



# Request for Proposal

Procurement Reference: LUP 2023:1  
Procurement European Equity Funds

## Request for Proposal (RFP)

### Important information

- The Swedish Fund Selection Agency (FTN) is responsible for procuring funds for the premium pension system, which falls within the framework of the Swedish social security system. This procurement will therefore be subject to specific requirements to safeguard the interests of pension savers. As the contractual period will be long, it is important that the Fund Manager has the financial resources to develop its business over time and can fulfil all the obligations arising from this type of business.
- Tenders shall be submitted by completing this tender documentation ("Request for Proposal"), submitting the documents including attachments electronically via <e-Avrop> and providing the requested information in the Excel file "Supplementary information", Appendix 4.
- This Request for Proposal is divided into chapters corresponding to the sub-criteria within the award criteria quality and cost efficiency Procurement Guidelines section 6.11 – 6.12).
- All answers must be written in English or Swedish according to the Procurement Guidelines section 6.8. All amounts requested must be expressed in EUR. Information in other currencies shall be converted into EUR as of the information date according to the instructions in the Procurement Guidelines section 6.6.
- In order to enable an objective evaluation, all the below questions must be answered with relevant and true information. Irrelevant information will be disregarded. Where appropriate, answers must also be stated in accordance with the additional assessment criteria mentioned in each question. Incorrect or misleading information may lead to the rejection of the tender.
- The tenderer must meet all mandatory requirements and answer all questions in chapter 2. Failure to answer all applicable questions in chapters 1 and 2, and/or failure to submit all requested annexes in chapter 3, will lead to the rejection of the tender.



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## 1. Administrative information

This chapter is intended for administrative purposes and will not be part of the evaluation. The requested information must be provided.

- 1.1 Information on the Fund Manager of the Fund:  
The information must be entered in the attached Excel file  
'Supplementary information', Annex 4, under tab 'Question 1-1'

**Please complete all yellow shaded cells.**

	Information about the Fund Manager and the Fund
Name of the Fund Manager	
Registration number	
Address	
Date of incorporation	
Country of incorporation	
External auditor and name of responsible auditor	
Date of initial appointment of current external auditor	
Name of depositary	
Registration number of depositary	
Administrator of the shareholder register	
Payment reference as requested in point 6.3, Procurement Instructions (7 initials)	

*Copy the completed information from the Excel file into the box, paste as picture.*

**1.2 Information on the Investment Manager (if this is a legal entity other than the Fund Manager, see definitions in the Procurement Guidelines):**

The information must be provided in the attached Excel file "Supplementary information", Annex 4, under tab "Question 1-2".

**Please complete all yellow shaded cells.**

	Information about the Investment Manager ( if other legal entity than the Fund Manager, see the definitions in the Procurement Guidelines)
Name of Investment Manager	
Registration number	
Address	
Date of incorporation	
Country of incorporation	
External auditor and name of responsible auditor	
Date of initial appointment of current external auditor	

*Copy the completed information from the Excel file into the box, paste as picture.*

**1.3 Is the Investment Manager part of the same Group of Companies as the Fund Manager?**

YES	
NO	

(Mark the answer with an "X")

**1.4 Please provide the following general information and characteristics of the Fund (please state only facts in this table, i.e., do not comment on the answers). The information must be provided in the attached Excel file "Supplementary information", Annex 4, in tab "Question 1-4".**

*Please complete all yellow shaded cells.*

	As of 30 June 2023		As of 30 June 2023
The Fund's inception date		Relative return target per annum over a market cycle (3-5 years)	
Offered share class		Expected interval for active risk ex-post in relation to the Fund's benchmark	
ISIN for offered share class		Target information ratio during a market cycle (3-5 years)	
The Fund's Bloomberg ticker (if the information is missing, the field can be left blank)		Number of holdings normally held in the portfolio	
Are historical return data for the share class available in Morningstar Direct?		Turnover rate (calculated as the lowest of the Fund's total purchases or total sales of securities divided by average net asset value (NAV). State for the last twelve months as of 30 June 2023)	
Are historical return data for the share class or the Fund's Composite available in the eInvestments data base? If applicable, state the identification code or equivalent, otherwise leave the field blank.		The fund's transaction costs in relation to average AuM (only explicit transaction costs in basis points) during the last 12 months as of 30 June 2023	
Is the investment management delegated to a legal entity other than the Fund Manager?		The fund's transaction costs in relation to average AuM (only explicit transaction costs in basis points) during the last 36 months as of 30 June 2023	
Year the current investment team was formed		Share of NAV that is not included in the Fund's benchmark	
Total number of persons in the investment team		Maximum share of NAV that is not included in the Fund's benchmark	
Investment universe		Excess return relative the Fund's benchmark (after taxes and gross of fees) ex post 1 year	
The Fund's benchmark		Annualized excess return relative the Fund's benchmark (after taxes and gross of fees) the last three years as of 30 June 2023. If the Fund's history is shorter than three years, the field can be left blank.	
Bloomberg ticker for the Fund's benchmark		Annualized excess return relative the Fund's benchmark (after taxes and gross of fees) last five years as of 30 June 2023. If the Fund's history is shorter than five years, the field can be left blank.	
Currency for the Fund's benchmark		the minimum proportion of sustainable investments (as defined by SFDR Article 2.17) in the Fund (%)	
Is the benchmark a total return index?			
Investment process (for ex. bottom-up, top-down etc.)			
Investment strategy (for ex. Value, Growth, core, GARP etc.)			
Investment horizon			

*Copy the completed information from the Excel file into the box, paste as picture.*

## 2 Confirmations

- 2.1 The Fund Manager confirms that neither the Fund Manager nor any Investment Managers are subject to any of the exclusion grounds listed in Annex 3 (see also Chapter 7 of the Procurement Guidelines).

Confirmed	
Not confirmed	

(Mark the answer with an "X")

If the Fund Manager is unable to attest to the above, a statement must be attached containing the following information and any other relevant information of importance in assessing whether the Fund Manager or any Investment Manager can be considered subject to the grounds for exclusion:

In the case of a conviction which has become legally binding, indicate the date and reason for the judgment as well as the individual(s) convicted.

If measures ("self cleaning"), pursuant to what is described under the heading "Exceptions to exclusion in certain cases" in Annex 3 Exclusion grounds and mandatory requirements, have been taken to demonstrate the reliability of the supplier, describe what measures have been taken.

If the judgment or decision concerns taxes and social security contributions indicate;

- the date and reasons for the judgment/decision,
- the amount of unpaid taxes or social security contributions due; and
- whether the supplier has now fulfilled its obligations by paying taxes or social security contributions due, including any interest and penalties, or has entered into a binding agreement for their payment.

