This is not an official translation and shall be used for information purposes only. The Swedish version is the official and legal document and FCG Fonder AB, or its officers, employees, and/or agents, shall not be liable for damages or losses of any kind arising out of, or in connection with, the use of the translated document, including but not limited to, damages or losses caused by reliance upon the accuracy of translations, or damages incurred from the viewing, distributing, or copying of such materials.

Annual Report 2023

for the UCITS fund

Pensum Norge

The Fund Company

The fund is managed by FCG Fonder AB, corporate identity number 556939-1617, (the "Company"), which is a limited liability company founded in 2014 with registered office in Stockholm. The Company is under the supervision of the Financial Supervisory Authority.

The Portfolio Manager

The Company has commissioned Pensum Asset Management AS, Norwegian registration number 920685714, (the "Portfolio Manager") to carry out portfolio management, marketing and distribution for the fund. The portfolio manager, which was founded in 2018, has its head office in Oslo, Norway and is under the supervision of the Financial Supervisory Authority of Norway.

Information on risk

Historical returns are no guarantee of future returns. The money invested in a fund can both increase and decrease in value and it is therefore not certain that you will get all your invested capital back. There are thus no guarantees that an investment in a fund will not lead to a loss or will provide a good return, despite a positive performance in the financial markets.

Management report

THE INVESTMENT POLICY OF THE FUND.

The fund is an actively managed equity fund that invests primarily in equities listed on the Oslo Stock Exchange.

The fund's objective is to generate a return over time that exceeds the return for the fund's benchmark index. The fund's benchmark index is the Oslo Børs Mutual Fund Index (OSEFX). An investment in the fund can be expected to be associated with a medium level of risk and an investor should have an investment horizon of at least five years.

The fund's resources may be invested in transferable securities, money market instruments, fund units and in accounts at credit institutions. The fund may also include the cash resources required for management of the fund

At least 90 per cent of the fund's value shall be invested in equity-related financial instruments admitted to trading on the Oslo Stock Exchange. The base currency of the fund is NOK. The fund may invest no more than 10 percent of its value in fund units.

DEVELOPMENT OF THE FUND

The fund was launched on 22 November 2023. The launch of the fund was particularly marked by the fall in long-term interest rates, which only started in mid-October, and then the conflict between Israel and Palestine.

Norwegian ten-year government yields peaked at 4.17% in October, fell to 3.61% at the start of the fund and then further to 3.27% at New Year. The fall in long-term interest rates drove a sectoral rotation in favour of interest-rate-sensitive sectors such as real estate and "green stocks", while more value-oriented sectors such as energy and shipping underperformed. This sectoral rotation was partially reversed in the second half of December, after Norges Bank somewhat surprisingly, and as one of the few central banks towards the end of the year, raised its policy rate by 0.25 percentage points to 4.5%. The banking sector performed well after this interest rate decision.

The conflict between Israel and Palestine contributed to increased geopolitical tension, but had little immediate effect on the price of Norwegian shares. Nevertheless, there is reason to believe that this conflict, together with the war in Ukraine, has contributed to the development of stocks in the defence and arms industry. In November, unrest increased in the Red Sea, where the Houthi militia supported Palestine and Hamas, by attacking ships carrying goods to or from Israel, or owned by Israel. By the end of the year, 23 ships had been attacked. The attacks on shipping have led many shipping companies to choose to sail via the southern tip of Africa instead of through the Suez Canal, tying up the shipping fleet for longer distances, which in turn increases prices.

The Norwegian krone has had a weak year, with large fluctuations. Since the fund was set up, the krona has recovered some of its lost value, strengthening from 22 November to the end of the year by 5.5% against the US dollar, 4% against the euro and 1.75% against the Swedish krona. This can be negative for export industries, such as agriculture and industry, while importers such as retailers benefit through lower purchasing costs. Hopefully, a stronger krona will also help to reduce inflationary pressures in the Norwegian economy.

