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CARNEGIE FONDER

Statement on principal adverse impacts of investment decisions on sustainability factors

Table 1

Financial market participant Carnegie Spin-Off LEI 549300DBH5OBMKGD4C98

Summary

Carnegie Spin-Off, LEI 549300DBH5OBMKGD4C98, considers principal adverse impacts of its investment decisions on sustainability factors. The present statement is the consolidated statement on principal adverse impacts on sustainability factors of Carnegie Spin-Off. This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2025.

Carnegie Fonder works with three general methods for addressing and mitigating ESG risks and principal adverse impacts of investment decisions on sustainability factors. These are positive screening, negative screening and advocacy. Among other things, these factors are considered in CF THOR, our internal ESG analysis tool. Carnegie Fonder also excludes investments in companies whose activities are assessed as harmful to society or the environment. The fund company influences investee companies through active shareholder engagement in relation to matters including increasing transparency, targets and/or further development.

Data have been obtained from Bloomberg on a quarterly basis and a median value was used for each indicator. Only reported data have been used, and as this data is unavailable for some holdings, portfolio coverage for each indicator is shown in the table under “Explanation”.

Description of the principal adverse impacts on sustainability factors

Indicators applicable to investments in investee companies

Adverse sustainability indicator		Metric	Impact 2025	Impact 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions (tCO2e)	1,147	1,196	Decreased by -4%. Indicator increases with fund assets (AuM). AuM has changed 20%. The indicator is also affected by portfolio changes and data availability. Portfolio coverage 2025: 88%	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.

Greenhouse gas emissions	1. GHG emissions	Scope 2 GHG emissions (tCO2e)	656	802	Decreased by -18%. Indicator increases with fund assets (AuM). AuM has changed 20%. The indicator is also affected by portfolio changes and data availability. Portfolio coverage 2025: 88%	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.
		Scope 3 GHG emissions (tCO2e)	65,140	83,900	Decreased by -22%. Indicator increases with fund assets (AuM). AuM has changed 20%. The indicator is also affected by portfolio changes and data availability. Portfolio coverage 2025: 90%	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.
		Total GHG emissions (tCO2e)	66,931	85,897	Decreased by -22%. Indicator increases with fund assets (AuM). AuM has changed 20%. The indicator is also affected by portfolio changes and data availability. Portfolio coverage 2025: 88%	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.
	2. Carbon footprint	Carbon footprint (tCO2e/mEUR EVIC)	611	988	Decreased by -38%. The indicator is also affected by portfolio changes and data availability. Portfolio coverage 2025: 88%	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.

	3. GHG intensity of investee companies	GHG intensity of investee companies (tCO2e/mEUR Revenue)	1,246	1,683	Decreased by -26%. The indicator is also affected by portfolio changes and data availability. Portfolio coverage 2025: 88%	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.
	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	0%	0%	Has followed exclusion policy. The indicator is affected by portfolio changes and data availability. Portfolio coverage 2025: 100%	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.
Greenhouse gas emissions	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	Consumption: 69% Production: 0%	Consumption: 58% Production: 0%	Change in large part due to more and better data. Portfolio coverage 2025: 80%	Actions: Excluded companies with more than 5% revenue from coal. 0 company dialogues regarding energy. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.
	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/mEUR)	NACE sector: A:0 B:0 C:0.11 D:0 E:0 F:0.01 G:0 H:0 L:0	NACE sector: A:0 B:0 C:0.13 D:0 E:0 F:0.01 G:0 H:0 L:0	The indicator is affected by portfolio changes and data availability. Portfolio coverage 2025: 80%	Actions: Excluded companies with more than 5% revenue from coal. 0 company dialogues regarding energy. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.
Biodiversity	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	5.62%	0%	Data only shows companies with activities in these areas, not potential harm. Overall very low portfolio coverage.	Actions: 1 company dialogues regarding biodiversity. Target: Exclude companies in violation of UN Global Compact principle 7 (environmental challenges).

Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average (t/mEUR)	0.05	0.16	The indicator is also affected by portfolio changes and data availability. Portfolio coverage 2025: 4%	Actions: 1 company dialogues regarding biodiversity. Target: Exclude companies in violation of UN Global Compact principle 7 (environmental challenges).
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average (t/mEUR)	512.09	1.84	The indicator is also affected by portfolio changes and data availability. Change in large part due to more company-reported data. Portfolio coverage 2025: 67%	Actions: 0 company dialogues regarding waste management. Target: Exclude companies in violation of UN Global Compact principle 7 (environmental challenges).
INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Social and employee matters	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%	0%	Portfolio coverage 2025: 100%	Actions: Excluded companies in violation of UN and OECD guidelines. Target: Exclude companies systematically in violation of UN and OECD guidelines.
	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	0%	0%	Portfolio coverage 2025: 87%	Actions: 0 company dialogues to urge signing of UN Global Compact, 0 company dialogoues concerning human rights and corruption. Target: Increase the share of companies having signed UN Global Compact and exclude companies in violation of indicator 10.
	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	19.74%	20.98%	Very low reported data. Portfolio coverage 2025: 54.6%	Actions: 3 company dialogues concerning board gender diversity. Target: Exclude companies systematically in violation of UN Global Compact principle 6 (discrimination).
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	Average ratio of female board members: 36.12%	Average ratio of female board members: 35.87%	Portfolio coverage 2025: 95%	Actions: 3 company dialogues concerning board gender diversity. Target: Exclude companies systematically in violation of UN Global Compact principle 6 (discrimination).

	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%	0%	Portfolio coverage 2025: 100%	Actions: Excluded companies involved in controversial weapons. Target: Exclude companies involved in controversial weapons.

Indicators applicable to investments in sovereigns and supranationals

Adverse sustainability indicator		Metric	Impact 2025	Impact 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries (ktCO2/mEUR BNP)	N/A	N/A	The fund does not invest in soveregin bonds.	The fund does not invest in soveregin bonds.
Social	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	N/A	N/A	The fund does not invest in soveregin bonds.	The fund does not invest in soveregin bonds.

Other indicators for principal adverse impacts on sustainability factors

Table 2

Additional climate and other environment-related indicators

Adverse sustainability indicator	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2025	Impact 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies						
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Emissions	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	49.75%	54%	Share with verified climate targets (SBT) has gone from 46% to 50%.	Actions: Excluded companies with more than 5% revenue from coal. 4 engagement dialogues regarding emissions. Share with verified climate targets (SBT) has gone from 46% to 50%. Target: Manegement according to the fund company climate target, verified by Science Based Target Initiative.

Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Adverse sustainability indicator	Adverse impact on sustainability factors (qualitative or quantitative)	Metric	Impact 2025	Impact 2024	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies						
Social and employee matters	6. Insufficient whistleblower protection	Share of investments in entities without policies on the protection of whistleblowers	17.08%	17.81%	Portfolio coverage 2025: 87%	Actions: 0 company dialogues to urge signing of UN Global Compact, 0 company dialogoues concerning human rights and corruption. Target: Increase the share of companies having signed UN Global Compact and exclude companies in violation of indicator 10.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

The fund company's governing body adopted the following strategies on 15 July 2022.

Responsibility and methods for implementing these strategies
ESG factors can directly or indirectly affect a company's revenue and/or costs and thus have a large positive or negative impact on its financial performance and value, and thus value growth in the funds. Carnegie Fonder shall therefore and to the greatest possible extent seek to understand how the ESG factors that are considered the most material for the specific investee company could affect its future business model, competitiveness and financial position. These might involve, for example, environmental factors such as climate, emissions, resource and energy efficiency and water and waste management, or social factors such as human rights, working conditions, equality and diversity, the working environment and a responsible supply chain, or good business ethics and prevention of bribery and corruption ("anti-corruption"). We consider a wide range of ESG-related data at Carnegie Fonder, including the Principal Adverse Impacts (PAI) identified by the EU for which structured data is available. Prioritisation of and actions related to sustainability indicators are based on our Policy for Responsible Investment and Shareholder Engagement.

