



PUBLIC TRANSPARENCY REPORT

2025

Atlant Fonder AB

Generated 24-11-2025

About this report

PRI reporting is the largest global reporting project on responsible investment.

It was developed with investors, for investors. PRI signatories are required to report publicly on their responsible investment activities each year. In turn, they receive a number of outputs, including a public and private Transparency Report.

The public Transparency Reports, which are produced using signatories' reported information, provide accountability and support signatories to have internal discussions about their practices and to discuss these with their clients, beneficiaries, and other stakeholders. This public Transparency Report is an export of the signatory's responses to the PRI Reporting Framework during the 2025 reporting period. It includes the signatory's responses to core indicators, as well as responses to plus indicators that the signatory has agreed to make public.

In response to signatory feedback, the PRI has not summarised signatories' responses – the information in this document is presented exactly as it was reported.

For each of the indicators in this document, all options selected by the signatory are presented, including links and qualitative responses. In some indicators, all applicable options are included for additional context.

Disclaimers

Legal Context

PRI recognises that the laws and regulations to which signatories are subject differ by jurisdiction. We do not seek or require any signatory to take an action that is not in compliance with applicable laws. All signatory responses should therefore be understood to be subject to and informed by the legal and regulatory context in which the signatory operates.

Responsible investment definitions

Within the PRI Reporting Framework Glossary, we provide definitions for key terms to guide reporting on responsible investment practices in the Reporting Framework. These definitions may differ from those used or proposed by other authorities and regulatory bodies due to evolving industry perspectives and changing legislative landscapes. Users of this report should be aware of these variations, as they may impact interpretations of the information provided.

Data accuracy

This document presents information reported directly by signatories in the 2025 reporting cycle. This information has not been audited by the PRI or any other party acting on its behalf. While this information is believed to be reliable, no representations or warranties are made as to the accuracy of the information presented.

The PRI has taken reasonable action to ensure that data submitted by signatories in the reporting tool is reflected in their official PRI reports accurately. However, it is possible that small data inaccuracies and/or gaps remain, and the PRI shall not be responsible or liable for such inaccuracies and gaps.

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SENIOR LEADERSHIP STATEMENT (SLS)

SENIOR LEADERSHIP STATEMENT

SENIOR LEADERSHIP STATEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SLS 1	CORE	N/A	N/A	PUBLIC	Senior Leadership Statement	GENERAL

Section 1. Our commitment

- Why does your organisation engage in responsible investment?
- What is your organisation's overall approach to responsible investment, and what major responsible investment commitment(s) have you made?

Many years of research and obvious market actions have shown us that the financial industry cannot ignore sustainability factors in our investments. The flow of capital and information have great effects on the global development. This is something that in turn will have impact on the investments of our mutual funds. Responsible investments must be taken into consideration in every investment we do and there is no more separating "normal" investments from responsible investments. Today all investments must take responsibility issues into consideration because the focus and the impact on financial development is fully integrated today. All of our investments must take responsibility issues into consideration as a natural part of the fundamental analysis of all our investments. This means that Atlant Fonder engages in responsible investment because of our fiduciary duty towards our investors. It has great impact on financial performance. Another reason for engaging in responsible investment is a growing concern about these issues from external parties. Investors and fund distributors are raising the bar for sustainability issues. Responsible investment is no longer a nice to have but a need to have and Atlant Fonder is responding to this. Our approach to responsible investment is that since management of other peoples financial capital is a question of trust, Atlant Fonder needs to live up to this trust not only as a provider of solid financial performance but also of responsible investment. A client investing in one of our funds should be ensured of a good financial performance combined with sound judgement concerning responsible investment. We are transparent regarding our financial doings and this is also true for our responsible investments, which are reported on a quarterly basis in a separate responsible investment report which is produced in addition to the periodic reporting according to the legal requirements of Article 8 funds. The main difference between Atlant Fonder and other organizations is that we are a provider of market neutral funds aiming to deliver an absolute return. This means that our funds are investing in many different asset classes, often in the same fund. Our funds may invest in equities (both listed and unlisted), bonds (both government and corporate), commodities and derivatives and this can be challenging from a responsible investment reporting perspective. Most evaluation processes and labels regarding responsible investments are based on pure equity or fx funds. In addition, the investment universe for Atlant Fonder consists of sometimes small Nordic issuers of equities or bonds. The challenge in this area is that the large providers of sustainability data have no analysis available for our holdings. The upside of our strategy is that our funds seldom have more than 200 holdings in total, which makes it possible for us to control sustainability issues for all our holdings. This has led to the development of a responsible investment evaluation process of our own. The responsible investment analysis is incorporated in our investment process as described below. Our methods and findings are reported on a quarterly basis. From the beginning of 2025 our funds have started using SLB and green bonds. This helps us regarding transparency in the sustainability reporting area because of the reporting guidelines and investment criteria for these instruments. So far, each new investment in these kind of instruments have been seperately reported in our quarterly sustainable investment report. During 2024, Atlant Fonder has shifted somewhat regarding sustainability focus. We still measure and report climate impact but we can see that the areas where we can deliver greatest impact through our investment activities rather can be found in the social area and we've begun an effort within financial inclusion.

Section 2. Annual overview

- Discuss your organisation's progress during the reporting year on the responsible investment issue you consider most relevant or material to your organisation or its assets.
- Reflect on your performance with respect to your organisation's responsible investment objectives and targets during the reporting year. Details might include, for example, outlining your single most important achievement or describing your general progress on topics such as the following (where applicable):
 - refinement of ESG analysis and incorporation
 - stewardship activities with investees and/or with policymakers
 - collaborative engagements
 - attainment of responsible investment certifications and/or awards

1. In the beginning of 2022, Atlant Fonder signed an agreement with Datia regarding a system solution helping in our process of taxonomy reporting. The system makes it possible for Atlant Fonder to comply with the new regulatory frameworks and to systemize sustainability data for our funds. The agreement was signed after an evaluation of many other producers of sustainability data and sustainability reporting solutions. The Datia user community has expanded the possibilities to work together with other mutual fund companies in order to further develop common methods for ESG analysis and reporting, especially in the context of constant evolving regulatory demands in the reporting area of sustainable investments. Other important influences in the ESG area for Atlant Fonder is of course the newsletters of the PRI and the guidelines from the Swedish Mutual Funds Association.

During 2023, Atlant Fonder took part of a number of workshops arranged by Datia. These workshops gave us valuable input in how to report on new parameters and formalia in the legal framework. During the reporting year we've also compared other sustainability investment reporting systems to Datia to ensure that Atlant Fonder is using the most relevant solution for these reporting purposes. Atlant Fonder also used the Datia system to produce EET files in order to provide our distributors with relevant sustainable investment data in accordance with the most recent version of the EET file.

2. Since 2023 Atlant Fonder has contacted other mutual fund companies that have similar traits to find possibilities for cooperation and efficient ways to adapt to new regulatory requirements in the ESG area.

These cooperations were mostly about interpretations of rules and common courses of actions regarding ESG issues. Regarding stewardship activities with investees, Atlant Fonder has contacted relevant companies we've invested in regardless if our funds invest in equity or bonds to highlight how important ESG is to us as an owner and an investor. During 2023 our focus in these activities have continuously been ESG reporting from the companies, questions regarding their ESG ambitions and their documentation and follow up on these things. The activities have been reported quarterly in our ESG reports and aggregated in the annual sustainability report.

3. The collaborative engagements have been mostly regarding reporting standards and common actions regarding ESG issues. During 2024 our funds have not been invested in global companies requiring international collaboration actions. Atlant Fonder takes part of the PRI weekly news letter and the calls for action but have not detected any of our holdings from these channels during 2024. Atlant Fonder also follows the development in the Swedish Mutual Funds Association to be prepared to engage in ESG activities that are in line with our ESG policy.

4. Atlant Fonder is a member of Swesif and a signatory of UNPRI. We are an active member of Swesif and have participated in several member meetings and round table discussions.

No new ESG certifications during 2024.

5. During 2024, Atlant Fonder started to invest in SLB and green bonds.

6. From 2024, the scope of impact from our funds' investments has shifted from climate impact to social impact like financial inclusion. The issue has been highlighted in our interaction with investors and in 2025 a workshop was facilitated. One of the members of the board of Atlant Fonder is the managing founder of a micro finance initiative within this area and brings knowledge and impact network that makes it possible for us to approach this issue in a trustworthy and meaningful manner.

Section 3. Next steps

- What specific steps has your organisation outlined to advance your commitment to responsible investment in the next two years?

Atlant Fonder has classified our funds according to Article 8 in the EU Taxonomy. In order to live up to the guidelines that exist so far, the board of directors has decided on an updated policy for sustainable investments and the policy is updated on an annual basis. Also the webpage of Atlant Fonder, www.atlantfonder.se has been updated with information about how Atlant Fonder is incorporating the EU guidelines. Information brochures for all of our funds have been updated according to the Swedish Mutual Fund Associations guidelines for funds aiming for Article 8 and have also been published on our web page. The last years ESG work has mostly been about adapting to the new EU regulatory frameworks. Another area of development is the systemization and further adaptation of Datia's reporting system which will lead to further transparency and more accessibility for sustainability data for our funds. One of our board members is managing Favafond (www.favafond.se) which is a social micro finance initiative focusing on integration of new Swedish citizens. We have presented this initiative to our distributors in order to engage them in this initiative and to raise this important question. Since the investment universe of Atlant Fonder mostly consists of Nordic corporate bonds, this is an issue where our investments can have an impact. We have started to initiate a network and conduct round table discussions with other mutual fund market actors to further enhance the importance of this issue. Due to changes in our organization, the CEO of Atlant Fonder is now the same person as the head of responsible investments. This vouches for that additional focus and resources will be allocated to this area.

Section 4. Endorsement

'The Senior Leadership Statement has been prepared and/or reviewed by the undersigned and reflects our organisation-wide commitment and approach to responsible investment'.

Name

Peter Beckman

Position

Managing Director, Head of Responsible Investments

Organisation's Name

Atlant Fonder AB

☒ A

'This endorsement applies only to the Senior Leadership Statement and should not be considered an endorsement of the information reported by the above-mentioned organisation in the various modules of the Reporting Framework. The Senior Leadership Statement serves as a general overview of the above-mentioned organisation's responsible investment approach. The Senior Leadership Statement does not constitute advice and should not be relied upon as such. Further, it is not a substitute for the skill, judgement and experience of any third parties, their management, employees, advisors and/or clients when making investment and other business decisions'.

☐ B

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS (ORO)

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

OTHER RESPONSIBLE INVESTMENT REPORTING OBLIGATIONS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 1	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which international or regional ESG-related legislation(s) and/or regulation(s) did your organisation report?

- ☐ (A) Corporate Sustainability Reporting Directive (CSRD) [European Union]
- ☐ (B) Directive on AIFM (2011/61/EU) [European Union]
- ☐ (C) Enhancing climate-related disclosures by asset managers, life insurers and FCA-regulated pension providers (PS21/24) [United Kingdom]
- ☒ (D) **EU Taxonomy Regulation [European Union]**
- ☐ (E) Improving shareholder engagement and increasing transparency around stewardship (PS19/13) [United Kingdom]
- ☐ (F) IORP II (Directive 2016/2341) [European Union]
- ☐ (G) Law on Energy and Climate (Article 29) [France]
- ☒ (H) **MiFID II (2017/565) [European Union]**
- ☐ (I) Modern Slavery Act [United Kingdom]
- ☒ (J) **PEPP Regulation (2019/1238) [European Union]**
- ☒ (K) **PRIIPS Regulation (2016/2340 and 2014/286) [European Union]**
- ☐ (L) Regulation on the Integration of Sustainability Risks in the Governance of Insurance and Reinsurance Undertakings (2021/1256) [European Union]
- ☒ (M) **SFDR Regulation (2019/2088) [European Union]**
- ☐ (N) SRD II (Directive 2017/828) [European Union]
- ☐ (O) The Occupational Pension Schemes Regulation on Climate Change Governance and Reporting [United Kingdom]
- ☐ (P) Climate Risk Management (Guideline B-15) [Canada]
- ☐ (Q) Continuous Disclosure Obligations (National Instrument 51-102) [Canada]
- ☐ (R) Disposiciones de Carácter General Aplicables a los Fondos de Inversión y a las Personas que les Prestan Servicios (SIEFORE) [Mexico]
- ☐ (S) Instrucciones para la Integración de Factores ASG en Los Mecanismos de Revelación de Información para FIC (External Circular 005, updated) [Colombia]
- ☐ (T) Provides for the creation, operation, and disclosure of information of investment funds, as well as the provision of services for the funds, and revokes the regulations that specifies (CVM Resolution No. 175) [Brazil]
- ☐ (U) SEC Expansion of the Names Rule [United States of America]
- ☐ (V) SEC Pay Ratio Disclosure Rule [United States of America]
- ☐ (W) ASIC RG65 Section 1013DA Disclosure Guidelines [Australia]
- ☐ (X) Circular to Licensed Corporations: Management and Disclosure of Climate-related Risks by Fund Managers [Hong Kong SAR]
- ☐ (Y) Financial Investment Services and Capital Markets Act (FSCMA) [Republic of Korea]
- ☐ (Z) Financial Instruments and Exchange Act (FIEA) [Japan]
- ☐ (AA) Financial Markets Conduct Act [New Zealand]
- ☐ (AB) Guiding Opinions on Regulating the Asset Management Business of Financial Institutions [China]
- ☐ (AC) Guidelines on Environmental Risk Management for Asset Managers [Singapore]
- ☐ (AD) Guidelines on Sustainable and Responsible Investment Funds [Malaysia]
- ☐ (AE) Modern Slavery Act (2018) [Australia]

- ☐ (AF) Stewardship Code for all Mutual Funds and All Categories of AIFs [India]
- ☐ (AG) ADGM Sustainable Finance Regulatory Framework [United Arab Emirates]
- ☐ (AH) JSE Limited Listings Requirements [South Africa]
- ☐ (AI) Other
- ☐ (AJ) Other
- ☐ (AK) Other
- ☐ (AL) Other
- ☐ (AM) Other
- ☐ (AN) Not applicable; our organisation did not report to any ESG-related legislation and/or regulation during the reporting year.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
ORO 2	CORE	N/A	N/A	PUBLIC	Other Responsible Investment Reporting Obligations	6

During the reporting year, to which voluntary responsible investment/ESG frameworks did your organisation report?