The fund has a significant emphasis on the energy sector, with services and shipping of energy (oil, LNG, LPG, petrol/diesel) having the largest overweights. The fund is also weighted towards other shipping sectors such as car shipping, dry goods and chemicals. These are sectors that underperformed during the sector rotation, but ended the year well. The fund is particularly underweight towards industrial companies such as Norsk Hydro, Tomra and Elkem and technology companies such as Telenor and Schibsted

The three most positive contributors to the return were ABG Sundal Collier (ABG), Klaveness Combination Carriers (KCC) and Sparebank 1 Midt-Norge (MING). ABG and MING are both financial companies, but with quite different price drivers. For ABG, the rise is likely due to increased confidence in IPOs, restructurings and high stock market activity, while MING is affected by persistently high interest rates, relatively stable house prices, low loan losses and the favourable development of the Norwegian economy. KCC performed well following good developments in both dry bulk and product tanker rates

The three companies that contributed most to the decline in returns were Equinor, Aker BP and Frontline. The common denominator for Equinor and Aker BP was weak oil and gas prices. Equinor, in particular, is affected by the fact that gas stocks in Europe are full for the winter and market concerns about gas supplies to Europe are more or less gone for the coming winter. Frontline is most affected by VLCC rates, which are at good levels, but market expectations of extremely high rates towards the end of the year did not materialise.

BENCHMARK

The fund's benchmark index is the Oslo Børs Mutual Fund Index (OSEFX). The index is a Norwegian equity index focusing on the largest and most traded listed companies in Norway. The Benchmark Index applies the investment restrictions applicable to investment funds under the UCITS Directive (2009/65/EC).

The benchmark index is relevant as it reflects the fund's investment universe as described in the fund's investment policy. As the fund is actively managed, the fund's return is likely to deviate from the index over time. The benchmark is used for comparative purposes only, e.g. for the calculation of active risk.

and for presenting the fund's past performance, and there is no intention for the fund to follow the index.

The indices are administered by Euronext, which is part of the register maintained by ESMA under Article 36 of the Regulation of the European Parliament and of the Council (2016/2011) on benchmark indices, etc. The company has a plan for measures to be taken if an index ceases to be provided or changes significantly. In such case, the fund rules will need to be amended, which will be done after the approval of the Financial Supervisory Authority, and information will be provided on the company's website, www.fcgfonder.se.

DERIVATIVE INSTRUMENTS

The fund does not have the option to use derivative instruments.

SECURITIES FINANCING TRANSACTIONS AND TOTAL RETURN SWAPS

Lending of securities

Under fund legislation, the fund has the option of lending transferable securities included in the fund to a third party (securities loans) up to 20 per cent of the value of the fund. However, this is not expected to happen, nor does the fund use other types of securities financing transactions.

Total return swaps

The fund does not have the option to use total return swaps.

SIGNIFICANT RISKS IN THE FUND

The risk associated with investing in the fund is primarily influenced by risks in the equity and currency markets.

The primary risk associated with investing in equity-linked financial instruments is market risk in the form of equity price risk, as equity markets can fluctuate sharply in value resulting in high volatility in the value of the fund.

The fund's investments are geographically concentrated in equity-linked financial instruments listed on the Oslo Stock Exchange. This means that the risk in the fund is normally higher than in a global equity fund where investments are spread across several regions. However, the fund's investments are made in companies in several sectors and industries, which over time helps to reduce the risk in the fund.

The fund consists of different unit classes, which means that changes in exchange rates mean that the currency risk may differ between

different unit classes depending on the currency in which the unit class is traded.

The fund is exposed to liquidity risk, which means a risk that it may not be possible to sell or purchase financial instruments at a reasonable cost and within a reasonable period. The investments are expected to consist of liquid equities. Against this background, the liquidity of the investments in the portfolio companies is considered to be generally good. The fund strives to have a suitable mix of holdings in order to be able to thereby manage the liquidity risk effectively. In stressed market conditions, however, liquidity and demand in the market may deteriorate so that the fund may have difficulty selling holdings at the desired price, which may mean that unitholders do not receive their liquidity within a reasonable time.

The fund's value can vary greatly due to its composition, the market(s) to which the fund is exposed and the management methods used by the portfolio manager.

FEES

The table shows the current and maximum fixed management fee for each unit class. The amounts are annualised. The applicable management fee is the management fee that is actually charged.

