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PROSPECTUS

For the UCITS fund

Investtech Invest

July 2025

This prospectus includes the following parts

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The information brochure for the above fund (the "fund") has been prepared in accordance with lagen (2004:46) om värdepappersfonder ("LVF") [the Swedish Investment Funds Act] and the Swedish Financial Supervisory Authority's regulations (FFFS 2013:9) on UCITS. This information brochure and the fund rules for the fund together constitute the so-called information brochure. The fund's key information document, fund rules, annual report and half-year report are available on the Company's website: [Our funds - FCG Fonder](#)

Before investing in the fund, you are recommended to read this information brochure and the key information document for the fund. The information contained herein should not be seen as a recommendation to subscribe for units in the fund. Foreign law may mean that an investment may not be made by certain investors. It is the responsibility of any person interested in investing funds in the fund to ensure that such investment is made in accordance with applicable laws or other regulations.

MANAGEMENT OF THE FUND

The fund company responsible for the fund in this information brochure is FCG Fonder AB, corporate identity number 556939-1617, (the "Company"), which is a limited liability company, incorporated in 2014, with its registered office in Stockholm. The Company is under the supervision of the Swedish Financial Supervisory Authority. The Company is responsible for the register of all unitholders and their holdings.

The Company has commissioned the fund's portfolio management, marketing and distribution to Investtech.com AS, Norwegian corporate identity number 978 655 424, (the "Asset Manager"). The portfolio manager is a Norwegian investment firm based in Lysaker, Norway.

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

Publication date 2025-07-07

Investtech Invest

Type of fund: The Fund is a mutual fund pursuant to the Investment Funds Act (Swedish Code of Statutes 2004:46) ("LVF").

Target group: The fund is suitable for investors who have a five-year investment horizon and who are looking for a medium risk for their investment.

Fund managers: Fredrik Tyvand and Asbjørn Taugbøl at the Asset Manager.

Fund started: 2021.

Unit classes:

- Unit class A, ISIN SE0014704821, started 2021.
- Unit class B, ISIN SE0014704839, started 2021.
- Unit class C, ISIN SE0014704847, not yet started.
- Unit class D, ISIN SE0014704854, started 2021.

OBJECTIVES AND INVESTMENT POLICY

The fund is an equity fund with a focus on the Nordic region. The fund's objective is to generate a return over time that exceeds a composite index consisting of 50 percent of the OSEBX Index and 50 percent of the OMXSBI Index.

The fund uses a quantitative model to select the equities you want to invest in.

At all times, the fund must be invested at least 90 percent in transferable securities and money market instruments admitted to trading on a marketplace in the Nordic region. The fund's geographical exposure may be allocated as follows:

- Norway - a maximum of 60 percent of the fund's value
- Sweden – a maximum of 60 percent of the fund's value
- Denmark – a maximum of 10 percent of the fund's value
- Finland – a maximum of 10 percent of the fund's value

The fund has no restrictions on exposure to different types of issuers and investments can therefore be made in different types of sectors and in companies of different sizes.

The assets of the fund may be invested in transferable securities, money market instruments and in accounts with credit institutions.

Derivative instrument

The fund is not able to invest in derivative instruments.

Total return swaps

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

Securities financing transactions

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 percent of the value of the fund. However, this is not expected to happen and the fund does not use other types of securities financing transactions.

A general description of the purpose and risks of securities financing transactions and the collateral management associated with the transactions can be found further down under the section "General information" in this information brochure.

RISK-RELATED INFORMATION

Investing in funds is always associated with risk. General information about the risk associated with investing in a fund can be found further down under the section "General information" in this information brochure.

Risk profile

The fund is an equity fund with a focus on the Nordic region. An investment in the fund should be expected to be associated with a high risk, and an investor should have an investment horizon of at least five years.

The primary risk associated with investing in equities and equity-related financial instruments is market risk in the form of share price risk, as stock markets can fluctuate significantly in value, which can result in high volatility in the value of the fund. The value of the fund can therefore vary significantly due to its composition, the market or markets to which the fund is exposed and the management methods used by the manager.

The management of the fund uses quantitative decision-making models and data obtained from external parties. The models are used for investment decisions. In the event that the models or data are not accurate or complete, or inaccurate in any way, it may adversely affect the investment decisions and/or the fund's risk mitigation techniques. The asset manager and the Company ensure that there is adequate preparedness to maintain well-functioning management of the fund.

The fund's investments are concentrated in a certain geographical area (the Nordic region), which means that the risk in the fund is normally higher than it is in a global equity fund where the investments can be made more diversely. 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.

Since the fund has the opportunity to invest in assets outside Sweden with exposure to different currencies, this means that currency risk is a natural part of the fund's total risk. Exchange rate fluctuations affect the fund's net worth expressed in the fund's base currency, if the fund has holdings in another currency. The fund also consists of unit classes that are traded in different currencies, which means that changes in exchange rates mean that the currency risk can differ between different unit classes depending on the currency in which the unit class is traded.

The fund is exposed to liquidity risk, which refers to the risk that financial instruments cannot be sold or purchased at a reasonable cost and within a reasonable time. The fund strives to have an appropriate mix of holdings in order to be able to manage liquidity risk in an efficient manner. However, in stressed market conditions, liquidity and market demand may deteriorate, which in turn may mean that the fund, in the event of a redemption order, is unable to release liquid funds to meet redemptions within a reasonable time. The Company has an established process for ongoing management and monitoring of liquidity risk in the fund, which is described in more detail under section "General Information" in this information brochure.

Sustainability risks

The fund does not promote environmental or social sustainability characteristics and does not pursue sustainable investment as its objective. The fund shall integrate sustainability risks into its investment decisions, but the existence of sustainability risk does not mean that the fund is prevented from investing in the underlying asset if the manager otherwise considers it appropriate for the fund. Thus, it is not binding on the investment decisions nor does it limit the fund's investment universe that such a risk has been identified.

The fund is exposed to sustainability risks that may affect the fund's return. The different types of sustainability risks, and their possible impact on returns, are expected to be at the following levels in the fund; E: medium, S: medium, and G: medium. The assessment is based on the fact that the fund primarily invests in Nordic companies in different size segments. Companies in different size segments may have different sustainability risks based on size, industry and operational characteristics. Examples of sustainability risks specific to the Nordic countries can be climate change, digitalisation and cybersecurity, as well as natural resource management.

The company has an established process for ongoing management and monitoring of sustainability risks in the fund, which is described in more detail under section "General information" in this information brochure.

Risk assessment method

The company measures the total exposure to the fund through the commitment method. The total exposure may amount to a maximum of 100 percent of the value of the fund.

SUSTAINABILITY-RELATED INFORMATION

Transparency on sustainability risk integration

The integration of sustainability risks into investment decisions is described in the section "Risk-related information" above.

Transparency of negative impacts on sustainable development

In its management, the manager does not take into account the negative impact of investment decisions on sustainability factors, in light of the fund's investment orientation.

Information on the EU Taxonomy for environmentally sustainable activities

The EU Taxonomy is a classification system that aims to establish common criteria for environmentally sustainable economic activities. The underlying investments of this fund do not take into account the EU criteria for environmentally sustainable economic activities.

DIVIDENDS

All of the fund's unit classes are accumulative and therefore do not pay dividends.

MARKETING IN OTHER COUNTRIES

The fund is marketed in Norway and Denmark.

BENCHMARK

The fund's benchmark index consists of 50 percent of the OSEBX Index and 50 percent of the OMXSBGI Index.

The OSEBX Index is a reinvesting stock index that shows the development of the approximately 65-70 most traded stocks on the Oslo Stock Exchange. The OMXSBGI Index is a reinvesting stock index that shows the performance of the approximately 100 largest and most traded stocks on the Stockholm Stock Exchange.

The Company assesses that the composite index is consistent with the fund's investment strategy with respect to the choice of asset class and market. The fund is actively managed and the return is therefore likely to deviate from the index over time. The index is used as the return threshold in the calculation of the performance-

based fee and for comparative purposes, e.g. in the calculation of active risk and in the presentation of the fund's past performance.

The OMXSBGI Index is published by Nasdaq Copenhagen and the OSEBX Index is published by the Oslo Stock Exchange, which is owned by Euronext. Both index administrators are included in the register maintained by ESMA pursuant to Article 36 of Regulation (2016/2011) of the European Parliament and of the Council on benchmark indices, etc.

The fund manager has a plan of actions to be taken if an index ceases to be provided or has changed significantly. In such a case, the fund rules will need to be amended, which will take place after the approval of the Swedish Financial Supervisory Authority, and information will be provided on the nominee's website.

