



Template for 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: ODIN Small Cap

Legal entity identifier: 213800P566PM350G3440

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.

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

Yes

No

It made sustainable investments with an environmental objective:

in economic activities that qualify as environmentally sustainable under the EU Taxonomy

in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

It made sustainable investments with a social objective:

It **promoted environmental/social characteristics** and while it did not have as its objective sustainable investment, it had a proportion of 34% of sustainable investments

with an environmental objective in economic activities that qualify as environmentally sustainable under the EU Taxonomy

with an environmental objective in economic activities that do not qualify as environmentally sustainable under the EU Taxonomy

with a social objective

It promoted environmental/social characteristics but **did not make any sustainable investments**



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

The Fund promoted environmental characteristics via investments in companies that are expected to contribute to the UN Sustainable Development Goals (SDGs) on the environment. The Fund excludes companies that are associated with violations of international norms and conventions related to the environment. The Fund also excludes companies with revenues from fossil fuels and companies with unacceptably high greenhouse gas emissions. The Fund takes the most important negative impacts on sustainability factors (PAI indicators) related to the environment and climate into consideration when analysing individual companies.

The Fund promotes social characteristics via investments in companies that are expected to contribute to the UN Sustainable Development Goals (SDGs) on social issues. The Fund excludes companies that are associated with violations of international norms and conventions related to human rights and workers rights, and companies where the risk of contributing to corruption and bribery is high. The Fund also excludes companies that produce weapons, tobacco, alcohol, cannabis, pornography, or that offer or are engaged in gambling. The Fund takes the most important negative impacts on sustainability factors related to social issues into consideration.

The Fund had sustainable investments in companies with revenues from activities that contribute to the UN Sustainable Development Goals on the environment. These include Goal 9 “Industry, innovation and infrastructure,” Goal 11 “Sustainable cities and communities,” Goal 12 “Responsible consumption and production,” and Goal 13 “Climate Action.” The Fund has sustainable investments in companies with revenues from activities that contribute to the UN Sustainable Development Goals on social issues, including Goal 3 “Good health and well-being”.

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



● How did the sustainability indicators perform?

The Fund's ESG risk level – Medium

Sustainalytics is the data provider and assesses companies' ESG risks. There are five risk categories: negligible, low, medium, high and severe. (For more information on the ESG ratings see: <https://www.sustainalytics.com/esg-ratings>)

Exclusions

No new companies were excluded due to violations of the product criteria in this year's Sustainable and Responsible Investment Policy for ODIN Forvaltning.

No new companies were excluded this year due to violation of the norm criteria in this year's Sustainable and Responsible Investment Policy for ODIN Forvaltning.

The Fund's carbon intensity –11.8 tCO₂ekv/mEUR

The carbon intensity shows the ratio of issuers' total emissions relative to their revenues, adjusted for portfolio weight.

Use of voting rights – 100 %

The figure shows the share of the voting rights exercised by the Fund at the annual general meeting.

Dialogues with companies – 81

Number of dialogues with companies regarding ESG-related topics

● 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 Fund had sustainable investments in companies with revenues from activities that contribute to the UN Sustainable Development Goals on the environment, including Goal 9 "Industry, innovation and infrastructure," Goal 11 "Sustainable cities and communities," Goal 12 "Responsible consumption and production," and Goal 13 "Climate Action." The Fund has sustainable investments in companies with revenues from activities that contribute to the UN Sustainable Development Goals on social issues, including Goal 3 "Good health and well-being."

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

The Fund's sustainable investments fulfilled the requirements of the Sustainable and Responsible Investment Policy for ODIN Forvaltning:

- *None of the investments were in companies with revenues from excluded sectors.*
- *None of the investments were in companies in breach of international norms and conventions.*
- *None of the investments were in companies that have activities that in our judgement cause significant negative impacts on sustainability factors (the PAI indicators).*

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

All companies in the Fund are assessed in terms of ESG. This assessment includes an analysis of the company's impact on the most significant negative impacts on sustainability factors as defined by the EU. Data has been obtained from an independent analysis provider and an assessment of all 14 mandatory and three self-selected PAI indicators has been performed on each company. Where data was not available from the external provider, the fund manager has made its own assessment based on in-depth knowledge of each individual company. Via a dialogue, the Fund has engaged portfolio companies to ensure better information and good risk management of the companies' impact on the relevant and most significant negative sustainability impacts.