Concerning the performance-based management fee

In addition to the fixed management fee, a performance-based variable fee is paid for all unit classes. The performance-based fee amounts to a maximum of 20 percent of the part of the return for a unit class that exceeds a threshold value. The threshold for the unit classes is as follows:

- The threshold for unit classes A and D is OSEFX (NOK)
- The threshold for unit classes B and E is OSEFX (NOK, converted to SEK)
- The threshold for unit classes C and F is OSEFX (NOK, converted to EUR).

Unit class	Applicable fixed fee	Maximum fixed fee	Performance- based fee
A	1.25%	1.25%	20%
В	1.25%	1.25%	20%
С	1.25%	1.25%	20%
D	0.75%	0.75%	20%
E	0.75%	0.75%	20%
F	0.75%	0.75%	20%

ACTIVITY LEVEL

The fund's activity level is measured by the active risk measurement. The measurement indicates how much the difference between the fund's returns and the returns of the fund's benchmark varies over time. The measurement therefore shows how active portfolio management is in relation to the benchmark.

The fund's benchmark index is the Oslo Børs Mutual Fund Index (OSEFX).

Active risk is calculated on a 24-month history, so the measure will be recognised when the fund has been active for two years.

The fund is an actively managed equity fund that invests primarily in equities listed on the Oslo Stock Exchange. Because the fund is actively managed, the return is expected to deviate over time from the fund's benchmark index and the active risk will be different from year to year.

SUSTAINABILITY INFORMATION

The fund, which was launched in 2023, has been reported as an Article 6 fund during the year. Sustainability risks have been integrated into investment decisions, without the fund promoting environmental or social characteristics or having sustainable investments as an objective.

The fund is an actively managed equity fund that invests primarily in equities listed on the Oslo Stock Exchange. The sustainability risks to which the fund has been exposed in 2023 are thus linked to individual portfolio companies' management of sustainability risks. Sustainability risks were considered in the fund's investment process but did not restrict the manager's investment universe.

Sustainability risks, like other identified risks such as market risk and liquidity risk, were integrated into the manager's investment analysis and process but were not binding on investment decisions. Identified sustainability risks in the fund included transition risks and climate risks. Transition risks are risks that arise from changes in legislation, changes in demand for products and services, changes in customer behaviour or other structural changes that occur in order to transition to a climate-neutral economy to counteract global warming. Climate risks are linked to risks arising from increased greenhouse gas emissions and global warming. Sustainability risks were managed to some extent in 2023 by excluding certain industries and sectors that the manager deemed to have a high exposure to sustainability risks. The fund has applied an exclusion strategy based on an exclusion list from Norges Bank Investment Management (NBIM).

Companies that are excluded have contributed, or contribute, to violations of basic ethical standards, produce certain types of weapons or base their operations on production of coal or tobacco.

As the exclusion list changes over time, the manager has monitored the exclusion list during the year as part of the investment process and the management of sustainability risks.

The manager assesses that the fund's exclusions have reduced the negative impact of the sustainability risks on the return during the year 2023 and that the sustainability risks had a low impact on the return.

The EU taxonomy is a classification system that aims to establish common criteria for environmentally sustainable economic activities. This fund's underlying investments did not take account of the EU criteria for environmentally sustainable economic activities in the year 2023.

Fund facts

KEY FIGURES (AMOUNTS IN NOK)

Development of the fund	31/12/2023
Fund assets, NOK '000	377,418
Unit class A	130,862
Unit class D	246,556
Number of outstanding fund units	3,749
Unit class A	1,300
Unit class D	2,448
Unit value, NOK	
Unit class A	100.64
Unit class D	100.70
The fund's total return1, %	
Unit class A	0.64
Unit class D	0.70
Active risk %	-
Benchmark	
Oslo Stock Exchange Mutual Fund Index	1.20%
The fund was launched on 22 November 2023	

Risk and profitability ratios	
Total risk for the fund, %	-
Unit class A	-
Unit class D	-
Total risk compared to index, %	-
The fund's average annual return 2 years, %	
Unit class A Unit class D	-
Unit class D	-
The fund's average annual return 5 years, %	
Unit class A	-
Unit class D	-
The fund's average annual return since inception	
Unit class A	0.64
Unit class D	0.70