- ☐ (A) Asset Owners Stewardship Code [Australia]
- ☐ (B) Código Brasileiro de Stewardship [Brazil]
- ☐ (C) New Zealand Stewardship Code
- ☐ (D) Principles for Responsible Institutional Investors (Stewardship Code) [Japan]
- ☐ (E) Stewardship Code [United Kingdom]
- ☐ (F) Stewardship Framework for Institutional Investors [United States of America]
- ☐ (G) CFA Institute ESG Disclosure Standards for Investment Products [Global]
- ☐ (H) Guidelines on Funds' Names using ESG or Sustainability-related Terms [European Union]
- ☐ (I) Luxflag ESG Label [Luxembourg]
- ☐ (J) RIAA Responsible Investment Certification Program [Australia]
- ☐ (K) SRI Label [France]
- ☐ (L) ANBIMA Code of Regulation and Best Practices of Investment Funds [Brazil]
- ☐ (M) Code for Institutional Investors 2022 [Malaysia]
- ☐ (N) Code for Responsible Investing in South Africa (CRISA 2) [South Africa]
- ☐ (O) Corporate Governance Guidelines [Canada]
- ☐ (P) Defined Contribution Code of Practice [United Kingdom]
- ☐ (Q) European Association for Investors in Non-Listed Real Estate Vehicles (INREV) Guidelines [Global]
- ☐ (R) Global ESG Benchmark for Real Assets (GRESB) [Global]
- ☐ (S) Global Impact Investing Network (GIIN) Impact Reporting and Investment Standards (IRIS+) [Global]
- ☐ (T) OECD Guidelines for MNEs - Responsible Business Conduct for Institutional Investors [Global]
- ☐ (U) UN Guiding Principles (UNGP) on Business and Human Rights [Global]
- ☐ (V) Net Zero Asset Managers (NZAM) Initiative [Global]
- ☐ (W) Net-Zero Asset Owner Alliance (NZAOA) [Global]
- ☐ (X) Recommendations of the Taskforce for Climate-related Financial Disclosure (TCFD) [Global]
- ☐ (Y) The Net Zero Investment Framework (NZIF) 2.0 [Global]
- ☐ (Z) Recommendations of the Taskforce for Nature-related Financial Disclosure (TNFD) [Global]
- ☐ (AA) Global Reporting Initiative (GRI) Standards [Global]
- ☐ (AB) IFC Performance Standard [Global]
- ☐ (AC) International Sustainability Standards Board (ISSB) Standards [Global]
- ☐ (AD) Sustainability Accounting Standards Board (SASB) Standards [Global]
- ☐ (AE) Other
- ☐ (AF) Other
- ☐ (AG) Other
- ☐ (AH) Other
- ☐ (AI) Other
- ☒ (AJ) Not applicable; our organisation did not report to any voluntary responsible investment/ESG frameworks during the reporting year.

Provide context:

Atlant Fonder reports on all data necessary for most of the initiatives and standards mentioned above. We've found that it's hard for us ourselves to commit to a standard. This is partly because we have a very active management philosophy. This means that the constituents of our fund portfolios will vary a lot between different time periods. This means that the sustainability metrics will vary a lot over time, not driven by a sustainability goal or framework but because of our financial considerations. Secondly, our investment universe consists mostly of Nordic corporate bonds. The issuers of these bonds are often not listed companies that are not obliged to report on sustainability data. This means that the companies we invest in does not set any sustainability goals and does not provide any KPIs in this area. This makes it very hard for us to comply to a framework and/or goals. We do however gather all the data available and we work continuously to encourage the companies we invest in to report on sustainability data to be more transparent. Since sustainability is a key factor for us we also aspire to invest as sustainable as possible given every market view.

ORGANISATIONAL OVERVIEW (OO)

ORGANISATIONAL INFORMATION

REPORTING YEAR

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 1	CORE	N/A	N/A	PUBLIC	Reporting year	GENERAL

What is the year-end date of the 12-month period you have chosen to report for PRI reporting purposes?

	Date	Month	Year
Year-end date of the 12-month period for PRI reporting purposes:	31	12	2024

SUBSIDIARY INFORMATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 2	CORE	N/A	OO 2.1	PUBLIC	Subsidiary information	GENERAL

Does your organisation have subsidiaries?

- ☐ (A) Yes
☒ (B) No

ASSETS UNDER MANAGEMENT

ALL ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 4	CORE	OO 3	N/A	PUBLIC	All asset classes	GENERAL

What are your total assets under management (AUM) at the end of the reporting year, as indicated in [OO 1]?

USD

(A) AUM of your organisation, including subsidiaries not part of row (B), and excluding the AUM subject to execution, advisory, custody, or research advisory only

US\$ 652,246,035.00

(B) AUM of subsidiaries that are PRI signatories in their own right and excluded from this submission, as indicated in [OO 2.2]

US\$ 0.00

(C) AUM subject to execution, advisory, custody, or research advisory only

US\$ 0.00

ASSET BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5	CORE	OO 3	Multiple indicators	PUBLIC	Asset breakdown	GENERAL

Provide a percentage breakdown of your total AUM at the end of the reporting year as indicated in [OO 1].

	(1) Percentage of Internally managed AUM	(2) Percentage of Externally managed AUM
(A) Listed equity	2.06%	0%
(B) Fixed income	73.06%	0%
(C) Private equity	0%	0%
(D) Real estate	0%	0%
(E) Infrastructure	0%	0%
(F) Hedge funds	0.2%	0%
(G) Forestry	0%	0%
(H) Farmland	0%	0%
(I) Other	24.68%	0%
(J) Off-balance sheet	0%	0%

(I) Other - (1) Percentage of Internally managed AUM - Specify:

The investment strategy of Atlant Fonder is built on a foundation of Nordic corporate bonds. On top of this we use derivatives to protect our capital and to achieve relevant market exposure. We also like to have a large portion of cash to be able to buy, mostly bonds, in a volatile market with low liquidity.

ASSET BREAKDOWN: INTERNALLY MANAGED LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 LE	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed listed equity	GENERAL

Provide a further breakdown of your internally managed listed equity AUM.

(A) Passive equity 0%

(B) Active – quantitative 0%

(C) Active – fundamental 100%

(D) Other strategies 0%

ASSET BREAKDOWN: INTERNALLY MANAGED FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 FI	CORE	OO 5	Multiple	PUBLIC	Asset breakdown: Internally managed fixed income	GENERAL

Provide a further breakdown of your internally managed fixed income AUM.

(A) Passive – SSA 0%

(B) Passive – corporate 0%

(C) Active – SSA 0%

(D) Active – corporate 100%

(E) Securitised 0%

(F) Private debt 0%

ASSET BREAKDOWN: INTERNALLY MANAGED HEDGE FUND

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 5.3 HF	CORE	OO 5	OO 11	PUBLIC	Asset breakdown: Internally managed hedge fund	GENERAL

Provide a further breakdown of your internally managed hedge fund assets.

(A) Multi-strategy 100%

(B) Long/short equity 0%

(C) Long/short credit 0%

(D) Distressed, special situations
and event-driven fundamental 0%

(E) Structured credit 0%

(F) Global macro 0%

(G) Commodity trading advisor 0%

(H) Other strategies 0%

Additional context to your response(s): (Voluntary)

We only invest in our own funds.

GEOGRAPHICAL BREAKDOWN

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 7	CORE	Multiple, see guidance	N/A	PUBLIC	Geographical breakdown	GENERAL

How much of your AUM in each asset class is invested in emerging markets and developing economies?

AUM in Emerging Markets and Developing Economies

(A) Listed equity	(1) 0%
(C) Fixed income – corporate	(2) >0 to 10%
(I) Hedge funds	(1) 0%

STEWARDSHIP

STEWARDSHIP

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 8	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship	GENERAL

Does your organisation conduct stewardship activities, excluding (proxy) voting, for any of your assets?

	(1) Listed equity - active	(3) Fixed income - active	(8) Hedge funds	(11) Other
(A) Yes, through internal staff	☒	☒	☒	☐
(B) Yes, through service providers	☐	☐	☐	☐
(C) Yes, through external managers	☐	☐	☐	☐
(D) We do not conduct stewardship	☐	☐	☐	☒

Additional context to your response(s): (Voluntary)

The board of directors of Atlant Fonder annually updates a policy for ownership and internal rules for corporate governance. Since listed equity holdings during 2024 have diminished to a very small part of our AuM we have not performed any activities during 2024. Hedge funds consists of investments in our own funds which means that stewardship activities are not meaningful. All of our activities have been conducted for fixed income. As a rule, we vote in companies where we own more than 5%. This was not the case during 2024.

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9 HF	CORE	OO 5	OO 9	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation have direct investments in listed equity across your hedge fund strategies?

- ☒ (A) Yes
- ☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Stewardship: (Proxy) voting	GENERAL

Does your organisation conduct (proxy) voting activities for any of your listed equity holdings?

	(1) Listed equity - active	(3) Hedge funds
(A) Yes, through internal staff	☒	☒
(B) Yes, through service providers	☐	☐
(C) Yes, through external managers	☐	☐
(D) We do not conduct (proxy) voting	☐	☐

Additional context to your response(s): (Voluntary)

During 2024 our holdings were so small that no voting was conducted.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 9.1	CORE	OO 9	PGS 10.1, PGS 31	PUBLIC	Stewardship: (Proxy) voting	GENERAL

For each asset class, on what percentage of your listed equity holdings do you have the discretion to vote?

Percentage of your listed equity holdings over which you have the discretion to vote

(A) Listed equity – active	(12) 100%
(C) Hedge funds	(1) 0%

STEWARDSHIP NOT CONDUCTED

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 10	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship not conducted	2

Describe why your organisation does not currently conduct stewardship and/or (proxy) voting.

Stewardship, excluding (proxy) voting

(K) Other

The board of directors of Atlant Fonder annually updates a policy for ownership and internal rules for corporate governance. Since listed equity holdings during 2024 have diminished to a very small part of our AuM we have not performed any activities during 2024. Hedge funds consists of investments in our own funds which means that stewardship activities are not meaningful. All of our activities have been conducted for fixed income. As a rule, we vote in companies where we own more than 5%. This was not the case during 2024.

ESG INCORPORATION

INTERNALLY MANAGED ASSETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 11	CORE	Multiple, see guidance	Multiple indicators	PUBLIC	Internally managed assets	1

For each internally managed asset class, does your organisation incorporate ESG factors, to some extent, into your investment decisions?

	(1) Yes, we incorporate ESG factors into our investment decisions	(2) No, we do not incorporate ESG factors into our investment decisions
(C) Listed equity - active - fundamental	☒	☐
(F) Fixed income - corporate	☒	☐
(L) Hedge funds - Multi-strategy	☒	☐
(V) Other: The investment strategy of Atlant Fonder is built on a foundation of Nordic corporate bonds. On top of this we use derivatives to protect our capital and to achieve relevant market exposure. We also like to have a large portion of cash to be able to buy, mostly bonds, in a volatile market with low liquidity.	☒	☐

Additional context to your response(s): (Voluntary)

The investment strategy of Atlant Fonder is built on a foundation of Nordic corporate bonds. On top of this we use derivatives to protect our capital and to achieve relevant market exposure. We also like to have a large portion of cash to be able to buy, mostly bonds, in a volatile market with low liquidity.

ESG IN OTHER ASSET CLASSES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 15	CORE	OO 11, OO 12–14	N/A	PUBLIC	ESG in other asset classes	1

Describe how your organisation incorporates ESG factors into the following asset classes.

Internally managed
(C) Other

Atlant Fonder applies exclusion criteria to our investments. Please find complete list of exclusions at: https://www.atlantfonder.se/hallbara_investeringar This is the first step of our DNSH analysis. Then we rank the sustainability of each investment case in order to see if they contribute to an environmental or social objective. We also check if the investment is aligned with the EU Taxonomy and any UN SDG and if these contributions are measurable. Our internal sustainability ranking also considers other DNSH criteria such as if the PAI indicators are being assessed, review of Taxonomy DNSH, if the company has policies in place to mitigate adverse impacts and environmental and social risks. On the positive side, we score companies on their commitment to different frameworks or standards, governance practices etc. When this is done, we consider if the company is eligible for investment. After we have invested in a company we follow up on these topics on an ongoing basis and report on the sustainability ranking quarterly. In addition we report according to the SFDR sustainability investing reporting framework.

ESG STRATEGIES

LISTED EQUITY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 LE	CORE	OO 11	OO 17.1 LE, LE 12	PUBLIC	Listed equity	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active listed equity?

Percentage out of total internally managed active listed equity

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	99%
(E) Thematic and integration	0%

(F) Screening and thematic	0%
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(G) All three approaches combined	1%
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(H) None	0%
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Additional context to your response(s): (Voluntary)

We have one long only equity global fund which is thematic and combines all three methods.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17.1 LE	CORE	OO 17 LE	LE 9	PUBLIC	Listed equity	1

What type of screening does your organisation use for your internally managed active listed equity assets where a screening approach is applied?

Percentage coverage out of your total listed equity assets where a screening approach is applied

(A) Positive/best-in-class screening only	0%
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(B) Negative screening only	0%
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(C) A combination of screening approaches	100%
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Additional context to your response(s): (Voluntary)

Exclusions criteria are published on our website: https://www.atlantfonder.se/hallbara_investeringar Best-in-class is applied to all our investments according to our internal sustainability ranking.

FIXED INCOME

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 17 FI	CORE	OO 5.3 FI, OO 11	Multiple, see guidance	PUBLIC	Fixed income	1

Which ESG incorporation approach and/or combination of approaches does your organisation apply to your internally managed active fixed income?

(2) Fixed income - corporate

(A) Screening alone	0%
(B) Thematic alone	0%
(C) Integration alone	0%
(D) Screening and integration	0%
(E) Thematic and integration	100%
(F) Screening and thematic	0%
(G) All three approaches combined	0%
(H) None	0%

Additional context to your response(s): (Voluntary)

We do not offer pure thematic funds in the managed fixed income universe.

ESG/SUSTAINABILITY FUNDS AND PRODUCTS

LABELLING AND MARKETING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18	CORE	OO 11–14	OO 18.1	PUBLIC	Labelling and marketing	1

Do you explicitly market any of your products and/or funds as ESG and/or sustainable?

☒ **(A) Yes, we market products and/or funds as ESG and/or sustainable**

Provide the percentage of total AUM that your ESG and/or sustainability-marketed products or funds represent:

100%

- ☐ (B) No, we do not offer products or funds explicitly marketed as ESG and/or sustainable
- ☐ (C) Not applicable; we do not offer products or funds

Additional context to your response(s): (Voluntary)

All of Atlant Fonders mutual funds are categorized as Article 8 as defined in the EU Taxonomy. The goal of the funds are not sustainable goals but the funds promote sustainability goals and apply screening based on sustainability. We do not name the funds according to sustainability traits but report on KPIs and PAIs to fulfill the requirements of investors with sustainable investments preferences.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 18.1	CORE	OO 18	OO 18.2	PUBLIC	Labelling and marketing	1

Do any of your ESG and/or sustainability-marketed products and/or funds hold formal ESG and/or RI certification(s) or label(s) awarded by a third party?

