

## **Sustainability policy**

### **21 May 2024**

With respect to CB Fonder, hereinafter referred to as the Company. Information about the funds managed by the Company is found in Appendix 1.

#### **1. Financial sustainability**

*The Company's financial position.*

##### **Background**

The Company operates in asset management, which in nature is a solid business since no large investments are required and the business is not exposed to any significant financial risk. Since its inception in 1994, the Company has generated a profit every fiscal year.

##### **Purpose**

Generating a profit is essential in order to be a stable player to each of the Company's stakeholders: investors, employees, owners, service providers, product suppliers and others. Long-term financial responsibility and economic proactivity are thus key factors to achieve and maintain financial sustainability.

##### **Goals**

- To operate a debt free and financially stable business
- To generate a profit every year

##### **Principles**

- Every employee acts thoughtfully and diligently in order to maximize the return on capital and to never cause the Company any unnecessary costs.
- No individual investment or expense can be of a nature where it poses a risk to the Company's financial health.

#### **2. Social sustainability**

*Employee conditions, satisfaction, and health*

##### **Purpose**

The Company strives to be a long-term attractive employer. We support each other so that every employee can use their skills in the best way in line with the Company's goals. This section describes the principles used to achieve this purpose.

##### **Goals**

- To have a corporate culture that puts the funds and the management of these first – the funds are the Company's clients.
- To create a good work environment that enables the Company to be an attractive employer in order to keep important human capital and at the same time have the opportunity to recruit talented individuals.

## Principles

- We recruit based on experience and competence. Every employee should have relevant education and/or experience to the work they are expected to perform.
- We promote learning and skills development. The Company pays for educational activities for the development of skills that are deemed relevant to the employees and their work.
- We have a clear organisation and division of responsibilities.
- We have a safe and supportive work environment. The Company strives to maintain and promote the employees' safety, health, well-being, and work capacity through preventive actions in developing the work environment and promoting health. Health care contributions to all employees are included in this. By having a close collaboration on a daily basis, we can assure that actions of this nature are forward-looking and integrated in the daily work.
- We strive to have all our employees maintaining a good work-life balance. The physical work environment should be designed to prevent and reduce injuries and to promote the employees' health. The Company has not had any work-related accidents.

### 3. Environmental sustainability

*This section describes amongst other things how the employees at the Company will conduct their work with minimal environmental impact. By having clear guidelines, the employees will work to minimize the environmental impact caused by the Company's operations. Today the Company's environmental impact can be attributed to employee travels and paper-based information material.*

#### Environmental impact from operations

The Company works to avoid the use of paper-based material to the greatest extent possible. This applies above all to service providers such as stockbrokers, whose material to a large extent is received and read digitally. In cases where material is sent via mail, we ask to receive e-mails instead of physical paper in the future. Distribution of our own paper-based material (mainly monthly reports for the funds) have, due to active and continuous work, decreased to zero during the last years and instead been replaced by digital distribution.

In addition to reduced paper consumption, environmental considerations will be taken regarding which paper and toners to use. Our policy is that environmentally friendly alternatives will be chosen first. Every employee has their own box for paper recycling and the goal is that all recyclable paper-based material will be recycled.

#### Energy consumption

Environmental considerations regarding energy consumption will be taken when purchasing computers and computer screens. Only low energy light bulbs are to be used for lighting the office.

## Travels

### *Planning*

If possible, telephone meetings and video conferences will be used to replace physical meetings and conferences. Travel distance and availability with public transport will be considered when choosing location for meetings. The main principle for business trips to a different location is to plan several meetings within in the same trip.

### *Travels to and from work*

The Company has its main office in central Stockholm and therefore good opportunities exists for the employees to travel to and from work by foot, bike, or public transport. Our policy is that those options are to be chosen firsthand as long as personal circumstances or the location of the employee's residence does not significantly complicate the travel, in relation to travel by car.

### *Domestic business trips*

Our policy is to choose the travel option with the smallest possible environmental impact for business trips. Train and bus will be chosen firsthand. Domestic flights are acceptable if corresponding travel by train takes more than five hours one way. If the destination is located so that it cannot reasonably be reached by public transportation a car may be used. In that case the rental car used should have low fuel consumption and in other aspects be environmentally friendly. If the destination requires travel by taxi an environmentally friendly taxi should be ordered. Deviation from the policy can occur due to health reasons or other private aspects and is determined by the CEO.

### *Foreign business trips*

Commercial flights are commonly chosen for foreign business trips but considerations to more environmentally friendly alternatives will always be taken, especially in cases where corresponding travel by train takes less than five hours one way.

### *Accommodation during travels*

Environmental and economic factors will be considered when choosing accommodation.

## **4. Guidelines for sustainable and ethical investments**

The funds managed by the Company invest in companies with a stable profit growth and a long-term sustainable business model, which is why the funds do not have any holdings in companies with, e.g., fossil assets.