Costs	
Management fee, %	
Unit class A	1.25
Unit class D	0.75
Performance fee, %	
Unit class A	0.00
Unit class D	0.00
Transaction costs, NOK '000	94.80
- of which analysis costs, NOK '000	0.00
Transaction costs, % of turnover	0.02
Management fees and other administrative or operating costs, %	
Unit class A	1.25
Unit class D	0.75
	0.73
Deposit fee (payable to the management company) Unit class A	0.00
Unit class D	0.00
Withdrawal fee (payable to the fund)	0.00
Unit class A	0.00
Unit class D	0.00
	0.00
Management cost 1 year, NOK	
- One-off deposit NOK 10,000 Unit class A	
Unit class A Unit class D	-
- Ongoing savings NOK 100/month	-
Unit class A	
Unit class A Unit class D	-

Turnover	
The fund's turnover rate, times/year	0.14

BALANCE SHEET AND INCOME STATEMENT

(AMOUNTS IN NOK)

Income statement	
	2023
Revenue and change in value	
Change in value of transferable securities	2,543,637
Interest income	88,022
Dividends (Note 1)	348,002
Total revenue and change in value	2,979,661
Costs	
Management costs	-365,681
Other expenses (Note 2)	-94,798
Total costs	-460,479
Profit/loss for the year	2,519,182

Balance sheet	
	31/12/2023
Assets	
Transferable securities	357,736,155
Total financial instruments with positive MV	
	357,736,155
Total investments with positive MV	357,736,155
Total investments with positive wiv	337,730,133
Bank funds and other liquid funds	19,895,528
Other assets (Note 3)	76,601
Total assets	377,708,285
Liabilities	
Accrued expenses and deferred income (Note 4)	000.404
	-290,124
Total liabilities	-290,124
Fund assets	377,418,161

Items within the line	31/12/2023
Pledged assets	0
Collateral pledged for OTC derivative instruments	0
Total pledged securities	0

Change in fund assets	2023
Fund assets at the beginning of the year	0
Share issue	375,901,318
- Unit class A	130,070,141
- Unit class F	245,831,176
Share redemption	-1,002,339
- Unit class A	0
- Unit class F	-1,002,339
Result according to income statement	2,519,182
Fund assets at year-end	377,418,161

Note 1. Dividends	31/12/2023
Dividends	366,402
Tax on dividends	-18,400
Total dividends	348,002
Note 2. Other costs	31/12/2023
Transaction costs	-94,798
Total other costs	-94,798
Note 3. Other assets	31/12/2023
Fund receivables	76,601
Total other assets	76,601
Note 4. Accrued expenses and deferred income	31/12/2023
Management fee	-290,124
ivianagement ree	-290,124
Total accrued expenses and prepaid	
income	-290,124