Carnegie Fonder works with three general methods for managing and limiting ESG risks and principal adverse impacts of investment decisions on sustainability factors. These are positive screening, negative screening and advocacy (engagement).

Positive screening
Three main methods are applied in the investment screening and selection process.
• ESG analysis using CF THOR
• Meetings between fund managers and company management
• Investments in bonds linked to ESG investments

CF THOR creates structure in the analysis process and ensures that managers consider material ESG aspects, including identification and assessment of principal adverse impacts on sustainable development. This also involves identifying business opportunities, and not only the risks. The tool is based on long-established and accepted sustainability frameworks and initiatives, such as GRI, CDP and the 17 UN SDGs, and also considers future developments in, for example, the EU Taxonomy and the Task Force for Climate Related Financial Disclosures (TCFD). The tool covers more than 100 data points related to environmental, social and governance factors, as well as about 30 qualitative questions to capture the full breadth of ESG factors.

Negative screening
Carnegie Fonder excludes investments in companies whose activities are assessed as harmful to society or the environment. Carnegie Fonder therefore does not invest in companies that have been proven in a serious or systematic way to violate international conventions and norms concerning labour law, human rights, the environment and corruption, and that have not been judged as showing sufficient willingness to change to address the problems. Norms that are given special consideration are the UN Global Compact and the OECD Guidelines for Multinational Enterprises.
This includes companies that have either been identified as "non-compliant" in the Sustainalytics Global Standards Screening, or companies that have otherwise been brought to the attention of Carnegie Fonder. A systematic review of all investee companies is carried out twice a year.
Sustainalytics Global Standards Screening also identifies companies with operations (generating more than 5 percent of turnover) within selected sectors. Precise definitions of each excluded sector and the procedures followed when companies are shown to violate the screened international norms can be found in the document called "Sector Definitions", which is available on Carnegie Fonder's website.

Margins of error in the selected methods
The methods described are dependent upon the supply and quality of data provided directly by investee companies as well as third-party data. By nature, the following indicators contain an assessment component and are provided by third-party providers.
1.10 Violations of UN Global Compact and the OECD Guidelines for Multinational Enterprises
1.14 Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)

Data sources used
Bloomberg, Sustainalytics, Science Based Target initiative

Engagement policies

Carnegie Fonder exerts influence on investee companies by means of active shareholder engagement. Policies for shareholder engagement and voting have been established for this purpose. These policies apply to Carnegie Fonder's shareholder engagement in companies that have issued shares admitted to trading on a regulated market in Sweden or the equivalent abroad, and are applied to both equity and bond holdings or other debt instruments. The express purpose of shareholder engagement at Carnegie Fonder is to safeguard or increase return on the funds' investments. Shareholders, boards of directors and company management have different roles and it is important that there is a balance between these roles.
Shareholder engagement is the influence of shareholders on, and their monitoring of, the work performed by company boards and management. Carnegie Fonder's shareholder engagement takes place mainly on three levels: dialogues with representatives of investee companies, voting at general meetings and our work on nomination committees. Carnegie Fonder is not part of any fixed shareholder group, but may collaborate with other shareholders concerning certain issues if it improves the opportunities for active and effective shareholder engagement. To avoid restricting the freedom of Carnegie Fonder to trade in securities in listed companies, employees of Carnegie Fonder are not allowed to serve on the boards of directors of listed companies.