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.

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

Details:

The sustainable investments were aligned with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. There were no breaches of these guidelines for any of the Fund's investments.

The EU Taxonomy for sustainable activities sets out a “do no 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 EU criteria for environmentally sustainable economic activities. The investments underlying the remaining portion of this financial product do not take into account the EU criteria for environmentally sustainable economic activities.

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



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

Data has been obtained from an independent data provider and an assessment of the most important negative impacts has been made. For some of the indicators, the Fund has absolute thresholds that companies cannot exceed. This applies to the indicators that largely overlap with the Sustainable and Responsible Investment Policy for ODIN Forvaltning, such as indicators 4, 5, 10 and 14. No companies were in breach of these indicators this year. For the other indicators, the Fund focuses on seeing a positive trend in the figures over time. Several of the indicators have not been common for companies to report on. This applies in particular to indicators 5, 6, 8, 9, 11 and 12, where there is very low coverage in the reported figures. Where data is not available from an external supplier or the company's own reporting, the fund manager has made a separate assessment of the company's performance for relevant indicators. By means of dialogue and exercising voting rights, the Fund has engaged portfolio companies to ensure better information and good risk management of the companies' impact on the relevant and most important negative sustainability impacts.

#	PAI indicator	Unit	Results
1	Greenhouse gas emissions	Scope 1 (tCO ₂ eq)	647
		Scope 2 (tCO ₂ eq)	310
		Scope 3 (tCO ₂ eq)	6 765
		Scope 1 + 2 (tCO ₂ eq)	976
		Scope 1 + 2 + 3 (tCO ₂ eq)	7 741
2	Carbon footprint	Scope 1 + 2 (tCO ₂ eq/EURm)	4
		Scope 1 + 2 + 3 (tCO ₂ eq/EURm)	33
3	Greenhouse gas intensity	Scope 1 + 2 (tCO ₂ eq/EURm)	13
		Scope 1 + 2 + 3 (tCO ₂ eq/EURm)	100
4	Exposure to companies that operate in the fossil fuel sector	% share in the portfolio	-
5	Proportion of consumption and production of non-renewable energy	Proportion consumption of non-renewable energy	64
		Proportion of production of non-renewable energy	57

6	Energy consumption intensity per high impact climate sector	Agriculture, forestry and fisheries (GWh/EURm)	-
		Building and construction of facilities (GWh/EURm)	-
		Electricity, gas, steam and air conditioning (GWh/EURm)	-
		Industrial Engineering (GWh/EURm)	1
		Mining (GWh/EURm)	-
		Real property activities (GWh/EURm)	-
		Transport & storage (GWh/EURm)	-
		Water supply, sewage, waste management and remediation (GWh/EURm)	-
		Wholesale and retail trade and repair of vehicles and motorcycles (GWh/EURm)	-
7	Activities with a negative impact on biodiversity-sensitive areas	% share in the portfolio	-
8	Discharges to water	t/EURm	-
9	Proportion of hazardous waste and radioactive waste	t/EURm	0
10	Non-compliance with the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises	% share in the portfolio	-
11	Lack of processes and mechanisms to monitor compliance with UN Global Compact principles and the OECD Guidelines for Multinational Enterprises	% share in the portfolio	97
12	Unadjusted gender gap in pay	%	-
13	Gender diversity of the Board of Directors	percentage of woman Board members	31
14	Exposure to controversial weapons (anti-personnel mines, cluster munitions, and chemical or biological weapons)	% share in the portfolio	0
15	Investments in companies without established measures to reduce CO2 emissions	% share in the portfolio	87
16	Lack of or deficiency in guidelines concerning respect for human rights	% share in the portfolio	5
17	No guidelines on combating bribery and corruption	% share in the portfolio	5

The list includes the investments constituting **the greatest proportion investments** of the financial product during the reference period, which is 01/01/2022 – 31/12/2022



Which investments were the most important for this financial product?