The Fund Manager shall, in cases where information as described above regarding convictions, etc., is provided, confirm that neither the Fund Manager nor any Investment Manager is otherwise subject to the grounds for exclusion.

Confirmed	
Not confirmed	

(Mark the answer with an "X". To be completed only if the Fund Manager can not confirm the information above.)

*Provide the requested explanation and information in the box*

- 2.2 The Fund Manager confirms that all mandatory requirements listed in Annex 3, Exclusion grounds and mandatory requirements, including those related to the Investment Manager (see Chapter 8 of the Procurement Guidelines) are met.

Confirmed	
Not confirmed	

(Mark the answer with an "X")

- 2.3 A Fund Manager may submit only one tender for a single Fund. If a Fund Manager submits multiple tenders for the same Fund, all of that Fund Manager's tenders for that Fund will be rejected. The Fund Manager confirms that only one tender is submitted per Fund.

Confirmed	
Not confirmed	

(Mark the answer with an "X")



- 2.4 If and only if the Fund Manager proceeds to an interview session, the FTN will at that time request information on historical transactions for the Fund (limited to the shorter period of last five years or since inception as of 30 June 2023). The Fund Manager will submit the transactions. The transactions will be requested four to six weeks before the interview is due to take place. The information is needed to conduct in-depth analyses to verify the investment philosophy and investment process. Confirm that this requirement can be met. An Excel-file showing the information that will be collected is provided in “Template for transaction”, Annex 5.

Confirmed	
Not confirmed	

(Mark the answer with an "X")

- 2.5 Please confirm that the information submitted in this tender is accurate and true.

Confirmed	
Not confirmed	

(Mark the answer with an "X")

- 2.6 The tender must be signed, by an authorised representative of the tenderer, with a personal signature and name clarification, in Annex 7 – Signature of the tender. The signed annex must be scanned and attached to the tender electronically. The original is kept by the tenderer and must be presented at the request of FTN.

Confirmed	
Not confirmed	

(Mark the answer with an "X")

### 3 Supplementary documents

It is a mandatory requirement to provide the documents and information requested in this chapter. This chapter is not part of the evaluation. If these documents are not provided, the tender will be rejected, with the exception to question 3.18 regarding confidentiality which is optional to answer.

- 3.1 Attach the Fund Manager's two most recent approved annual reports as PDF files labelled, e.g., as follows: "NAME OF FUND MANAGER\_YYYY\_Annual Report.pdf".
- 3.2 Provide a register of all direct owners of the Fund Manager and, where applicable, the Investment Manager, controlling one (1) per cent or more of the shares or voting rights (five (5) per cent if the Fund Manager or Investment Manager are listed companies). Indicate for each owner their share interest and votes.  
Submit the register as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Register\_of\_direct\_owners.pdf"
- 3.3 Provide a register of all indirect owners of the Fund Manager and, where applicable, the Investment Manager, controlling one (1) per cent or more of the shares or voting rights (five (5) per cent if the Fund Manager or Investment Manager are listed companies ). Indicate for each owner their indirect share interest and votes.  
Submit the register as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Register\_of\_indirect\_owners.pdf"
- 3.4 Provide information on and describe, where applicable, any existing shareholder agreements or other arrangements that may change the ownership structure, control or voting rights as described in the answers to items 3.4 or 3.5.

*Provide the answer in the text box*

- 3.5 Provide information on the person(s) considered the Beneficial Owners of the Fund Manager and any Investment Manager.

*Provide the answer in the text box*

- 3.6 Provide information on and describe the composition of the boards of directors of the Fund Manager and any Investment Manager, and indicate which directors are independent of the company and its owners. Describe any other engagements of the directors that risk a conflict of interest.

*Provide the answer in the text box*

- 3.7 Attach the Fund Manager's conflict-of-interest policy as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Conflicts of interest.pdf"

Attach, where applicable, the Investment Manager's conflict-of-interest policy as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Conflicts of interest\_Investment Manager.pdf"

- 3.8 Attach the Fund Manager's ethical guidelines, code of conduct or similar policy as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_CoC.pdf"

Attach, where applicable, the Investment Manager's ethical guidelines, code of conduct or other similar policy as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_CoC Investment Manager.pdf"

- 3.9 Attach an overview of the Group of Companies which the Fund Manager is part of, including a detailed schematic overview as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Corporate\_structure Fund Manager.pdf".

Attach, where applicable, an overview of the Groups of Companies which any Investment Managers is part of, including a detailed schematic overview as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Corporate\_structure Investment Manager.pdf".

- 3.10 Attach the current Fund rules of the Fund as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Fund Rules.pdf"
- 3.11 Attach the current prospectus of the Fund as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Prospectus.pdf"
- 3.12 Attach the latest annual report of the Fund as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Annual Report.pdf"
- 3.13 Attach the current PRIIPs KID for the Fund as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_PRIIPs KID.pdf"

- 3.14 List the Fund's holdings as of 30 June 2023 in the template provided in the attached Excel file "Supplementary information". Annex 4, under tab "Questions 3-14".

- 3.15 Attach a sample monthly report detailing the Fund's performance. The report should include
- Information regarding the returns of the Fund and for the Fund specified benchmark for the following periods (where applicable): 1 month, 3 months, 6 months, year to date, 1 year, 3 years, 5 years, 10

years and since inception.

- Graph showing returns since inception for the Fund and the benchmark.
- Table with key figures over three years (alpha, beta, Sharpe ratio, information ratio, tracking error and volatility).
- Specification of the ten largest holdings, the ten largest positive contributors to the relative return and the ten largest negative contributors to the relative return.
- Allocation by sector, region and/or country.
- Allocation in relation to the Fund's stated benchmark for industry, region and/or country.

Provide the example as a PDF file labelled, e.g., as follows:

"NAME OF FUND MANAGER\_Monthly report.pdf"

**3.16 Attach a sample quarterly report for the Fund.**

The report should contain the same information as the monthly report above, in addition to:

- Comment from the responsible Portfolio Manager.
- Attribution analysis (e.g., Brinson-Faschler) by sector, country and/or region.
- Risk contribution analysis by sector, country and/or region.

