

## SUSTAINABILITY-RELATED DISCLOSURE

### C WorldWide Sweden (the “Strategy”),

Legal entity identifier: 967600QIGO353E50TF04

This sustainability-related disclosure has been prepared in accordance with article 10 of Regulation (EU) 2019/2088 of the European Parliament and the Council of 27 November 2019 on sustainability-related disclosures in the financial sector (the “Disclosure Regulation”).

The information in this sustainability-related disclosure is a supplement to the pre-contractual disclosure.

### 1. Summary

The Strategy promotes **environmental or social characteristics** but does not have as its objective sustainable investment.

The Strategy promotes environmental and social characteristics by:

- Considering principal adverse impacts (PAI) on sustainability factors (**principal adverse impacts**).
- Having a minimum proportion of 5% of sustainable investments (**minimum proportion of sustainable investments**)
- Avoiding investments in investee companies involved in controversial weapons (**controversial weapons exclusion**).
- Avoiding investments in companies exceeding a certain level of involvement in small arms, adult entertainment, alcoholic beverages, gambling, tobacco products, oil & gas, thermal coal, oil sands and shale energy (**sector exclusions**).

The **investment strategy** of the Strategy includes the following elements:

- Principal adverse impacts,
- Minimum proportion of sustainable investments,
- Controversial weapons,
- Sector exclusions,
- UN Global Compact,
- Active ownership, and
- Norm-based screening.

The **binding elements of the investment strategy** used to select the investments to attain each of the environmental or social characteristics promoted by the Strategy are minimum proportion of sustainable investments, principal adverse impacts, controversial weapons exclusion and sector exclusions.

The attainment of the environmental or social characteristics promoted by the Strategy are measured by the following **sustainability indicators**:

- **Principal adverse impacts**: The PAI Indicators specified in the PAI statement of the Investment Manager (the PAI statement).

- **Minimum proportion of sustainable investments:** The actual average proportion of sustainable investments.
- **Controversial weapons exclusion:** The number of investee companies of the Strategy:
  - o Involved in the core weapon system of controversial weapons, or components or services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon.
  - o Providing components or services for the core weapon system of controversial weapons, which are either not considered tailor-made or not essential to the lethal use of the weapon.
- **Sector exclusions:** The number of investee companies of the Strategy exceeding a certain level of involvement in the activities specified below:

Activities	Description of Activities	Level of involvement
Small arms	Companies involved in the manufacturing, distribution, sale or retail sale of assault weapons.	5%
	Companies involved in the manufacturing, distribution, sale or retail sale of small arms or key components to small arms.	5%
Adult entertainment	Companies involved in the production or distribution of adult entertainment or owning or operating adult entertainment establishments.	5%
Alcoholic beverages	Companies involved in the manufacturing, distribution or retail sale of alcoholic beverages or in supplying alcohol-related products or services to alcoholic beverage manufacturers.	5%
Gambling	Companies owning or operating gambling establishments, manufacturing specialized equipment used exclusively for gambling or providing supporting products or services to gambling operations.	5%
Tobacco products	Companies involved in the manufacturing, distribution or retail sale of tobacco products or in the supply of tobacco-related products or services.	5%
Oil & gas	Companies involved in oil and gas exploration, production, refining, transportation, or storage.	5%
	Companies involved in the generation of electricity from oil or gas.	25%
Thermal coal	Companies involved in thermal coal extraction.	5%
	Companies involved in the generation of electricity from thermal coal.	5%
Oil sands	Companies involved in oil sands extraction.	5%
Shale energy	Companies involved in shale energy exploration or production.	5%

The Strategy plans to **allocate a minimum of 90% of the assets** of the Strategy to investments in equities. All equities are used to meet the environmental or social characteristics promoted by the Strategy, in accordance with the binding elements of the investment strategy.

The investee companies are systematically **screened and monitored** prior to the initial investment and continuously during the holding period to ensure that the investments are made in accordance with

the binding elements of the investment strategy and that the investee companies follow good governance practices. Furthermore, the investee companies are systematically screened for violations of international conventions, norms and standards relating to ESG issues such as human rights, labour rights, the environment and business ethics.

The environmental or social characteristics of the Strategy will primarily be attained using **data** supplied by Morningstar Sustainalytics and Clarity AI. The quality of the research provided is evaluated on an ongoing basis to ensure a high data quality. Morningstar Sustainalytics generally update their company specific data annually based on annual reporting by the companies. Company specific data will therefore not always be fully updated.