Largest investments	Sector	% Assets	Country
NCAB Group	Information technology	6.9%	Sweden
CTT Systems	Manufactured goods and services	6.5%	Sweden
Absolent Group	Manufactured goods and services	5.7%	Sweden
MIPS	Capital goods and services	4.6%	Sweden
Chemometec	Health care services	4.3%	Denmark
Medistim	Health care services	4.1%	Norway
Troax Group A	Manufactured goods and services	4.1%	Sweden
Bravida Holding	Manufactured goods and services	4.0%	Sweden
Sdiptech B	Manufactured goods and services	4.0%	Sweden
OEM Intl B	Manufactured goods and services	4.0%	Sweden
Fortnox	Information technology	3.7%	Sweden
Coor Service Management	Manufactured goods and services	3.4%	Sweden
Bredband 2	Communication services	3.3%	Sweden
Avanza Bank Holding	Financial services	3.1%	Sweden
Vaisala Corporation A	Information technology	3.1%	Finland
Total for the 15 largest investments		64.8%	

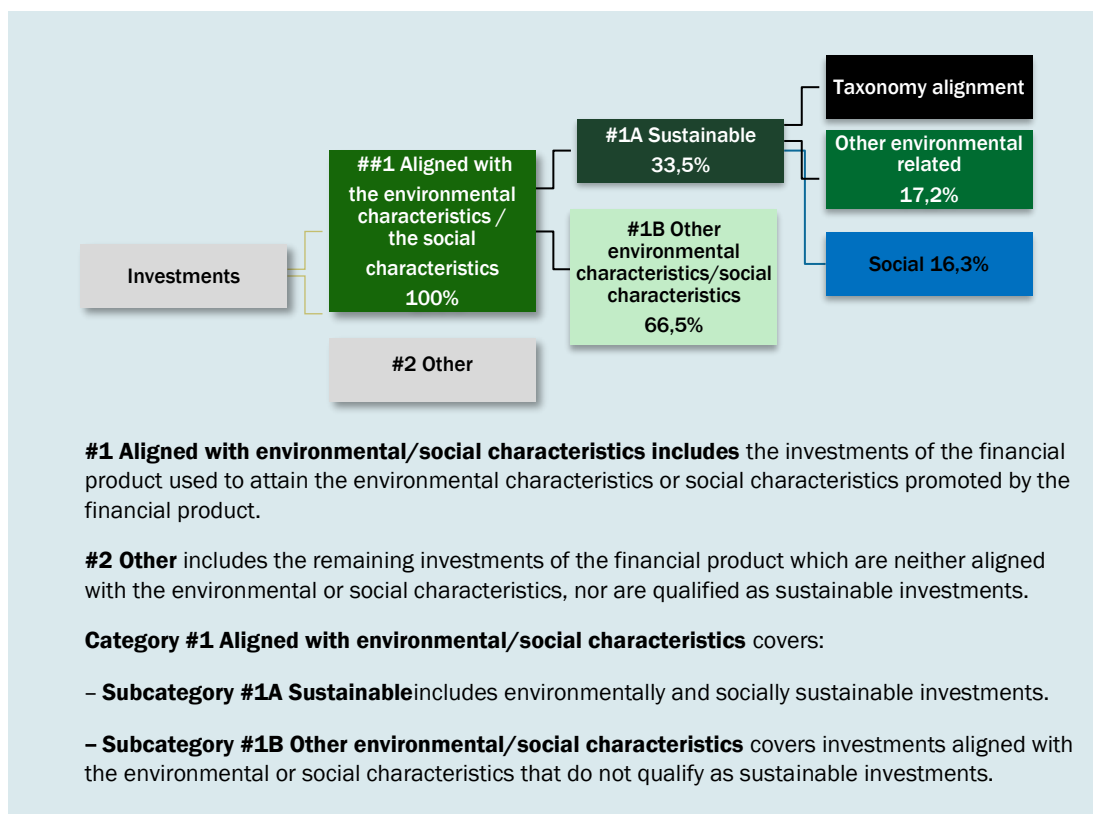


What was the proportion of sustainability-related investments?

● What was the asset allocation?

All of the Fund's investments are covered by ODIN's Sustainable and Responsible Investment Policy. This means that there are clear exclusion criteria detailing what the Fund may not invest in. An assessment is made of the ESG risk level in all existing and potential investments in the Fund.

Asset allocation describes the share of investments in specific assets.