Provide the example as a PDF file labelled, e.g., as follows:

"NAME OF FUND MANAGER\_Quarterly report.pdf"

**3.17 Attach a sample of the Fund's annual sustainability report.**

The report should include, as a minimum, information on the Principal Adverse Impact (PAI) pursuant to SFDR

- Information on guidelines for the identification of PAIs and prioritisation between different sustainability factors
- Description and status of the 14 mandatory and the two optional PAI indicators (including historically where possible)
- Actions taken or planned to address these PAIs
- A description of processes in place to analyse PAIs

Provide the example as a PDF file labelled, e.g., as follows:

"NAME OF FUND MANAGER\_Sustainability report.pdf"

- 3.18 Attach an annex, specifying what information in the tender the Fund Manager considers confidential describing, for each piece of information how the Fund Manager would be harmed if the information were to be disclosed, as a PDF file labelled, e.g., as follows: "NAME OF FUND MANAGER\_Confidentiality.pdf", or alternatively reply here (Note: if the Fund Manager does not consider any information to be confidential, please indicate this):

Specify what information in the tender the Fund Manager considers confidential.	For each piece of information, describe how the Fund Manager would suffer damage if the information were to be disclosed.

## 4 The Fund Manager

Part of the award criterion 'fund quality' <7.5%>

Questions 4.4, 4.7 and 4.12 are of particular importance and have weights in the range of 0.68% – 0.98% each, i.e., 2.04% – 2.94% jointly. The other questions have equal weight and a total within the range of 4.56% – 5.46%, depending on the final weight given to question 4.4, 4.7 and 4.12.

This section includes questions where the Fund Manager must provide information describing its business, history, organisation, financial ratios and client base.

Based on the responses, FTN will evaluate the Fund Manager's capacity, financial resources and other aspects of its organisation, including any changes thereto, specifically in relation to the premium pension platform, in order to form an opinion on the Fund Manager's expected ability to manage the Fund's assets in a way that is relevant to the procurement and which leads to the generation of good future returns.

High quality in this context is defined as a business that demonstrates financial stability over time and under various market conditions. A financially stable business has diversified income streams which are independent of

individual clients and specific investment strategies. The cost structure of the business should be flexible to ensure that financial stability is not jeopardised in any given year by poor market conditions. In addition, the Fund Manager's balance sheet should be sound to ensure adequate resources within the organisation at all times and to allow for investment in the future development of the business. High-quality talent management seeks diversity in multiple dimensions and strives for a corporate culture that ensures loyalty and good development opportunities for employees.

A high quality fund is provided by a reputable fund manager that fulfils its obligations and the requirements of the law and of supervisory authorities. The evaluation will assess the existence of interventions and sanctions, the severity of any breaches, and the measures taken and how the incidents were managed to prevent future incidents.

A Fund Manager that intends to offer a fund on the fund platform must manage fund assets in an exemplary manner in terms of sustainability. A prerequisite for meeting these legal requirements, and the terms of the Fund Agreement, is that, to reduce financial risks and to seize investment opportunities, the organisation integrates sustainability in each step of the investment activities.

- 4.1 Describe the history of the Fund Manager, starting with the year the Fund Manager was established. Describe main events in the history of the Fund Manager.

*Provide the answer in the text box*

- 4.2 Has the Group of Companies which the Fund Manager is part of changed in the last five years? Describe the background to any changes. Are there any upcoming changes to the Group of Companies that are approved and communicated?

*Provide the answer in the text box*

**4.3 Does the Fund Manager or any Related Party offer services other than asset management?**

No gives 4 points. Points are deducted if the other services are deemed likely to lead to conflicts of interest or otherwise adversely affect the Fund or the unitholders.

YES	
NO	

(Mark the answer with an "X")

If yes, describe the other services. The answer should include the type of services and which company in the Group of Companies that operates the business.

*Provide the answer in the text box*

**4.4 Describe the internal guidelines on how the Fund Manager, and where applicable the Investment Manager, identifies, handles and monitors conflicts of interest.**

*Provide the answer in the text box*



- 4.5 If the Fund Manager proceeds to an interview meeting, FTN will request a list of the Fund Manager's, and where applicable the Investment Manager's, identified conflicts of interest and how they are addressed. Can this requirement be met?

YES (4 pts)	
NO (1 pts)	

(Mark the answer with an "X")

- 4.6 Describe which climate or other sustainability targets the Fund Manager has set for its own operations?

The description must include the sustainability areas and risks (e.g., climate, equality, inclusion) for which targets have been set for the organisation and what motivated the targets, what the targets and any sub-targets are, the type of activities undertaken to achieve the objectives and how they are monitored, and how this work is reflected in the analysis of the return potential of the Fund's investments.

*Provide the answer in the text box*

4.7 Provide the following financial information for the Fund Manager for the last five annual financial statements, or if the Fund Manager has not been operating for such a period, the financial information for the annual accounts available. If the financial year is not identical with the calendar year, enter the information in the column in which the financial year ends.

The information must be stated in the provided Excel file "Supplementary information", Annex 4, under tab "Question 4-7".

**Please complete all yellow shaded cells. Please pay attention to the correct currency according to the Procurement Guidelines and Tender Documentation.**

	2018	2019	2020	2021	2022	Change 2018 - 2022 (%)
EBITDA						N/A
Net profit						N/A
Total assets						N/A
Total liabilities						N/A
Personnel costs						N/A
Total number of employees						N/A

l million EUR

*Copy the completed information from the Excel file into the box, paste as picture.*

4.8 Indicate the Fund Manager's three largest strategies as a proportion of AuM. Assessment of the responses will be related to the Fund Manager's business and financial stability.

The information must be stated in the provided Excel file "Supplementary information", under tab "Question 4-8".



**Please complete all yellow shaded cells.**

	AuM (mEUR)	Share of AuM (%)
Largest strategy		
Second largest strategy		
Third largest strategy		

*Copy the completed information from the Excel file into the box, paste as picture.*

4.9 Fill in the table below for the Fund Manager's AuM and number of Accounts. Enter the AuM in EUR million. In assessing the question, emphasis will be placed on development of AuM and the number of Accounts over time. The information on the number of Accounts is important to assess the amount of administrative work resulting from a growth in AuM. The share of AuM from Associated Companies and the other questions relate to the general and financial stability of the organisation.

The information must be stated in the provided Excel file "Supplementary information", Annex 4, under tab "Question 4-9".

Please complete all yellow shaded cells. Please pay attention to the correct currency according to the procurement Guidelines and Tender Documentation. If the Fund Manager as of 30 June 2023 has been active for less than five years, enter the information for the period the Fund Manager has been active. Fill in all fields.

	31 December 2019	31 December 2020	31 December 2021	31 December 2022	30 June 2023	Change 31 December 2019 to 30 June 2023 (%)
Total AuM (mEUR)						N/A
Total number of Accounts						N/A
Total AuM from Related companies (mEUR)						N/A
Total number of Accounts from Related companies						N/A
Share of AuM from Related companies	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	
Share of Accounts belonging to Related companies	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	

Copy the completed information from the Excel file into the box, paste as picture.