ACTIVITY LEVEL

Date:	2024-12-31	2023-12-31	2022-12-31	2021-12-31
Active risk:	7,39 %	8,02 %	-	-

The fund's activity level is measured by the measure of active risk. The measure indicates how much the difference between the fund's return and the return of the fund's benchmark index varies over time. In this way, the measure shows how active portfolio management is in relation to the benchmark index. A low risk indicates that the fund has deviated slightly from the index, and a high active risk indicates the opposite. If the active risk is 0%, it means that the fund has moved exactly like the index. However, active risk does not say anything about whether the fund has performed

better or worse than its index. Information about the fund's benchmark index can be found in the section above.

The fund is an actively managed equity fund with a focus on the Nordic region. The fund uses a quantitative model to select the equities you want to invest in.

Active risk is calculated over 24 months.

Explanation of the achieved activity measure

The activity measure varies over time due to allocation to different geographic markets, industries or individual securities. Compared to the index, the fund has had fewer securities and a different

weight in individual securities. The fund's volatility has decreased during the year and is at a higher level than the index's volatility.

COSTS AND CHARGES

	Current fixed management fee	Maximum fixed management fee	Performance-based fee	Maximum fee for subscription	Maximum fee for redemption
Unit class A	0,9 %	0,9 %	20 %	None	None
Unit class B	1,0 %	1,5 %	20 %	None	None
Unit class C	0,9 %	0,9 %	20 %	None	None
Unit class D	1,5 %	1,5 %	20 %	None	None

The table shows the current and maximum fixed management fee and the performance-based fee for each unit class. The amounts are expressed on an annual basis. The current management fee is the management fee that is actually charged from each unit class. Furthermore, any fees for subscription and redemption are stated. Fees and costs are described in more detail further down under the section "General information" in this information brochure.

About the performance-based fee

In addition to the fixed management fee, a performance-based variable fee is payable for all unit classes. The performance-based fee is no more than 20 percent of the unit class return that exceeds a threshold value. The threshold for the unit classes is as follows:

- The threshold for unit classes A and B consists of 50 percent OSEBX Index (NOK) and 50 percent OMXSBGI Index (SEK, but converted to NOK).
- The threshold for unit classes C and D consists of 50 percent OSEBX Index (NOK, but converted to SEK) and 50 per cent OMXSBGI Index (SEK).

If the value development of the unit class is negative, but still exceeds the threshold value, a performance-based fee may be charged. The calculation of the performance-based fee is based on the so-called high watermark principle, which means that the performance-based fee may only be levied once on the same excess return in relation to the threshold. If the unit class achieves a value development below the threshold value on a later day and if the share class achieves a value development above the threshold value on a later date, no performance-based fee will be charged until the underperformance of previous periods has been

compensated. The fee is calculated collectively for each unit class, which means that all unit holders in a share class are treated equally regardless of the time of the investment. The fee is calculated after deduction of the fixed management fee. The fee is calculated and reserved for the calculation of the fund unit price, and is deducted from the fund's account in arrears on the last banking day of the month.

An example calculation showing the calculation of the performance-based fee at different points in time can be found further down under the section "Example of calculation of the performance-based fee" in this information brochure.

Fee for subscription and redemption of fund units

There is no subscription fee or redemption fee for the unit classes.

Other costs

The fund pays brokerage fees and other costs for the fund's securities trading, such as transaction, delivery, interest costs and taxes. These other costs are charged to the fund at the time they are incurred.

SUBSCRIPTION AND REDEMPTION IN THE FUND

Subscription (unitholders' purchase) and redemption (unitholders' sale) can normally take place every banking day (Trading Day). The table below shows the trading currency and minimum subscription amount for each unit class as well as the cut-off times for

subscription and redemption. More information on how you can subscribe for and redeem fund units can be found further down under the section "General information" in this information brochure.

	Minimum first subscription amount	Minimum subsequent subscription amount	Cut-off time subscription & redemption ordinary banking day	Cut-off time subscription & redemption banking day
Unit class A	500 000 NOK	None	at 14:00 on the Trading Day	at 10:00 on the Trading Day
Unit class B	100 NOK	None	at 14:00 on the Trading Day	at 10:00 on the Trading Day
Unit class C	500 000 SEK	None	at 14:00 on the Trading Day	at 10:00 on the Trading Day
Unit class D	100 SEK	None	at 14:00 on the Trading Day	at 10:00 on the Trading Day

HISTORICAL PERFORMANCE

Historical returns are no guarantee of future returns. The money invested in the fund can both increase and decrease in value, and it is not certain that you will get back the entire invested capital.

Unit classes A and B started on 25 January 2021, and unit class D started on 12 February 2021. Unit class C has not yet started.

	2024	2023	2022	2021
Unit class A	23,8 %	10,4 %	-18,1 %	-
Unit class B	23,7 %	10,3 %	-18,3 %	-
Unit class D	20,7 %	2,2 %	-15,5 %	-
Benchmark	9,7 %	18,3 %	-11,7 %	-

FUND RULES

11 May 2021

§ 1 The fund's legal status

The name of the fund is Investtech Invest (the "fund"). The fund is a UCITS fund under the Swedish Investment Funds Act (Swedish Code of Statutes 2004:46) ("LVF").

The fund is aimed at the general public subject to the limitation set out in § 17. The fund assets are owned jointly by the fund unit holders. The fund is not a legal entity and cannot acquire rights or assume obligations or bring legal proceedings before a court or any other authority. Property included in a fund may not be seized, and unit holders are not liable for obligations related to a fund. The fund company referred to in § 2 represents the unitholders in all matters relating to the fund, decides on the assets included in the fund and exercises the rights arising from the assets. The business is conducted in accordance with these fund regulations, the Articles of Association of the company specified in § 2, LVF, the Swedish Financial Supervisory Authority's regulations (FFFS 2013:9) on mutual funds and other applicable statutes.

The fund consists of four unit classes, "A", "B", "C" and "D". The content of the fund rules is common to the unit classes, with the exception of management fees, currency and conditions for the first subscription amount. Since the fund consists of unit classes, this means that the value of a fund unit in one unit class may differ from the value of a fund unit in another unit class. The units in each unit class are the same size and entail equal rights to the assets included in the fund.

§ 2 Fund manager

The fund is managed by FCG Fonder AB, with corporate identity number 556939-1617 (the "fund company").

§ 3 The depositary and its tasks

The custodian of the fund's assets is Danske Bank A/S, Sverige Filial, with corporate registration number 516401-9811 (the "depositary").

The depositary shall execute the fund company's decisions regarding the fund and receive and store the fund's assets. The depositary shall verify that the decisions regarding the fund made by the fund company, such as valuation, redemption and subscription of fund units, are made in accordance with law, regulations and these fund rules.

§ 4 The nature of the fund

The fund is an equity fund that, through investments in transferable securities, takes exposure to equities that are admitted to trading on the Nordic markets.

The fund's objective is to generate a return over time that exceeds a composite index consisting of 50 percent of the OSEBX Index and 50 percent of the OMXSBGI Index.

An investment in the fund should be expected to be associated with a high risk, and an investor should have an investment horizon of at least five years.

§ 5 The fund's investment policy

The assets of the fund may be invested in transferable securities, money market instruments and in accounts with credit institutions.

At all times, the fund must be invested at least 90 percent in transferable securities and money market instruments admitted to trading on a marketplace in the Nordic region. The fund's geographical focus is therefore towards the Nordic region. Geographical exposure to a single country within the Nordic region may not exceed

- 60 percent of the fund's value for Norway
- 60 percent of the fund's value for Sweden
- 10 percent of the fund's value for Denmark
- 10 per cent of the value of the fund for Finland

As the fund has a Nordic mandate, the fund has the opportunity to invest in assets with exposure to the different currencies used in the Nordic countries. This means that currency risk is a natural part of the fund's total risk.

The fund has no restrictions on exposure to different types of issuers. The fund can thus be exposed to different types of sectors and different sizes of companies.

§ 6 Marketplaces

The fund's trading in financial instruments may take place on a regulated market or an equivalent market outside the EEA and another market within or outside the EEA that is regulated and open to the public.

§ 7 Special investment policy

The fund is not able to invest in transferable securities and money market instruments referred to in Chapter 5. Section 5 LVF.

The fund does not have the opportunity to use derivative instruments, and thus not the derivative instruments specified in Chapter 5. Section 12(2) of the LVF (so-called OTC derivatives).

§ 8 Valuation

The value of the fund is calculated by deducting the liabilities relating to the fund from the fund's assets.

The fund's assets consist of:

- Financial instruments.
- Liquid assets.
- Accrued interest.
- Accrued dividends.
- Unsettled sales.
- Other assets and receivables relating to the fund.

The fund's liabilities consist of:

- Remuneration to the AIFM.
- Remuneration to the depository.
- Unsettled purchases.
- Tax liabilities.
- Other liabilities relating to the fund.

Financial instruments are valued at the prevailing market value, meaning the latest price paid or, if there is no such price, the latest bid price. If, in the opinion of the fund company, such prices are not representative or if such prices are missing, a market value will be determined on objective grounds following a special valuation. The special valuation is based on, for example, market prices from a non-regulated market, independent brokers or market-makers, other external independent sources, other listed financial instruments, indices, acquisition value or corporate actions that affect the market value.

