



EUROPEAN
COMMISSION

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ANNEX 4

ANNEX

to the

Commission Delegated Regulation (EU) .../...

supplementing Regulation (EU) 2019/2088 of the European Parliament and of the Council with regard to regulatory technical standards specifying the details of the content and presentation of the information in relation to the principle of ‘do no significant harm’, specifying the content, methodologies and presentation of information in relation to sustainability indicators and adverse sustainability impacts, and the content and presentation of the information in relation to the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, on websites and in periodic reports

ANNEX IV

Template 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: SKAGEN Focus

Legal entity identifier: 549300X4NHEXBG52JU28

Environmental and/or social characteristics

Did this financial product have a sustainable investment objective?

☒ ☐ Yes

☐ 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**: ____%

☒ ☐ No

☐ It **promoted Environmental/Social (E/S) characteristics** and while it did not have as its objective a sustainable investment, it had a proportion of ____% 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 E/S characteristics, but **did not make any sustainable investments**

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.



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

The environmental and/or social characteristic promoted by this Fund is the application of an ESG integration strategy.

The Investment Manager's ESG integration strategy consists of four pillars to execute the investment selection process and exercise of ownership rights. The first pillar of the strategy is negative screening and control of potential investments, the second is an enhanced due diligence of companies in high emitting industries, the third is ESG integration through dedicated factsheets, whilst the fourth and final pillar is active ownership.

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

The ESG Integration strategy is an entirely incorporated process within the Funds investments. Throughout the year, all the 4 binding elements of the strategy are followed and further developed. As a result, the environmental and social characteristics promoted by this product were fully met.

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

The sustainability indicators of the Fund are the 4 pillars of binding elements in the ESG integration strategy. The sustainability indicators performed as following:

Pillar 1- Exclusion criterias and negative screening

As of 31 December 2022, 319 companies are on the exclusion list, and hence not investable for the Investment Manager.

During 2022, the Fund performed pre investment screening on 20 potential investments.

The Fund is also subject to quarterly controls to ensure alignment with the exclusion criterias. Controls have been performed for Q1, Q2, Q3 and Q4 2022.

All current investments have been individually screened, analyzed and cleared to be in line with SKAGEN's sustainable investment policy.

Pillar 2- Enhanced due diligence of high-emitting companies.

During 2022, all of the investees that operate within high-emitting sectors where subject to enhanced due diligence. For the Fund, enhanced due diligence was performed for 24 companies during 2022.

The enhanced due diligence is enshrined in the ESG factsheet documentation.

Pillar 3- ESG Factsheets

As of 31 December 2022, ESG factsheets have been completed for 24/50 investees in the Fund, and traffic lights assigned. As stated in other disclosures, SKAGEN is implementing and scaling ESG factsheets and the traffic light solution. Development of ESG factsheets have been prioritized for companies that operate within high-emitting industries.

Traffic light distribution for completed ESG factsheets:

Dark green: 3 number of companies

Light green: 14 number of companies

Grey: 0 number of companies

Amber: 7 number of companies

Red: 0 number of companies

Black: 0 number of companies

Pillar 4- Active ownership

Engagement activities pertaining to the Fund in 2022 consisted of 5 unique company engagements covering 5 unique engagement cases.

There were 53 voteable meetings in the Funds companies in 2022, with 662 voteable items on the agenda. The Fund voted on 99.09% of these items. Votes were cast in line with management recommendations 88.87% of the time, while 11.13% of votes were against management recommendations on one or more items on the agenda.

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

N/A. Periodic report not issued for prior 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?**

This product does not have a sustainable investment objective.

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

This product does not have a sustainable investment objective.

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

This product does not have a sustainable investment objective.

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

This product does not have a sustainable investment objective.

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

This product does not have a sustainable investment objective.

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.

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.



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

Throughout all pillars of the ESG integration strategy, company specific analysis is performed on the holdings of the Fund. Material principal adverse indicators are assessed and constitute an important contribution to the analysis. Subject to data availability and data quality, all principal adverse indicators considered material, are tracked to identify positive and negative developments at security level.



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: 31 December 2022

Largest investments	Sector	% Assets	Country
METHANEX CORP	Materials	3.31	Canada
KB FINANCIAL GROUP INC	Financials	3.27	South Korea
TEXTAINER GROUP HOLDINGS LTD	Industrials	3.18	United States
KOMATSU LTD	Industrials	3.12	Japan
VITESCO TECHNOLOGIES GROUP A	Consumer Discretionary	3.11	Germany
ENDEAVOUR MINING PLC	Materials	3.09	Britain
DB INSURANCE CO LTD	Financials	2.97	South Korea
PANASONIC HOLDINGS CORP	Consumer Discretionary	2.85	Japan
CHINA COMMUNICATIONS SERVI-	Industrials	2.79	China
KIMBERLY-CLARK DE MEXICO-A	Consumer Staples	2.74	Mexico
KYOCERA CORP	Information Technology	2.74	Japan
SHIGA BANK LTD/THE	Financials	2.68	Japan
KOREAN REINSURANCE CO	Financials	2.61	South Korea
VISCOFAN SA	Consumer Staples	2.52	Spain
NOVA LJUBLJANSKA B-GDR REG S	Financials	2.46	Slovenia



What was the proportion of sustainability-related investments?