Furthermore, the environmental or social characteristics of the Strategy will be attained using a proprietary analysis tool to identify and assess principal adverse impacts on sustainability factors. Principal adverse impacts are identified and assessed prior to the initial investment in an investee company and regularly during the holding period. All the PAI Indicators are sourced via Bloomberg to the extent investee companies report and disclose. For some PAI indicators data from several data providers are applied.

## **2. No sustainable investment objective**

This financial product promotes environmental or social characteristics but does not have as its objective sustainable investment.

### **Minimum proportion of sustainable investments**

The Strategy will have a minimum proportion of 5% of sustainable investments. In order to ensure that the sustainable investments that the Strategy partially intends to make, does not cause significant harm to any environmental or social sustainable investment objective, a do no significant harm evaluation will be performed on each investee company.

### **Do no significant harm evaluation**

To pass the do no significant harm evaluation an investee company must have:

- No negative products, services or operational exposure PAI's measured by the Exposure PAI Indicators
- No negative product controversy product PAI's measured by the Controversy products PAI Indicators
- No quantitative PAI's in the bottom 5 percentile measured by the Quantitative PAI Indicators
- No controversy related to breaches of the minimum safeguards.

For the definition of Exposure PAI Indicators, Controversy PAI Indicators and Quantitative PAI indicators reference is made to section 7 below.

### **Minimum safeguards**

The minimum safeguards include high severity controversies, including controversies in relation to Labour rights and human rights.

### **PAI indicators**

The mandatory indicators for adverse impacts on sustainability factors have been taken into account in the measurement of an investee company's contribution to an environmental or social sustainable investment objective and the do no significant harm evaluation as described above.

The mandatory PAI indicators as defined in table 1 of annex 1 of Regulation (EU) 2022/1288 have been divided into:

- Exposure PAI Indicators: PAI indicator no. 4 and 14
- Controversy products PAI Indicators: PAI indicator no. 7, 10 and 11
- Quantitative PAI Indicators: PAI indicator no. 1-3, 5, 6, 8, 9, 12 and 13

Reference is made to section 7 below for additional information on the PAI indicators.

### **Alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights**

PAI indicator no. 10 is used to measure violations of the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights. In addition, alignment with the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises are included in the minimum safeguard evaluation.

## **3. Environmental or social characteristics of the financial product**

### **Principal adverse impacts**

The Strategy promotes environmental and social characteristics by considering principal adverse impacts on sustainability factors.

**Minimum proportion of sustainable investments:** The Strategy promotes environmental and social characteristics through a minimum proportion of sustainable investments.

### **Controversial weapons exclusion**

The Strategy promotes social characteristics by avoiding investments in investee companies involved in controversial weapons.

### **Sector exclusions**

The Strategy promotes environmental and social characteristics by avoiding investments in companies exceeding a certain level of involvement in small arms, adult entertainment, alcoholic beverages, gambling, tobacco products, oil & gas, thermal coal, oil sands and shale energy.

## **4. Investment strategy**

The investment strategy of the Strategy includes the following elements:

### **Principal adverse impacts**

Principal adverse impacts are identified, prioritized, and assessed from a materiality perspective relevant to the specific investment strategy of the Strategy. A proprietary analysis tool based on PAI indicators is applied. In addition, the Strategy will consider principal adverse impacts through active ownership. Principal adverse impacts are considered as part of the investment process and regularly during the holding period of an investee company.

### **Minimum proportion of sustainable investments**

A minimum proportion of the investments of the Strategy will be in sustainable investments.

### **Controversial weapons exclusion**

Before an investment is made in an investee company and regularly during the holding period the Strategy conducts screening of the activities of each investee company to avoid investments in companies involved in controversial weapons.

#### **Sector exclusions**

Before an investment is made in an investee company and regularly during the holding period the Strategy conducts screening of the activities of the investee company to avoid investments in companies exceeding a certain level of involvement in specific activities. If the activities of an investee company exceed the level of involvement the shares in the investee company will be sold within a reasonable time-period and in accordance with the general obligation to execute all orders on terms most favourable to the client.

#### **UN Global Compact**

Before the initial investment in an investee company is made and continuously during the holding period it will be evaluated whether an investee company is compliant with the 10 principles of the UN Global Compact.

#### **Active ownership**

Engagement is an integral part of the investment process. It is anchored directly with the portfolio management team responsible for the Strategy. Through engagement sustainable business conduct is encouraged. All general meetings of investee companies are monitored and voting rights are exercised.