Liquid assets and short-term receivables (deposits with credit institutions, short-term investments in the money market and liquid assets from sold financial instruments, are measured at the estimated amount expected to be received.

Since the fund consists of unit classes, the value of a fund unit will be determined taking into account the conditions associated with each unit class. The value of a fund unit in a unit class of the fund is the value of the unit class divided by the number of units outstanding in the unit class in question.

The value of a fund unit is normally calculated every banking day by the fund company. However, the fund company does not calculate the net asset value if the fund is closed for subscription and redemption taking into account the circumstances specified in §§ 9 or 10.

§ 9 Subscription and redemption of fund units

Subscription and redemption of fund units can normally take place every banking day (trading day). However, the fund is not open for subscription and redemption on trading days when the valuation of the fund's assets cannot be carried out in a way that ensures the equal rights of fund unit holders, for example when a significant part of the fund's assets are invested in a market that is fully or partially closed to trading. This applies even if subscription and redemption are postponed in accordance with § 10.

Requests for subscription and redemption are made in the manner specified in the fund's information brochure or in accordance with the instructions that can be obtained from the fund company. The request for subscription and redemption will be executed on the same day as it is received, provided that the request has been received by the fund company, or a person designated by the fund company, on a trading day and no later than at the time and in accordance with the terms and conditions set out in the fund's information brochure. Otherwise, the request will be executed on the next trading day. Requests for subscription or redemption of fund units may only be withdrawn if the fund company consents to it in writing. Subscription and login passwords cannot be limited.

If funds for redemption need to be raised through the sale of assets included in the fund, the sale must take place and the

redemption must be carried out as soon as possible. The fund company may postpone subscription and redemption of fund units if there are special reasons for the measure and it is justified by the interests of the fund unit holders. The fund company must notify the Swedish Financial Supervisory Authority and the investors and unitholders concerned of the measure without delay. The fund company shall, after the reasons for the postponement have ceased, notify the Swedish Financial Supervisory Authority.

Subscription and redemption of units always takes place at a price unknown at the time of the request. The subscription price and redemption price for a fund unit shall be the fund unit price calculated by the fund company in accordance with § 8 on the date of subscription or redemption. The fund's subscription and redemption price is normally published on the fund company's website on the next banking day after the date on which the fund unit price has been determined. For a request for subscription or redemption that is received when the fund is closed for subscription or redemption, the NAV per unit or share is normally set at the next trading day's price.

Subscription and redemption in each unit class will take place as follows:

- | | |
|--------------|---|
| Unit class A | Subscription and redemption will take place in NOK. The minimum initial subscription amount is NOK 500,000. |
| Unit class B | Subscription and redemption takes place in NOK. The minimum initial subscription amount is NOK 100. |
| Unit class C | Subscription and redemption will take place in SEK. The minimum initial subscription amount is SEK 500,000. |
| Unit class D | Subscription and redemption will take place in SEK. The minimum initial subscription amount is SEK 100. |

The unit classes do not have any restrictions on subsequent subscriptions.

There is no subscription or redemption fee for the unit classes.

§ 10 Extraordinary circumstances

The fund may be closed for subscription and redemption if extraordinary circumstances have occurred that mean that a valuation of the fund's assets cannot be carried out in a way that ensures the equal rights of the unitholders.

§ 11 Fees and charges

The unit classes are charged with the following fees and costs:

1. Fixed management fee. This includes remuneration for management, marketing, administration of the fund as well as costs for storage, supervision and auditors.
2. Costs for the purchase and sale of financial instruments. These costs may consist of, for example, brokerage, taxes and other costs in connection with the fund's purchase and sale of assets.

The maximum fixed management fee that can be paid from each unit class is:

- | | |
|-----------------------|--------------------------------------|
| Unit classes A and C: | 0.90 percent of fund assets per year |
| Unit classes B and D: | 1.50 percent of fund assets per year |

In addition to the fees and costs listed above, all unit classes are subject to a performance-based fee of no more than 20 percent of the share 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 B consists of 50 percent OSEBX Index (NOK) and 50 per cent OMXSBGI Index (SEK, but converted to NOK).
- The threshold for unit classes C and D consists of 50 percent OSEBX Index (NOK, but converted to SEK) and 50 per cent OMXSBGI Index (SEK).

If the value development of the unit class is negative, but still exceeds the threshold value, a performance-based fee may be charged. The calculation of the performance-based fee is based

on the so-called high watermark principle, which means that the performance-based fee may only be levied once on the same excess return in relation to the threshold. If the unit class achieves a value development below the threshold value on a later day and if the unit class achieves a value development above the threshold value on a later date, no performance-based fee will be charged until the underperformance of previous periods has been compensated. The fee is calculated collectively for each unit class, which means that all unit holders in a unit class are treated equally regardless of the time of the investment. The fee is calculated after deduction of the fixed management fee. The fee is calculated and reserved for the calculation of the fund unit price, and is deducted from the fund's account in arrears on the last banking day of the month. The information brochure contains calculation examples showing the calculation of performance-based fees at different times.

There is no subscription or redemption fee for the unit classes.

Any value added tax applicable at any given time will be charged in addition to the fees and charges.

§ 12 Dividends

The fund does not pay any dividends.

§ 13 The fund's financial year

The fund's financial year is a calendar year.

§ 14 Half-yearly report and annual report, amendment of the fund rules

The fund company shall submit a half-yearly report for the first six months of the financial year within two months of the end of the financial year and an annual report for the fund within four months of the end of the financial year. The documents shall be sent free of charge to unitholders who so request and be available at the fund company and the depositary.

Amendments to the fund rules may only be made by decision of the fund company's Board of Directors and shall be submitted to the Swedish Financial Supervisory Authority for approval. Once the amendment has been approved, the amended fund rules shall be available at the fund company and the depositary and shall be announced in the manner prescribed by the Swedish Financial Supervisory Authority.

§ 15 Pledging and transfer

If the fund company so decides, a unit holder may pledge a fund unit. Pledging is done by the mortgagor notifying the fund of the pledge in writing to the fund company. The notification must state the mortgagor, the pledgee, the shares covered by the pledge and any restrictions on the scope of the pledge. The unitholder must be notified in writing that the fund company has entered the pledge in the register of unitholders. The pledge will cease when the pledgee has notified the fund company in writing and when the fund company has removed the information about the pledge from the unitholder register. The fund company has the right to charge the unitholder for the registration of the pledge. The compensation may amount to a maximum of 1 percent of the value of the pledge at the time of registration.

Unitholders can transfer their fund units. In the event of such a transfer, the fund company may charge a fee of a maximum of SEK 500.

§ 16 Limitation of liability

Without derogating from what is stipulated in Chapter 2. Section 21 of the LVF on the liability of the fund company and Chapter 3. Sections 14-16 of the LVF on the depositary's liability apply to the following.

If a fund unit holder has suffered damage as a result of the fund company's violation of the LVF or the fund rules, the fund company shall compensate for the damage. Damage incurred in other cases shall not be compensated by the fund company, if the fund company has exercised normal care. The fund company is in no case liable for indirect damage.

The fund company or the depositary is not liable for damage caused by external events beyond the control of the fund company or the depositary, such as damage due to Swedish or foreign law, Swedish or foreign government action, war event, strike, blockade, boycott, lockout or other similar circumstance. The proviso regarding strikes, blockades, boycotts and lockouts applies even if the fund company or the depositary is subject to or itself takes such industrial action.

The fund company or the depositary is not liable for damage caused by a Swedish or foreign stock exchange or other marketplace, central securities manager or clearing organisation.

Nor is the fund company or the depositary liable for any damage arising from any restriction of disposal that may be applied to the fund company or the depositary in respect of financial instruments.

If there is an impediment for the fund company or the depositary to fully or partially execute measures due to circumstances stated above, the measure may be postponed until the impediment has ceased. In the event of deferred payment, any interest will only be payable on the terms and conditions in force on the due date. Default interest shall not be payable in these cases.

§ 17 Permitted Investors

The fund is aimed at the general public, but not at investors whose subscription of a share in the fund is in conflict with provisions of Swedish or foreign law or regulations. Nor is the fund addressed to investors whose subscription or holding of units in the fund means that the fund or the fund company will be obliged/obliged to take a registration measure or other action that the fund or the fund company would not otherwise be obliged/obliged to take. The fund company has the right to refuse subscription to an investor referred to in this paragraph.

The fund company may redeem unit holders' units in the fund – against the unitholder's objection – if it should turn out that unit holders have subscribed for units in the fund in violation of provisions of Swedish or foreign law or regulations, or that the fund company, due to the unit holder's subscription or holding in the fund, becomes obliged to take a registration measure or other measure for the fund or the fund company that the fund or the fund company would not be obliged/obliged to take if the unit holder would not holding shares in the fund.