- ☐ (A) Yes, our ESG and/or sustainability-marketed products and/or funds hold formal labels or certifications
- ☒ **(B) No, our ESG and/or sustainability-marketed products and/or funds do not hold formal labels or certifications**

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 20	CORE	OO 17 FI	FI 15, FI 17	PUBLIC	Thematic bonds	1

What percentage of your total environmental and/or social thematic bonds are labelled by the issuers in accordance with industry-recognised standards?

Percentage of your total environmental and/or social thematic bonds labelled by the issuers

(A) Green or climate bonds	0.1%
(B) Social bonds	0%
(C) Sustainability bonds	0%
(D) Sustainability-linked bonds	0%
(E) SDG or SDG-linked bonds	0%
(F) Other	0%
(G) Bonds not labelled by the issuer	99.9%

Additional context to your response(s): (Voluntary)

The figures are valid for December 31 2024. As of June 2025 we have several sustainable-linked bonds and increased our holdings in green bonds.

SUMMARY OF REPORTING REQUIREMENTS

SUMMARY OF REPORTING REQUIREMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 21	CORE	Multiple indicators	Multiple indicators	PUBLIC	Summary of reporting requirements	GENERAL

The following table shows which modules are mandatory or voluntary to report on in the separate PRI asset class modules. Where a module is voluntary, indicate if you wish to report on it.

Applicable modules	(1) Mandatory to report (pre-filled based on previous responses)	(2.1) Voluntary to report. Yes, I want to opt-in to reporting on the module	(2.2) Voluntary to report. No, I want to opt-out of reporting on the module
Policy, Governance and Strategy	☒	☐	☐
Confidence Building Measures	☒	☐	☐
(C) Listed equity – active – fundamental	☐	☐	☒
(F) Fixed income – corporate	☒	☐	☐
(L) Hedge funds – Multi-strategy	☐	☐	☒

Additional context to your response(s): (Voluntary)

ATlant Fonder chooses to opt-out on reporting on listed equity since this is such a small part of our AuM. As for hedge funds, we only invest in our own funds and the process for our own funds are reported in the rest of this report.

SUBMISSION INFORMATION

REPORT DISCLOSURE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
OO 32	CORE	OO 3, OO 31	N/A	PUBLIC	Report disclosure	GENERAL

How would you like to disclose the detailed percentage figures you reported throughout the Reporting Framework?

- ☒ (A) Publish as absolute numbers
- ☐ (B) Publish as ranges

POLICY, GOVERNANCE AND STRATEGY (PGS)

POLICY

RESPONSIBLE INVESTMENT POLICY ELEMENTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 1	CORE	OO 8, OO 9	Multiple indicators	PUBLIC	Responsible investment policy elements	1, 2

Which elements are covered in your formal responsible investment policy(ies)?

- ☒ (A) Overall approach to responsible investment
- ☒ (B) Guidelines on environmental factors
- ☒ (C) Guidelines on social factors
- ☒ (D) Guidelines on governance factors
- ☐ (E) Guidelines on sustainability outcomes
- ☒ (F) Guidelines tailored to the specific asset class(es) we hold
- ☒ (G) Guidelines on exclusions
- ☒ (H) Guidelines on managing conflicts of interest related to responsible investment
- ☒ (I) Stewardship: Guidelines on engagement with investees
- ☐ (J) Stewardship: Guidelines on overall political engagement
- ☐ (K) Stewardship: Guidelines on engagement with other key stakeholders
- ☒ (L) Stewardship: Guidelines on (proxy) voting
- ☒ (M) Other responsible investment elements not listed here

Specify:

Commitments to responsible investments reporting

- ☐ (N) Our organisation does not have a formal responsible investment policy and/or our policy(ies) do not cover any responsible investment elements

Additional context to your response(s): (Voluntary)

Please find attached a link to Atlant Fonder's responsible investment policy which is published on our website: <https://www.atlantfonder.se/?do=proxy.file&chk=3aeba05b67ce96c856e55c0a0aa6270d&format=pdf&filename=Policy+-+Hållbarhet.pdf>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 2	CORE	PGS 1	Multiple, see guidance	PUBLIC	Responsible investment policy elements	1

Does your formal responsible investment policy(ies) include specific guidelines on systematic sustainability issues?

- ☐ (A) Specific guidelines on climate change (may be part of guidelines on environmental factors)
- ☐ (B) Specific guidelines on human rights (may be part of guidelines on social factors)
- ☐ (C) Specific guidelines on other systematic sustainability issues
- ☒ (D) Our formal responsible investment policy(ies) does not include guidelines on systematic sustainability issues

Additional context to your response(s): (Voluntary)

The responsible investment policy is updated by the board of directors on an annual basis. The details regarding guidelines is delegated to the CEO/head of responsible investments and incorporated in the internal sustainable ranking system. The guidelines are published in the annual sustainability investment report.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 3	CORE	PGS 1, PGS 2	N/A	PUBLIC	Responsible investment policy elements	6

Which elements of your formal responsible investment policy(ies) are publicly available?

☒ **(A) Overall approach to responsible investment**

Add link:

https://www.atlantfonder.se/hallbara_investeringar

☐ (B) Guidelines on environmental factors

☐ (C) Guidelines on social factors

☒ **(D) Guidelines on governance factors**

Add link:

https://www.atlantfonder.se/hallbara_investeringar

☒ **(I) Guidelines tailored to the specific asset class(es) we hold**

Add link:

https://www.atlantfonder.se/hallbara_investeringar

☒ **(J) Guidelines on exclusions**

Add link:

https://www.atlantfonder.se/hallbara_investeringar

☐ (K) Guidelines on managing conflicts of interest related to responsible investment

☒ **(L) Stewardship: Guidelines on engagement with investees**

Add link:

https://www.atlantfonder.se/om_foretaget/om_foretaget

☒ **(O) Stewardship: Guidelines on (proxy) voting**

Add link:

https://www.atlantfonder.se/om_foretaget/om_foretaget

☒ **(P) Other responsible investment aspects not listed here**

Add link:

https://www.atlantfonder.se/hallbara_investeringar

☐ (Q) No elements of our formal responsible investment policy(ies) are publicly available

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 4	PLUS	PGS 1	N/A	PUBLIC	Responsible investment policy elements	1 – 6

Does your formal responsible investment policy(ies) identify a link between your responsible investment activities and your fiduciary duties or equivalent obligations?

☒ (A) Yes

Elaborate:

This is an extract from the current responsible investment policy of Atlant Fonder: "The fund company's goal is to create a good return on its assets under management and work for a sustainable development and future. Responsible investing is a basic prerequisite for long-term value creation in a company. Responsible investments thus become an important prerequisite for achieving our goal of generating good long-term returns. Our actions as responsible investors and owners are thus central to our asset management. The investment strategy builds on active management, which means that the managers carefully analyse each investment (portfolio company) based on relevant issues regarding the companies' strategy, financial and non-financial performance and risks, capital structure, social and environmental impact and corporate governance. This is done by obtaining information from the portfolio companies and external sources, as well as through our own analysis. According to applicable regulations, management shall be carried out exclusively in the common interest of the fund shareholders. The fund management company shall always act with the aim of achieving the best possible return to the funds' shareholders, taking into account the funds' objectives and investment restrictions. The opportunities for sustainable investments and shareholder influence linked to the shareholdings in the various funds shall be utilised by the company in order to promote this goal. Investments in debt securities also take advantage of opportunities for influence linked to this type of financing." The board of directors of Atlant Fonder AB is also engaged in the fund company's responsible investment activities and the policy for responsible investments is updated on an annual basis.

☐ (B) No

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 5	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Which elements are covered in your organisation's policy(ies) or guidelines on stewardship?

- ☒ (A) Overall stewardship objectives
- ☐ (B) Prioritisation of specific ESG factors to be advanced via stewardship activities
- ☒ (C) Criteria used by our organisation to prioritise the investees, policy makers, key stakeholders, or other entities on which to focus our stewardship efforts
- ☒ (D) How different stewardship tools and activities are used across the organisation
- ☒ (E) Approach to escalation in stewardship
- ☐ (F) Approach to collaboration in stewardship
- ☒ (G) Conflicts of interest related to stewardship
- ☒ (H) How stewardship efforts and results are communicated across the organisation to feed into investment decision-making and vice versa
- ☐ (I) Other
- ☐ (J) None of the above elements is captured in our policy(ies) or guidelines on stewardship

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 6	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy elements	2

Does your policy on (proxy) voting include voting principles and/or guidelines on specific ESG factors?

- ☐ (A) Yes, it includes voting principles and/or guidelines on specific environmental factors
- ☐ (B) Yes, it includes voting principles and/or guidelines on specific social factors
- ☐ (C) Yes, it includes voting principles and/or guidelines on specific governance factors
- ☒ (D) Our policy on (proxy) voting does not include voting principles or guidelines on specific ESG factors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 7	CORE	OO 9	N/A	PUBLIC	Responsible investment policy elements	2

Does your organisation have a policy that states how (proxy) voting is addressed in your securities lending programme?

- ☐ (A) We have a publicly available policy to address (proxy) voting in our securities lending programme
- ☐ (B) We have a policy to address (proxy) voting in our securities lending programme, but it is not publicly available
- ☐ (C) We rely on the policy of our external service provider(s)
- ☐ (D) We do not have a policy to address (proxy) voting in our securities lending programme
- ☒ (E) Not applicable; we do not have a securities lending programme

RESPONSIBLE INVESTMENT POLICY COVERAGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 8	CORE	PGS 1	N/A	PUBLIC	Responsible investment policy coverage	1

What percentage of your total AUM is covered by the below elements of your responsible investment policy(ies)?

Combined AUM coverage of all policy elements

(A) Overall approach to responsible investment
 (B) Guidelines on environmental factors
 (C) Guidelines on social factors
 (D) Guidelines on governance factors

(7) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10	CORE	OO 8, OO 9, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

Per asset class, what percentage of your AUM is covered by your policy(ies) or guidelines on stewardship with investees?

☒ (A) Listed equity

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%
- ☐ (8) >70% to 80%
- ☐ (9) >80% to 90%
- ☐ (10) >90% to <100%

☒ (11) 100%

☒ (B) Fixed income

(1) Percentage of AUM covered

- ☐ (1) >0% to 10%
- ☐ (2) >10% to 20%
- ☐ (3) >20% to 30%
- ☐ (4) >30% to 40%
- ☐ (5) >40% to 50%
- ☐ (6) >50% to 60%
- ☐ (7) >60% to 70%

- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

☒ (F) Hedge funds

(1) Percentage of AUM covered

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 10.1	CORE	OO 9.1, PGS 1	N/A	PUBLIC	Responsible investment policy coverage	2

What percentage of your listed equity holdings is covered by your guidelines on (proxy) voting?

☒ (A) Actively managed listed equity

(1) Percentage of your listed equity holdings over which you have the discretion to vote

- (1) >0% to 10%
- (2) >10% to 20%
- (3) >20% to 30%
- (4) >30% to 40%
- (5) >40% to 50%
- (6) >50% to 60%
- (7) >60% to 70%
- (8) >70% to 80%
- (9) >80% to 90%
- (10) >90% to <100%
- (11) 100%

GOVERNANCE

ROLES AND RESPONSIBILITIES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11	CORE	N/A	Multiple indicators	PUBLIC	Roles and responsibilities	1

Which senior level body(ies) or role(s) in your organisation have formal oversight over and accountability for responsible investment?

- ☒ (A) Board members, trustees, or equivalent
- ☒ (B) Senior executive-level staff, or equivalent

Specify:

The board of directors implements a policy for responsible investments which is updated annually. The board of directors delegates the implementation of the policy to the managing director. The managing director is also head of responsible investments at Atlant Fonder. The head of responsible investments educates the rest of the staff and develops guidelines, analyses, and reports for responsible investments.

☒ (C) Investment committee, or equivalent

Specify:

All investment managers has to follow the given investment mandates for each fund portfolio. These mandates also dictates the framework for responsible investments. The compliance of the investment mandates is controlled by compliance officer, internal auditors and external auditors.

☐ (D) Head of department, or equivalent

☐ (E) None of the above bodies and roles have oversight over and accountability for responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.1	CORE	PGS 1, PGS 2, PGS 11	N/A	PUBLIC	Roles and responsibilities	1, 2

Does your organisation's senior level body(ies) or role(s) have formal oversight over and accountability for the elements covered in your responsible investment policy(ies)?

	(1) Board members, trustees, or equivalent	(2) Senior executive-level staff, investment committee, head of department, or equivalent
(A) Overall approach to responsible investment	☒	☒
(B) Guidelines on environmental, social and/or governance factors	☒	☒
(G) Guidelines tailored to the specific asset class(es) we hold	☒	☒
(H) Guidelines on exclusions	☒	☒
(I) Guidelines on managing conflicts of interest related to responsible investment	☒	☒
(J) Stewardship: Guidelines on engagement with investees	☒	☒
(M) Stewardship: Guidelines on (proxy) voting	☒	☒

(N) This role has no formal oversight over and accountability for any of the above elements covered in our responsible investment policy(ies)

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Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 11.2	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1 – 6

Does your organisation have governance processes or structures to ensure that your overall political engagement is aligned with your commitment to the principles of PRI, including any political engagement conducted by third parties on your behalf?

- (A) Yes
- (B) No

● (C) **Not applicable, our organisation does not conduct any form of political engagement directly or through any third parties**

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 12	CORE	N/A	N/A	PUBLIC	Roles and responsibilities	1

In your organisation, which internal or external roles are responsible for implementing your approach to responsible investment?

☒ (A) **Internal role(s)**

Specify:

Head of responsible investments is responsible for educating the rest of the staff, developing guidelines, analysing the companies we invest in and report on responsible investments. The rest of the organization is responsible for implementing current guidelines and policies in the daily business activities.

☒ (B) **External investment managers, service providers, or other external partners or suppliers**

Specify:

Our service provider Datia delivers a reporting system where we gather sustainability data, both internal and external. The Datia system produces data for our taxonomy reporting, EET files and PAI statements.

- (C) We do not have any internal or external roles with responsibility for implementing responsible investment

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 13	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your board members, trustees, or equivalent?

- (A) Yes, we use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent

● (B) **No, we do not use responsible investment KPIs to evaluate the performance of our board members, trustees, or equivalent**

Explain why: (Voluntary)

We do rank our investments based on an internal sustainability analysis and the scores and actions are reported on a quarterly basis. We evaluate our investment team on how they follow the investment mandates decided by the board of directors. The mandates defines sustainability standards and if the managers divert from the given mandates this of course has consequences since sustainable investments are an integral part of the investment mandate. All of Atlant Fonders mutual funds are registered as Article 8 funds according to the EU Taxonomy. If the funds or the reporting structure diverts from this framework this also has consequences both for the management team and the board of directors, depending on the type of breach. As the EU Taxonomy develops new technical standards, these are used to report and measure the KPIs specified by the regulatory framework. We do not apply any KPIs for our internal activities. This is because of proportionality, we're only ten people employed in the fund company. The distributors of our funds are evaluated on an annual basis and in this due diligence process, their approach to responsible investments is considered.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 14	CORE	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

Does your organisation use responsible investment KPIs to evaluate the performance of your senior executive-level staff (or equivalent), and are these KPIs linked to compensation?