#### **Norm-based screening**

The investee companies are systematically screened and monitored prior to the initial investment and continuously during the holding period for violations of international conventions, norms and standards relating to ESG issues such as human rights, labour rights, the environment and business ethics.

#### **The binding elements of the investment strategy**

The binding elements of the investment strategy used to select the investments to attain each of the environmental or social characteristics promoted by the Strategy are principal adverse impacts, controversial weapons and sector exclusions.

#### **The policy to assess good governance practices of the investee companies**

Screenings are performed prior to the initial investment and continuously during the holding period in order to ensure that the investee companies in which the Strategy invest follow good governance practices, including practices relating to sound management structures, shareholder rights, employee relations, remuneration of staff and tax compliance. Furthermore, the Strategy will attempt to strengthen good governance practices through active ownership.

## **5. Proportion of investments**

The investments of the Strategy mainly consist of equities. All equities are used to meet the environmental or social characteristics promoted by the Strategy, in accordance with the binding elements of the investment strategy. The Strategy plans to allocate a minimum of 90% of the assets of the Strategy to investments in equities. The remaining investments of the Strategy consist of cash held as ancillary liquidity.

The Strategy is not committed to a minimum proportion of sustainable investments with an environmental objective aligned with the EU Taxonomy, sustainable investments with an

environmental objective that are not aligned with the EU Taxonomy or socially sustainable investments.

All investments in investee companies constitutes direct exposure to such investee companies. The Strategy does not use derivatives.

## **6. Monitoring of environmental or social characteristics**

The environmental or social characteristics of the Strategy and the sustainability indicators used to measure the attainment of each of those environmental or social characteristics promoted by the financial product are continuously monitored.

The investee companies are systematically screened and monitored prior to the initial investment and continuously during the holding period to ensure that the investments are made in accordance with the binding elements of the investment strategy and that the investee companies follow good governance practices.

Monitoring of the investee companies can be described in two parts:

### *Initial investments*

Before an initial investment is made the investee company is screened via Morningstar Sustainalytics, Clarity AI and, in the case of PAIs, via a proprietary analysis tool, and the investment will only be effectuated if the screening proofs satisfactory that the investment will not cause a breach of the binding elements of the investment strategy and that the investee company follow good governance practices.

### *Holding period*

During the holding period, all investee companies are screened monthly via Morningstar Sustainalytics. If a screening reveals a breach of the sector exclusions or that the investee company is involved on controversial weapons or does not follow good governance practices, the shares in the investee company will be sold within a reasonable time-period and in accordance with the general obligation to execute all orders on terms most favourable to the client.

Compliance with the minimum proportion of sustainable investments is monitored quarterly based on data provided by Clarity AI.

As for the PAIs all investee companies are screened regularly – and as a minimum once a year - during the holding period via a proprietary analysis tool. Where material adverse impacts have been identified in relation to an investee company, such impacts may form the basis for an engagement with the investee company.

## **7. Methodologies**

The attainment of the environmental or social characteristics promoted by the Strategy are measured by the following sustainability indicators:

### **Principal adverse impacts**

The Strategy considers principal adverse impacts on sustainability factors as part of its investment decision process as specified in the PAI statement of the Investment Manager. The PAI statement is available at <https://www.cworldwide.com/downloads/statement-on-principal-adverse-impacts-of-investment-decisions-on-sustainability-factors/>.

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

The PAI-indicators are considered to assess the principal adverse impacts on sustainability factors. The PAI-indicators consists of a number of mandatory and voluntary PAI indicators applicable to investments in investee companies.

### **Minimum proportion of sustainable investments**

The proportion of sustainable investments is determined by an identifying investee companies that:

1. Contribute to a sustainable objective
2. Does not significantly harm other environmental or social objectives
3. Follow good governance processes

#### *Contributes to a sustainable objective*

The sustainable objectives of the sustainable investments and the methodology for measuring a contribution to each objective are as follows:

Sustainable objective	Methodology for measuring contribution
Reduction of greenhouse gas emissions and pollution and positive contribution to diversity.	An investee company contributes to the sustainable objective if it has at least two relevant Quantitative PAI indicators in the top quartile of companies within the Investment Universe.
Reduction of greenhouse gas emissions	An investee company contributes to the sustainable objective if it has science-based targets to reduce greenhouse gas emissions which has been reviewed and validated by the Science Based Targets Initiative.
Contribution to the environmental objectives set out in article 9 of Regulation 2020/852	An investee company contributes to the sustainable objective if it has any greater than zero value for revenue aligned to the EU Taxonomy.

The “Investment Universe” is defined as the total investment universe of Clarity AI across all industries.