Example of calculation of performance-based fee

For Investtech Invest, a performance-based variable fee is payable for all unit classes. The performance-based fee is no more than 20 percent of the unit class return that exceeds a threshold value. The threshold for the unit classes is as follows:

- The threshold for unit classes A and B consists of 50 percent OSEBX Index (NOK) and 50 percent OMXSBGI Index (SEK, but converted to NOK).
- The threshold for unit classes C and D consists of 50 percent OSEBX Index (NOK, but converted to SEK) and 50 percent OMXSBGI Index (SEK).

If the value development of the unit class is negative, but still exceeds the threshold value, a performance-based fee may be

charged. The calculation of the performance-based fee is based on the so-called high watermark principle, which means that the performance-based fee may only be levied once on the same excess return in relation to the threshold.

The performance-based fee is a variable fee and the size of the fee depends on the value development of a unit class compared to the threshold value of the unit class. The performance-based fee is calculated collectively after deduction of the fixed management fee. The table below illustrates how the performance-based fee can affect the share value.

Sample calculation of a performance-based fee of 20 percent on returns exceeding the threshold

Day	NAV per unit after the fixed management fee	Return since the most recent performance fee	Threshold	Threshold at the most recent HWM calculation	Threshold since the most recent HWM calculation (%) in SEK	Out/Underperformance SEK	Performance fee (in SEK)	NAV after performance fee	NAV at the last HWM when the performance-based fee was paid	Threshold at HWM calculation
0	100,00		100,00					100,00	100,00	100,00
1	100,30	0,30	100,10	100,00	0,10	0,20	0,04	100,26	100,26	100,10
2	101,00	0,74	100,50	100,10	0,40	0,34	0,07	100,93	100,93	100,50
3	100,80	-0,13	100,45	100,50	-0,05	-0,08	0,00	100,80	100,93	100,50
4	100,75	-0,18	100,70	100,50	0,20	-0,38	0,00	100,75	100,93	100,50
5	102,00	1,06	100,75	100,50	0,25	0,81	0,16	101,84	101,84	100,75

On day 1, the share value goes up by 0.3 percent and the benchmark index goes up by 0.1 percent. A performance-based fee is payable because there was an excess return of SEK 0.2 per share. 20 percent of the excess return entails a replacement of 0.04 per unit and the unit value is reduced to $100.3 - 0.04 = 100.26$.

On day 2, the share value goes up by 0.74 percent and the benchmark index goes up by 0.4 percent. A performance-based fee is payable because there was an excess return of SEK 0.34 per share. 20 percent of the excess return entails a remuneration levy of 0.07 per share and the unit value is reduced to $101 - 0.07 = 100.93$.

On day 3, the share value decreased by -0.13 percent and the benchmark index decreased by -0.05 percent. A performance-based fee is not payable because there was an underperformance of SEK -0.08 per share.

On day 4, the share value goes down by -0.18 percent and the benchmark index goes up by 0.25 percent. A performance-based fee is not payable because there was an underperformance of SEK -0.38 per share.

On day 5, the share value goes up by 1.06 percent and the benchmark index goes up by 0.05 percent. A performance-based fee is payable because there was an excess return of SEK 0.81 per share. 20 percent of the excess return entails a replacement of 0.16 per share and the unit value is reduced to $102 - 0.16 = 101.84$.

General information

ASSIGNMENT AGREEMENT ON PORTFOLIO MANAGEMENT

The fund's portfolio management, marketing, and distribution have been delegated to an external actor (the "Asset Manager"), see more information in the introductory information, p. 1, in this information brochure.

There may be conflicts of interest in the relationships between the fund, the unitholders, the Company and the Asset Manager. An example of such a conflict of interest is that the Asset Manager does not have the formal responsibility for the fund vis-à-vis the unitholders and other stakeholders, and that there is therefore an increased risk that competing services reduce the focus on management. The Company manages this conflict of interest primarily through the process of monitoring outsourced operations, as well as on an ongoing basis through follow-up of the external management of the internal management unit, ongoing limit controls and independent audits of the risk management and compliance function.

The Company has a Policy for Conflict of Interest Managed by the Board of Directors. The Asset Manager also has guidelines developed regarding conflicts of interest and how they should be prevented and treated. Between the Company and the Asset Manager, there are also written agreements that regulate the parties' responsibilities and commitments. More information about delegation and any conflicts of interest can be obtained from the Company upon request.

DEPOSITARIES OF FUNDS

The fund's assets are held by Danske Bank A/S, Denmark, Sweden Branch, with corporate identity number 516401-9811, a foreign bank with a branch in Sweden that mainly conducts banking and securities business and has its registered office in Copenhagen, Denmark.

Conflicts of interest

A depositary shall act exclusively in the interest of unitholders and independently of the fund and the Company. The institution conducts business on its own behalf as well as on behalf of its clients, and thus conflicts of interest may arise. In order for this not to affect the storage activities, other activities are separated from these activities both functionally and organisationally, and a system for identifying, managing and monitoring any conflicts of interest is in place. Conflicts of interest that may arise between the depositary and the Company are when the institution is also a counterparty in other transactions, such as trading in financial instruments. Up-to-date information about the depositary, its operations and the conflicts of interest that may arise can be obtained from the Company upon request.

Delegation of the depositary's tasks

The depositary may delegate parts of its operations to one or more external companies, including other custodian banks appointed by the institution from time to time. The tasks that may be delegated, according to the UCITS Directive and applicable Swedish regulations, are storage and listing. The depositary shall act with due skill, diligence and care in its selection, continued engagement and supervision of the party to whom depositary functions have been delegated. A list of contractors and contractors to whom sub-delegation has been made and any conflicts of interest that may arise as a result of such delegation can be obtained from the Company.

THE LEGAL NATURE OF THE FUND

A fund is not a legal person and may therefore not acquire rights or assume obligations. Nor can a fund bring any action before a court or other authority. It is the Company that represents the unit holders in all matters relating to a fund, decides on the fund's assets and exercises the rights of the fund.

Assets included in a fund may not be seized and unit holders are not liable for obligations relating to a fund, which means that a unit holder cannot lose more than it has invested. The assets of a fund are held by the depository of the fund. That ensures that a unit holder is not adversely affected should the Company find itself in financial difficulties.

An investment in a fund means that a person who invests money in a fund receives fund units in the fund for a value equivalent to the amount invested. A fund's assets are thus jointly owned by the unit holders who subscribed for units in the fund. The fund units in a fund without unit classes are of equal size and each fund unit confers an equal right to the assets included in the fund.

The terms and conditions that apply to unit holders in a fund are regulated in the fund's fund rules, which can be found in connection with each fund's fund-specific section of this information brochure. The Company shall always act in the best interests of the unit holders and ensure that the same terms and conditions, as set out in the fund rules, apply to all unitholders.

NOMINEE REGISTRATION OF FUND UNITS

Registration of units is decisive for the right to hold units in a fund and rights deriving therefrom. The unit holder's holdings are reported in annual statements and semi-annual statements, which also include information on tax declarations. Fund units may also be registered in the name of a nominee with a bank or securities company, which means that the bank or securities company is listed in the unit holder's place in the unit holder register, and that the unit holder is thus anonymous to the Company. In these cases, it is the person who subscribed for units on behalf of the unit holder who is responsible to the unit holder for the registration of the holding and the transmission of information about the investment from the Company.

INFORMATION ON SUBSCRIPTION AND REDEMPTION

This section describes how subscription and redemption can be made in a fund. Information on how a particular fund is open for trading, cut-off times for subscription and redemption, etc., can be found in the fund-specific section for each fund in this information brochure. The terms and conditions for subscription and redemption are also set out in § 9 of the fund rules for each fund.

When investing in a fund, fund units are subscribed for in the fund corresponding to the value of the invested amount. A person who has subscribed for fund units in a fund becomes a unit holder in the fund.

Subscription

A request for subscription in a fund is made by prospective unit holders notifying the Company, or to the person appointed by the Company (representative), on a special form, that subscription is to be made and in what amount. In order for the Company to be able to execute such a subscription request, the subscription request must have been received by the Company and the subscription amount must be at the Company's disposal in the fund's bank account. The subscription amount needs to be received by the Company, i.e. in the fund's bank account no later than the date and time that is the cut-off time for subscription, in order for subscription to be made on the immediately following trading day. For some funds, there are different cut-off times for subscription application and deposit of subscription amounts. The cut-off period

for subscription is specified in each fund's fund-specific section. Should the request for subscription come after the cut-off time, or if the subscription amount is not available to the Company in the fund's bank account before the cut-off time, subscription will normally take place on the next trading day.

An investor is responsible for ensuring that the application is duly signed and that other documents required by the Company at any given time have been attached. Requests for subscription may not be limited or withdrawn unless the Company or a person appointed by the Company (representative) so agrees.