- ☐ (A) Yes, we use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)
- ☒ **(B) No, we do not use responsible investment KPIs to evaluate the performance of our senior executive-level staff (or equivalent)**

Explain why: (Voluntary)

Atlant Fonder does not pay out bonuses to the senior executive-level staff, with exception for the marketing director and head of sales that can receive a sum depending on sales results.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 15	PLUS	PGS 11	N/A	PUBLIC	Roles and responsibilities	1

What responsible investment competencies do you regularly include in the training of senior-level body(ies) or role(s) in your organisation?

	(1) Board members, trustees or equivalent	(2) Senior executive-level staff, investment committee, head of department or equivalent
(A) Specific competence in climate change mitigation and adaptation	☒	☒
(B) Specific competence in investors' responsibility to respect human rights	☒	☒
(C) Specific competence in other systematic sustainability issues	☒	☒

(D) The regular training of this senior leadership role does not include any of the above responsible investment competencies

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EXTERNAL REPORTING AND DISCLOSURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 16	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

What elements are included in your regular reporting to clients and/or beneficiaries for the majority of your AUM?

- ☒ (A) Any changes in policies related to responsible investment
- ☒ (B) Any changes in governance or oversight related to responsible investment
- ☒ (C) Stewardship-related commitments
- ☒ (D) Progress towards stewardship-related commitments
- ☒ (E) Climate-related commitments
- ☒ (F) Progress towards climate-related commitments
- ☒ (G) Human rights-related commitments
- ☒ (H) Progress towards human rights-related commitments
- ☒ (I) Commitments to other systematic sustainability issues
- ☒ (J) Progress towards commitments on other systematic sustainability issues
- ☐ (K) We do not include any of these elements in our regular reporting to clients and/or beneficiaries for the majority of our AUM

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 17	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose climate-related information in line with the Task Force on Climate-Related Financial Disclosures' (TCFD) recommendations?

- ☐ (A) Yes, including governance-related recommended disclosures
 - ☐ (B) Yes, including strategy-related recommended disclosures
 - ☐ (C) Yes, including risk management-related recommended disclosures
 - ☐ (D) Yes, including applicable metrics and targets-related recommended disclosures
 - ☒ (E) None of the above
- Explain why: (Voluntary)

Atlant Fonder does not report according to the TCFD recommendations. The CO2 data is reported according to the EU Taxonomy regarding GHG emissions and the method for calculating the data is the same as for TCFD recommendations but we do not publicly disclose information in line with the TCFD.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 18	PLUS	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, to which international responsible investment standards, frameworks, or regulations did your organisation report?

☒ (A) Disclosures against the European Union's Sustainable Finance Disclosure Regulation (SFDR)

Link to example of public disclosures

<https://www.atlantfonder.se/fonder/opportunity>

☒ (B) Disclosures against the European Union's Taxonomy

Link to example of public disclosures

<https://www.atlantfonder.se/?do=template.fil&id=27553&csrf=1c0456b1728ae6579a44a0678974a950>

- ☐ (C) Disclosures against the CFA's ESG Disclosures Standard
- ☐ (D) Disclosures against other international standards, frameworks or regulations
- ☐ (E) Disclosures against other international standards, frameworks or regulations
- ☐ (F) Disclosures against other international standards, frameworks or regulations
- ☐ (G) Disclosures against other international standards, frameworks or regulations

Additional context to your response(s): (Voluntary)

Customized sustainable investments report on a quarterly basis: <https://www.atlantfonder.se/?do=template.fil&id=27604&csrf=1c0456b1728ae6579a44a0678974a950>

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 19	CORE	N/A	N/A	PUBLIC	External reporting and disclosures	6

During the reporting year, did your organisation publicly disclose its membership in and support for trade associations, think tanks or similar bodies that conduct any form of political engagement?

- ☐ (A) Yes, we publicly disclosed all of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- ☐ (B) Yes, we publicly disclosed some of our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- ☐ (C) No, we did not publicly disclose our membership in and support for trade associations, think tanks, or similar bodies that conduct any form of political engagement
- ☒ (D) Not applicable, we were not members in or supporters of any trade associations, think tanks, or similar bodies that conduct any form of political engagement during the reporting year

STRATEGY

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 20	CORE	N/A	N/A	PUBLIC	Capital allocation	1

Which elements do your organisation-level exclusions cover?

- ☒ (A) Exclusions based on our organisation's values or beliefs regarding particular sectors, products or services
- ☒ (B) Exclusions based on our organisation's values or beliefs regarding particular regions or countries
- ☒ (C) Exclusions based on minimum standards of business practice aligned with international norms such as the OECD Guidelines for Multinational Enterprises, the International Bill of Human Rights, UN Security Council sanctions or the UN Global Compact
- ☒ (D) Exclusions based on our organisation's climate change commitments
- ☐ (E) Other elements
- ☐ (F) Not applicable; our organisation does not have any organisation-level exclusions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 21	CORE	N/A	N/A	PUBLIC	Capital allocation	1

How does your responsible investment approach influence your strategic asset allocation process?

- ☐ (A) We incorporate ESG factors into our assessment of expected asset class risks and returns
- ☐ (B) We incorporate climate change-related risks and opportunities into our assessment of expected asset class risks and returns
- ☐ (C) We incorporate human rights-related risks and opportunities into our assessment of expected asset class risks and returns
- ☐ (D) We incorporate risks and opportunities related to other systematic sustainability issues into our assessment of expected asset class risks and returns
- ☐ (E) We do not incorporate ESG factors, climate change, human rights or other systematic sustainability issues into our assessment of expected asset class risks and returns
- ☒ (F) Not applicable; we do not have a strategic asset allocation process

STEWARDSHIP: OVERALL STEWARDSHIP STRATEGY

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 22	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

For the majority of AUM within each asset class, which of the following best describes your primary stewardship objective?

	(1) Listed equity	(2) Fixed income	(6) Hedge funds
(A) Maximise our portfolio-level risk-adjusted returns. In doing so, we seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	☒	☒	☒
(B) Maximise our individual investments' risk-adjusted returns. In doing so, we do not seek to address any risks to overall portfolio performance caused by individual investees' contribution to systematic sustainability issues.	☐	☐	☐

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 23	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How does your organisation, or the external service providers or external managers acting on your behalf, prioritise the investees or other entities on which to focus its stewardship efforts?

Atlant Fonder manages 8 mutual funds. The investment strategy is basically the same with a twist on total portfolio risk. The portfolio base in each fund (except for Atlant Green Tech Metals which is a global long-only equity fund focusing on materials needed in the green transition) is a mix of Nordic corporate bonds and/or cash or equivalent. The risk for each fund is regulated with the help of derivatives. This means that total number of holdings in all of the funds combined seldom exceeds 200 different holdings (ou of which 40-50 is in Atlant Green Tech Metals). This makes it possible for us to meet and in person discuss different topics with the management teams of all of our holdings. Since we invest mainly in Nordic corporate bonds this often makes us one of the largest investors in every holding. This means that we get a good access to the management team and the full attention when we highlight what is important to us and our fund investors. We report annually on our stewardship activities and which priorities we've focused on during the year. The largest issue so far is to get the companies to start reporting on sustainability. The Nordic companies are often too small for the large analysts to cover regarding sustainability and they are not obliged to report anything according to current regulations.

This means that we often encourage the companies to report and what to report. We often find that this will help the companies to raise capital from other investors and to improve the company image and often this process is a win-win for both Atlant Fonder and the companies we invest in. Regarding voting on annual meetings, this is not performed very often. In part because this often is a very small part of our fund portfolios and therefore we are very seldom significant owners in any company we hold equity in. Partly it is because we try to keep up a good dialogue with each of the companies we own in advance of the general meetings. Proxy voting is a possible solution for us and we follow the UNPRI reports on ownership activities. As our investment universe is mostly Nordic corporate bonds and/or Nordic equity, we seldom use proxy voting.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24	CORE	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Which of the following best describes your organisation's default position, or the position of the external service providers or external managers acting on your behalf, concerning collaborative stewardship efforts?

- ☐ (A) We recognise the value of collective action, and as a result, we prioritise collaborative stewardship efforts wherever possible
- ☒ (B) We collaborate on a case-by-case basis
- ☐ (C) Other
- ☐ (D) We do not join collaborative stewardship efforts

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 24.1	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Elaborate on your organisation's default position on collaborative stewardship, or the position of the external service providers or external investment managers acting on your behalf, including any other details on your overall approach to collaboration.

We have found that the traditional work with stewardship is often seen from a perspective of equity holding. The work is reported according to attendance and/or voting on general meetings of companies the funds own shares in. Atlant Fonder has a policy for voting (please find attached earlier in this report) but since the largest part of our fund holdings are Nordic corporate bonds we have to work in a different way. The large providers of sustainability data and facilitators of collaborative stewardship initiatives do not cover most of the companies our funds invest in. Instead, we work together with other fund managers active in the same investment universe.

One initiative to enhance company reporting on sustainability data on the Nordic corporate bond market is called "21 questions". Early 2021, Carnegie Fonder and Spiltan Fonder started asking all Nordic High Yield issuers to disclose material aspects regarding their sustainability work to emphasize the importance we place on the topic. The introduction of bonds featuring a sustainability label, for example Green bonds, has increased transparency and sustainability awareness amongst issuers and investors alike. However, we believe that there is even more to do to ensure a faster transition to a sustainable society. Bond issuers are ideally positioned to have a positive impact.

The aim is to inspire them to use this opportunity by asking questions that we strongly believe will benefit all stakeholders. By integrating these topics in roadshow material circulated before a transaction, regardless of label, we hope to ignite a spark and a way of thought. Together, the 21 questions participants represent SEK 40 billion of high yield credits under management. This is an important initiative, among others, to give an incentive to corporate bond issuers that may be too small to adhere to the Green Bond principles and still attract capital that takes ESG into consideration. One member of our board of directors has started a micro finance fund dedicated to help integrating new Swedish citizens in start up activities.

The fund, Favafond, is a platform from which Atlant Fonder can influence other parties on the Swedish financial market to highlight this issue which is very important in light of the social challenges in Sweden today. We've discussed the issue with several of our counterparties and distribution platforms the past year.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 25	PLUS	OO 5, OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

Rank the channels that are most important for your organisation in achieving its stewardship objectives.

- ☒ **(A) Internal resources, e.g. stewardship team, investment team, ESG team, or staff**
Select from the list:
☒ **1**
- ☒ **(B) External investment managers, third-party operators and/or external property managers, if applicable**
Select from the list:
☒ **3**
- ☒ **(C) External paid specialist stewardship services (e.g. engagement overlay services or, in private markets, sustainability consultants) excluding investment managers, real assets third-party operators, or external property managers**
Select from the list:
☒ **4**
- ☒ **(D) Informal or unstructured collaborations with investors or other entities**
Select from the list:
☒ **2**
- ☒ **(E) Formal collaborative engagements, e.g. PRI-coordinated collaborative engagements, Climate Action 100+, or similar**
Select from the list:
☒ **5**
- ☐ (F) We do not use any of these channels

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 27	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

How are your organisation's stewardship activities linked to your investment decision making, and vice versa?

Atlant Fonder investment universe is mostly (95-99%) Nordic corporate bonds. In many of our investments our capital is the main financing source of these bonds. This means that it is very important to us and our clients that we can expect a sustainable and ethical conduct from the owners of the companies in which we invest our funds' capital.. All of our investments are expected to be in line with Atlant Fonders' policy for sustainable investments. This is made clear to the companies we invest in and all brokers that convey business propositions to Atlant Fonder. They are fully informed regarding our sustainable investment criteria and do not suggest a deal unless it is compliant with our ESG standards. As of the beginning of 2025 we have also invested in Sustainable Linked Bonds and Green Bonds.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 28	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Overall stewardship strategy	2

If relevant, provide any further details on your organisation's overall stewardship strategy.

This is described on our website as attached above.

STEWARDSHIP: (PROXY) VOTING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 29	CORE	OO 9, PGS 1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

When you use external service providers to give recommendations, how do you ensure those recommendations are consistent with your organisation's (proxy) voting policy?

- ☐ (A) Before voting is executed, we review external service providers' voting recommendations for controversial and high-profile votes
- ☐ (B) Before voting is executed, we review external service providers' voting recommendations where the application of our voting policy is unclear
- ☐ (C) We ensure consistency with our voting policy by reviewing external service providers' voting recommendations only after voting has been executed
- ☐ (D) We do not review external service providers' voting recommendations
- ☒ (E) Not applicable; we do not use external service providers to give voting recommendations

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 30	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How is voting addressed in your securities lending programme?

- ☐ (A) We recall all securities for voting on all ballot items
- ☐ (B) When a vote is deemed important according to pre-established criteria (e.g. high stake in the company), we recall all our securities for voting
- ☐ (C) Other
- ☐ (D) We do not recall our securities for voting purposes
- ☒ (E) Not applicable; we do not have a securities lending programme

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 31	CORE	OO 9.1	N/A	PUBLIC	Stewardship: (Proxy) voting	2

For the majority of votes cast over which you have discretion to vote, which of the following best describes your decision making approach regarding shareholder resolutions (or that of your external service provider(s) if decision making is delegated to them)?

- ☒ (A) We vote in favour of resolutions expected to advance progress on our stewardship priorities, including affirming a company's good practice or prior commitment
- ☐ (B) We vote in favour of resolutions expected to advance progress on our stewardship priorities, but only if the investee company has not already publicly committed to the action(s) requested in the proposal
- ☐ (C) We vote in favour of shareholder resolutions only as an escalation measure
- ☐ (D) We vote in favour of the investee company management's recommendations by default
- ☐ (E) Not applicable; we do not vote on shareholder resolutions

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 32	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

During the reporting year, how did your organisation, or your external service provider(s), pre-declare voting intentions prior to voting in annual general meetings (AGMs) or extraordinary general meetings (EGMs)?

- ☐ (A) We pre-declared our voting intentions publicly through the PRI's vote declaration system on the Resolution Database
- ☐ (B) We pre-declared our voting intentions publicly by other means, e.g. through our website
- ☐ (C) We privately communicated our voting decision to investee companies prior to the AGM/EGM
- ☐ (D) We did not privately or publicly communicate our voting intentions prior to the AGM/EGM
- ☒ (E) Not applicable; we did not cast any (proxy) votes during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 33	CORE	OO 9	PGS 33.1	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, do you publicly disclose your (proxy) voting decisions or those made on your behalf by your external service provider(s), company by company and in a central source?

- ☐ (A) Yes, for all (proxy) votes
 - ☐ (B) Yes, for the majority of (proxy) votes
 - ☐ (C) Yes, for a minority of (proxy) votes
 - ☒ (D) No, we do not publicly report our (proxy) voting decisions company-by-company and in a central source
- Explain why:

We disclose our voting but since no voting activities have been performed during the past year, nothings has been published. No link can be submitted.