- 4.10 Provide the size of the Fund Manager's three largest Accounts as of 30 June 2023.  
The information must be stated in the provided Excel file "Supplementary information", Annex 4, under tab "Question 4-10".

Please complete all yellow shaded cells.

	AuM (mEUR)	Share of AuM (%)	Type of client
Largest Account			
Second largest Account			
Third largest Account			

Copy the completed information from the Excel file into the box, paste as picture.

- 4.11 Fill in the table below for the Fund Manager's AuM. As for increases and decreases in assets under management, these figures should only refer to inflows and outflows of capital.  
The information must be stated in the provided Excel file "Supplementary information", Annex 4, under tab "Question 4-11".

Please complete all yellow shaded cells. Please pay attention to the correct currency according to the Procurement Guidelines and Tender Documentation. Fill in all fields.

	Institutional clients (Segregated)	Institutional clients (funds)	Distribution via platforms	Own Distribution (funds)	Total
Number of Accounts					0,0
AuM (mEUR)					0,0
Share of total number of Accounts (%) (30 June 2023)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Share of total AuM (%) (30 June 2023)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Number of new Accounts during the last 12 months as of 30 June 2023					0,0
Inflow of AuM during the last 12 months as of 30 June 2023 (mEUR)					0,0
Number of closed Accounts during the last 12 months as of 30 June 2023					0,0
Outflow of AuM during the last 12 months as of 30 June 2023 (mEUR)					0,0
Number of new Accounts during the last 36 months as of 30 June 2023					0,0
Inflow of AuM during the last 36 months as of 30 June 2023 (mEUR)					0,0
Number of closed Accounts during the last 36 months as of 30 June 2023					0,0
Outflow of AuM during the last 36 months as of 30 June 2023 (mEUR)					0,0
Net change number of Accounts during the last 12 months in relation to number of Accounts as of 30 June 2023 (%)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Net flow AuM during the last 12 months in relation to AuM as of 30 June 2023 (%)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Net change number of Accounts during the last 36 months in relation to number of Accounts as of 30 June 2023 (%)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Net flow AuM during the last 36 months in relation to AuM as of 30 June 2023 (%)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!

Copy the completed information from the Excel file into the box, paste as picture.

- 4.12 The Fund must be appropriate for the premium pension system. One important factor is therefore that the operations do not risk damaging confidence in the premium pension system or the interests of pension savers in general. This also applies to personal behaviour and reputation, and other similar circumstances of importance. Here and thus in addition to, the binary assessment of whether or not exclusion according to Annex 3 should take place, an assessment of such factors is made.

Therefore, please indicate whether the Fund Manager, Investment Manager, Related Party, Relevant Person (see definition in the Fund Agreement) during the last five years counting backwards from 30 June 2023 (for Fund Managers and Investment Managers the period from five years backwards to three years backwards from the mentioned date) has been subject to review or investigation resulting in an intervention, sanction from the relevant supervisory authority (e.g. the Swedish Financial Supervisory Authority or equivalent authorities abroad) or other relevant authority (e.g. the Swedish Tax Agency or equivalent authorities abroad). Examples may be that the Fund Manager or Relevant Persons have been subject to legal proceedings relating to regulatory, tax or business interventions, or have been subject to statutory company restructuring or have been declared bankrupt.

If so, describe the circumstances that led to the intervention, sanction or other measure and the reasons given for such measures. What changes, if any, have such measures brought about in the organisation?

*Provide the answer in the text box*

## 5. Investment management

Share of award criterion 'fund quality' <7.5%>

Questions 5.3, 5.6 and 5.11 are of particular importance and have weights in the range of 0.75% – 1.05% each, i.e., 2.25% – 3.15% jointly. The other questions have equal weight and a total within the range of 4.35% – 5.25%, depending on the final weight given to questions 5.3, 5.6 and 5.11.

This section contains questions related to the Fund's asset management. If the Fund Manager has delegated asset management to another legal entity (Investment Manager), the questions must be answered with regard to the operations of that entity.

This section includes questions about the Fund Manager's human resources and the environment in which they operate. The questions cover organisation, Key Employees, responsibilities, HR policies, diversity and culture.

Based on the responses provided, FTN will evaluate the Fund Manager's ability to attract and retain talent and ensure that they have the knowledge and skills required to generate good risk-adjusted returns in relation to the described investment philosophy and investment process.

A Fund Manager demonstrates good ability to deliver a high quality fund by:

- Credibly demonstrating a stable organisation with sound business principles.
- Presenting adequate resources, whether internal or third-party considering the scope of the business.
- Having access to resources with the skills required for the assignment
- Describing an organisation characterised by stability and foresight regarding skills supply over time.
- Adopting a remuneration policy or equivalent that ensures employee loyalty and that the interests of the Fund's unitholders are safeguarded.
- Actively aiming for the elimination of unjustified gender pay gap.

The information provided will be used to assess both the capacity and ability of the Fund Manager to provide high-quality management of the Fund.



- 5.1 Describe the Fund's performance over time, starting from the year the Fund was launched. Describe all significant events, such as changes in investment policy, changes in investment team, Investment Manager or jurisdiction and any mergers the Fund has been involved in.

*Provide the answer in the text box*

- 5.2 Describe the history of the Fund's responsible investment team or equivalent. When the team was formed, important events during the last five years or, if the Fund is less than five years old, since inception, and any organisational changes affecting the composition of the team.  
Fill in the table in the Excel file "Supplementary information", Annex 4, in the tab "Question 5-2 Joined" and the tab "Question 5-2 Left" with information on the persons who have joined and left the investment team as of 30 June 2023.

*Provide the answer in the text box*



*Please complete all yellow shaded cells. If no people have joined in the last five*

Year of employment	Name	Responsibility	Former employer

*Copy the completed information from the Excel file into the box, paste as picture.*



*Please complete all yellow shaded cells. If no*

Year the person left	Name	Responsibility	Year of employment

*Copy the completed information from the Excel file into the box, paste as picture.*



Attach an organisation chart for the asset management entity and indicate the investment team responsible for the Fund.

Label the file, e.g.: "NAME OF FUND MANAGER\_organisation chart.pdf".

5.3 Fill in the table using the tab "Question 5-3" in the attached Excel file "Supplementary information", Annex 4. When assessing the information in the table, the number of employees with different specialist expertise will be evaluated in the light of the Investment Manager's business and organisation. Third-party resources will also be considered in the evaluation.