Closing for new subscriptions

For certain funds, the Company's Board of Directors may decide to close the fund for subscription of new fund units (also referred to as a "sales halt"). Where applicable, more information on the conditions for a sales halt can be found in the fund-specific section.

Execution of fund units before payment has been made to the fund

For certain funds, the Company may allow fund units to be issued before payment has been added to the fund. However, this is subject to a special agreement being made with the Company. A fund unit may only be issued if it is ensured that payment is made to the fund within a reasonable period of time. For further information, please contact the Company's administration department.

Redemption

A request for redemption in a fund is made by unit holders notifying the Company, or to the person appointed by the Company (representative), on a special form, that redemption is to take place and in what amount. The unit holder is responsible for ensuring that the notification is duly signed, that the correct bank account number has been entered and that other documents required by the Company at any given time have been attached. The notification of redemption cannot be limited or withdrawn unless the Company or a person appointed by the Company (representative) consents to it.

Unit holders who have their fund units registered in the name of a nominee with a bank or other securities institution turn to them for redemption.

Notification of redemption in a fund must be received by the Company no later than the date and time that is the cut-off time for redemption in the fund, in order for redemption to take place on the closest trading day. The cut-off period for each fund is specified in the fund-specific section of the fund. Should the request for redemption come after the specified cut-off time, redemption will normally take place on the next trading day.

In the event of redemption in a fund, the Company shall immediately redeem fund units if funds are available in the fund. If this is not the case, funds shall be raised through the sale of the financial instruments of the fund and redemptions shall be effected as soon as possible. If funds for redemption must be raised through the sale of the fund's financial instruments, such sale shall take place and redemption shall be effected as soon as possible. Should a sale be significantly disadvantageous to other unit holders, the Company may, after notification to Finansinspektionen (the Swedish Financial Supervisory Authority), postpone the sale of financial instruments. The Company also has the option to temporarily postpone subscription or redemption.

PERMITTED INVESTORS

The fact that a fund is aimed at the general public does not mean that the fund is aimed at investors whose subscription of units, or participation in other respects, is in conflict with the provisions of Swedish or foreign law or regulation. Further, units in a fund are

not offered to investors whose subscription or holding of units in the Company's opinion would entail or entail a risk of:

- The Company is obliged to take a registration action, or any other action, that the Company would not otherwise be obliged to take, or
- The Company or a fund incurs damage or costs that are not in the interests of the unit holders.

Neither the Company nor any of the Company's managed funds are or intend to be registered in accordance with the United States Securities Act 1933, the US Investment Companies Act 1940, the US Investment Adviser Act 1940, as amended, or any equivalent legislation in North America, Asia, Australia or any other country outside the EU/EEA.

A party that wishes to acquire units in any of the Company's funds must notify the Company of his or her national domicile and, at the Company's request, confirm that he or she is not subject to the restrictions described above. In addition, unit holders are obliged to notify the Company of any change of national domicile. If the Company deems that there is an impediment to offering, selling or otherwise distributing fund units in accordance with the above, the Company may refuse to execute such assignment to subscribe for units in the funds and, where applicable, without prior consent, redeem such unit holder's holdings of fund units on his behalf and pay the additional funds to the unit holder.

VALUATION AND SUBSCRIPTION AND REDEMPTION PRICE

The value of a fund is calculated by deducting the liabilities relating to the fund from the fund's assets. Property included in a fund is valued on the basis of its current market value. All costs and fees in a fund, except for any subscription or redemption fees, are deducted in the valuation of the fund.

Based on a fund's value, the net asset value per unit (NAV) is calculated by dividing the fund's value by the number of fund units. The NAV per unit is the price at which subscription and redemption of fund units is made.

Requests for subscription and redemption of fund units are always made at an unknown price. The subscription and redemption price is the net asset value calculated on the day that the request for subscription and redemption is executed. The number of fund units resulting from the subscribed amount and the amount of funds resulting from the redemption of fund units will not be announced until the value of the units has been determined.

If a calculated NAV per unit is found to be incorrect, the Company will apply the Swedish Investment Fund Association's guidance for handling compensation in the event of an incorrect NAV per unit. This means that unit holders who have been adversely affected by a material error are compensated.

The Company has the option to temporarily postpone the calculation of the subscription and redemption price if a valuation of the fund's assets that ensures equal rights for unit holders is not possible.

More information on valuation principles and determination of the fund value can be found in § 8 of the fund rules for each fund.

The latest calculated net asset value for funds managed by the Company is published on the Company's website, www.fcg-fonder.se, and may also be disclosed via other mediums.

POSTPONEMENT OF SUBSCRIPTION AND REDEMPTION

The Company may postpone trading in a fund, i.e. close a fund for subscription (unit holders' purchases) and redemptions (unit holders' sales) of fund units, when the valuation of the fund's assets cannot be carried out in a way that ensures the equal rights of unit holders. This refers to, for example, cases where one or more of

the markets on which the fund trades are partially or completely closed or when any of the underlying funds are not open for subscription or redemption. An example of this is when trading in a financial instrument, in which the fund's assets are invested, is stopped due to prevailing extreme market conditions or extraordinary events and the Company for such reason is unable to determine the net asset value on objective grounds, and that such determination could cause harm to unit holders. The same applies if the fund's assets are invested in instruments that are based on financial instruments, currencies or indices related to financial instruments where trading is stopped. In such cases, the Company may, upon notification to the Swedish Financial Supervisory Authority, postpone its sale and redemption of fund units until a correct valuation can be made.

Requests for subscription and redemption can normally be received by the Company while trading in a fund is postponed. The orders submitted to the Company during this period shall, when the decision on postponement has been lifted, be executed in the order in which they were received.

GENERAL INFORMATION ON FEES AND COSTS

The following is a general description of the fees and costs that a fund may be charged with, or that fund savings may otherwise be associated with. The specific fees that apply to each fund are presented in the fund-specific section. For information on the amount of fees paid by a fund during the previous year, please refer to the fund's annual report.

Fixed management fee

A fixed management fee is paid to the Company from the fund's assets. The fixed management fee constitutes compensation for the costs incurred by the Company for the management of the fund as well as costs for safekeeping, supervision and auditors. Normally, the fixed management fee is calculated on an ongoing basis at a rate of 365 per day (366 part in leap years). For some funds, this may be different. This fee is fixed in advance and expressed as a percentage per year. The maximum possible fixed management fee that may be charged is regulated in the fund rules of the fund. Information about the current and maximum fixed management fee can be found in each fund's fund-specific section. The amount of the fixed management fee paid by the fund for the previous year is shown in each fund's annual report.

Performance-based fee

From some funds, the Company has the option to charge a performance-based fee. A fund's performance-based fee is a variable fee that is tied to the fund's return, and can only be charged if the fund has outperformed. Performance-based fees may only be charged if permitted by a fund's fund rules (§ 11). For those funds where a performance-based fee can be charged, information on calculation bases, etc., is provided in the fund-specific section.

Other fees and costs

Brokerage fees and other costs attributable to a fund's purchase and sale of financial instruments as well as tax are paid directly from the fund and are in addition to the fees above. These costs are charged to the fund at the time they are incurred and are not known in advance. These costs also include, where applicable, fees in the underlying funds or fund company, such as management fees and any subscription and redemption fees in the underlying funds. For funds that invest significantly in the units of other funds or fund companies, the maximum fees that may be charged to the underlying funds are specified in the fund-specific section.

To the extent permitted by applicable law, a fund may also be charged with costs for analysis. In this case, the cost of external investment research is separated from the transaction cost. The fund is charged, where applicable, for research costs and they are reported separately as they arise. An evaluation of the analysis

services is carried out continuously to ensure that the fund only pays for analysis that is useful in the management work. Information on research costs is provided in the fund's annual report.

It is possible that a fee for subscription and redemption in a fund may be charged, but only to the extent permitted by the fund rules. It is also stated in the fund-specific section whether these fees apply to the fund.

GENERAL INFORMATION ON RISKS

The following is a general description of the risks that may arise in a fund. The risks associated specifically with each fund are described in the "Risk profile" section of each fund's fund-specific section.

The value of a fund is determined by changes in the value of the assets in which the fund invests. This means that the fund can both increase and decrease in value and an investor cannot be sure of getting back the entire capital invested.

Buying units in a fund is always associated with risk. Investment risk refers to uncertain returns. Investments in funds may include risks linked to the equity, fixed income and foreign exchange markets, for example in the form of changes in prices, interest rates, etc. A fund of funds is affected by the level of risk in the funds you choose to invest in.

Different types of risks

The Company applies established processes and procedures to measure, analyse and correct risk in each fund. The following is a non-exhaustive list of risks that may occur in a fund.