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

Sector	% Assets	Revenues related to fossil fuels (J/N)
Industrials	39.5%	N
Information Technology	27.5%	N
Health Care	12.9%	N
Communication Services	6.3%	N
Consumer Discretionary	6.1%	N
Financials	3.1%	N
Real Estate	2.3%	N
Materials	1.1%	N
Total sectors <u>not</u> related to fossil fuels	98.9%	0%

The remaining investment funds are cash deposits in bank accounts.



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

The Fund has not committed to a minimum proportion of sustainable investments with an environmental objective aligned with the EU Taxonomy. At the time of writing this report, none of the companies reported on share of revenue, Capex or Opex aligned with the taxonomy.

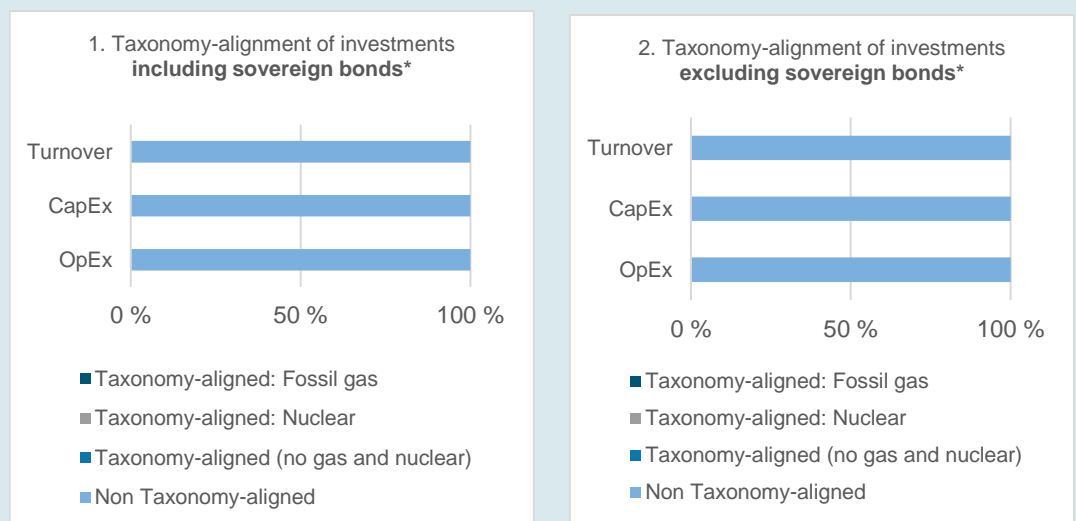
● **Did the financial product invest in activities related to fossil gas and/or nuclear energy aligned with the EU Taxonomy¹?**

Yes

In fossil gas In nuclear energy

No

The graph below displays in green the percentage of investments that were aligned with the EU Taxonomy. As there is no suitable method for determining the Taxonomy-alignment for sovereign bonds, the first graph shows the Taxonomy-alignment of all investments of the financial product including sovereign bonds, while the second graph shows the Taxonomy-alignment only for the investments of the financial product excluding sovereign bonds.*



**For the purpose of these graphs, "sovereign bonds" consist of all sovereign exposures.*

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

At the time of writing this report, none of the companies reported on the share of activities in transitional and enabling activities.

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 control rules.

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

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

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.



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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 has sustainable investments in companies with revenues or other activities that contribute to the UN Sustainable Development Goals on the environment, including Goal 9 “Industrial innovation and infrastructure,” Goal 11 “Sustainable cities and communities,” Goal 12 “Responsible consumption and production,” and Goal 13 “Climate Action.” The share is 17,2%.



What was the share of socially sustainable investments?

The Fund has sustainable investments in companies with revenues from activities that contribute to the UN Sustainable Development Goals on social issues, including Goal 3 “Good health and well-being” at 16,3%.



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

No investments are included under “Other.”



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

The fund manager conducts an ESG analysis for all the companies it invests in and exercises active ownership by engaging in dialogue and exercising voting rights with the companies in the Fund. Investments are also screened quarterly for non-compliance with the Sustainable and Responsible Investment Policy for ODIN Forvaltning In 2022, a process for collecting and monitoring the most important negative impacts of investments (PAI data) has also been established, and a methodology developed to assess which companies in the Fund contribute to the UN Sustainable Development Goals.

¹Fossil 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 other environmental objectives of the EU Taxonomy (see the explanatory note in the margin to the left). 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