



Brussels, 31.10.2022
C(2022) 7545 final

ANNEXES 1 to 4

ANNEXES

to the

COMMISSION DELEGATED REGULATION (EU) .../...

amending and correcting the regulatory technical standards laid down in Delegated Regulation (EU) 2022/1288 as regards the content and presentation of information in relation to disclosures in precontractual documents and periodic reports for financial products investing in environmentally sustainable economic activities

ANNEX III

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: Stefmir - Grænaval hs.

Legal entity identifier: 2549007N1MZP1G29M668

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 0% 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 include a list of socially sustainable economic activities. Sustainable investments with an environmental objective might be aligned with the Taxonomy or not.



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

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

The Fund sought to promote environmental and social characteristics in a holistic manner. Rather than applying all characteristics to every investment, the fund focuses on the what is deemed the most relevant based on the nature of each investment's activities, operational areas, and products or services. Using third party data, we aimed to promote the characteristics outlined below, while recognizing that a broader range of characteristics may also have been advanced in certain investments. In general, the environmental and/or social characteristics were met to the investment manager's satisfaction. The sustainability indicators of the environmental and social characteristics of the portfolio showed improvement over the period.

Environmental		Scale (0-10)	
•	Climate change and greenhouse gas emissions	4,4	higher better
•	Resource depletion, including water	5,0	higher better
•	Waste and pollution	2,3	lower better
Social			
•	Working conditions, including no child labour or slavery	3,6	higher better
•	Health and safety	1,2	lower better
•	Employee relations and diversity	5,8	higher better

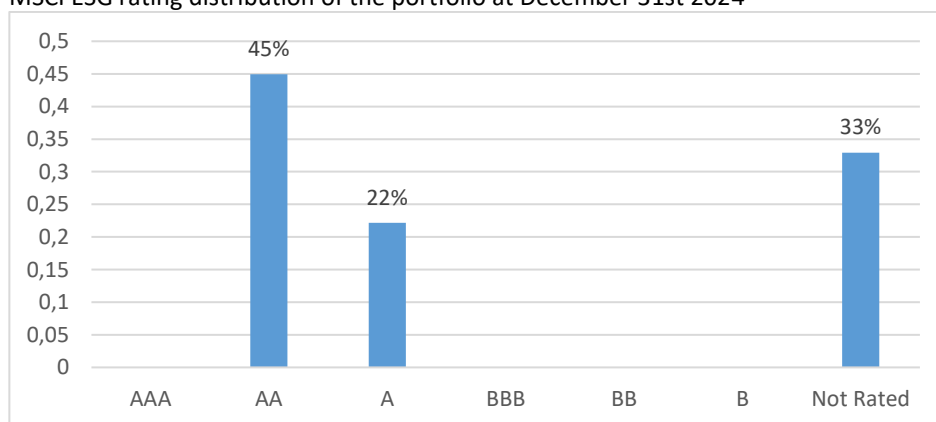
● **How did the sustainability indicators perform?**

Indicators 2024	MSCI avg Score		Scale
Carbon emission score	9,52	higher better	1-10
Carbon emission performance relative to peers *	5,77	higher better	1-10
Water Stress Score Quartile**	1,79	lower better	1-4
Natural Capital Theme Score	7,71	higher better	1-10
Pollution & Waste Theme Score	5,38	lower better	1-10
MSCI Toxic Emissions & Waste Score Quartile	1,78	lower better	1-10
BSEG Pollution & Waste Theme Weight	67,13	lower better	1-100
Company's Social Pillar Score Quartile **	1,94	lower better	1-4
MSCI Social Pillar Score	5,41	higher better	1-10
MSCI Health & Safety Exposure Score	2,05	lower better	1-10
MSCI Labor Management Employee Satisfaction Score	8,95	higher better	1-10

*over 5 better than average within respective industry

**average 3,0

MSCI ESG rating distribution of the portfolio at December 31st 2024



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 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.

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

N/A the fund is reporting for the first time

● ***What were the objectives of the sustainable investments that the financial product partially made and how did the sustainable investment contribute to such objectives?***

N/A

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

N/A

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

N/A

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

N/A

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



The fund tracks the Mandatory PAI factors for informational and data tracking reasons.

End of year performance averages:

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.