Market risk: The risk of a decrease in the NAV per unit as a result of movements in, for example, the stock market or the bond market. Market risk has a major impact on the value of investments. Market risks may include, for example:

- **Unit price risk:** Unit price risk refers to the risk of a decrease in the net asset value as a result of movements in the stock market.
- **Interest rate risk:** Interest rate risk refers to the risk of a decrease in the net asset value as a result of movements in the fixed income market that affect the value of the fund's fixed income investments and thus also the value of the fund.
- **Credit risk:** The risk of a decrease in the net asset value as a result of changes in the creditworthiness of issuers of instruments in which the fund has invested. A deterioration in creditworthiness may affect the ability of issuers, guarantors or other parties to pay the loan for fixed income investments.
- **Currency risk:** The risk of a decrease in the net asset value as a result of changes in the exchange rates to which the funds are exposed.
- **Concentration risk:** Concentration risk refers to the risk of loss as a result of large individual exposures or a high concentration of the fund's investments in individual markets, countries or sectors. Concentration risks can be found in funds that are required to invest in specific countries, regions or sectors according to their investment policy, but may also arise in other funds as a consequence of broad investment mandates or thematic investment strategies.

Liquidity risk: The risk that the fund will not be able to sell, redeem or close a position in a timely manner, and that the price may be lower or higher than expected, as an effect of the current liquidity situation in the underlying market.

Operational risk: The fund may incur losses due to external events, criminal activity, system failures and errors committed by parties acting on behalf of the fund, the depositary and other external parties.

Sustainability risk: An environmental, social or governance event or condition that, if materialised, could have a negative material impact on the value of the investment.

Counterparty risk: The risk of a decrease in the NAV per unit as a result of the inability of the funds' counterparties in the form of transaction counterparties, counterparties to derivative contracts or counterparties to account positions with credit institutions to fulfil their obligations.

Risk classification of the fund

Risk and the possibility of higher returns are normally linked to each other and the unit holder needs to take some form of risk in order to receive compensation in the form of higher returns. Each fund is classified according to the EU standard in a risk/return indicator with a seven-point scale. The calculation of the risk indicator (SRI) is standardised according to PRIIP Regulation 1286/2014/EU. All of the Company's funds are graded on a seven-point scale, where 1 stands for the lowest risk and 7 for the highest risk. However, category 1 does not mean risk-free. A fund's risk class may change over time, as the classification is based on historical data that is not a guarantee of future risk and return. Information about each fund's classification is provided in the fund's fact sheet.

LIQUIDITY RISK MANAGEMENT

The Company has established processes and procedures for measuring and analysing the liquidity risk in each fund, which make it possible to check that each fund has an appropriate composition of liquid assets and is within the limits and risk measures that apply to the fund.

On a general level, the controls aim to ensure investor protection, financial stability and well-functioning markets. More specifically, it is a matter of ensuring that the fund's holdings have liquidity that enables the fund to meet inflows and outflows in a way that is in accordance with the fund's trading cycle and the fund's investment policy, and that ensures that the fund and thus the fund unit holders do not suffer.

In order to ensure that a fund has an appropriate composition from a liquidity risk point of view, there are risk measures that are monitored and possibly limited, as well as procedures that must be applied before the fund's investments. Regular tests are carried out to ensure that the risk measures and limits are appropriate. In doing so, the Company assesses, among other things, that the consistency of the fund's liquidity profile is consistent with its liquidity needs. In connection with this, consideration is also given to the fund's underlying obligation in terms of redemption terms, i.e. the effect that redemption in the fund may have on the fund's assets. The tests are carried out in different scenarios to verify that the fund's liquidity profile is in line with the fund's underlying obligations even under normal conditions. If the stress tests indicate that there is a need for new or changed risk measures or limits, or that the liquidity risk in a fund is significantly higher than what follows from the fund's risk profile, work is initiated on a review and, if necessary, the development of an action plan for managing liquidity risk.

The Company's management of liquidity risks is governed by the Company's policy for managing liquidity risks in funds, which is based on ESMA's guidelines in this area, as well as the fund-specific liquidity risk frameworks established by the Company.

SUSTAINABILITY RISK MANAGEMENT

The Company integrates sustainability risks into the funds' investment decisions and takes these into account in the Company's governing documents, procedures and internal controls. This means that sustainability risks, like other identified risks such as market risk and liquidity risk, are integrated into the manager's investment analysis and are followed up on a regular basis. By taking

into account the sustainability risk in the investments, the Company has the opportunity to limit the potential negative return that an event/incident may entail. The level of the various sustainability risks depends on the fund's investment orientation, such as the sector or types of companies in which the fund invests and the country in which the investments are made.

The risks are divided into E (environment), S (social/society) and G (governance). These are then grouped into company-specific and country-specific sustainability risks.

- E: In the environment and climate category, the rating is influenced, among other things, but not exclusively, by carbon footprint, waste and energy use.
- A: Within the category of social factors, the rating is influenced, among other things, but not exclusively, by gender equality and labour law issues.
- G: In the Corporate Governance category, the rating is influenced, among other things, but not exclusively, by the fight against corruption and bribery, the composition of the Board of Directors, cultural representation and governing documents.

To ensure that the fund does not take on excessive sustainability risks, the Company identifies the material sustainability risks for all funds and monitors the extent of the sustainability risks. If the fund's risk levels deviate significantly from what is expected, the Company can through follow-up steer the fund back towards the desired level.

When evaluating the fund's investments based on ESG criteria (company-specific and country-specific), the Company relies on information and data that may sometimes be incomplete, inaccurate or inaccessible. As a result, there is a risk that the Company may make an incorrect assessment of an investment and its sustainability risks. There is also a risk that the Company does not apply all relevant ESG criteria correctly or that the fund may have indirect exposure to companies that do not meet the relevant ESG criteria used by the fund.

You can read more about fund-specific risks under the fund's risk profile.

INFORMATION ON RISK AND LIQUIDITY MANAGEMENT

Information on the current risk profile of a fund, as well as the risk management systems applied to the fund, as well as information on any proportion of illiquid assets in the fund, is provided in each fund's annual report and half-yearly report. Significant changes in a fund's liquidity risk management can be announced on the Company's website, www.fcgfonder.se.

GENERAL INFORMATION ON DERIVATIVES

The following is a general description of derivative instruments and their impact on a fund's risk profile. Information on a fund's use of derivative instruments can be found in each fund's fund-specific section.

Derivative instruments are a form of contract between two parties that is tied to an underlying asset or value. The change in value of the contract is mainly determined by the change in value of the underlying asset. Underlying assets may refer to, for example, individual stocks or financial indices. Commonly used derivative instruments are futures, options and swap agreements.

The purpose of using derivative instruments in a fund may be to protect the fund against certain risks, such as currency risks. Derivative instruments can also be used to leverage the fund's market exposure, in order to benefit from the manager's current belief in the market, or to more effectively expose the fund to the direct market risks that the fund wishes to have at any given time. Derivative instruments provide the opportunity to receive the entire

change in value of the underlying instrument, without paying its full price.

When a fund uses derivative instruments as part of its management strategy, the fund's risk level can change significantly by increasing the fund's sensitivity to market changes. The risk in option trades, for example, is that the market price falls below the agreed price, which means that the contract becomes without value or results in a liability.

When a fund transacts in OTC derivatives (which refer to derivatives traded directly with a single counterparty), counterparty risk arises. Counterparty risk is managed within the framework of the Company's collateral management processes, which are described in more detail below under the section "Security management".

LEVERAGE

Leverage refers to a method by which a fund's exposure increases by, for example, using derivative instruments or borrowing or lending cash/securities. The following is a general description of leverage. Information on a fund's use of leverage can be found in the fund-specific section for each special fund.

Leverage in a fund means that the fund's performance is strengthened compared to the underlying market's performance. The leverage of a special fund is calculated in accordance with Commission Delegated Regulation (EU) No 231/2013 and is expressed as the ratio between the exposure of the fund and the net asset value of the fund. This means that the fund may, from time to time, have a higher exposure than the actual assets in the fund. If a special fund's exposure does not exceed 100 per cent, no financial leverage has been created.

The annual report and half-yearly statement of a leveraged fund provide information on the total amount of leverage used by the fund, any change in the maximum level of leverage that may be used on behalf of the fund, and any right to dispose of collateral or other guarantees provided under the leverage scheme.

Any right of disposal of collateral and guarantees provided under the leverage arrangements is governed by an agreement with the counterparty.

GENERAL INFORMATION ON SECURITIES FINANCING TRANSACTIONS

A fund may use securities financing transactions. The following is a general description of the securities financing transactions that may occur in funds managed by the Company. Information on each fund's use of securities financing transactions can be found in the fund-specific section for each fund. For information on each fund's actual use of securities financing transaction, please refer to the annual report and the half-yearly statement of each fund.

Lending of securities

Under fund legislation, mutual funds and special funds have the possibility, under certain conditions, to lend transferable securities included in the fund to a third party (securities loans) at up to 20 per cent of the fund value. Special funds can be exempted from fund legislation and thus expand this scope.