FINANCIAL INSTRUMENTS AS AT 31 DECEMBER 2023

Holdings	Numb er	Price	Curren cy	Market value NOK	Share of the fund
Category 1					
Norse Atlantic ASA	550,000	12.10	NOK	6,655,000	1.89
Durable goods		400.00		6,655,000	1.8%
Mowi ASA	60,000	182.00	NOK	10,920,000	2.99
Salmar ASA Perishable goods	20,000	569.20	NOK	11,384,000 22,304,000	3.09 5.99
<u> </u>	04.050	205.52	NOW		
Aker BP ASA	84,953	295.50	NOK	25,103,612	6.79
DOF ASA	350,000	56.71	NOK	19,848,500	5.39
Equinor ASA	82,714	322.15	NOK	26,646,315	7.19
Hafnia Ltd	200,000	70.20	NOK	14,040,000	3.79
Subsea 7 SA	110,320	148.20	NOK	16,349,424	4.39
TGS NOPEC Geophysical Co ASA	113,548	132.20	NOK	15,011,046	4.09
Energy				116,998,896	31.0%
ABG Sundal Collier Holding ASA	1,936,904	6.80	NOK	13,170,947	3.59
DnB ASA	85,000	216.00	NOK	18,360,000	4.99
Protector Forsikring ASA	121,902	180.00	NOK	21,942,360	5.89
SpareBank 1 SMN	125,000	141.80	NOK	17,725,000	4.79
Storebrand ASA	190,000	90.04	NOK	17,107,600	4.59
Finance				88,305,907	23.49
SpareBank 1 SR-Bank ASA	100,000	128.90	NOK	12,890,000	3.49
Healthcare				12,890,000	3.4%
BW LPG Ltd	90,000	151.30	NOK	13,617,000	3.69
Frontline Ltd	24,013	202.90	NOK	4,872,238	1.39
Hoegh Autoliners ASA	265,335	92.25	NOK	24,477,154	6.59
Kitron ASA	150,000	33.50	NOK	5,025,000	1.30
Klaveness Combination Carriers	200,000	87.00	NOK	17,400,000	4.69
Kongsberg Gruppen ASA	20,000	465.40	NOK	9,308,000	2.5
Stolt-Nielsen Ltd	45,000	311.50	NOK	14,017,500	3.79
Industry				88,716,891	23.59
StrongPoint ASA	453,576	13.35	NOK	6,055,240	1.69
Zaptec ASA	99,046	21.78	NOK	2,157,222	0.6
Information technology				8,212,461	2.29
Yara International ASA	37,799	361.20	NOK	13,652,999	3.6
Material Total Category 1				13,652,999 357,736,155	3.6° 94.8°
Sum of transferable securities				357,736,155	94.89
otal securities				357,736,155	94.80
ank funds					
ash and cash equivalents NOK				19,895,528	5.3
Total bank balances				19,895,528	5.39
Other net assets/liabilities				-213,522	-0.19
Fund assets				377,418,161	100.09

The fund's holdings of securities have been divided into the following categories:

- $1. \ Transferable \ securities \ admitted \ to \ trading \ on \ a \ regulated \ or \ equivalent \ market \ outside \ the \ EEA$
- $2. \ Other financial instruments \ that \ are \ admitted \ to \ trading \ on \ a \ regulated \ market \ or \ equivalent \ market \ outside \ the \ EEA$
- 3. Transferable securities that are regularly traded on another market that is regulated and open to the public
- $4. \ Other financial instruments \ that \ are \ regularly \ traded \ on \ another \ market \ that \ is \ regulated \ and \ open \ to \ the \ public$
- 5. Transferable securities that are intended to be admitted to trading on a regulated market or an equivalent market outside the EEA within one year of the issue
- 6. Transferable securities which, within one year of issue, are intended to be regularly traded on another market which is regulated and open to the public
- 7. Other financial Instrument

About FCG Fonder AB

1.1 COMPANY FACTS

FCG Fonder AB (the Company), corporate identity number 556939-1617, is a limited liability company with a share capital of SEK 50,000. The Company was started up in 2014 and its registered office is in Stockholm. The Company is under the supervision of the Swedish Financial Supervisory Authority and has been licensed to carry on fund operations in accordance with the Mutual Funds Act (2004:46) and to manage alternative investment funds in accordance with the Alternative Investment Fund Managers Act (2013:561) since 12 June 2014.

Website: www.fcgfonder.se

Address: Östermalmstorg 1, 5 tr., SE-114 42 Stockholm, Sweden

E-mail: fondadmin@fcgfonder.se

Telephone: +46 8 19 18 13 (switchboard)

Complaints officer: Johan Schagerström (CEO)

Directors

• Tove Bångstad (Chairman of the Board)

• Jimmi Brink (Director)

• Mari Thjømøe (Director)

• Rikard Edvardsson (Member)

Senior Executives

• Johan Schagerström, Chief Executive Officer

• Mikael Olausson, Head of Outsourcing

• Tom Michels, Deputy CEO & Head of the Management Function

• Erica Laestander, Head of the Risk Management Function

• Veronica Sommerfeld, acting Head of the Compliance function

Auditor

The company's auditor is Peter Nilsson, Authorised Public Accountant, Öhrlings PricewaterhouseCoopers AB, 113 97 Stockholm.