Total GHG Emissions/EVIC	273,91	MT CO ₂ -eq/EVIC (M€)
Carbon Footprint/EVIC	17,06	MT CO ₂ -eq/EVIC (M€)
GHG Intensity	75,97	MT CO ₂ -eq/Sales (M€)
Exposure to Fossil Fuel Sectors	3,11	%
Non-Renewable Energy Consumption	53,51	%
Non-Renewable Energy Production	-	%
Energy Consumption Intensity	139,19,35	MWh/Sales (M€)
Number of Sites Env. Sensitive Areas	-	Number of Sites
Emissions to Water	1,04	1k MT
Hazardous Waste	378.30	1k MT
UNGC Signatory	Y	Y/N
Policies for Monitoring UNGC Compliance	54,45	Ratio
Mean Gender Pay Gap	12,64	%
Median Gender Pay Gap	13,92	%
Board Gender Diversity	37,0	% Female Members/Total Members
Exposure to Controversial Weapons (Latest)	N	Y/N



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: 01.01.2024-31.12.2024

Largest investments	%Assets	Sector	Country
OR020934 GB	8,12%	Energy	IS
LSB280829 GB	5,49%	Financials	IS
KALD 041139 GB	1,95%	Real Estate	IS
BRIM 221026 GB	1,81%	Consumer Staples	IS
LL 010641 GB	1,71%	Financials	IS
NOVOB DC	1,67%	Health Care	DK
DSV DC	1,18%	Industrials	DK
PNDORA DC	1,12%	Consumer Discretionary	DK

MSFT US	1,04%	Information Technology	US
HEIMAR27 GB	0,99%	Real Estate	IS
HEIMAR25 GB	0,99%	Real Estate	IS
COLOB DC	0,96%	Health Care	DK
ISB GB 25 1126	0,92%	Financials	IS

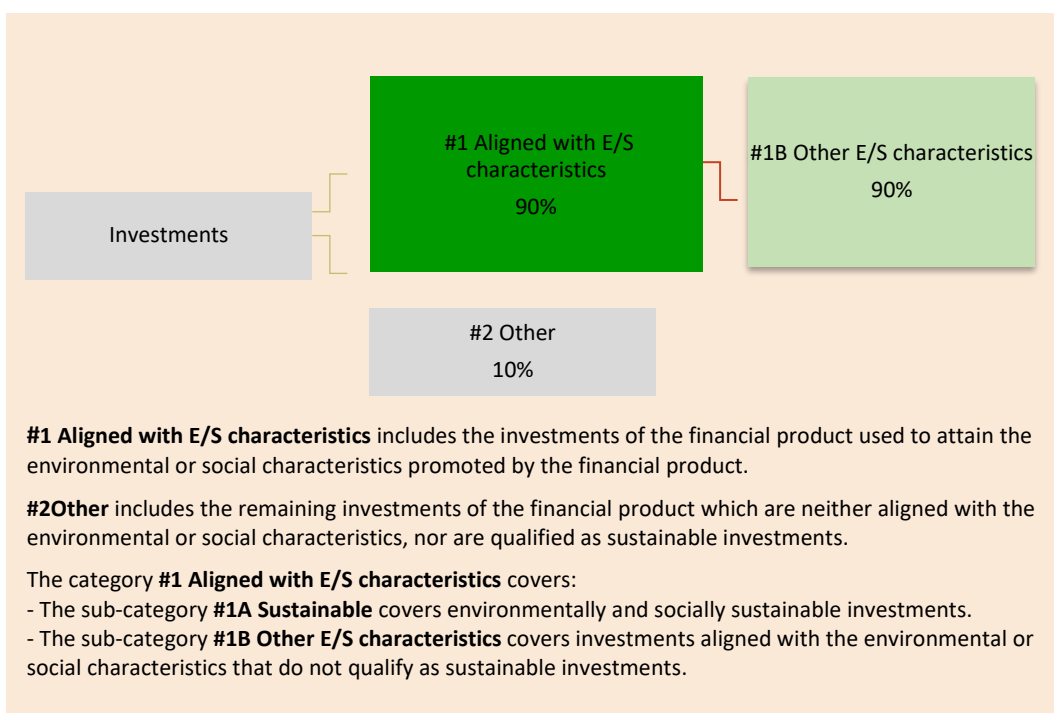
What was the proportion of sustainability-related investments?

● What was the asset allocation?

The fund committed to hold a minimum of 90% of the Fund's assets aligned with E/S characteristics. Environmental and social safeguards are met by applying certain PAI's, where relevant, to these underlying assets. The Fund invests a maximum of 10% of assets in the "Other" category, which include cash, money market instruments and derivatives.