Additional context to your response(s): (Voluntary)

We disclose our voting but since no voting activities have been performed during the past year, nothings has been published.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 34	CORE	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

After voting has taken place, did your organisation, and/or the external service provider(s) acting on your behalf, communicate the rationale for your voting decisions during the reporting year?

(1) In cases where we abstained or voted against management recommendations

(2) In cases where we voted against an ESG-related shareholder resolution

(A) Yes, we publicly disclosed the rationale

(B) Yes, we privately communicated the rationale to the company

(C) We did not publicly or privately communicate the rationale, or we did not track this information

☐

☐

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year

☒

☒

(D) Not applicable; we did not abstain or vote against management recommendations or ESG-related shareholder resolutions during the reporting year - Explain why:

Atlant Fonder holds very little listed equity and there were no cases to vote on in our holdings during 2023.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 35	PLUS	OO 9	N/A	PUBLIC	Stewardship: (Proxy) voting	2

How does your organisation ensure vote confirmation, i.e. that your votes have been cast and counted correctly?

Atlant Fonder has very few equity holdings and the few we do have are in the Nordics. This means that we can attend every general assembly in person and follow up each individual voting chain and confirmation process closely.

STEWARDSHIP: ESCALATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 36	CORE	OO 8, OO 9 HF, OO 9	N/A	PUBLIC	Stewardship: Escalation	2

For your listed equity holdings, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

	(1) Listed equity	(2) Direct listed equity holdings in hedge fund portfolios
(A) Joining or broadening an existing collaborative engagement or creating a new one	☐	☐
(B) Filing, co-filing, and/or submitting a shareholder resolution or proposal	☐	☐
(C) Publicly engaging the entity, e.g. signing an open letter	☐	☐
(D) Voting against the re-election of one or more board directors	☐	☐
(E) Voting against the chair of the board of directors, or equivalent, e.g. lead independent director	☐	☐
(F) Divesting	☐	☐
(G) Litigation	☐	☐
(H) Other	☐	☐
(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings	☒	☒

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings - (1) Listed equity - Explain why: (Voluntary)

Listed equity is a very small part of our AuM and no issues have occurred.

(I) In the past three years, we did not use any of the above escalation measures for our listed equity holdings - (2)
Direct listed equity holdings in hedge fund portfolios - Explain why: (Voluntary)

Same as above.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 37	CORE	Multiple, see guidance	N/A	PUBLIC	Stewardship: Escalation	2

For your corporate fixed income assets, what escalation measures did your organisation, or the external investment managers or service providers acting on your behalf, use in the past three years?

- ☒ (A) **Joining or broadening an existing collaborative engagement or creating a new one**
- ☐ (B) Publicly engaging the entity, e.g. signing an open letter
- ☒ (C) **Not investing**
- ☐ (D) Reducing exposure to the investee entity
- ☒ (E) **Divesting**
- ☐ (F) Litigation
- ☐ (G) Other
- ☐ (H) In the past three years, we did not use any of the above escalation measures for our corporate fixed income assets

STEWARDSHIP: ENGAGEMENT WITH POLICY MAKERS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39	CORE	OO 8, OO 9	PGS 39.1, PGS 39.2	PUBLIC	Stewardship: Engagement with policy makers	2

Did your organisation, or the external investment managers or service providers acting on your behalf, engage with policy makers as part of your responsible investment approach during the reporting year?

- ☐ (A) Yes, we engaged with policy makers directly
- ☐ (B) Yes, we engaged with policy makers through the leadership of or active participation in working groups or collaborative initiatives, including via the PRI
- ☒ (C) **Yes, we were members of, supported, or were in another way affiliated with third party organisations, including trade associations and non-profit organisations, that engage with policy makers, excluding the PRI**
- ☐ (D) We did not engage with policy makers directly or indirectly during the reporting year beyond our membership in the PRI

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.1	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, what methods did you, or the external investment managers or service providers acting on your behalf, use to engage with policy makers as part of your responsible investment approach?

- ☐ (A) We participated in 'sign-on' letters
- ☒ (B) We responded to policy consultations
- ☒ (C) We provided technical input via government- or regulator-backed working groups

Describe:

As active members of Swesif, Atlant Fonder participated in several processes regarding the implementation and interpretation of the EU Taxonomy and SFDR during the year. The chairman of the board of directors of Atlant Fonder is an attorney that is an associated member of the Swedish Fund Association. Atlant Fonder has decided to follow all guidelines and recommendations from this association and together with other Swedish mutual fund managers, we've worked with interpretation of new regulatory frameworks in order to be transparent to our clients.

- ☐ (D) We engaged policy makers on our own initiative

- ☒ (E) Other methods

Describe:

Atlant Fonder has been an active member of Swesif, participating in member meetings and round table discussions. During 2023, our custodian Swedbank also started an initiative, ESG Talks, in order to promote information sharing and networking among the Swedish fund industry regarding responsible investments. Atlant Fonder also participated in Almedalsveckan which is a democracy week in Sweden, gathering politicians and civil organizations to discuss and learn more about important topics. Sustainability and responsible investments is always high on the agenda during this week.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 39.2	CORE	PGS 39	N/A	PUBLIC	Stewardship: Engagement with policy makers	2

During the reporting year, did your organisation publicly disclose details of your engagement with policy makers conducted as part of your responsible investment approach, including through external investment managers or service providers?

- ☒ (A) We publicly disclosed all our policy positions

Add link(s):

https://www.atlantfonder.se/om_foretaget/om_foretaget

- ☐ (B) We publicly disclosed details of our engagements with policy makers

- ☐ (C) No, we did not publicly disclose details of our engagement with policy makers conducted as part of our responsible investment approach during the reporting year

Additional context to your response(s): (Voluntary)

No such activities performed during 2024.

STEWARDSHIP: EXAMPLES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 40	PLUS	OO 8, OO 9	N/A	PUBLIC	Stewardship: Examples	2

Provide examples of stewardship activities that you conducted individually or collaboratively during the reporting year that contributed to desired changes in the investees, policy makers or other entities with which you interacted.

(A) Example 1:

Title of stewardship activity:

Dialogue about ESG reporting

(1) Led by

- ☒ (1) **Internally led**
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☒ (1) **Environmental factors**
- ☒ (2) **Social factors**
- ☒ (3) **Governance factors**

(3) Asset class(es)

- ☒ (1) **Listed equity**
- ☒ (2) **Fixed income**
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Several of our portfolio companies did not report on ESG. In 2024 they produced their first ESG report after a dialogue with us among others. Some of these companies are now reporting on ESG annually.

(B) Example 2:

Title of stewardship activity:

Sustainable linked bond

(1) Led by

- ☐ (1) Internally led
- ☒ (2) **External service provider led**
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☒ (1) **Environmental factors**
- ☒ (2) **Social factors**
- ☒ (3) **Governance factors**

(3) Asset class(es)

- ☐ (1) Listed equity
- ☒ (2) **Fixed income**
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure

- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

Several of our portfolio companies wanted to finance their business with sustainable linked bonds. Atlant Fonder was a speaking partner in some of the processes.

(C) Example 3:

Title of stewardship activity:

(1) Led by

- ☐ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☐ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(D) Example 4:

Title of stewardship activity:

(1) Led by

- ☐ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☐ (2) Social factors
- ☐ (3) Governance factors

(3) Asset class(es)

- ☐ (1) Listed equity
- ☐ (2) Fixed income
- ☐ (3) Private equity
- ☐ (4) Real estate
- ☐ (5) Infrastructure
- ☐ (6) Hedge funds
- ☐ (7) Forestry
- ☐ (8) Farmland
- ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

(E) Example 5:

Title of stewardship activity:

(1) Led by

- ☐ (1) Internally led
- ☐ (2) External service provider led
- ☐ (3) Led by an external investment manager, real assets third-party operator and/or external property manager

(2) Primary focus of stewardship activity

- ☐ (1) Environmental factors
- ☐ (2) Social factors
- ☐ (3) Governance factors
- (3) Asset class(es)
 - ☐ (1) Listed equity
 - ☐ (2) Fixed income
 - ☐ (3) Private equity
 - ☐ (4) Real estate
 - ☐ (5) Infrastructure
 - ☐ (6) Hedge funds
 - ☐ (7) Forestry
 - ☐ (8) Farmland
 - ☐ (9) Other

(4) Description of the activity and what was achieved. For collaborative activities, provide detail on your individual contribution.

CLIMATE CHANGE

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41	CORE	N/A	PGS 41.1	PUBLIC	Climate change	General

Has your organisation identified climate-related risks and opportunities affecting your investments?

☒ (A) Yes, within our standard planning horizon

Specify the risks and opportunities identified and your relevant standard planning horizon:

Atlant Fonder has registered all of our funds as Article 8 according to the EU Taxonomy. As of today, very little data is available for measuring and reporting on climate-related and especially social risks and opportunities. Our focus today is mainly on GHG emissions because this is the area where we can find most data. We measure and report on GHG emissions, intensity and carbon footprint. In addition, we rank the companies we invest in according to an internal sustainability ranking system. The sustainability ranking for a company affects if we will invest in it or not. The evaluation is based on the following criteria: 1.

The company must have a vision for its sustainability work. We need to see dedication in sustainability work, preferably linked to specific goals and measurement methods. What do you want to achieve with your sustainability work and how is this linked to the staff and/or management's remuneration program? For example, if one or more of the UN's global environmental goals have been selected, there is something to measure annual outcomes against. A further factor is which different policies and regulations have been adopted, and which concern sustainability, and at what level these are discussed and decided.

2. The company needs to understand the basic principle of its business model and how this is affected by developments in the field of sustainability.

This is related both to expected future return on equity as well as to sustainability. Major changes and investments need to be implemented if society is to be able to meet the sustainability goals it has jointly set. This can present both opportunities and threats for individual companies. Our analysis takes into account how the individual company relates to this fact.

3. Collaborations. We would like to see the companies we invest in engage broadly in various social issues that drive sustainable development.

Initiatives for sustainable development through industry-wide organizations or academic projects are also positive for the company's sustainability ranking at Atlant Fonder.

4. Special considerations. Here we look at individual factors that affect this particular company. Our ranking of sustainability can be negatively affected if, for example, the company has been convicted of environmental crimes or violations of labor law or human rights. Here, negative news, which the company cannot respond to in a good way in our dialogue with them, can also have a negative impact. Special considerations can also have a positive impact if you have achieved a high grade in a sustainability certification system or received awards in sector associations or similar.

The standard planning horizon for an investment in our funds varies from a few months up to two or three years.

☐ (B) Yes, beyond our standard planning horizon

☐ (C) No, we have not identified climate-related risks and/or opportunities affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 41.1	CORE	PGS 41	N/A	PUBLIC	Climate change	General

Does your organisation integrate climate-related risks and opportunities affecting your investments in its overall investment strategy, financial planning and (if relevant) products?

● (A) Yes, our overall investment strategy, financial planning and (if relevant) products integrate climate-related risks and opportunities

Describe how climate-related risks and opportunities have affected or are expected to affect your investment strategy, financial planning and (if relevant) products:

On of our funds, Atlant Green Tech Metals, is dedicated to only invest in companies delivering materials needed for the green transition. The companies must also be aligned with the SDGs not only regarding the climate goals but also regarding the goals related to social criteria and human rights. Atlant Green Tech Metals got its name and new direction in June 2021. Before this, the fund strategy was built on companies active in the precious metal sector. The investment strategy is based on the global megatrend that is driven by both investors and politicians regarding the green transition. More and more focus is placed on the climate challenge and the measures being taken to convert production and consumption to a sustainable cycle.

Most of the world's countries have agreed on the Net Zero 2050 goal, which requires a huge transition away from fossil fuels to renewables. This transition requires new and sustainable sources of materials. Atlant Green Tech Metals is an actively managed equity fund that invests globally in companies focusing on metals and other materials for the green energy transition, so-called green metals. In practice, this means metals needed for infrastructure for the production of fossil-free energy, electrification and energy storage. The fund invests in the entire life cycle of green metals from financing, exploration, extraction, processing and recycling. The focus is primarily on the companies that participate in building up the European and North American supply chains, which are now being expanded to meet the explosive growth in demand that is approaching.

The portfolio in the fund has been restructured and many interesting companies now provide good opportunities for both good returns and good contributions to the green transition. Atlant Fonder sees good investment opportunities in this area and is not alone in this. The International Energy Agency (IEA, an association of energy ministers from 30 countries) has calculated in a report that in order to reach Net Zero by 2050, it will require a quadrupling of wind power capacity, an increase in electric car sales by 18 times and investments in the energy sector of USD 2,200 billion, a threefold increase from today's USD 760 billion. Atlant Green Tech Metals invests in companies with products and services that contribute to achieving global goals for sustainable development, especially the goals regarding sustainable energy and combating climate change.

Special focus is directed at companies operating in the supply chain of sustainably produced metals, minerals and other raw materials from primary and secondary (recycling) sources, to the industry for sustainable energy production, energy storage and electrification. While we see very good investment opportunities in companies that supply technology and materials for the green transition, there are major sustainability challenges in the industries Atlant Green Tech Metals invests. Above all, this applies to companies that extract materials in the form of mining. This industry has a long history of problems in both climate and social issues. Atlant's way of taking this into account is to concentrate investments to companies that have operations/are listed in Europe and America.

Many different new players will emerge here based on the sustainability requirements set by their customers. The customers are ultimately consumers, but before that comes specification of input goods from various industries, not least the automotive industry. It will no longer be sustainable to market an electric vehicle as environmentally friendly if it is not possible to ensure that the entire production chain complies with the requirements set by authorities and other stakeholders.

- (B) No, our organisation has not yet integrated climate-related risks and opportunities into its investment strategy, financial planning and (if relevant) products

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 42	PLUS	N/A	N/A	PUBLIC	Climate change	General

Which sectors are covered by your organisation's strategy addressing high-emitting sectors?

☑ (A) Coal

Describe your strategy:

Exclusion, please find attached more details in the link above describing Atlant Fonder's methodology for exclusions.

☒ **(B) Gas**

Describe your strategy:

Exclusion, please find attached more details in the link above describing Atlant Fonder's methodology for exclusions.

☒ **(C) Oil**

Describe your strategy:

Exclusion, please find attached more details in the link above describing Atlant Fonder's methodology for exclusions. This year this area also includes sustainable linked bonds aiming to lower carbon emission through less use of oil.

☒ **(D) Utilities**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Please find attached more details in the link above describing Atlant Fonder's methodology for sustainability ranking.

☒ **(E) Cement**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Very seldom a part of our portfolios.

☒ **(F) Steel**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Very seldom a part of our portfolios.

☒ **(G) Aviation**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Please find attached more details in the link above describing Atlant Fonder's methodology for sustainability ranking.