1.2 REMUNERATION POLICY

As a rule, the Company does not pay variable remuneration. However, the Company has adopted a remuneration policy that governs how employees and other relevant persons are able to receive variable remuneration. Variable remuneration is evaluated on the basis of an employee's performance in relation to both quantitative and qualitative targets and will be adjusted for the risk to which the employee's conduct gives rise. Remuneration is decided on mainly by the board of directors, but may be decided on by the Chief Executive Officer for certain categories of employees. An employee's remuneration must be based on a balanced weighting between the employee's fixed remuneration and the variable component. When remuneration is paid out, parts of the variable remuneration will be deferred for later payment and will be subjected to risk adjustment before payment. Variable remuneration may be discontinued for reasons such as inappropriate conduct or breach of internal guidelines.

Portfolio managers receive fixed remuneration from the Company based on the size of the assets under management as well as, in some cases, variable remuneration in the form of a performance-based fee. In view of the type of business to be carried on by the Company, the Company has assessed the risk of the Company's remuneration system adversely affecting the risk level at the Company as low. Further information on the remuneration policy is available on the website at www.fcgfonder.se under "om oss/legal information" [about us/legal information] and a hard copy of the policy can be obtained free of charge from the Company on request.

1.3 INFORMATION ABOUT REMUNERATION

During the period 01/01/2023-31/12/2023, FCG Fonder AB paid out 20,721, 434 to the company's directors, 29 permanent employees and 5 hourly employees. Compensation includes taxable benefits in the amount of SEK 218,976.

Category	Total amount	Of which variable remuneration	Comments
Specially			
regulated			No double
Personnel, 15	12,883,443	0	counting
Executive			People are
Management	8,362,515	0	included in
			multiple categories
Strategic			No double
positions*	0	0	counting
			No double
Control	2,471,682	0	counting
			People are
Risk-takers	2,049,246	0	included in
			multiple categories

The Board of Directors of FCG Fonder has adopted a Remuneration Policy and is responsible for its application and updating. The Board has also appointed a special member of the Board to assess the Company's remuneration system, to decide what measures, if any, should be taken to monitor the application of the policy, and to prepare Board decisions on remuneration. The Board shall also ensure that the compliance function reviews, at least annually or as necessary, the compliance of the Company's remuneration system with this policy. The Company has not paid any variable remuneration in 2023. The compliance function has carried out the assigned audit. The audit showed satisfactory results and did not lead to any recommendations.

1.4 ACCOUNTING AND VALUATION PRINCIPLES

The fund's assets are measured at current market value, which means the latest prices paid or, if no such prices exist, the latest bid prices. If, in the opinion of the Management Company, such prices are not representative or if no such prices exist, as is mainly the case with transferable securities referred to in Chapter 5, section 5 LVF, a market value is established on objective grounds after a specific valuation. The basis used for the particular valuation includes, for example, market prices from a non-regulated market. an independent broker, other external independent sources, another listed financial instrument, index, acquisition cost or events affecting a company that impact on market value. The value of the fund unit is calculated by the Management Company every business day. OTC derivatives are valued using recognised valuation models such as Black & Scholes, Black 76 or similar valuation models and based on underlying assets. Negative interest on deposits is recognised under interest expense. The value of a fund unit in a unit class in the fund consists of the value of the unit class divided by the number of outstanding units in the unit class in question. The annual report has been prepared in accordance with ESMA guidelines (ESMA 2012/832SV), the Swedish Investment Funds Act (2004:46) and the recommendations of the Swedish Investment Fund Association.

1.5 PROCESSING OF PERSONAL DATA

When you open a fund account and buy units in funds with the Company or an agent of the Company, your personal data will

be processed in connection with this. The processing relates to preparation and administration of the service in question and the data may also form the basis for market and customer analyses, business monitoring and business and method development. It may also be used to send information to you as a unit owner and for marketing purposes.

The data may also be processed at the Company's contractors and other companies within the FCG Group that collaborate on services. All processing takes place in accordance with confidentiality and protection provisions

contained in laws and regulations. If you require more information on the Company's processing and your right to change, delete or request your personal data, etc., the Company's Data Protection Policy is available on the Company's website at <u>Legal information - FCG Fonder</u>

1.6 SHAREHOLDER ENGAGEMENT POLICY

The Company's shareholder engagement policy is published on the Company's website <u>Legal information - FCG Fonder</u> Section 7.2 of the Policy states how Annual reporting of votes takes place.