Please complete all yellow shaded cells.

	Current number of full-time employees	Available third-party resources (number of full-time employees)	Total work experience (years)	Number of new hires (last 3 years)	Number of leavers (last 3 years)	Turnover	Change
<b>The Fund manager</b>							
Portfolio Managers							
Analysts							
Trading							
Strategists and macroeconomists							
Sustainability							
Legal (incl. Tax)							
Administration and accounting							
Investment monitoring and risk management							
Regulatory compliance							
AML							
Other							
<b>The Investment team</b>							
Portfolio Managers							
Analysts							
Trading							
Strategists and macroeconomists							
Sustainability							
Other							

Copy the completed information from the Excel file into the box, paste as picture.

5.4 For each member of the Fund's investment team, list all other responsibilities (e.g., other investment assignments, marketing or administration) that the person has. Indicate the estimated time spent on these assignments, and the year in which the member received each specific responsibility.

*Provide the answer in the text box*

5.5 Provide curricula vitae (CV) for the following persons:  
a) Head of the Fund's investment team or equivalent position  
b) Responsible portfolio manager of the Fund  
c) Deputy to the responsible portfolio manager

Provide CV including relevant education and work experience, as a PDF file labelled, e.g., as follows:

"NAME OF FUND MANAGER\_CV.pdf".

*Provide the answer in the text box*

**5.6 Does the Fund Manager and, where applicable, the Investment Manager, have a succession plan for both the day-to-day management of the Fund's capital as well as for Key Employees? Describe this plan.**

*Provide the answer in the text box*

**5.7 Describe the recruitment process of the Fund Manager and, where applicable, the Investment Manager. Include the following information in your answer.**

- a) Equal career opportunities and diversity initiatives.
- b) Checks/background checks of Key Employees.

*Provide the answer in the text box*

**5.8 Describe the corporate culture that characterises the Fund Manager and, where applicable, the Investment Manager. The description should cover**

- a) This culture's importance to the business;
- b) How the Fund Manager and, where applicable, the Investment Manager, are committed to developing the corporate culture; and

- c) Beyond incentive programmes, how is employee loyalty ensured?

*Provide the answer in the text box*

- 5.9 Is the gender pay gap in the organisation measured? Describe the results as well as any efforts to reduce any differences.

The information should be provided on a general basis, without personal data.

*Provide the answer in the text box*

- 5.10 Describe the internal and external expertise associated with the Fund in terms of sustainable investments and related research on financial risks and investment opportunities. Also describe how internal skill development is continuously ensured and the evaluation process regarding external expertise.

*Provide the answer in the text box*

- 5.11 Describe the remuneration policy of the investment team.
- Total remuneration and what it consists of (fixed and any variable remuneration according to jurisdiction, any employee share-option programme)
  - The basis of the fixed remuneration and how it is determined (e.g., organisational responsibilities, professional experience, contribution to the achievement of business strategies, objectives, organisational values, etc.)
  - The basis of the variable remuneration and how it is determined (e.g., return relative to index, cap on the variable remuneration, evaluation period, discretionary interest, etc.)
  - The structure of the remuneration programme including the lock-up period
  - Requirement to invest variable remuneration in the Fund
  - Clawback of variable remuneration in the event of mismanagement, breach of rules, etc.

*Provide the answer in the text box*

## 6. The Fund

Part of the award criterion 'fund quality' <4.5%>

Question 6.10 is of particular importance and has a weight in the range of 0.45% – 0.63%. The other questions have equal weight and a total within the range of 3.87% – 4.05%, depending on the final weight given to question 6.10.

In this section, the Fund Manager shall provide information on the general characteristics and performance of the Fund by describing:

- the sustainability factors promoted in the Fund and outline any sustainability objectives
- what the customer base looks like
- any capital flows to and from the Strategy

- the set up around securities lending, participation in issuance of securities and IPOs, and
- how liquidity and any capacity constraints are managed.

Based on the answers provided, FTN will assess the Fund Manager's expertise in and preparedness for sustainability challenges and risks, the stability of the Fund Manager's operations in relation to the Fund and any capacity constraints and that the Fund can fulfil the daily-trading requirement without any noticeable market impact. FTN will evaluate the answers related to securities lending and activities related to issuance of securities and IPOs to, among others, assess the Fund Manager's ability to handle potential situations of conflict of interest.

A high quality fund is characterised by the presence of:

- identified sustainability factors that are relevant to the Fund's investments in terms of risk and returns and where activities are specified to promote identified sustainability factors or set sustainability goals
- a broad and well-diversified customer base as the basis for a stable business
- plans for the management of any capacity constraints well in advance
- processes and procedures for securities lending, stock issues and IPOs to ensure that the interests of savers are met in the best possible way, and
- appropriate liquidity tools in place in accordance with applicable legislation to ensure the best interests of unitholders are safeguarded

#### 6.1 What sustainability factors does the investments in the Fund promote?

The description must demonstrate, among other things, which sustainability areas (e.g., climate, equality, biodiversity) are being promoted or for which targets have been set. Describe any targets and sub-targets and what activities are being undertaken to promote sustainability factors or achieve the sustainability targets that have been set and how progress is monitored.

*Provide the answer in the text box*



6.2 Fill in the table with information on Accounts and AuM within the Strategy where the Fund is included as of 30 June 2023. In platforms, accounts include, e.g., the Swedish Pensions Agency. The information must be stated in the provided Excel file "Supplementary information", Annex 4, under tab "Question 6-2".

Please complete all yellow shaded cells. Please pay attention to the correct currency according to the procurement Guidelines and Tender Documentation.

	Institutional clients (Segregated)	Institutional clients (funds)	Distribution via platforms	Own distribution (funds)	Total
Total number of Accounts					0,0
AuM (mEUR)					0,0
Share of total number of Accounts (%) (30 June 2023)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Share of total AuM (%) (30 June 2023)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Number of new Accounts the last 12 months as of 30 June 2023					0,0
Inflow of AuM the last 12 months as of 30 June 2023 (mEUR)					0,0
Number of closed Accounts the last 12 months as of 30 June 2023					0,0
Outflow of AuM the last 12 months as of 30 June 2023 (mEUR)					0,0
Number of new Accounts the last 36 months as of 30 June 2023					0,0
Inflow of AuM the last 36 months as of 30 June 2023 (mEUR)					0,0
Number of closed Accounts the last 36 months as of 30 June 2023					0,0
Outflow of AuM the last 36 months as of 30 June 2023 (mEUR)					0,0
Net change number of Accounts the last 12 months in relation to number of Accounts	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Net flow AuM the last 12 months in relation to AuM 30 June 2023 (%)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Net change Number of Accounts the last 36 months in relation to number of Accounts	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!
Net flow AuM the last 36 months in relation to AuM as of 30 June 2023 (%)	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!