Asset allocation describes the share of investments in specific assets.



● In which economic sectors were the investments made?

	5,87%
Communication Services	
Consumer Discretionary	7,92%
Consumer Staples	5,75%

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.

Financials	14,31%
Government	10,57%
Healthcare	12,44%
Industrials	9,36%
Information Technology	10,84%
Materials	3,15%
Real Estate	4,71%
Utilities	12,63%



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

There is no mandatory minimum allocation to sustainable investments with an environmental objective aligned with the EU Taxonomy, the fund may choose to allocate to such investments as part of its overall allocation to environmentally focused sustainable investments.

Did the financial product invest in fossil gas and/or nuclear energy related activities complying with the EU Taxonomy¹?

☐ Yes:

☐ In fossil gas ☐ In nuclear energy

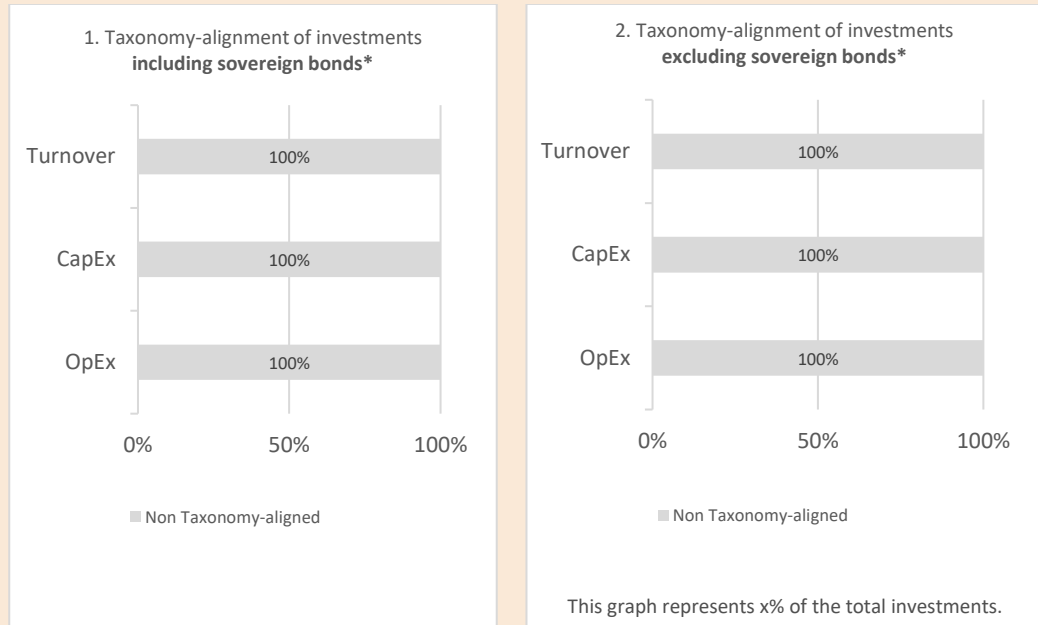
☒ No

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.

¹ Fossil 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 EU Taxonomy objective - see explanatory note in the left hand margin. 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.

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?**

N/A

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

N/A



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

N/A



- **What was the share of socially sustainable investments?**

N/A



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

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.

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

“Other” investments include cash, cash equivalents, investments for diversification purposes or investments such as UCITS, ETF, for which data is lacking and does not follow any minimum environmental or social safeguards.



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

To meet its environmental and social objectives, the Fund incorporates ESG assessment and screening criteria while actively promoting good governance and social factors.

Additionally, the Fund is committed to considering specific Principal Adverse Impacts (PAIs) within its investment process. These include PAI 1: Greenhouse Gas (GHG) emissions (Scope 1 and 2) and PAI 10: Violations of the UN Global Compact (UNGC) principles and the Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises.

Furthermore, the Fund excludes investments in companies involved in controversial weapons (PAI 14). The sub-fund also employs negative screening (does not invest in) fur production and animal experiments, gambling, coal and oil sands processing, production of pornography, companies whose primary business model relies on exploitive lending practices e.g. loan sharking, activities which violate basic human rights, e.g. slavery.

The binding elements of the investment strategy, which guide the selection of investments to achieve the environmental or social characteristics promoted by this fund, are monitored and documented continuously.



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

N/A

- *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