The determination of sustainable investments is made on the level of the investee company. An investee company is therefore either considered a sustainable investment or not. If an investee company is considered a sustainable investment the full AUM of the investee company will be included as a sustainable investment in the monitoring of the minimum proportion of sustainable investments.

#### *Do no significant harm evaluation*

Reference is made to section 2.

#### *Follow good governance processes*

Investee companies with high severity controversies relating to management structures (shareholder rights and insider dealing), employee relations (working conditions and diversity), remuneration of

staff (employee wages and management compensation) and tax compliance are not considered as following good governance processes.

#### *PAI indicators*

The sustainable investments assessment is partially based on the mandatory PAI indicators as set out in table 1 of annex I of Commission delegated regulation (EU) 2022/1288.

The mandatory PAI Indicators have been divided into:

- Quantitative PAI Indicators (PAI indicator no. 1-3 (1-3 are considered one PAI measured by PAI indicator 2), 5 (PAI 5 is considered two PAI Indicators), 6, 8, 9, 12 and 13)
- Exposure PAI Indicators (PAI indicator no. 4 and 14)
- Controversy products PAI Indicators (PAI indicator no. 7, 10 and 11)

#### *Quantitative PAI Indicators:*

- PAI 1 – 3: Carbon footprint (measured by PAI indicator no. 2)
- PAI 5.1: Share of non-renewable energy consumption
- PAI 5.2: Share of non-renewable energy production
- PAI 6: Energy consumption intensity per high-impact climate sector
- PAI 8: Emissions to water
- PAI 9: Hazardous waste and radioactive waste ratio
- PAI 12: Unadjusted gender pay gap
- PAI 13: Board gender diversity

In order to measure contribution to an objective through Quantitative PAI Indicators, it is necessary to determine whether an investee company is capable of effectively contributing to the objective behind the Quantitative PAI Indicator. Through Clarity AI the relevant Quantitative PAI Indicators for each industry have been identified.

#### *Exposure PAI Indicators:*

- PAI 4: Exposure to Fossil Fuels
- PAI 14: Exposure to Controversial Weapons

#### *Controversy products PAI Indicators:*

- PAI 7: Activities negatively affecting biodiversity sensitive areas
- PAI 10: Violations of UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises
- PAI 11: Lack of mechanisms for conformance to UN Global Compact Principles and the OECD Guidelines for Multinational Enterprises

#### **Controversial weapons exclusion**

Controversial weapons are defined as weapons that have a disproportionate and indiscriminate impact on civilian populations, sometimes even years after a conflict has ended. Some controversial weapons are illegal, as their production and use are prohibited by international legal instruments such as conventions or bans. Others are legal.



Controversial weapons include but are not restricted to anti-personnel mines, biological and chemical weapons, cluster weapons, depleted uranium munitions, white phosphorus munition and nuclear weapons.

Exclusion of controversial weapons is measured by the number of investee companies of the Strategy involved in the core weapon system of controversial weapons, or components or services of the core weapon system that are considered tailor-made and essential for the lethal use of the weapon, and the number of investee companies of the Strategy providing components or services for the core weapon system of controversial weapons, which are either not considered tailor-made or not essential to the lethal use of the weapon.

### Sector exclusions

The number of investee companies of the Strategy exceeding a certain level of involvement in the activities specified below:

Activities	Description of Activities	Level of involvement
<b>Small arms</b>	Companies involved in the manufacturing, distribution, sale or retail sale of assault weapons.	5%
	Companies involved in the manufacturing, distribution, sale or retail sale of small arms or key components to small arms.	5%
<b>Adult entertainment</b>	Companies involved in the production or distribution of adult entertainment or owning or operating adult entertainment establishments.	5%
<b>Alcoholic beverages</b>	Companies involved in the manufacturing, distribution or retail sale of alcoholic beverages or in supplying alcohol-related products or services to alcoholic beverage manufacturers.	5%
<b>Gambling</b>	Companies owning or operating gambling establishments, manufacturing specialized equipment used exclusively for gambling or providing supporting products or services to gambling operations.	5%
<b>Tobacco products</b>	Companies involved in the manufacturing, distribution or retail sale of tobacco products or in the supply of tobacco-related products or services.	5%
<b>Oil &amp; gas</b>	Companies involved in oil and gas exploration, production, refining, transportation, or storage.	5%
	Companies involved in the generation of electricity from oil or gas.	25%
<b>Thermal coal</b>	Companies involved in thermal coal extraction.	5%
	Companies involved in the generation of electricity from thermal coal.	5%
<b>Oil sands</b>	Companies involved in oil sands extraction.	5%
<b>Shale energy</b>	Companies involved in shale energy exploration or production.	5%

Generally, level of involvement is measured as the percentage of an investee company's revenue derived from the relevant activity either directly or indirectly through corporate ownership. The estimation of revenue is either based on data provided by the investee companies or data estimated by Morningstar Sustainalytics.