The funds managed by the Company also do not invest in companies active in:

- Production or sales of tobacco, alcohol, and cannabis
- Sales and manufacturing of conventional weapons
- Sales and manufacturing of civilian hand-held weapons
- Gambling
- Pornography
- Mining, pumping or refining of coal, natural gas, crude oil, or uranium for fuel
- Companies that extract energy from coal, natural gas, crude oil or uranium
- Production of genetically modified seeds used by others in agriculture

These restrictions are valid also for companies who supply services/products to/in the above-mentioned industries. Activity in these industries is defined as accounting for 5% or more of the companies reported revenue in the most recent annual report. In the case of energy production from fossil fuels, the production capacity in Gigawatt (GW) must also not exceed 5%.

Furthermore, the funds managed by the Company do not invest in companies operating in any capacity in the production or sale of the following controversial weapons:

- Nuclear weapons
- Chemical weapons
- Biological weapons
- Cluster munition
- Landmines
- Depleted uranium
- White phosphorus

The restriction also applies to companies that provide components with the sole purpose of being used in these weapons and refer to those cases where it has been stated in the company's most recently published annual report that they generated sales in some capacity in the above-mentioned areas.

In the case of investments in government bonds, in addition to the restrictions defined in the prospectus, investments from the funds managed by the Company may not be made in government bonds issued by:

- Countries which the EU or the UN issued financial sanctions against
- Countries that have not approved the following:
  - The UN Convention on Biological Diversity
  - The Paris Agreement
- Countries whose ranking in the Transparency International's Corruption Perception Index falls outside of the top 70.

The Company aims to invest in companies which promote human rights and should therefore show diligence in the management of funds with investments that pose a risk of contributing to:

- Harmful forms of child labor and forced labor or unreasonable working environment (defined in the UN Rights of the Child Convention and ILO Conventions nr 29, 87, 98, 105, 138 and 182)
- Deliberate discrimination of employees due to gender, race, or religion (defined in the UN Declaration of Human Rights and ILO Conventions nr 100 and 111)
- Deliberate crimes against central international agreements in the environmental area (defined in the UN Climate Convention and the Kyoto protocol)
- Corruption, extortion and / or bribery (defined in the UN Convention against Corruption)

The Company strives for the company-managed funds to invest in companies that promote conservation of biodiversity and to refrain from investing in companies active in deforestation.

The Company is a member of UN PRI, the United Nations-sanctioned principles of responsible investing, and SWESIF, Sweden's forum for sustainable investments. The Company reports in quarterly updates all holdings in the funds that the company manages. This is done to ensure access to data and information that investors need to ensure that all investments the funds make are within the restrictions outlined in this document.

## Sustainability Risks

Sustainability risk refers to an environmental, social or governance-related event or circumstance that, if it were to occur, would have an actual or potential significant negative impact on the value of the investment. Climate risks are a type of sustainability risk that can be divided into physical risks and transition risks. Physical risks can be divided into acute risks such as short-term heat waves, and chronic risks such as increased average temperature over a longer period of time.

Transition risks are made up of risks related to society's transition, and include, for example, regulations from government authorities and demands from consumers. Even technology development driven by sustainability reasons is included as a transition risk as old technology may become obsolete.

Sustainability Risks are integrated into the investment decision making and risk monitoring to the extent that they represent potential or actual material risks and/or opportunities for maximizing the long-term risk-adjusted returns. The Investment Manager considers sustainability risks as part of its broader analysis of potential investments and the factors considered will vary depending on the security in question, but typically include ownership structure, board structure and membership, capital allocation track record, management incentives, labor relations history, and climate risks. Failure to consider sustainability risks could have a negative long-term impact on returns.

Due to the nature of the Company's investment strategy and types of securities it holds, the Company is exposed to varied Sustainability Risks which include, but are not limited to:

- corporate governance malpractices (e.g., board structure, executive remuneration);
- shareholder rights (e.g., election of the likely directors, capital amendments);
- changes to regulation (e.g., greenhouse gas emissions restrictions, governance codes);
- physical threats (e.g., extreme weather, climate change, water shortages);
- brand and reputational issues (e.g., poor health & safety records, cyber security breaches);
- supply chain management (e.g., increase in fatalities, lost time injury rates, labor relations);
- and
- work practices (e.g., observation of health, safety, and human rights provisions).

How the Company considers the main negative consequences of investment decisions for sustainability factors at the product level is stated in the prospectus for each product. Reporting of negative consequences in previous years takes place in the PAI Statement, which is published no later than June 30 of the following year. The first time the PAI Statement is published is 2023, and describes negative consequences in 2022.

Sustainability risks can also arise in employee compensation. Since the variable compensation is directly dependent on the company's revenues, which in turn depend largely on the managed capital in the funds, increased managed capital therefore contributes to higher variable compensation. Both funds have ethical guidelines that work for a better environment and one of the funds is an environmental fund. Increased AuM in the funds therefore contributes to climate goals.

## Reporting

This document was established at the board meeting on 25 May 2021. It is re-established upon changes in content and at least once per year. The latest time it was established was at the board meeting on 21 May 2024.

**Appendix 1**

<b>Fund</b>	<b>LEI</b>	<b>ISIN</b>
<b>CB European Quality Fund</b>	549300G6TK5TFMDMOC83	LU0112589485 LU0806934948 LU1179404386
<b>CB Save Earth Fund</b>	529900CM3ES7TC9YOL54	LU0354788688 LU1760112463 LU0354788506 LU1053083884