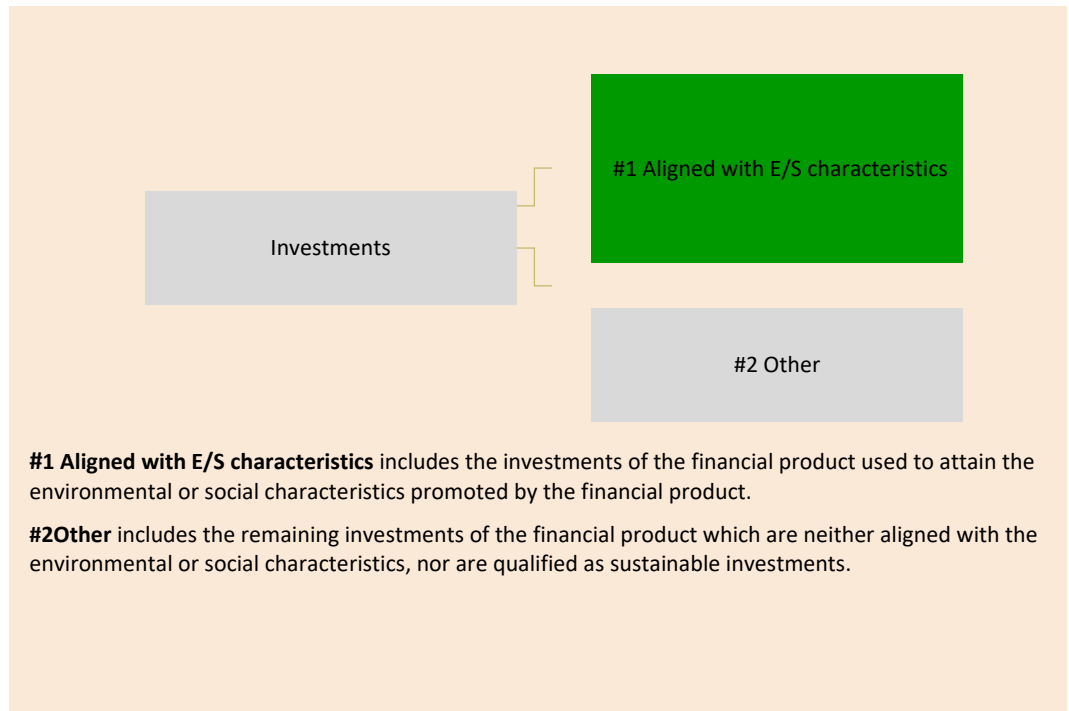
0%. This product does not have a sustainable investment objective.

What was the asset allocation?

In theory, all of the Fund's assets under management should be aligned with E/S characteristics as all companies that are selected and invested in by the Fund are subject to the ESG integration strategy. Residual capital in the Fund can however de-facto be categorized as 'other' due to cash position of the Fund. As of 31 December 2022, the asset allocation in the Fund was as following

#1 Aligned with E/S characteristics: :98.61%
 #2 Other :1.39%

Asset allocation describes the share of investments in specific assets.



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

The Funds invested in the following sectors:

- Materials
- Financials
- Industrials
- Consumer Staples
- Information Technology
- Consumer Discretionary
- Communication Services
- Health Care



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

The Fund does not have any intentions to invest in Taxonomy-aligned investments (including transitional and enabling activities) but it is not excluded that this may be the case due to unintended and residual reasons. Taxonomy alignment of this Fund's investments is as of 31 December 2022:

Turnover: 0.78%
CapEx: 0.09%
OpEx: 0.02%

**The Fund does not include sovereign bonds.*

Enabling activities

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

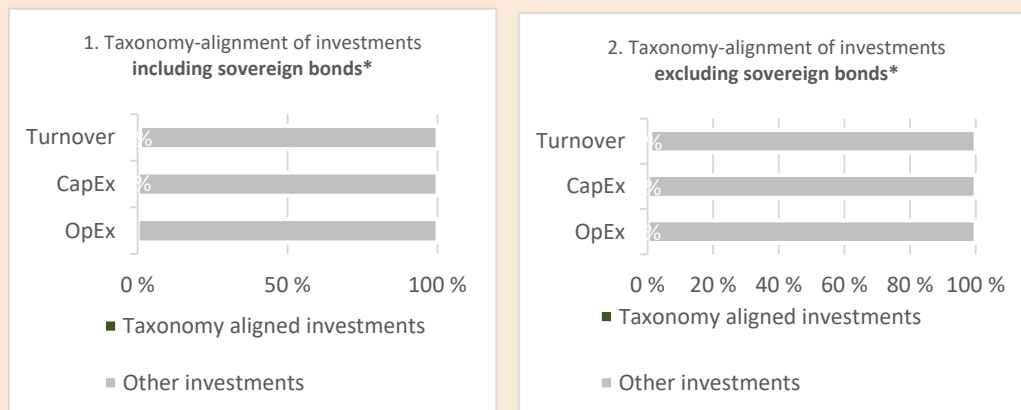
Transitional activities are

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

Taxonomy-aligned activities are expressed as a share of:

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

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.



*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?

Transitional activities: 0.0%

Enabling activities: 0.38%

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

N/A. Periodic report not issued for prior periods.



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

This product does not have a sustainable investment objective.



What was the share of socially sustainable investments?

This product does not have a sustainable investment objective.



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

Residual capital in the Fund categorized as ‘other’ is due to cash position of the Fund.

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

- Screening and quarterly controls
- Enhanced due diligence of all companies operating within "high-emitting" sectors.
- Factsheet development
- The aim is to complete factsheets for 100% of the Funds investees during 2023.
- Voting and engagement dialogues
- Training and development



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

The Fund is actively managed and uses a benchmark for performance comparison purposes. However, the fund does not specifically use a benchmark index to attain its environmental or social characteristics.

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

N/A

- ***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?***

N/A

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

N/A

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

N/A

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