If an investee company holds a majority stake, i.e. more than 50%, of another company that is considered directly involved in a relevant activity, the parent company is considered involved in the same category of involvement as the subsidiary. In these cases, the revenues of the involved subsidiary are attribute to the parent.

In the case of a minority stake, i.e. 10-50%, of another company that is considered directly involved in a relevant activity the revenues of the subsidiary are not attributed to the parent but instead the percentage of the ownership stake is captured in order to signal the level of control and influence present in the relationship.

## **8. Data sources and processing**

The environmental or social characteristics of the Strategy will primarily be attained using data supplied by the global ESG research and data provider Morningstar Sustainalytics and Clarity AI. The quality of the research provided by Morningstar Sustainalytics and Clarity AI is evaluated on an ongoing basis to ensure a high data quality.

The data supplied by Morningstar Sustainalytics is received in a form where it can be used without further processing for determining whether an investee company is engaged in activities that exceed the limits of the sector exclusions.

The data supplied by Morningstar Sustainalytics will to a limited extent be estimated where no underlying data is available from the investee companies.

### *Principal adverse impacts*

Furthermore, the environmental or social characteristics of the Strategy will be attained using a proprietary analysis tool to identify and assess principal adverse impacts on sustainability factors. Our PAI analysis tool applies data from external ESG data providers, company disclosure and research conducted by our Global ESG Specialist and portfolio managers. The external data used in the assessment of the principal adverse impacts vary. All the PAI Indicators are sourced via Bloomberg to the extent companies report and disclose. For some PAI indicators data from several data providers are applied.

### *Minimum proportion of sustainable investments*

The sustainable investment evaluation, including the evaluation of an investee company's contribution to a sustainable objective, the do no significant harm evaluation and the evaluation of good governance practices will primarily be made based on data provided by Clarity AI supplemented by internal data and data from the principal adverse impacts analysis.

## **9. Limitations to methodologies and data**

Morningstar Sustainalytics generally update their company specific data annually based on annual reporting by the companies. Company specific data will therefore not always be fully updated.

In relation to IPO's and in other rare occasions an investee company will not be covered or fully covered by research from Morningstar Sustainalytics or the quality of the data supplied by Morningstar Sustainalytics will be of an insufficient quality. For these investee companies alternative internal and/or external research and data will be applied.

The quality of our methodology for identifying and assessing principal adverse impacts and assessing the proportion of sustainable investments is dependent on quality data from the investee companies.

Where quality data from the investee companies is not available, we rely on data from third-party service providers. Such data might not be completely accurate.

Limitations to the methodology and data are not expected to affect the attainment of the environmental or social characteristics promoted by the Strategy in any material way.

## **10. Due diligence**

The investee companies are systematically screened and monitored prior to the initial investment and continuously during the holding period for violations of international conventions, norms and standards relating to ESG issues such as human rights, labour rights, the environment and business ethics. The due diligence is based on internal analysis, external research as well as screenings via Morningstar Sustainalytics.

Furthermore, the Investment Manager has developed a proprietary analysis tool to identify and assess principal adverse impacts across all mandatory and voluntary PAI indicators that have chosen to consider. Principal adverse impacts are identified and assessed prior to the primary investment in an investee company and regularly during the holding period.

## **11. Engagement policies**

Engagement is an integral part of the investment process. It is anchored directly with the portfolio management team responsible for the Strategy. Through engagement sustainable business conduct is encouraged.

The management of an investee company is engaged directly through meetings or collectively with other investors. This approach provides access to highly qualified specialists with a strong knowledge and a network that can be leveraged in the ongoing engagement with the investee companies on key issues, including ESG issues such as human rights, labour rights, and environmental issues.

The decision to engage an investee company in relation to a specific matter and the method of engagement is made based on a proportionality consideration of several factors, including the size of the shareholding in the investee company, the materiality of the matter, the reliability of the data, the possibility of effecting the behaviour of the investee company and the resources required to conduct the engagement.

All general meetings of investee companies are monitored and voting rights are exercised.

## **12. Revision history**

To see the revision history, please follow this link: <https://cworldwide.com/downloads/sustainability-related-disclosures/>