Copy the completed information from the Excel file into the box, paste as picture.

**6.3 Describe in detail any capacity constraints in the Fund and how they are managed.**

*Provide the answer in the text box*

**6.4 Complete the table below for AuM and number of Accounts within the Strategy.**

The information must be stated in the provided Excel file "Supplementary information", Annex 4, under tab "Question 6-4".

*Please complete all yellow shaded cells. Please pay attention to the correct currency according to the Procurement Guidelines and Tender Documentation. If the Strategy has existed less than five years, fill in the information for the period that the Strategy existed. Fill in all fields where*

	31 December 2019	31 December 2020	31 December 2021	31 December 2022	30 June 2023	Change 31 December 2019 to 30 June 2023 (%)
<b>Total AuM (mEUR)</b>						N/A
<b>Total number of Accounts</b>						N/A
<b>Total AuM from Related companies (mEUR)</b>						N/A
<b>Total number of Accounts from Related companies</b>						N/A
<b>Share of AuM from Related companies</b>	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	
<b>Share of Accounts belonging to Related companies</b>	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	#DIVISION/0!	

*Copy the completed information from the Excel file into the box, paste as picture.*

6.5 Indicate separately the size of each of the Fund manager's three largest accounts invested in the Fund.

The information must be stated in the provided Excel file "Supplementary information", Annex 4 under tab "Question 6-5".

*Please complete all yellow shaded cells.*

	AuM (mEUR)	Share of AuM (%)	Type of client
Largest Account			
Second largest Account			
Third largest Account			

*Copy the completed information from the Excel file into the box, paste as picture.*

6.6 Does the Fund engage in securities lending? If so, please answer the questions below; if not, please elaborate.

- Does the Fund use a Related Party for the management of securities lending?
- What limits are set on securities lending (as a percentage of the Fund's NAV)?
- What proportion of the NAV is normally lent out?
- How many holdings are normally, wholly or in part, lent out?
- Does the Fund always buy back shares before general meetings?
- Enter the Fund's total income from securities lending as a percentage of average NAV in the last financial year
- What proportion of total income from securities lending accrues to the Fund?
- What proportion of the total income from securities lending from the Fund accrues to the Fund Manager and Related Party respectively?

*Provide the answer in the text box*

**6.7 Does the Fund participate in issuance of securities and IPOs? If so, please answer the questions below; if not, please elaborate.**

- How many issuances of securities and IPOs has the Fund participated in during the last three calendar years?
- How much did those contribute to the Funds return per calendar year?
- For how many of these IPOs was a company within the Fund Manager's Group of Companies an advisor or issuer agent?

*Provide the answer in the text box*

**6.8 Does the Fund Manager use any liquidity tools available in the jurisdiction in which the Fund is registered?**

The information must be provided in the attached Excel file

"Supplementary information", Annex 4, under tab "Question 6-8".

*Please complete all yellow shaded cells.*

	Yes/No	Maximal adjustment factor/ fee
Adjusted fund unit value (partially)		
Adjusted fund unit value (in full)		
Fees for dilution protection (Anti-Dilution Levy)		
Redemption gates		Not applicable
Discretionary redemption fee		
Other		

*Copy the completed information from the Excel file into the box, paste as picture.*

**6.9 Provide a general overview of the Fund's liquidity in terms of potential challenges in managing inflows and outflows of capital. Include perceived and potential situations where liquidity constrains daily management of the Fund.**

*Provide the answer in the text box*

- 6.10 Describe how the Fund Manager monitors and manages liquidity aspects related to the Fund. Describe:
- the market analyses and information channels used to monitor the liquidity in the market
  - how the liquidity of the Fund's holdings is monitored
  - the types of stress tests that are applied
  - how an illiquidity incident is handled (provide, if available, a specific example)
  - how contributions to and redemptions from the Fund are handled
  - how the Fund Manager avoids causing market impact
  - if any problems with liquidity and market effects are to be expected in relation to the size of the Fund
  - if the Fund Manager has introduced s redemption of units in the Fund in the last five years. If so, please elaborate

*Provide the answer in the text box*

## 7. Investment philosophy and process

Part of the award criterion 'fund quality' <22.5%>

Questions 7.1, 7.6, 7.10 and 7.12 are of particular importance and have weights in the range of 1.58% – 2.25% each, i.e., 6.32% – 9.00% jointly. The other questions have equal weight and a total within the range of 13.50% – 16.18%, depending on the final weight given to questions 7.1, 7.6, 7.10 and 7.12.

This section includes questions where the Fund Manager must describe the investment philosophy, the investment process, the decision making procedure and delegation, responsibilities of team members and the integration of sustainability factors in financial analysis.

FTN will assess to what extent the characteristics of the Fund Manager's investment philosophy is expected to add value for unitholders. The answers in this section will also be the base for evaluating how the design of the investment process aligns with the investment philosophy.

A high-quality fund is managed according to an investment philosophy that is well grounded in academic financial theory. The characteristics resulting from the investment philosophy are verifiable through observable data and presumably result in competitive advantages.

A high-quality fund has an investment process that clearly demonstrate discipline, repeatability, predictability and integration of sustainability factors, through among other things, clear responsibilities and delegation. A high-quality fund has clearly defined decision-making processes.

The Fund Managers shall also have the ability to manage the Fund's assets in accordance with the objectives and constraints set out in the investment guidelines and monitor, manage and report the financial risks.

A high-quality fund has procedures and processes in place to identify and assess material sustainability risks and business opportunities related to sustainability in the businesses in which the Fund invests. These procedures and processes must also be integrated with the Fund's investment and active ownership processes. A high-quality fund also has procedures and processes in place to identify and assess whether businesses, existing or potential investments in the Fund, are associated with violations of any of the ten principles of the Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs). The Fund also has procedures, processes and an escalation process in place to act in its capacity as an investor in case of identified violations in the Fund's investments.

In addition, FTN will evaluate the consistency between the information provided in the answers and the information provided in the answers in section 6.

**7.1 Describe in detail the investment philosophy currently applied in the management of the Fund. Why is the investment philosophy expected to generate added value for unitholders?**

*Provide the answer in the text box*

7.2 Have there been any changes, major or minor, in the last five years up until 30 June 2023 (or since inception, if the Fund is less than five years as of 30 June 2023) to the investment philosophy as described in 7.1? If so, please explain in greater detail the reason for the changes. Major changes impact the characteristics of the Fund, e.g., its expected return and risk profile in various market conditions. Minor changes are adjustments to adapt the philosophy to new circumstances.

