 Union criteria.*

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

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



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

The portfolio manager considers principle adverse impacts on sustainability factors (PAI). This is done through one of the fund company's developed PAI tools where potential adverse impacts are identified and analysed. Companies deemed to have high risks in regard to PAI are managed primarily through exclusion or asset stewardship.

Below, the indicators that have been analysed for the fund are disclosed:

Adverse sustainability indicator & metric	Value 2023	% coverage 2023	Value 2022	% coverage 2022
1.1 GHG Emissions - Scope 1 GHG emissions (tCO <sub>2</sub> eq)	134,463.52	99.35%	163,712.37	99.53%
1.1 GHG Emissions - Scope 2 GHG emissions (tCO <sub>2</sub> eq)	22,100.57	99.35%	22,823.67	99.53%
1.1 GHG Emissions - Scope 3 GHG emissions (tCO <sub>2</sub> eq)	1,149,054.32	99.35%	1,710,003.63	99.53%
1.1 GHG Emissions - Scope 1+2 GHG emissions (tCO <sub>2</sub> eq)	156,564.09		186,536.07	
1.1 GHG Emissions - Scope 1+2+3 GHG emissions (tCO <sub>2</sub> eq)	1,305,618.41		1,896,539.67	
1.2 Carbon Footprint - Carbon Footprint Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	920.04	99.35%	1,360.72	99.53%
1.2 Carbon Footprint - Carbon Footprint Scope 1+2 (tCO <sub>2</sub> eq/EURm)	110.70	99.35%	133.84	99.53%
1.3 GHG intensity of investee companies - GHG Intensity Scope 1+2+3 (tCO <sub>2</sub> eq/EURm)	1,469.07	99.35%	1,821.56	99.53%
1.3 GHG intensity of investee companies - GHG Intensity Scope 1+2 (tCO <sub>2</sub> eq/EURm)	136.01	99.35%	204.63	99.53%
1.4 Exposure to companies active in the fossil fuel sector - Share of investments in companies active in the fossil fuel sector (%)	0.00%	99.35%	0.00%	99.53%

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Adverse sustainability indicator & metric	Value 2023	% coverage 2023	Value 2022	% coverage 2022
1.5 Share of non-renewable energy consumption and Production - Share of non-renewable energy consumption of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage (%)	56.82%	71.25%	62.13%	69.77%
1.5 Share of non-renewable energy consumption and Production - Share of non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage (%)	30.40%	26.96%	37.53%	23.89%
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm)				
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - A – AGRICULTURE, FORESTRY AND FISHING	0.00			
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - B – MINING AND QUARRYING	0.00			
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - C – MANUFACTURING	2.05		1.91	
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - D – ELECTRICITY, GAS, STEAM AND AIR CONDITIONING SUPPLY	0.00			
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - E – WATER SUPPLY; SEWERAGE, WASTE MANAGEMENT AND REMEDIATION ACTIVITIES	0.00			
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - F – CONSTRUCTION	0.02		0.08	

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Adverse sustainability indicator & metric	Value 2023	% coverage 2023	Value 2022	% coverage 2022
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - G – WHOLESALE AND RETAIL TRADE; REPAIR OF MOTOR VEHICLES AND MOTORCYCLES	0.07		0.08	
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - H – TRANSPORTATION AND STORAGE	9.82		19.64	
1.6 Energy consumption intensity per high impact climate sector - Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector (GWh/EURm) - L – REAL ESTATE ACTIVITIES	0.00			
1.7 Activities negatively affecting biodiversity-sensitive areas - Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas (%)	1.87%	99.35%	1.84%	99.53%
1.8 Emissions to water - Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average (t/EURm)	1.85	20.97%	2.15	20.81%
1.9 Hazardous waste ratio - Tonnes of hazardous waste generated by investee companies per million EUR invested, expressed as a weighted average (t/EURm)	0.79	90.66%	1.18	63.87%
1.10 Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises - Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises (%)	0.00%	99.35%	0.00%	99.53%
1.11 Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises - Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises (%)	18.72%	97.19%	28.89%	97.41%
1.12 Unadjusted gender pay gap - Average unadjusted gender pay gap of investee companies (%)	15.00%	1.35%		0.00%
1.13 Board gender diversity - Average ratio of female to male board members in investee companies (%)	37.87%	99.35%	38.45%	99.53%