Lending securities gives the fund the opportunity for extra returns without the fund taking any extra market risk. The fund charges for the lending through interest, after deduction of administrative costs, which accrue to the fund and thus increase the return on the fund. Since the revenue sharing agreement does not increase the costs of the fund, the remuneration of the securities lending agent is not included in the annual fee.

Lending of securities exposes the fund to counterparty risk. The counterparty risk is managed within the framework of the

Company's security management process, see the section "Security management" below. Collateral received is held by the fund's custodian. The shares that are lent are transferred to the counterparty.

Furthermore, risks may arise with regard to the interpretation of the securities loan agreements, as well as risks that the fund's principles for shareholder engagement cannot be fully implemented as voting rights are transferred to the borrower during the lending period. In addition, securities loans may give rise to some liquidity risk as a fund's ability to dispose of loaned securities during the term of the loan is limited.

Borrowing of securities (short selling)

A sale of securities that a fund does not own but that the fund has in its possession, so-called short selling, can take place after borrowing of securities. The intention is to later buy back the units at a lower price and return the units to the lender. This creates opportunities for funds to generate returns even when stock prices fall in the stock market. Deposited units are held in custody with the fund's custodian. The return on the borrowed units accrues to the fund, the interest payable on securities lending is charged to the fund.

The risks associated with deposits of transferable securities are market risk, which is part of the fund's strategy, and counterparty risk. The counterparty risk is managed within the framework of the Company's security management process, see the section "Security management" below.

Cash loan

A special fund can borrow money to make investments in financial instruments. The use of money loans increases the fund's investment scope and creates leverage in the fund. Typically, money loans are used to increase the fund's market risk, but the increased investment scope can also be used to reduce the fund's market risk. In addition to the fact that the use of loans affects the fund's market risk, some counterparty risk may arise if the lender requires collateral for the loan. The counterparty risk is managed within the framework of the Company's security management process, see the section "Security management" below.

GENERAL INFORMATION ON TOTAL RETURN SWAPS

A fund may use total return swaps. The following is a general description of total return swaps and how they affect a fund's risk profile. Information on each fund's use of total return swaps can be found in the fund-specific section for each fund.

A total return swap is an agreement between two parties to exchange the total return of an asset for interest compensation. Total return swaps can be used in asset management as a capital-efficient way to achieve desired exposures to selected stocks and index. This can be done, for example, by the manager of a fund choosing to create an exposure to an industry, region or individual stock in a way that ties up less capital than an investment via a unit or an index. These instruments can also be used to manage flows in the fund.

The return arising from the use of total return swaps accrues to the fund, after deduction of administrative costs for collateral management and other costs, as well as the interest payable on total return swaps. The fund's custodian bank holds the assets associated with the fund's total return swaps and any collateral received

Total return swaps entail increased counterparty risk. The counterparty risk is managed within the framework of the Company's security management process, see the section "Security management" below.

SECURITY MANAGEMENT

When a fund makes transactions involving OTC derivatives and securities financing transactions, counterparty risk arises. This counterparty risk is managed by providing or receiving collateral and is regulated through collateral management governed by standardized security agreements (ISDA/CSA/GMSLA agreements).

Lending securities exposes the fund to the risk that the borrower will not be able to return the securities that have been borrowed, i.e. counterparty risk. Thus, when lending securities, the Company requires the counterparty to provide collateral to the Company, whereby the Company receives financial instruments or cash from the counterparty. In the case of deposits of shares, the ratio is the opposite and the Company provides collateral to the counterparty. In derivative contracts, collateral is provided to the party that has a claim on the counterparty during the term of the derivative contract.

Valuation of outstanding loans and derivative instruments and collateral received for these takes place on a daily basis. If the valuations show a higher exposure amount for the fund than the value of the collateral received, the fund shall call the counterparty for additional collateral. If the fund has provided collateral to the counterparty in an amount higher than the counterparty's exposure to the fund, the fund must recall collateral.

The operational risks associated with the ongoing management of collateral are monitored and managed to ensure that the Fund's counterparty risks are managed in the order intended.

The collateral that is accepted and how it is to be handled is regulated in the Company's Instructions on Eligible Collateral prepared in accordance with applicable statutes and ESMA's Guidelines on Exchange-Traded Funds and Other Matters Relating to UCITS (ESMA 2014/937). The general requirements for collateral are that the issuer must have a high credit rating. Only counterparties approved by the Company's Counterparty Committee are accepted. The assets must be liquid and valued on a daily basis, or consist of cash and cash equivalents. The security pool must also be diversified.

Furthermore, the Company has an established process for the selection of counterparties that includes ensuring that the counterparties meet the Company's set requirements. It is the Company's Counterparty Committee that appoints approved counterparties. When selecting a counterparty, a review of the company is made, including a review of the terms, conditions and principles for the implementation of the assignment. This is to ensure that general market practice is observed. The counterparty must be a bank within the EEA. All eligible counterparties are also subject to an evaluation every year, no later than one year after the counterparty has been accepted and operations have started.

PRIMARY BROKER

A so-called primary broker is, for example, a bank that offers services primarily to finance or as a counterparty carry out transactions in financial instruments, and that can also provide other services, such as clearing, settlement, custody services, securities lending, tailor-made technical solutions and ancillary services. If the fund uses primary brokers, this is stated in the fund-specific section of the fund.

MATTERS CONCERNING TAX IN SWEDEN

The following is a general description of certain Swedish tax rules that apply to a fund and its unitholders and is aimed at unitholders who are fully liable to tax in Sweden. The information is not intended to be exhaustive and does not cover situations where fund holdings are linked to, for example, investment savings accounts, unit-linked insurance, IPS or premium pensions. Holders of units

are advised to seek advice from tax advisers on the specific tax consequences that may arise in each individual case.

Taxation of funds

Since 1 January 2012, Swedish UCITS funds and special funds are not liable to pay tax on assets included in the fund. However, UCITS funds pay withholding tax on dividends they receive on their foreign unitholdings. Withholding tax varies by country. As a result, among other things, of legal uncertainty about the application of double taxation treaties and developments in the EU in the tax area, the withholding tax may be both higher and lower than the provisional withholding tax deducted when the dividend is received.

Tax rules for natural persons and estates of deceased persons

The rules described below apply to when Swedish natural persons save directly in funds. Other rules apply to legal persons and foreign unitholders. Other rules also apply to investment savings accounts and endowment insurance.

Swedish unitholders pay income tax on an annual standard income calculated on the value of the fund units at the beginning of the year, and on profits and any dividends on the fund units. The basis for the standard tax – the capital base – consists of the value of the unitholder's fund holdings at the beginning of the calendar at the beginning of the year. A standard income of 0.4 per cent of the capital base is calculated on the capital base. For natural persons and Swedish estates of deceased persons, the standard income is included in the capital income category and taxed at 30 percent. The effective tax rate will thus be 0.12 per cent (0.4 x 30 per cent) of the value of the fund units at the beginning of the calendar year. The annual standard income is reported on the income statement to the Swedish Tax Agency, but no deduction for preliminary tax is made. A disposal of fund units (normally through redemption) triggers capital gains tax. The capital gain or loss on fund units is calculated as the difference between the redemption price or the sale price less the costs of the sale and the amount of the overheads, and is taxed at 30 per cent. If a capital loss occurs, it is deductible at 70 percent. Capital gains and losses that arise on the sale of fund units are reported on income statements to the Swedish Tax Agency, but no tax deduction is made.

If a fund pays dividends, the unitholder is taxed on the dividend at 30 percent. When the dividend is distributed, 30 per cent preliminary tax is deducted and the dividend amount is reported on the income statement to the Swedish Tax Agency. This is stated in § 12 of the fund rules if a fund pays dividends.

ANNUAL REPORT AND HALF-YEARLY REPORT

The Company prepares an annual report and a half-yearly report for each fund. The documents shall be sent free of charge to unitholders upon request and are also available at the Company and the custodian no later than four months after the end of the financial year (annual report) and two months after the end of the first half of the year (half-year report). The documents are also published on the Company's website: [Our funds - FCG Fonder](#)

AMENDMENT OF FUND RULES

Amendments to a fund's fund rules may only be made by decision of the Company's Board of Directors and shall be submitted to the Swedish Financial Supervisory Authority for approval. The changes may affect the fund's characteristics, such as investment policy, fees and risk profile. After the amendment has been approved, the decision shall be available at the Company and the depositary of the fund concerned, and shall be announced in the manner instructed by the Swedish Financial Supervisory Authority.

TERMINATION OF A FUND OR TRANSFER OF FUND OPERATIONS

If the Company decides that a fund shall cease to exist or that the management of a fund, with the consent of the Swedish Financial Supervisory Authority, shall be transferred to another fund company or other AIFM, all unitholders in the fund will be informed of this by announcement in the Swedish Post- och Inrikes Tidningar. Information will also be available at the Company and the depositary of the fund concerned. The Swedish Financial Supervisory Authority may decide on exemptions from publication in the Post- och Inrikes Tidningar if there are special reasons for doing so, and unitholders may be notified in another way. A transfer of the management of a fund may be carried out no earlier than three months after the announcement, unless otherwise agreed by the Swedish Financial Supervisory Authority.