☒ **(H) Heavy duty road**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Very seldom a part of our portfolios.

☒ **(I) Light duty road**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Very seldom a part of our portfolios.

☒ **(J) Shipping**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Two holdings of sustainable linked bonds in this area which we wouldn't in normally, but with the bond framework it's possible.

☒ **(K) Aluminium**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking.

☒ **(L) Agriculture, forestry, fishery**

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Very seldom a part of our portfolios.

☒ (M) Chemicals

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Very seldom a part of our portfolios.

☒ (N) Construction and buildings

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Please find attached more details in the link above describing Atlant Fonder's methodology for sustainability ranking.

☒ (O) Textile and leather

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Please find attached more details in the link above describing Atlant Fonder's methodology for sustainability ranking.

☒ (P) Water

Describe your strategy:

Aiming for best in class according to alignment with EU Taxonomy, SDGs and internal sustainability ranking. Very seldom a part of our portfolios. Please find attached more details in the link above describing Atlant Fonder's methodology for sustainability ranking.

☐ (Q) Other

- ☐ (R) We do not have a strategy addressing high-emitting sectors

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 43	CORE	N/A	N/A	PUBLIC	Climate change	General

Has your organisation assessed the resilience of its investment strategy in different climate scenarios, including one in which the average temperature rise is held to below 2 degrees Celsius (preferably to 1.5 degrees Celsius) above pre-industrial levels?

☐ (A) Yes, using the Inevitable Policy Response Forecast Policy Scenario (FPS) or Required Policy Scenario (RPS)

☐ (B) Yes, using the One Earth Climate Model scenario

☐ (C) Yes, using the International Energy Agency (IEA) Net Zero scenario

☒ (D) Yes, using other scenarios

Specify:

Our responsible investment reporting system provider Datia is cooperating with WWF to provide scenario analysis. So far, we have not sufficient data, but are evaluating the methodology for internal use.

- ☐ (E) No, we have not assessed the resilience of our investment strategy in different climate scenarios, including one that holds temperature rise to below 2 degrees

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 44	CORE	N/A	N/A	PUBLIC	Climate change	General

Does your organisation have a process to identify, assess, and manage the climate-related risks (potentially) affecting your investments?

☒ (A) Yes, we have a process to identify and assess climate-related risks

(1) Describe your process

Atlant Fonder has defined the following climate-related types of risks: Physical risks resulting from climate change; For example, weather events such as floods, droughts and storms which may become more frequent or more severe. Transition risks related to the transition to a carbon-neutral economy Atlant Fonder works with its own analysis and risk model to identify, evaluate and integrate climate-related risks. This is described in more detail in our annual sustainability report. In short, it means that all companies that our funds invest or are considering investing in are ranked in relation to how sustainable we consider them to be. When it comes to climate-related risks, the companies are asked to report on their chosen path forward and how the board of directors has analyzed the situation, partly based on what is happening physically with the climate (such as rising sea levels), but also regarding the transition risks that arise with the outside world's reaction to climate change.

Examples of transition risks can be increasing prices for emissions or fossil-linked assets that are sharply losing value. At the same time, opportunities must also be reported that a changed climate and society enable for the company, for example when a need for new fossil-independent technology creates new market shares to take. Through analysis of future climate scenarios, risks and opportunities can be analyzed where their impact on the company's financial results can be forecasted. Atlant Fonder does not apply TCFD at the moment, but we encourage the companies we invest in to use this standard, as it makes climate-related risks easier to compare between different companies. As we have many other factors to consider this is only one set of data that we use in our own sustainability ranking.

The following sustainability indicators are used to measure the achievement of the environmental characteristics promoted by our funds. The goal is for the funds to actively work for an ongoing lower carbon dioxide emissions. The goal is for the funds to have as high a level of sustainability as possible (Atlant Fonder's own sustainability rating 1-100) PAI 1 Greenhouse gas emissions PAI 4. Exposure to companies operating in the fossil fuel sector PAI 10. Violation of the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises. The funds' environmentally sustainable investments contribute to the following environmental objectives defined in the EU taxonomy (2020/852) for environmentally sustainable activities: climate change mitigation. The funds' share of sustainable investments are made in companies that refer to sustainable companies with a high ESG level in our sustainability analysis and as fulfilment of one or more of the sub-goals in the UN Global Sustainability Goals and the Paris Agreement and which at the same time do not cause significant harm to any other sustainable goal and comply with good corporate governance.

The objectives of the funds' sustainable investments are to: Reduce climate risk by not investing in fossil fuels. Promote a transition to a low-carbon (GHG) world by excluding companies whose turnover comes from more than 5% fossil fuel production and/or distribution. The funds apply an exclusion strategy and do not invest, among other things, in companies that violate international norms and conventions related to serious climate or environmental damage.

(2) Describe how this process is integrated into your overall risk management

The process is integrated in the overall risk management as all possible investments are ranked according to our sustainability analysis available to the investment team and disclosed on our website. The evaluation model has been the same for many years, but the terms used for different ESG factors have been adapted to the Taxonomy regulatory framework. Responsible for sustainable investments educates the investment team regarding the new regulatory framework on a regular basis since this landscape has been changing a lot and fast the last couple of years. Nevertheless, the investment team always checks with the sustainable investments function before any investments are made. The sustainability ranking is reported quarterly on fund level and annually according to SFDR. The internal ranking system is explained in the quarterly reports and a more thorough explanation is attached annually. In the SFDR we report according to the KPIs as defined in the regulatory framework.

☐ (B) Yes, we have a process to manage climate-related risks

☐ (C) No, we do not have any processes to identify, assess, or manage the climate-related risks affecting our investments

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 45	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, which of the following climate risk metrics or variables affecting your investments did your organisation use and publicly disclose?

☐ (A) Exposure to physical risk

☐ (B) Exposure to transition risk

☐ (C) Internal carbon price

☒ (D) Total carbon emissions

(1) Indicate whether this metric or variable was used and disclosed, including the methodology

☐ (1) Metric or variable used

☐ (2) Metric or variable used and disclosed

☒ (3) Metric or variable used and disclosed, including methodology

- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.atlantfonder.se/hallbara_investeringar

☒ **(E) Weighted average carbon intensity**

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.atlantfonder.se/hallbara_investeringar

☐ (F) Avoided emissions

☐ (G) Implied Temperature Rise (ITR)

☐ (H) Non-ITR measure of portfolio alignment with UNFCCC Paris Agreement goals

☐ (I) Proportion of assets or other business activities aligned with climate-related opportunities

☒ **(J) Other metrics or variables**

Specify:

Internal sustainability ranking system. As described in the annual sustainability report in the link below.

- (1) Indicate whether this metric or variable was used and disclosed, including the methodology

- (1) Metric or variable used
- (2) Metric or variable used and disclosed

☒ **(3) Metric or variable used and disclosed, including methodology**

- (2) Provide link to the disclosed metric or variable, including the methodology followed, as applicable

https://www.atlantfonder.se/hallbara_investeringar

- (K) Our organisation did not use or publicly disclose any climate risk metrics or variables affecting our investments during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 46	CORE	N/A	N/A	PUBLIC	Climate change	General

During the reporting year, did your organisation publicly disclose its Scope 1, Scope 2, and/or Scope 3 greenhouse gas emissions?

☒ **(A) Scope 1 emissions**

- (1) Indicate whether this metric was disclosed, including the methodology

- (1) Metric disclosed

☒ **(2) Metric and methodology disclosed**

- (2) Provide links to the disclosed metric and methodology, as applicable

https://www.atlantfonder.se/hallbara_investeringar

☒ **(B) Scope 2 emissions**

- (1) Indicate whether this metric was disclosed, including the methodology

- (1) Metric disclosed

☒ **(2) Metric and methodology disclosed**

- (2) Provide links to the disclosed metric and methodology, as applicable

https://www.atlantfonder.se/hallbara_investeringar

☒ **(C) Scope 3 emissions (including financed emissions)**

- (1) Indicate whether this metric was disclosed, including the methodology

- (1) Metric disclosed

☒ **(2) Metric and methodology disclosed**

(2) Provide links to the disclosed metric and methodology, as applicable

https://www.atlantfonder.se/hallbara_investeringar

- (D) Our organisation did not publicly disclose its Scope 1, Scope 2, or Scope 3 greenhouse gas emissions during the reporting year

SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47	CORE	N/A	Multiple indicators	PUBLIC	Sustainability outcomes	1, 2

Has your organisation identified the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Yes, we have identified one or more specific sustainability outcomes connected to our investment activities
- (B) No, we have not yet identified the sustainability outcomes connected to any of our investment activities

Additional context to your response(s): (Voluntary)

The latest year has shown considerably less emissions of CO2 connected to our portfolio holdings even though the AuM is larger. This is mostly due to a different market view than the year before.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.1	CORE	PGS 47	N/A	PUBLIC	Sustainability outcomes	1, 2

Which widely recognised frameworks has your organisation used to identify the intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) The UN Sustainable Development Goals (SDGs) and targets
- ☐ (B) The UNFCCC Paris Agreement
- ☒ (C) The UN Guiding Principles on Business and Human Rights (UNGPs)
- ☐ (D) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors
- ☒ (E) The EU Taxonomy
- ☐ (F) Other relevant taxonomies
- ☒ (G) The International Bill of Human Rights
- ☒ (H) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions
- ☐ (I) The Convention on Biological Diversity
- ☐ (J) Other international framework(s)
- ☐ (K) Other regional framework(s)
- ☐ (L) Other sectoral/issue-specific framework(s)
- (M) Our organisation did not use any widely recognised frameworks to identify the intended and unintended sustainability outcomes connected to its investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 47.2	CORE	PGS 47	PGS 48	PUBLIC	Sustainability outcomes	1, 2

What are the primary methods that your organisation has used to determine the most important intended and unintended sustainability outcomes connected to its investment activities?

- ☒ (A) Identify sustainability outcomes that are closely linked to our core investment activities
- ☒ (B) Consult with key clients and/or beneficiaries to align with their priorities
- ☒ (C) Assess which actual or potential negative outcomes for people are most severe based on their scale, scope, and irremediable character
- ☐ (D) Identify sustainability outcomes that are closely linked to systematic sustainability issues
- ☐ (E) Analyse the input from different stakeholders (e.g. affected communities, civil society, trade unions or similar)
- ☐ (F) Understand the geographical relevance of specific sustainability outcome objectives
- ☐ (G) Other method
- ☐ (H) We have not yet determined the most important sustainability outcomes connected to our investment activities

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48	CORE	PGS 47.2	PGS 48.1, SO 1	PUBLIC	Sustainability outcomes	1, 2

Has your organisation taken action on any specific sustainability outcomes connected to its investment activities, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Yes, we have taken action on some of the specific sustainability outcomes connected to our investment activities
- ☐ (B) No, we have not yet taken action on any specific sustainability outcomes connected to our investment activities

Additional context to your response(s): (Voluntary)

We have started to invest in sustainable linked bonds and green bonds.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 48.1	PLUS	PGS 48	N/A	PUBLIC	Sustainability outcomes	1, 2

Why has your organisation taken action on specific sustainability outcomes connected to its investment activities?

- ☒ (A) We believe that taking action on sustainability outcomes is relevant to our financial risks and returns over both short- and long-term horizons
- ☐ (B) We believe that taking action on sustainability outcomes, although not yet relevant to our financial risks and returns, will become so over a long-time horizon
- ☒ (C) We have been requested to do so by our clients and/or beneficiaries
- ☒ (D) We want to prepare for and respond to legal and regulatory developments that are increasingly addressing sustainability outcomes
- ☐ (E) We want to protect our reputation, particularly in the event of negative sustainability outcomes connected to investments
- ☒ (F) We want to enhance our social licence-to-operate (i.e. the trust of beneficiaries, clients, and other stakeholders)

- ☐ (G) We believe that taking action on sustainability outcomes in parallel to financial return goals has merit in its own right
- ☐ (H) Other

HUMAN RIGHTS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49	PLUS	PGS 47	PGS 49.1	PUBLIC	Human rights	1, 2

During the reporting year, what steps did your organisation take to identify and take action on the actual and potential negative outcomes for people connected to your investment activities?

- ☒ (A) We assessed the country level context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes

Explain how these activities were conducted:

Atlant Fonder invests mainly in Nordic corporate bonds. This means that most of the investments are not exposed to the most severe human rights issues. However, the funds may contain securities where the beneficial owner is a state that ranks low in terms of human rights. Pure government bonds issued by such states are also not something in which we want to invest. We do not believe this will provide a good long-term return. To define which states rank low in terms of human rights, we use established indices. The Freedom House Freedom in the World index has been published annually since 1972 and ranks over 200 countries and disputed territories in terms of political and human rights and freedom.

The index is compiled by analysts who use broad sources of information such as domestic and global news reporting, academic analysis, non-governmental organizations and physical visits. The criterion for exclusion on the grounds of political and human rights is that those countries and territories that receive a ranking of seven or lower are excluded. Ranking seven is awarded where political and human rights do not exist at all and that the ruling regime is characterized by severe repression. We also take into consideration the sanctions of UN. Under Article 41 of the UN Treaty, the UN Security Council may call on Member States to take measures not involving the use of armed forces for the purpose of maintaining or restoring international peace and security.

Such measures are commonly referred to as sanctions. The current practice of the Security Council is to introduce targeted measures aimed at neutralising circumstances that have led to a threat or a crime against international peace and security. The criterion for exclusion for investment is that a country has been sanctioned by the UN Security Council. Countries are not excluded in cases where sanctions are aimed at independent groups within a country and not the government itself.

- ☐ (B) We assessed the sector context of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes
- ☐ (C) We assessed the human rights performance of our potential and/or existing investments to understand how this could connect our organisation to negative human rights outcomes
- ☐ (D) We monitored severe and emerging human rights controversies to understand how this could connect our organisation to negative human rights outcomes
- ☐ (E) We took other steps to assess and manage the actual and potentially negative outcomes for people connected to our investment activities
- ☐ (F) We did not identify and take action on the actual and potentially negative outcomes for people connected to any of our investment activities during the reporting year

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.1	PLUS	PGS 49	N/A	PUBLIC	Human rights	1, 2

During the reporting year, which stakeholder groups did your organisation include when identifying and taking action on the actual and potential negative outcomes for people connected to your investment activities?

- ☐ (A) Workers
- ☒ (B) Communities
- Sector(s) for which each stakeholder group was included

- ☐ (1) Energy
- ☒ (2) **Materials**
- ☐ (3) Industrials
- ☐ (4) Consumer discretionary
- ☐ (5) Consumer staples
- ☐ (6) Healthcare
- ☐ (7) Finance
- ☐ (8) Information technology
- ☐ (9) Communication services
- ☐ (10) Utilities
- ☐ (11) Real estate
- ☐ (C) Customers and end-users
- ☐ (D) Other stakeholder groups

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 49.2	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, what information sources did your organisation use to identify the actual and potential negative outcomes for people connected to its investment activities?