*Provide the answer in the text box*

7.3 Describe the procedures and processes used by the Fund Manager to:

- identify and assess whether businesses, existing or potential investments in the Fund, are associated with violations of any of the ten principles of the Global Compact, the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights (UNGPs).
- act in their capacity as investors in the event of identified violations among the Fund's investments, including what the escalation process looks like and what is required for businesses to be excluded on these grounds, and
- where third-party data or analysis is used in the above steps, describe the process and criteria for evaluating the provider and controls of the quality of the analysis performed. Describe how third-party data and analyses are used.



*Provide the answer in the text box*

**7.4 Describe how conclusions from the screening carried out for violations of international norms and standards (norm-based screening) are made available to the Portfolio manager and integrated into the Portfolio Manager's investment decisions. Describe whether, and how, the Fund Manager will make the information available to FTN.**

*Provide the answer in the text box*

**7.5 Describe the procedures and processes used by the Fund Manager to:**

- identify whether the businesses in which the Fund invests are taking actions in line with the Paris Agreement climate goals, and
- where third-party data or analysis is used in the above steps, describe the process and criteria for evaluating the provider and what quality-assurance measures are applied to the analysis performed. Describe how third-party data and analyses are used.

**Describe how the conclusions of the analysis performed are made available to the Portfolio Manager and integrated into the Portfolio Manager's investment decisions. Describe whether, and how, the Fund Manager will make the information available to FTN.**

*Provide the answer in the text box*

7.6 Describe in detail the investment process (provide process chart showing, step by step, the investment process of the Fund). Describe the following areas:

- idea generation
- research
- portfolio construction
- implementation
- how decisions are made at each stage of the process and by whom.

Submit the process chart in a PDF file labelled, e.g., as follows:

"NAME OF FUND MANAGER\_\_Process.pdf"

The answer will be evaluated and the reliability of the answers will be assessed using quantitative analyses based on the holdings and return series attached in the Excel file "Supplementary information", Annex 4.

*Provide the answer in the text box*

7.7 Indicate the relative importance of the following factors in generating added value in the last three years retrospectively from 30 June 2023. If the Fund is less than three years old, provide the corresponding information for the time period since inception of the Fund. The evaluation will assess the answers in relation to the answers on the investment philosophy and investment process.

The information must be stated in the provided Excel file "Supplementary information", Annex 4 tab ", under tab Question 7-7".



**Please complete all yellow shaded cells.**

	Share of total (%)
Stock selection	
Sector allocation	
Geographic allocation	
Currency	
Cash allocation	
Other (specify below)	
<b>Total (should add up to 100%)</b>	<b>CHECK SUM</b>
Specification of other	

*Copy the completed information from the Excel file into the box, paste as picture.*

**7.8 Under what market conditions is the Fund's investment process expected to perform well? Describe why and when it can be expected to outperform or to underperform its benchmark. The evaluation will assess the answers in relation to the answers regarding investment philosophy and investment process, assessing the predictability of the outcome of the investment activities.**

*Provide the answer in the text box*

**7.9** Is any part of the investment process delegated to third parties, such as parts of the research? Describe which parts and to whom or to which companies. Describe the review process that precedes such a delegation. If third-party data or analysis is used in this work, describe the process and criteria for evaluating the provider and what quality-assurance measures are applied to the analysis performed. Describe how third-party data and analyses are used.

*Provide the answer in the text box*

**7.10** Describe the buy and sell discipline in place to execute the investment decisions of the Fund. Higher points are awarded for descriptions which include a rationale for why a particular buy and sell discipline has been implemented as well as detailing how this discipline is realised in practice. The absence of a buy and sell discipline, or the failure to describe it, receives lower points in the assessment of the answer to this question.

*Provide the answer in the text box*

**7.11 Under what circumstances can the Fund Manager deviate from its buy and sell discipline? Has the Fund Manager ever deviated? If so, please describe.**

*Provide the answer in the text box*

**7.12 Describe how financial risk management is integrated into the Fund's investment process, the systems and methods used.**

*Provide the answer in the text box*

**7.13 How does the Portfolio Manager consider and integrate sustainability factors in its decision-making? Describe how the investment team identifies and manages material sustainability-related risks and opportunities in the fund's investment process and portfolio management. Provide some examples of how sustainability aspects have influenced investment decisions.**

*Provide the answer in the text box*

- 7.14** What sustainability data, systems and information does the Fund Manager use and for what purpose(s)? If data, systems or information from third parties is used, describe how this information is used.

*Provide the answer in the text box*

- 7.15** Describe the Fund Manager's active ownership process. Describe how company dialogues are conducted before, during and after the investment.

*Provide the answer in the text box*

- 7.16** Describe the Fund Manager's process for voting at general meetings. Comment on whether voting guidelines are public, whether the Fund Manager votes by proxy and whether best practices in local markets are taken into account. How and when are the results of the proxy voting reported, and to whom?

*Provide the answer in the text box*



## 8. Portfolio construction

Part of the award criterion 'fund quality' <3.0%>

Question 8.4 is of particular importance and has a weight in the range of 0.75% – 0.90%. The other questions have equal weight and a total within the range of 2.10% – 2.25%, depending on the final weight given to question 8.4.

This section includes questions asking the Fund Manager to describe its ability to implement the investment philosophy and process into a portfolio. The Fund Manager shall also describe the investment universe, the holdings and financial instruments used, deviations from the benchmark, investment guidelines, risk budgeting and liquidity management.

Based on the answers, FTN will assess the Fund Manager's ability to construct a well-structured portfolio based on the investment process in the areas listed in the previous section. The Fund Manager should be able to demonstrate that it can effectively generate good risk-adjusted returns under the given conditions and circumstances, and without using unnecessarily complex instruments.

A high-quality fund is a fund that exhibits a portfolio with characteristics in line with the investment philosophy and process described above. Furthermore, higher points will be awarded to tenderers with clear and transparent risk budgeting processes and liquidity management.

### 8.1 What types of financial instruments are used in the Fund?

If the Fund invests in other securities than equities, indicate the purpose and scope.

*Provide the answer in the text box*

8.2 Fill in the table with information on the active share in the Fund. Active share is calculated as the sum of the absolute difference between the weight of a holding in the portfolio and the weight in its benchmark.

The information must be stated in the provided Excel file "Supplementary information", Annex 4 tab "Question 8-2".