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Adverse sustainability indicator & metric	Value 2023	% coverage 2023	Value 2022	% coverage 2022
1.14 Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons) - Share of investments in investee companies involved in the manufacture or selling of controversial weapons (%)	0.00%	99.35%	0.00%	99.53%
2.4 Investments in companies without carbon emission reduction initiatives - Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement (%)	23.04%	99.35%	40.81%	99.53%
3.9 Lack of a human rights policy - Share of investments in entities without a human rights policy (%)	0.00%	93.20%	0.00%	90.22%
1.15 GHG Intensity - GHG intensity of investee countries (KtonCO2eq/EURm)	0.00	0.00%		0.00%
1.16 Investee countries subject to social violations - Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law.	0.00%	0.00%		0.00%



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

The list includes the investments constituting the **greatest proportion of investments** of the financial product during the reference period which is: 2023-01-01 to 2023-12-31

Largest investments	Sector	% Assets 2023	% Assets 2022	Country
Telenor	Information and Communication	3.07%	2.89%	NO
DNB Bank	Financial and Insurance Activities	2.77%	2.75%	NO
Tele2 B	Information and Communication	2.74%	2.84%	SE
Nordea Bank	Financial and Insurance Activities	2.73%	2.81%	FI
Elisa	Information and Communication	2.65%	2.65%	FI
Volvo B	Manufacturing	2.61%	2.63%	SE
Yara International	Manufacturing	2.55%	2.34%	NO
Orkla	Manufacturing	2.49%	2.67%	NO
Telia	Information and Communication	2.47%	2.46%	SE
Gjensidige Forsikring	Financial and Insurance Activities	2.45%	2.66%	NO
Handelsbanken A	Financial and Insurance Activities	2.41%	2.54%	SE
Tryg	Financial and Insurance Activities	2.41%	2.57%	DK
TietoEvry	Information and Communication	2.38%	2.39%	FI
Storebrand	Financial and Insurance Activities	2.38%	2.33%	NO
Swedbank A	Financial and Insurance Activities	2.37%	2.69%	SE



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

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

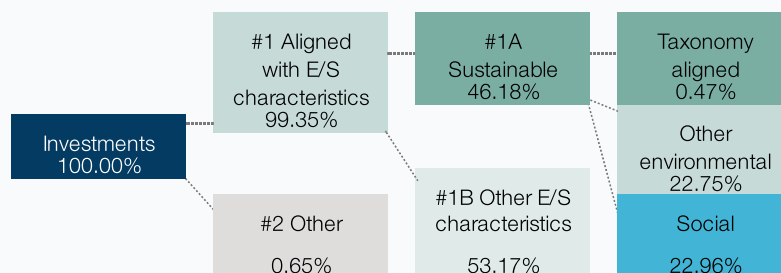
Taxonomy-aligned activities are expressed as a share of:

- **turnover** reflects the “greenness” of investee companies today.

- *What was the asset allocation?*



- **capital expenditure** (CapEx) shows the green investments made by investee companies, relevant for a transition to a green economy.  
- **operational expenditure** (OpEx) reflects the green operational activities of investee companies.



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

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

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

- Underkategorin **Nr1A Hållbara** omfattar miljömässigt och socialt hållbara investeringar.
- The sub-category **#1B Other E/S characteristics** covers investments aligned with the environmental or social characteristics that do not qualify as sustainable investments.