☒ **(A) Corporate disclosures**

Provide further detail on how your organisation used these information sources:

Annual reports and IR material combined with sustainability reports give a good picture of the large picture of a company's policy in this area. Atlant Fonder strives to invest the funds' money as sustainably as possible. The methodology is based on what has basically become a Swedish standard based on pure exclusions, which is combined with a positive selection and our own analysis that will distinguish which companies are most sustainable. In addition, there is active ownership, primarily through the financing that investments in corporate loans entail. With what has been said above, you have to be humble and see what you can really do to drive sustainable development as an investor. Atlant Fonder has chosen to make an evaluation and a rating of every investment we make from a sustainability perspective and corporate disclosures are the base of the information needed in this process.

☒ **(B) Media reports**

Provide further detail on how your organisation used these information sources:

We follow media on our investments. Often this can give us indication on issues that are important regarding a certain sector or region in which we are investing. This helps us to ask the right questions to the companies we invest in.

☒ **(C) Reports and other information from NGOs and human rights institutions**

Provide further detail on how your organisation used these information sources:

Information from NGOs gives a good perspective on issues not lifted by the companies. These organizations often highlight topics the companies have to address. White papers and scientific reports are used on a regular basis.

☒ **(D) Country reports, for example, by multilateral institutions, e.g. OECD, World Bank**

Provide further detail on how your organisation used these information sources:

In the first step, we exclude companies that violate international conventions based on the UN Global Compact and the OECD's guidelines for multinational companies in the areas of the environment, human rights, labor law, corruption and inhumane weapons. For example, for ethical reasons, we do not want to own securities in companies that manufacture landmines, cluster and nuclear weapons. In 2020, the exclusion of companies that manufacture chemical and biological weapons was introduced. When it comes to government bonds, Atlant Fonder also has some sustainability restrictions. Atlant Fonder strives to invest in both companies and countries that actively work for sustainable development. Atlant Fonder does not invest in government bonds issued by countries that: Are systematically corrupt and systematically oppose basic political and human rights or are under sanctions from the UN Security Council.

☒ **(E) Data provider scores or benchmarks**

Provide further detail on how your organisation used these information sources:

UN Global Compact and the OECD's guidelines for multinational companies in the areas of the environment, human rights, labor law, corruption and inhumane weapons. For example, for ethical reasons, we do not want to own securities in companies that manufacture landmines, cluster and nuclear weapons. Transparency International's Corruption Perceptions Index (CPI), published annually since 1995. The CPI ranks nearly 200 countries based on the level of perceived corruption determined by expert opinions and opinion polls. World Bank Worldwide Governance Indicators; The Control of Corruption Index has been published annually since 1996. This index aims to reflect the extent to which official functions are perceived to be used for personal gain, both on a large and small scale. The Freedom House Freedom in the World index has been published annually since 1972 and ranks over 200 countries and disputed territories in terms of political, human rights and freedom. The index is compiled by analysts who use broad sources of information such as domestic and global news reporting, academic analysis, non-governmental organizations and physical visits. Countries and territories that receive a ranking of seven or lower are excluded. Under Article 41 of the UN Treaty, the UN Security Council may call on Member States to take measures which do not involve the use of armed forces for the purpose of maintaining or restoring international peace and security. Such measures are commonly referred to as sanctions. The current practice of the Security Council is to introduce targeted measures aimed at neutralising circumstances that have led to a threat or a crime against international peace and security. The criterion for exclusion for investment is that a country has been sanctioned by the UN Security Council. Countries are not excluded in cases where sanctions are aimed at independent groups within a country and not the government itself.

☒ (F) Human rights violation alerts

Provide further detail on how your organisation used these information sources:

We use the sources mentioned above to supervise this area. Since we mostly have Nordic corporate bonds in our portfolios the companies we invest in are often not exposed to these issues. During the reporting period we've had no human rights violation alerts for our portfolio companies. Human rights performance is also a factor in our own sustainability ranking and affects the investability of a company.

☐ (G) Sell-side research

☒ (H) Investor networks or other investors

Provide further detail on how your organisation used these information sources:

If we discover something that is not listed as a problem among other fund companies, we usually contact the relevant person and asks why this is the case. This is a part of ongoing communications with other mutual fund companies.

☒ (I) Information provided directly by affected stakeholders or their representatives

Provide further detail on how your organisation used these information sources:

If we follow up on an issue, we first contact the company in question for discussions. There is an escalation process in place for this.

☐ (J) Social media analysis

☐ (K) Other

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
PGS 50	PLUS	PGS 47	N/A	PUBLIC	Human rights	1, 2

During the reporting year, did your organisation, directly or through influence over investees, enable access to remedy for people affected by negative human rights outcomes connected to your investment activities?

☐ (A) Yes, we enabled access to remedy directly for people affected by negative human rights outcomes we caused or contributed to through our investment activities

☐ (B) Yes, we used our influence to ensure that our investees provided access to remedies for people affected by negative human rights outcomes we were linked to through our investment activities

☒ (C) No, we did not enable access to remedy directly, or through the use of influence over investees, for people affected by negative human rights outcomes connected to our investment activities during the reporting year

Explain why:

No human rights violations linked to our portfolio companies were detected during the reporting year.

FIXED INCOME (FI)

OVERALL APPROACH

MATERIALITY ANALYSIS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 1	CORE	OO 21	N/A	PUBLIC	Materiality analysis	1

Does your organisation have a formal investment process to identify and incorporate material ESG factors across your fixed income assets?

(2) Corporate

(A) Yes, our investment process incorporates material governance factors

(1) for all of our AUM

(B) Yes, our investment process incorporates material environmental and social factors

(1) for all of our AUM

(C) Yes, our investment process incorporates material ESG factors depending on different investment time horizons

(D) No, we do not have a formal process; our investment professionals identify material ESG factors at their discretion

○

(E) No, we do not have a formal or informal process to identify and incorporate material ESG factors

○

MONITORING ESG TRENDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 2	CORE	OO 21	N/A	PUBLIC	Monitoring ESG trends	1

Does your organisation have a formal process for monitoring and reviewing the implications of changing ESG trends across your fixed income assets?

(2) Corporate

(A) Yes, we have a formal process that includes scenario analyses

(B) Yes, we have a formal process, but does it not include scenario analyses

(C) We do not have a formal process for our fixed income assets; our investment professionals monitor how ESG trends vary over time at their discretion



(D) We do not monitor and review the implications of changing ESG trends on our fixed income assets



PRE-INVESTMENT

ESG INCORPORATION IN RESEARCH

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 3	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

For the majority of your fixed income investments, does your organisation incorporate material ESG factors when assessing their credit quality?

(2) Corporate

(A) We incorporate material environmental and social factors



(B) We incorporate material governance-related factors



(C) We do not incorporate material ESG factors for the majority of our fixed income investments



Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 4	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

Does your organisation have a framework that differentiates ESG risks by issuer country, region and/or sector?

(2) Corporate

(A) Yes, we have a framework that differentiates ESG risks by country and/or region (e.g. local governance and labour practices)

(1) for all of our AUM

(B) Yes, we have a framework that differentiates ESG risks by sector

(1) for all of our AUM

(C) No, we do not have a framework that differentiates ESG risks by issuer country, region and/or sector



(D) Not applicable; we are not able to differentiate ESG risks by issuer country, region and/or sector due to the limited universe of our issuers

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 6	CORE	OO 21	N/A	PUBLIC	ESG incorporation in research	1

How do you incorporate significant changes in material ESG factors over time into your fixed income asset valuation process?

(2) Corporate

(A) We incorporate it into the forecast of financial metrics or other quantitative assessments

(B) We make a qualitative assessment of how material ESG factors may evolve

(1) for all of our AUM

(C) We do not incorporate significant changes in material ESG factors

o

ESG INCORPORATION IN PORTFOLIO CONSTRUCTION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 8	CORE	OO 21	N/A	PUBLIC	ESG incorporation in portfolio construction	1

How do material ESG factors contribute to your security selection, portfolio construction and/or benchmark selection process?

(2) Corporate

(A) Material ESG factors contribute to the selection of individual assets and/or sector weightings within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(B) Material ESG factors contribute to determining the holding period of individual assets within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(C) Material ESG factors contribute to the portfolio weighting of individual assets within our portfolio construction and/or benchmark selection process

(D) Material ESG factors contribute to the country or region weighting of assets within our portfolio construction and/or benchmark selection process

(1) for all of our AUM

(E) Material ESG factors contribute to our portfolio construction and/or benchmark selection process in other ways

(F) Our security selection, portfolio construction or benchmark selection process does not include the incorporation of material ESG factors

o

POST-INVESTMENT

ESG RISK MANAGEMENT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 11	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

How are material ESG factors incorporated into your portfolio risk management process?

(2) Corporate

(A) Investment committee members, or the equivalent function or group, can veto investment decisions based on ESG considerations

(1) for all of our AUM

(B) Companies, sectors, countries and/or currencies are monitored for changes in exposure to material ESG factors and any breaches of risk limits

(1) for all of our AUM

(C) Overall exposure to specific material ESG factors is measured for our portfolio construction, and sizing or hedging adjustments are made depending on the individual issuer or issue sensitivity to these factors

(D) We use another method of incorporating material ESG factors into our portfolio's risk management process

(E) We do not have a process to incorporate material ESG factors into our portfolio's risk management process

o

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 12	CORE	OO 21	N/A	PUBLIC	ESG risk management	1

For the majority of your fixed income assets, do you have a formal process to identify and incorporate material ESG risks and ESG incidents into your risk management process?

(2) Corporate

(A) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents and their implications for individual fixed income holdings



(B) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for other fixed income holdings exposed to similar risks and/or incidents



(C) Yes, our formal process includes reviews of quantitative and/or qualitative information on material ESG risks and ESG incidents, and their implications for our stewardship activities



(D) Yes, our formal process includes ad hoc reviews of quantitative and/or qualitative information on severe ESG incidents



(E) We do not have a formal process to identify and incorporate ESG risks and ESG incidents; our investment professionals identify and incorporate ESG risks and ESG incidents at their discretion



(F) We do not have a formal process to identify and incorporate ESG risks and ESG incidents into our risk management process



PERFORMANCE MONITORING

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 14	PLUS	OO 5.3 FI, OO 21	N/A	PUBLIC	Performance monitoring	1

Provide an example of how the incorporation of environmental and/or social factors in your fixed income valuation or portfolio construction affected the realised returns of those assets.

The obvious example is the exclusion of fossil fuels from all of our fund portfolios. This has had an impact on the financial performance, sometimes positive, sometimes negative. But we believe that the transition from fossil fuels will bring positive financial impact over time. Since our investment universe is mainly Nordic corporate bonds, and the companies in this sector are fairly well regulated in the sustainability area, this means that our portfolios have had a low exposure to many of the sustainability challenges we can see on a global scale.

THEMATIC BONDS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 15	PLUS	OO 20, OO 21	N/A	PUBLIC	Thematic bonds	3

What percentage of environmental, social and/or other labelled thematic bonds held by your organisation has been verified?

As a percentage of your total labelled bonds:

(A) Third-party assurance (5) >75%

(B) Second-party opinion

(C) Approved verifiers or external reviewers (e.g. via CBI or ICMA)

Additional context to your response(s): (Voluntary)

So far, only a small part of our AuM is in greenbonds or sustainable linked bonds. All of these have been verified by a third party framework.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 16	CORE	OO 17 FI, OO 21	N/A	PUBLIC	Thematic bonds	1

What pre-determined criteria does your organisation use to identify which non-labelled thematic bonds to invest in?

☐ (A) The bond's use of proceeds

- ☐ (B) The issuers' targets
- ☐ (C) The issuers' progress towards achieving their targets
- ☐ (D) The issuer profile and how it contributes to their targets
- ☐ (E) We do not use pre-determined criteria to identify which non-labelled thematic bonds to invest in
- ☒ (F) Not applicable; we do not invest in non-labelled thematic bonds

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
FI 17	CORE	Multiple, see guidance	N/A	PUBLIC	Thematic bonds	1, 2, 6

During the reporting year, what action did you take in the majority of cases when you felt that the proceeds of a thematic bond were not allocated appropriately or in accordance with the terms of the bond deal or prospectus?

- ☐ (A) We engaged with the issuer
- ☐ (B) We alerted thematic bond certification agencies
- ☐ (C) We sold the security
- ☐ (D) We blacklisted the issuer
- ☐ (E) Other action
- ☐ (F) We did not take any specific actions when the proceeds of a thematic bond were not allocated according to the terms of the bond deal during the reporting year
- ☒ (G) Not applicable; in the majority of cases, the proceeds of thematic bonds were allocated according to the terms of the bond deal during the reporting year

SUSTAINABILITY OUTCOMES (SO)

SETTING TARGETS AND TRACKING PROGRESS

SETTING TARGETS ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 1	PLUS	PGS 48	SO 2, SO 2.1, SO 3	PUBLIC	Setting targets on sustainability outcomes	1, 2

What specific sustainability outcomes connected to its investment activities has your organisation taken action on?

☒ (A) Sustainability outcome #1

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☒ (1) The UN Sustainable Development Goals (SDGs) and targets

☐ (2) The UNFCCC Paris Agreement

☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

☐ (9) The Convention on Biological Diversity

☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

☒ (1) Environmental

☒ (2) Social

☒ (3) Governance-related

☐ (4) Other

(3) Sustainability outcome name

The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.

(4) Number of targets set for this outcome

☐ (1) No target

☐ (2) One target

☒ (3) Two or more targets

☒ (B) Sustainability outcome #2

(1) Widely recognised frameworks used to guide action on this sustainability outcome

☒ (1) The UN Sustainable Development Goals (SDGs) and targets

☐ (2) The UNFCCC Paris Agreement

☐ (3) The UN Guiding Principles on Business and Human Rights (UNGPs)

☐ (4) OECD frameworks: OECD Guidelines for Multinational Enterprises and Guidance on Responsible Business Conduct for Institutional Investors

☐ (5) The EU Taxonomy

☐ (6) Other relevant taxonomies

☐ (7) The International Bill of Human Rights

☐ (8) The International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the eight core conventions

- ☐ (9) The Convention on Biological Diversity
- ☐ (10) Other international, regional, sector-based or issue-specific framework(s)

(2) Classification of sustainability outcome

- ☒ (1) Environmental
- ☒ (2) Social
- ☒ (3) Governance-related
- ☐ (4) Other

(3) Sustainability outcome name

The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.

(4) Number of targets set for this outcome

- ☐ (1) No target
- ☐ (2) One target
- ☒ (3) Two or more targets

- ☐ (C) Sustainability outcome #3
- ☐ (D) Sustainability outcome #4
- ☐ (E) Sustainability outcome #5
- ☐ (F) Sustainability outcome #6
- ☐ (G) Sustainability outcome #7
- ☐ (H) Sustainability outcome #8
- ☐ (I) Sustainability outcome #9
- ☐ (J) Sustainability outcome #10

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2	PLUS	SO 1	SO 2.1, SO 4, SO 5	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your nearest-term targets.