References to international standards

Carnegie Fonder signed the UN Global Compact in 2017 and committed to its principles for how companies should act in matters related to human rights, labour, environment and anti-corruption - the same principles that we require our holdings to adhere to. Holdings in all funds managed by Carnegie Fonder are assessed against the OECD Guidelines for Multinational Enterprises to ensure that an investee company's activities are not in breach of the same. These international standards are incorporated in the fund company's exclusion policy and Carnegie Fonder thus verifies on a daily basis that all fund holdings are in compliance with the standards. This is accomplished using data obtained from Sustainalytics and is checked in Bloomberg. Any non-compliance is flagged for Middle Office, which then reports to the fund company's Head of Sustainability as well as the Risk Manager. The primary PAI indicators that measure the compliance of investee companies with the aforementioned international standards are:
1.10. Share of investments that violate international norms and standards (e.g. UNGC)
1.11. Share of investments that lack policies to monitor compliance with international norms and standards

There are several initiatives that are all aimed at promoting compliance and support for the Paris Agreement. As a result of the scientific basis and gravitas of SBT (Science Based Targets), the initiative is increasingly becoming a standard for businesses committed to promoting the climate transition through the power of their actions, including the financial industry. SBTi, formed in 2015, is an initiative that involves a forward-looking climate scenario. In 2021, Carnegie Fonder became the first Swedish fund company to join the Science Based Targets initiative, SBTi. At that point, about 25 percent of assets under management at Carnegie Fonder had joined SBTi and that target is for 100 percent to have an SBT by 2040. The commitment will be evaluated every five years, and thus holdings corresponding to 46 percent of assets under management must have set an SBT by the end of 2026. Data obtained from Bloomberg and Science Based Targets initiative are used to measure commitments by investee companies. These data are included in the mandatory ESG analysis performed prior to investment.

The primary PAI indicators that measure the compliance of investee companies with or their adaptation to the Paris Agreement are:
2.4 Investments in companies that do not have initiatives to reduce carbon emissions
1.1 Emissions of greenhouse gases
1.2 Carbon footprint
1.3 Greenhouse gas intensity of the investment target
1.4 Exposure to companies operating in the fossil fuels sector

Historical comparison

	2025	2024	2023	2022
Scope 1 GHG emissions	1,147	1,196	1,506	1,241
Scope 2 GHG emissions	656	802	1,003	1,117
Scope 3 GHG emissions	65,140	83,900	102,134	73,726
Total GHG emissions	66,931	85,897	104,643	76,085
Carbon footprint	611	988	1,087	642
GHG intensity of investee companies	1,246	1,683	1,430	910
Share of investments in companies active in the fossil fuel sector	0%	0%	0%	0%

Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	Consumption: 69% Production: 0%	Consumption: 58% Production: 0%	Consumption: 59% Production: 0%	Consumption: 70% Production: 0%
Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	NACE sector: A:0 B:0 C:0.17 D:0 E:0 F:0.02 G:0 H:0 L:0	NACE sector: A:0 B:0 C:0.11 D:0 E:0 F:0.01 G:0 H:0 L:0	NACE sector: A:0 B:0 C:0.13 D:0 E:0 F:0.01 G:0 H:0 L:0	NACE sector: A:0 B:0 C:0.21 D:0 E:0 F:0.01 G:0 H:0 L:0
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	5.62%	0%	0%	2.09%
Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0	0	0	0
Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	512	2	1	1
Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0	0	0	0
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	0%	0%	0.5%	0.42%
Average unadjusted gender pay gap of investee companies	19.74%	20.98%	20.29%	18.66%

Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	Average ratio of female board members: 36.12%	Average ratio of female board members: 35.87%	Average ratio of female board members: 34.6%	Average ratio of female board members: 36.18%
Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0	0	0	0
GHG intensity of investee countries	N/A	N/A	0	0
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	N/A	N/A	N/A	N/A
Share of investments in investee companies without carbon emission reduction initiatives aimed at aligning with the Paris Agreement	49.75%	54%	63.75%	70%
Share of investments in entities without policies on the protection of whistleblowers	17.08%	17.81%	17.99%	13.64%