● *In which economic sectors were the investments made?*

Sector/Industry code	Sector/Industry name	Sum
C	Manufacturing	36.32%
10	Manufacture of food products	4.40%
17	Manufacture of paper and paper products	6.57%
20	Manufacture of chemicals and chemical products	3.02%
21	Manufacture of basic pharmaceutical products and pharmaceutical preparations	3.98%
22	Manufacture of rubber and plastic products	3.09%
24	Manufacture of basic metals	1.85%
26	Manufacture of computer, electronic and optical products	1.79%
27	Manufacture of electrical equipment	2.23%
28	Manufacture of machinery and equipment n.e.c.	6.78%
29	Manufacture of motor vehicles, trailers and semi-trailers	2.61%
F	Construction	0.00%
G	Wholesale and Retail Trade; Repair of Motor Vehicles and Motorcycles	4.36%
47	Retail trade	4.36%
H	Transportation and Storage	0.86%
50	Water transport	0.86%
J	Information and Communication	13.32%
61	Telecommunication	10.94%



62	Computer programming, consultancy and related activities	2.38%
K	Financial and Insurance Activities	28.47%
64	Financial service activities, except insurance and pension funding	18.21%
65	Insurance, reinsurance and pension funding, except compulsory social security	7.95%
66	Activities auxiliary to financial services and insurance activities	2.31%
L	Real Estate Activities	0.00%
N	Administrative and Support Service Activities	1.92%
80	Investigation and security activities	1.92%

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

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

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



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

Where possible, companies have begun to report on the extent to which their activities are aligned with the EU Taxonomy. In addition to reported data, estimated data is available. The fund company has assessed that this estimated data can be considered sufficiently reliable to be used to determine if the company contributes to an environmental objective defined in the EU Taxonomy and on that basis can be considered a sustainable investment in alignment with SFDR Article 2 (17).

The fund company's taxonomy reporting only shows the taxonomy alignment reported directly by the companies. The fund's proportion of taxonomy-aligned investments for 2023 totaled 0.52% based on the companies' revenue.

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

Yes:

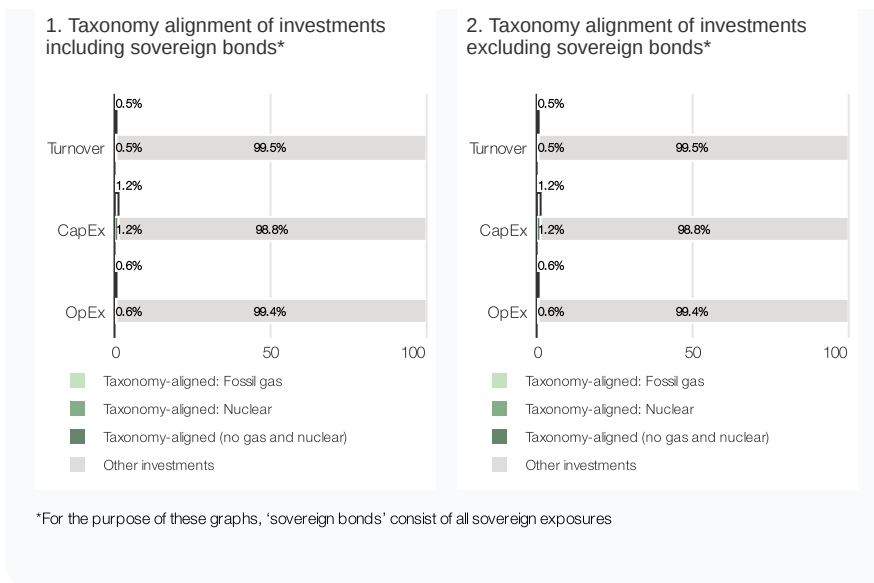
In fossil gas

In nuclear energy

No

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

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



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

The fund's proportion of taxonomy-aligned investments for 2023 totaled 0.13% in transitional activities and 0.26% in enabling activities.

• **How did the percentage of investments that were aligned with the EU Taxonomy compare with previous reference periods?**

In 2023, the fund's proportion of taxonomy-aligned investments totaled 0.52%

In 2022, the fund did not report any taxonomy-aligned investments since companies had not typically begun to report on the extent to which their activities were aligned with the EU Taxonomy.



are sustainable investments with an environmental objective that **do not take into account the criteria** for environmentally sustainable economic activities under Regulation (EU) 2020/852.



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

The fund is able to invest in economic activities that currently cannot be classified as aligned with the EU Taxonomy. This occurs, among other reasons, due to the environmental objectives currently not having complete technical screening criteria and due to the access to reported data from companies being insufficient.