If the Swedish Financial Supervisory Authority withdraws the Company's authorisation to manage funds, or if the Company has gone into liquidation or has been declared bankrupt, the management of the funds under the Company's management shall immediately be taken over by the respective fund's depositary. In such a case, the depositary shall, as soon as possible, transfer the management to another fund company or other AIFM if permitted by the Swedish Financial Supervisory Authority. Otherwise, the fund concerned shall be dissolved by selling the assets of the fund and distributing the net proceeds of the fund to the unitholders. While the fund's custodian manages the fund, subscription and redemption are not possible.

A company may merge or split funds if the Financial Supervisory Authority has given permission to do so. Information on this will be provided to unitholders in the manner instructed by the Financial Supervisory Authority. A merger or split may normally be carried out no earlier than three months after the Swedish Financial Supervisory Authority's decision.

DUTIES OF THE DEPOSITARY

The depositary shall execute the Company's instructions relating to the funds if they do not conflict with the provisions of law or other regulations or with the fund rules/articles of incorporation and ensure that, for each fund, that:

- the sale, redemption and cancellation of units in the fund are carried out in accordance with the law and the fund rules;
- the value of the units in the fund is calculated in accordance with the law and the fund rules;
- remuneration for transactions involving the assets of the Fund is paid to the fund without delay, and
- the fund's income is used in accordance with the provisions of the law and the fund rules.

In addition to the above, the depositary shall monitor the fund's cash flows, hold financial instruments in custody in the fund and keep a record of them.

LIMITATION OF LIABILITY AND DAMAGES

The Company is liable for damages in accordance with Chapter 2. Section 21 of the Swedish Securities Funds Act (2004:46) with regard to the UCITS funds managed by the Company and in accordance with Chapter 8. Sections 28–31 of the Act (2013:561) on Managers of Alternative Investment Funds for the Special Funds the Company Manages. The depositary is responsible in accordance with Chapter 3. Sections 14–16 of the Swedish Investment Funds Act (2004:46) and Chapter 9. Section 22 of the Alternative Investment Fund Managers Act (2013:561). It follows from these provisions that if a unitholder has suffered damage as a result of the Company violating the applicable law or the fund rules, the Company must compensate for the damage. In addition, if a unitholder or the Company has suffered damage as a result of the

depository's violation of the same law or the fund rules, the depository must compensate for the damage.

Without derogating from the provisions of these provisions, the Company or the depository shall not be liable for any damage caused by circumstances beyond the control of the Company or the depository, such as extraordinary events such as strikes or war. Indirect damage that arises in other cases shall only be

compensated if there has been gross negligence or for other damages if the Company or the depository has not been normally careful.

The limitation of liability of the Company and the custodian is described in more detail in the fund rules of each fund in § 16.

The Company has liability insurance in accordance with Chapter 7, Section 5 of the Alternative Investment Fund Managers Act (2013:561) to cover any claims for damages.

About FCG Fonder AB

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

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Phone: +46 8 19 18 13 (switchboard)

Complaints Manager: Johan Schagerström (CEO)

Board of Directors

- Tove Bångstad (Chairman of the Board)
- Jimmi Brink (Board member)
- Mari Thjømøe (Board member)
- Rikard Edvardsson (Board member)

Senior Executives

- Johan Schagerström, CEO
- Tom Michels, deputy CEO and Chief Investment Officer
- Mikael Olausson, Head of Outsourcing
- Erica Laestander, Chief Risk Officer
- Veronica Sommerfeld, Head of Compliance

Reviser

The Company's auditor is Peter Nilsson, authorized public accountant, Öhrlings PricewaterhouseCoopers AB, SE-113 97 Stockholm, Sweden.

REMUNERATION POLICY

As a rule, the Company does not provide variable remuneration. However, the Company has adopted a Remuneration Policy that regulates how employees and other relevant persons are able to receive variable remuneration. Variable remuneration is evaluated based on an employee's performance in relation to both quantitative and qualitative targets, and shall be adjusted for the risk that the employee's behaviour has given rise to. Remuneration is primarily decided by the Board of Directors, but for certain categories of employees may be decided by the CEO. An employee's remuneration shall be based on a balanced balance between the employee's fixed salary and the variable component. In the event of payment, parts of variable remuneration shall be deferred for later payment and risk-adjusted before payment. Variable remuneration may be waived in the event of inappropriate behaviour or in the event of a breach of internal guidelines.

Portfolio managers receive a fixed remuneration from the Company based on the size of the assets under management, and in some cases variable remuneration in the form of performance-based remuneration. In light of the type of business that the Company will conduct, the Company has assessed the risk that the Company's remuneration system could have a negative impact on the risk level in the Company as low. Further information about the Remuneration Policy can be found on the Company's website [Remuneration - FCG Funds](#), and a paper copy of the Policy can be obtained free of charge from the Company upon request.

OTHER SERVICE AGREEMENTS AND SERVICES

The Company has delegated the following part of the operations, which are not directly related to the fund management, to another party:

- Internal Audit: BDO Mälardalen AB (556291-8473)

In the event that the Company has delegated tasks directly related to the fund management, this is stated in the section "General Information" in this information brochure.

The Company also purchases services in the following areas:

- IT operations: Advisense Group AB through Dustin Sverige AB (556666-1012)
- Finance, HR and Marketing: Advisense Group AB (559138-6684)

Since Advisense Group AB is the parent company of the Company, the potential conflict of interest arises that the Company does not purchase services at market prices from the parent company, i.e. an inefficient procurement process in connection with the procurement of consulting services, which may have a negative impact on the unitholders. This conflict is handled by the Company regulating the procurement process in its internal rules for outsourcing operations. Otherwise, no conflicts of interest have been identified.

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 the preparation and administration of the service in question, and in addition, the data may form the basis for market and customer analyses, business follow-up and business and method development. They may also be used to send information to you as a unit holder and for marketing purposes.

The processing may also take place at the Company's contractors and other companies within the Advisense Group where they collaborate on services. All processing takes place in accordance with confidentiality and protection provisions in laws and regulations. If you want to know more about the Company's processing, and your rights to, among other things, change, delete or request your personal data, you can find the Company's Data Protection Policy on the Company's website [Data Protection Policy - FCG Fonder](#)

PRINCIPLES OF SHAREHOLDER ENGAGEMENT

The Company's principles for shareholder engagement are published on the Company's website [Legal information - FCG Fonder](#)

SUSTAINABILITY INFORMATION

Transparency on adverse impacts on sustainable development

The Company does not consider the adverse impacts of investment decisions on unit-level sustainability factors. The background to this position is that the Company has a range of funds that span several different investment strategies where the sustainability work differs. It is the task of each portfolio manager to integrate sustainability in a way that is relevant and value-creating for the fund being managed. As the sustainability regulations evolve, the Company may reconsider this position.

FUNDS UNDER MANAGEMENT

Below is a list of the funds managed by the Company at the time of publication of the information brochure. The current list can be found on the Company's website: [Our funds - FCG Fonder](#)

UCITS

- Aktiv Portföljförvaltning Balansera
- Aktiv Portföljförvaltning Bygga
- Catella Fastighetsfond Systematisk
- Dynamisk Allokering Ränta
- Dynamisk Allokering Sverige
- FE Småbolag Sverige
- FondNavigator 0-100 Balanserad
- FORTE Norge
- FORTE Obligasjon
- FORTE Strategisk
- FR Compounder Feeder (SEK)
- FR Compounder Feeder (EUR)
- FR Compounder Feeder (USD)
- FR Short Duration Bond Fund
- FR Bond Fund
- Fundamental Select
- Havsfonden
- Investtech Invest
- Pensum Global Energy
- Pensum Norge
- Pensum Financial Opportunity Fund
- Placerum Balanserad
- Placerum Dynamisk
- Placerum Optimera
- Placerum Polar
- Strand företagsobligationsfond

Special funds

- Catella Fastighetsfond Systematisk Select
- Chelonia Select
- Consensus Global Select
- Consensus Lighthouse Asset
- Consensus Mikrobolag
- Consensus Småbolag
- Consensus Sverige Select
- Dynamisk Allokering Alternativa Investeringar
- Dynamisk Allokering Global
- FE Select
- FondNavigator 0-100 Defensiv
- FondNavigator 0-100 Offensiv
- FR Compounder Core Dynamic
- Mercurius Credit Fund
- Pappers
- Pensum Global Opportunities
- Pensum Nordic Banking Sector Fund
- Pensum Select
- Systematic Trading

Alternative investment funds

- Uequity One AB
- Zenith Venture Capital I AB (publ)