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:	The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.
(1) Target name	GHG emissions and intensity
(2) Baseline year	2021
(3) Target to be met by	2050
(4) Methodology	Atlant Fonder has excluded investments in fossil fuel activities since 2019. We also measure and report GHG emissions and intensity and aim to lessen our funds exposure to these factors.
(5) Metric used (if relevant)	GHG emissions and intensity. Carbon footprint.

(6) Absolute or intensity-based (if relevant)

(2) Intensity-based

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting 29%

(10) Do you also have a longer-term target for this?

(1) Yes

(A2) Sustainability Outcome #1: Target details

(A2) Sustainability Outcome #1:

The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.

(1) Target name Investments in line with the SGDs.

(2) Baseline year 2021

(3) Target to be met by 2055

(4) Methodology We use our data provider Datia to gather relevant data indicating how much of our portfolio companies' activities that are in line with the EU Taxonomy. This is periodically reported as regulated by the EU Taxonomy regulatory framework.

(5) Metric used (if relevant)

(6) Absolute or intensity-based (if relevant)

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant)

(9) Percentage of total AUM covered in your baseline year for target setting 23.81%

(10) Do you also have a longer-term target for this?

(B1) Sustainability Outcome #2: Target details

(B1) Sustainability Outcome #2: The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.

(1) Target name Investments in line with the SDGs

(2) Baseline year 2021

(3) Target to be met by

(4) Methodology Atlant Fonder maps the portfolio holdings against the SDGs to define how large part of the fund portfolios that are in line with the SDGs. In our sustainability ranking and investment strategy we tend to focus on goals number 3, 12 and 13. Please find more information about this process in our annual sustainability report. We use external data providers and corporate information to find out to what extent the companies we invest in have businesses that are in line with the SDGs.

(5) Metric used (if relevant) Aggregated share of company activity in line with the SDGs reported on fund and fund company level.

(6) Absolute or intensity-based (if relevant) (1) Absolute

(7) Baseline level or amount (if relevant):

(8) Target level or amount (if relevant) 100 percent

(9) Percentage of total AUM covered in your baseline year for target setting 12%

(10) Do you also have a longer-term target for this? (2) No

(B2) Sustainability Outcome #2: Target details

(B2) Sustainability Outcome #2:	The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.
(1) Target name	
(2) Baseline year	
(3) Target to be met by	
(4) Methodology	
(5) Metric used (if relevant)	
(6) Absolute or intensity-based (if relevant)	
(7) Baseline level or amount (if relevant):	
(8) Target level or amount (if relevant)	
(9) Percentage of total AUM covered in your baseline year for target setting	
(10) Do you also have a longer-term target for this?	

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 2.1	PLUS	SO 1, SO 2	N/A	PUBLIC	Setting targets on sustainability outcomes	1

For each sustainability outcome, provide details of up to two of your long-term targets.

	(1) Target name	(2) Long-term target to be met by	(3) Long-term target level or amount (if relevant)
(A1) Sustainability Outcome #1: The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.	GHG emissions and intensity	2055	In line with the SDGs and the EU, this goal is aligned with the Net Zero sustainability goal

TRACKING PROGRESS AGAINST TARGETS

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4	PLUS	SO 2	SO 4.1	PUBLIC	Tracking progress against targets	1

Does your organisation track progress against your nearest-term sustainability outcomes targets?

(A1) Sustainability outcome #1:						
(A1) Sustainability outcome #1:		The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.				
Target name:		GHG emissions and intensity				
Does your organisation track progress against your nearest-term sustainability outcome targets?				(1) Yes		

(A2) Sustainability outcome #1:

(A2) Sustainability outcome #1:

The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.

Target name:

Investments in line with the SDGs.

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

(B1) Sustainability outcome #2:

(B1) Sustainability outcome #2:

The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.

Target name:

Investments in line with the SDGs

Does your organisation track progress against your nearest-term sustainability outcome targets?

(1) Yes

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 4.1	PLUS	SO 4	N/A	PUBLIC	Tracking progress against targets	1

During the reporting year, what qualitative or quantitative progress did your organisation achieve against your nearest-term sustainability outcome targets?

(A1) Sustainability Outcome #1: Target details

(A1) Sustainability Outcome #1:

The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.

(1) Target name

GHG emissions and intensity

(2) Target to be met by

2050

(3) Metric used (if relevant)

GHG emissions and intensity. Carbon footprint.

(4) Current level or amount (if relevant)	GHG emissions (scope 3) 124,14K tonnes, GHG intensity: 0,78K tonnes, carbon footprint: 0,1K tonnes. All numbers from Q1 2025.
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	Data gathering from external provider and information from corporate sustainability reports.
(A2) Sustainability outcome #1: Target details	
(A2) Sustainability outcome #1:	The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.
(1) Target name	Investments in line with the SDGs.
(2) Target to be met by	2055
(3) Metric used (if relevant)	
(4) Current level or amount (if relevant)	Please find data in Atlant Fonders' annual sustainability report
(5) Other qualitative or quantitative progress	
(6) Methodology for tracking progress	
(B1) Sustainability Outcome #2: Target details	
(B1) Sustainability Outcome #2:	The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.
(1) Target name	Investments in line with the SDGs
(2) Target to be met by	
(3) Metric used (if relevant)	Aggregated share of company activity in line with the SDGs reported on fund and fund company level.
(4) Current level or amount (if relevant)	Please find data in Atlant Fonders' annual sustainability report

(5) Other qualitative or quantitative progress

(6) Methodology for tracking progress

Measuring share of investments companies alignment with the SDGs. External data provider.

INDIVIDUAL AND COLLABORATIVE INVESTOR ACTION ON OUTCOMES

LEVERS USED TO TAKE ACTION ON SUSTAINABILITY OUTCOMES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 5	PLUS	SO 2	Multiple	PUBLIC	Levers used to take action on sustainability outcomes	1, 2, 5

During the reporting year, which of the following levers did your organisation use to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

- ☒ (A) Stewardship with investees, including engagement, (proxy) voting, and direct influence with privately held assets
 - Select from drop down list:
 - ☒ (1) Individually
 - ☐ (2) With other investors or stakeholders
- ☐ (B) Stewardship: engagement with external investment managers
- ☐ (C) Stewardship: engagement with policy makers
- ☐ (D) Stewardship: engagement with other key stakeholders
- ☒ (E) Capital allocation
- ☐ (F) Our organisation did not use any of the above levers to take action on sustainability outcomes during the reporting year

CAPITAL ALLOCATION

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 6	PLUS	SO 5	N/A	PUBLIC	Capital allocation	1

During the reporting year, how did your organisation use capital allocation to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Capital allocation activities used

(4) Divestment from assets or sectors

(2) Explain through an example

Investors in our funds should feel confident that Atlant Fonder does not have holdings that are controversial or stand out compared to other sustainably managed funds. In the first step, we exclude companies that violate international conventions based on the UN Global Compact and the OECD's guidelines for multinational companies in the areas of the environment, human rights, labor law, corruption and inhumane weapons.

For example, for ethical reasons, we do not want to own securities in companies that manufacture landmines, cluster bombs or nuclear weapons. In 2020, the exclusion of companies that manufacture chemical and biological weapons was introduced. In 2021, exclusion criteria for fossil fuels were extended to exclude all companies that generate more than five percent of their turnover from production or distribution from fossil fuels.

We also refrain from investing in companies where more than five percent of sales come from the production of alcohol, tobacco, weapons and games and where more than five percent derives from the distribution of pornographic material. The fund management company also excludes companies operating in countries with non-democratic regimes and that appear on UN sanctions lists. When it comes to government bonds, Atlant Fonder also has some sustainability restrictions. Atlant Fonder strives to invest in both companies and countries that actively work for sustainable development. Atlant Fonder does not invest in government bonds issued by countries that: Are systematically corrupt and systematically oppose basic political and human rights or are under sanctions from the UN Security Council. In 2024, Atlant Fonder started investing in Green Bonds and SLBs.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:

The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

The sector allocation excludes fossil fuels. One of our funds, Atlant Green Tech Metals, is fully dedicated to invest in global equities set to deliver materials needed for the green transition.

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:

The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.

(1) Capital allocation activities used

(2) Sector allocation
(4) Divestment from assets or sectors

(2) Explain through an example

Atlant Fonder reports on total alignment with the SDGs but is focusing on SDG number 3, 12 and 13. This has led to a tilt towards companies in the pharmaceutical and technology sectors.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 7	PLUS	OO 17 FI, SO 1	N/A	PUBLIC	Capital allocation	1

During the reporting year, did you use thematic bonds to take action on sustainability outcomes, including to prevent and mitigate actual and potential negative outcomes?

Thematic bond(s) label

(A) Sustainability Outcome #1: The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.

(A) Green/climate bonds
(D) Sustainability-linked bonds

(B) Sustainability Outcome #2: The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.

(A) Green/climate bonds
(D) Sustainability-linked bonds

STEWARDSHIP WITH INVESTEEES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 8	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

During the reporting year, how did your organisation use stewardship with investees to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

(A) Across all sustainability outcomes

(1) Describe your approach	Atlant Fonder mostly invests in Nordic corporate bonds. This means that our fund capital is the main financing source in many bond issues, which in turn gives us much attention from the management team of the bond issuers. This provides a means for us to start a dialogue with the companies. Often the scope of our engagement concerns sustainability reporting.
(2) Stewardship tools or activities used	(1) Engagement
(3) Example	Several of our portfolio companies have started reporting on sustainability.

(B) Sustainability Outcome #1:

(B) Sustainability Outcome #1:	The EU Taxonomy provides a framework KPIs on sustainability outcome which will be comparable for end clients. Atlant Fonder reports according to the Taxonomy but a common challenge with the Taxonomy is the availability of sustainability data. We hope this will improve as the regulatory framework develops.
(1) Describe your approach	Atlant Fonder mostly invests in Nordic corporate bonds. This means that our fund capital is the main financing source in many bond issues, which in turn gives us much attention from the management team of the bond issuers. This provides a means for us to start a dialogue with the companies. Often the scope of our engagement concerns sustainability reporting.
(2) Stewardship tools or activities used	(1) Engagement
(3) Example	One of our portfolio companies issued a sustainability bond in dialogue with Atlant Fonder. We could help the issuer regarding which bank to choose as market maker and which sustainability investment framework to use for the bond. Investments in Green Bonds and SLBs will enhance our focus and provide more data for reporting on sustainability outcome.

(C) Sustainability Outcome #2:

(C) Sustainability Outcome #2:	The SDGs are also developing regarding data and we've reported on total exposure in our sustainability reports. The goal is to have investments that are in line with the SDGs in as large extent as possible.
(1) Describe your approach	We use a system delivered by a third party to match our portfolio holdings with the SDGs. This is reported to our clients.
(2) Stewardship tools or activities used	(1) Engagement
(3) Example	A client picked up on our reporting of the aggregated SDG alignment in our funds and used this in their own sustainability reporting framework.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
SO 9	PLUS	SO 5	N/A	PUBLIC	Stewardship with investees	2

How does your organisation prioritise the investees you conduct stewardship with to take action on sustainability outcomes, including preventing and mitigating actual and potential negative outcomes?

☒ **(A) We prioritise the most strategically important companies in our portfolio.**

Describe how you do this:

The more strategically important holding, the more important overall. These are the companies we've had most success with.

Select from the list:

- ☒ 2
☐ 4

☒ **(B) We prioritise the companies in our portfolio most significantly connected to sustainability outcomes.**

Describe how you do this:

Atlant Fonder performs an internal sustainability ranking of the companies our funds invest in. This analysis highlights which issues/companies/sectors/regions which have the most challenges. So far the main focus has been to use our investment impact to get the companies we invest in to start reporting on sustainability.

Select from the list:

- ☒ 1
☐ 4

☒ **(C) We prioritise the companies in our portfolio to ensure that we cover a certain proportion of the sustainability outcomes we are taking action on.**

Describe how you do this:

This is a tricky issue since one of our biggest challenges is to get hold of sustainability data. This priority is combined with this challenge.

Select from the list:

- ☒ 3
☐ 4

☐ (D) Other

CONFIDENCE-BUILDING MEASURES (CBM)

CONFIDENCE-BUILDING MEASURES

APPROACH TO CONFIDENCE-BUILDING MEASURES

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 1	CORE	N/A	Multiple indicators	PUBLIC	Approach to confidence-building measures	6

How did your organisation verify the information submitted in your PRI report this reporting year?

- ☐ (A) We conducted independent third-party assurance of selected processes and/or data related to the responsible investment processes reported in our PRI report, which resulted in a formal assurance conclusion
- ☐ (B) We conducted a third-party readiness review and are making changes to our internal controls or governance processes to be able to conduct independent third-party assurance next year
- ☒ (C) We conducted an internal audit of selected processes and/or data related to the responsible investment processes reported in our PRI report
- ☒ (D) Our board, trustees (or equivalent), senior executive-level staff (or equivalent), and/or investment committee (or equivalent) signed off on our PRI report
- ☐ (E) Our responses in selected sections and/or the entirety of our PRI report were internally reviewed before submission to the PRI
- ☐ (F) We did not verify the information submitted in our PRI report this reporting year

Additional context to your response(s): (Voluntary)

Atlant Fonder uses data from internal sustainability analysis as well as external data from our sustainability reporting system Datia. The internal analysis is compared to sustainability data available on Bloomberg and the data from Datia is verified compared to our own analysis and other open data sources.

INTERNAL AUDIT

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 4	CORE	OO 21, CBM 1	N/A	PUBLIC	Internal audit	6

What responsible investment processes and/or data were audited through your internal audit function?

- ☒ (A) Policy, governance and strategy
Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☒ (2) Processes internally audited
 - ☐ (3) Processes and data internally audited
- ☒ (D) Fixed income
Select from dropdown list:
 - ☐ (1) Data internally audited
 - ☐ (2) Processes internally audited
 - ☒ (3) Processes and data internally audited

Additional context to your response(s): (Voluntary)

Our processes for sustainable investments and analysis are audited by internal auditors.

Indicator	Type of indicator	Dependent on	Gateway to	Disclosure	Subsection	PRI Principle
CBM 5	PLUS	CBM 1	N/A	PUBLIC	Internal audit	6

Provide details of the internal audit process regarding the information submitted in your PRI report.

The set up of the process for complying with SFDR has been evaluated by our compliance officer. The compliance function is outsourced to a third party. During the year before the reporting year KPMG which is performing internal audit for Atlant Fonder, focused on the reporting function in Atlant Fonder in general. The internal audit report concluded that reporting is performed according to regulations but could be improved through written protocol which defines the reporting routines. Such a protocol has been produced.