At the end of the reference period, the fund had 22.75% of sustainable investments with an environmental objective not aligned with the EU Taxonomy.

Additionally, the fund had 0.47% of sustainable investments that the fund company, based on estimated and/or reported data, deems as contributing to an environmental objective aligned with the EU Taxonomy (but which cannot with sufficient certainty be classified as compatible with the EU Taxonomy as such).



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

During the reference period, the fund had 22.96% of sustainable investments with a social objective.



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

During the reference period, the fund held cash and equity index derivatives for liquidity and risk management. Concerning investments listed in equity index derivatives, these

investments have been made in sustainability-screened derivatives where deemed possible.



### What actions have been taken to meet the environmental and/or social characteristics during the reference period?

#### Exclusions

During the reference period, the fund has been managed in line with its exclusion strategy, meaning that potential holdings that during this period no longer meet the fund's sustainability requirements have been divested.

#### Asset stewardship

The fund company and the portfolio manager have during the reference period conducted active asset stewardship in order to improve upon the portfolio companies' sustainability efforts, reduce sustainability risks and to manage and reduce potential risks regarding adverse impacts on sustainability factors.

#### Engagement

During the reference period, the fund company carried out direct engagement between the fund company and companies 197 times. 15 of these were dialogues with companies that on balance day had holdings in this fund. These dialogues aim to support the continuous improvement of the companies' sustainability efforts and include questions regarding how to handle the company's sustainability risks, the prevention of adverse impacts and contributions to sustainable development. The dialogues can also be reactive/incident based.

In addition to direct dialogues, the fund company has during the reference period taken part in collaborative engagements where 224 companies have been addressed together with other investors. 5 of these were dialogues with companies that on balance day had holdings in this fund.

Through participating in initiatives, investor statements and networks, the fund company has carried out engagement activities during the reference period.

#### Voting at shareholders' meetings

As a part of the fund company's asset stewardship, the fund company voted on behalf of the fund at 35 shareholders' meetings.

#### Nomination committees

The fund company has through its ownership share taken part in 70 nomination committees and worked to put forward proposals for boards with expertise and diversity. Among these, the fund had holdings in 7 of these companies on balance day.



### How did this financial product perform compared to the reference benchmark?

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

- **How does the reference benchmark differ from a broad market index?**

The fund follows an index with sustainability requirements. This means that companies that do not fulfill the requirements for sustainable and responsible investments are not allowed to be part of the index. These companies are ones involved in controversial weapons or with verified violations of international norms related to the environment, human rights, employee rights or anti-corruption and anti-bribery. This also includes companies whose revenue to more than 5% derives from activities (production/distribution) linked to military equipment, alcohol, tobacco, pornography, commercial gambling and fossil fuels.

- **How did this financial product perform with regard to the sustainability indicators to determine the alignment of the reference benchmark with the environmental or social characteristics promoted?**

The sustainability indicators of the fund and the index as well as the fund's performance relative to a broad market index are reported below.

- ***How did this financial product perform compared with the reference benchmark?***

The fund is an index fund managed in line with its reference benchmark, SHB Nordic High Div Low Vol. This means that the fund's performance with regard to the sustainability indicators in all essential aspects are consistent with the reference benchmark's corresponding performance.

- ***How did this financial product perform compared with the broad market index?***

The fund has been compared against a broad, market cap-weighted Nordic index.

	XACT Nordic High Dividend Low Volatility (UCITS ETF)	Broad market index
Share of sustainable investments (%)	46,18%	48,40%
Carbon footprint (Scope 1,2,3) (tCO <sub>2</sub> eq/EURm)	920,04	929,91
Greenhouse gas emissions (Scope 1,2,3) (tCO <sub>2</sub> eq/EURm)	1 469,07	950,34
Share of investments in companies that are active within the fossil fuels sector (%)	0,00%	4,03%
Share of investments in investee companies that have been involved in violations of the UN Global Compact principles and OECD Guidelines for Multinational Enterprises (%)	0,00%	0,00%