**Please complete all yellow shaded cells. Please fill in the information as of the date specified below, the extent that the Fund has been active.**

	30 June 2023	31 December 2022	31 December 2021	31 December 2020	31 December 2019
Active share (%)					

*Copy the completed information from the Excel file into the box, paste as picture.*

8.3 Describe restrictions on and limitations to the Fund's portfolio construction regarding, e.g., how much is invested in a particular region, country, industry, economic activity, currency or company? If there are no restrictions, explain why.

*Provide the answer in the text box*



**8.4 Describe in detail the risk–budgeting process and the risk model applied to the portfolio construction.**

*Provide the answer in the text box*

## 9. Implementation

Part of the award criterion ‘fund quality’ <6.0%>

Questions 9.5, 9.8 and 9.9 are of particular importance and have weights in the range of 0.60% – 0.78% each, i.e., 1.80%–2.34% jointly. The other questions have equal weight and a total within the range of 3.66% – 4.20%, depending on the final weight given to questions 9.5, 9.8 and 9.9.

This section covers securities transactions, how best price and lowest possible transaction risks are achieved, in which markets the Fund Manager executes transactions and with which counterparties.

FTN will evaluate the Fund Manager's ability to buy and sell securities in a qualitative, safe and cost–efficient manner based on analysis of the responses provided.

High quality is defined in this context as the ability to execute portfolio transactions on relevant trading venues at market prices, with low transaction costs and minimal market impact, and the existence of robust, transparent and well–documented processes for the execution of these transactions.

9.1 Describe the organisation and process to execute the Fund's portfolio transactions based on the following:

- The process from the Portfolio Manager's allocation decision through the execution of the transaction in the market.
- Transaction management systems
- The division of responsibilities between any trading desk and the Portfolio Manager, and the evaluation of the trading desk where it exists
- The proportion of transactions carried out by the Portfolio Manager itself, as a proportion of the number and amount of transactions respectively.

*Provide the answer in the text box*

9.2 Describe the Fund Manager's process for best execution of orders and portfolio transactions.

- How are executed transactions monitored in terms of best execution?
- How is best execution reported?
- Which organisational role is responsible for monitoring and controlling best execution?

*Provide the answer in the text box*

9.3 On which markets are portfolio transactions carried out?

*Provide the answer in the text box*

**9.4 Describe the process and criteria for selecting and evaluating the brokers or equivalent used for the Fund's transaction processing.**

*Provide the answer in the text box*

**9.5 Do you execute any portfolio transactions on behalf of the Fund with any Related Party?**

If so, describe with which company and to what extent this takes place, both as a proportion of the Fund's transaction volume (percentage of amount) and as a proportion of brokerage fees and charges.

*Provide the answer in the text box*

**9.6 Describe how portfolio transactions are allocated between the different funds and mandates under management. Is the allocation determined before or after placing the order? Describe the internal transaction allocation policy.**

*Provide the answer in the text box*

**9.7 Describe the current policy for cross trades with regard to:**

- Operational processing
- Pricing rules and methods
- Monitoring and control

*Provide the answer in the text box*

**9.8 How are the Fund's transaction costs forecasted, measured, reported and monitored?**

*Provide the answer in the text box*

**9.9 What were the Fund's total transaction costs, per year, in the last three calendar years (please provide explicit transaction costs in relation to AuM)?**

*Provide the answer in the text box*

- 9.10 Describe how the Fund Manager ensures that costs for research are separated from other costs, such as brokerage fees, and whether the Fund is charged with these costs.

Provide the answer in the text box

## 10. Returns

Part of the award criterion 'fund quality' <4.5%>

All questions in this chapter have equal weight.

This section considers the past performance of the Funds and Strategies and the ability of the Fund Manager to generate good risk-adjusted returns.

Based on the responses provided, FTN will evaluate the Fund Manager's ability to successfully deliver a high-quality Fund throughout the proposed investment period.

In this context, high quality means a risk-adjusted return that exceeds a relevant benchmark over time in a stable manner and under varying market conditions. A high-quality Fund demonstrates high consistency in relative returns and returns in line with expectations given the described investment philosophy and process.

Based on the answers provided, FTN will evaluate the credibility and reliability of the description of the investment philosophy and process (Section 7).

**10.1 Indicate the performance of the Fund and, if available, also a representative Composite of the Strategy**

The return must be stated before deduction of fees and calculated in EUR. Do not report simulated or hypothetical outcomes based on historical figures.

- Provide the relevant monthly performance data calculated in EUR for the Fund and, if applicable, a representative Composite of the Fund. Please submit this information using the "Question 10-1 Fund" and "Question 10-1 Composite" tabs in the attached Excel file, "Supplementary information", Annex 4. The return series should cover the entire history of the Fund and, if applicable, the Composite. If the Fund or Composite has a longer history than 10 years, the information shall be limited to the last 10 years.
- Does the provided return series represent a certified Composite? If so, indicate which certification (e.g., GIPS or equivalent)?
- Fill in the table describing the Composite in the attached Excel file, "Supplementary Information", Annex 4, under the tab "Question 10-1 Composite" (if the Fund Manager or the Investment Manager only manages one Fund in the Category or has no Composite, the table can be left blank):

*Provide the answer in the text box*

--

**10.2 Fill in the table below for the Fund or the Composite relevant to the Fund. If the track record is less than 5 years as of 30 June 2023, fill in the track record since inception.**

The information must be stated in the provided Excel file "Supplementary information", Annex 4 tab "Question 10-2".

**Please complete all yellow shaded cells. Please pay attention to the correct currency.**

Fill in the ratios since 2018-04-01 or from the	Portfolio total return (% p.a.)	Portfolio Volatility (% p.a.)	Benchmark total return (% p.a.)	Benchmark volatility (% p.a.)	Relative return (percentage points)	Active risk (tracking error) (% p.a.)
Ratios calculated from 1 July 2018 to 30 June 2023 (calculated in EUR)						
Ratios calculated since start (calculated in EUR)						

*Copy the completed information from the Excel file into the box, paste as picture.*

**10.3** Comment on the Fund's performance history for the last three (3) years as of 30 June 2023, or since inception if the Fund history is shorter than three (3) years as of 30 June 2023. Describe the outcome for each year the cases, outcomes, causes and lessons learned. Also describe how sustainability aspects have contributed to the Fund's return over the three-year period. List the investments and describe the cases, outcomes, causes and lessons learned.

The question will be evaluated in the context of process and philosophy.

*Provide the answer in the text box*

- 10.4 Describe the Fund's five best and five worst investments in terms of contribution to returns (relative to the Fund's Benchmark) in 2022. The response should include outcomes, causes and lessons learnt. The response will be evaluated in the context of investment philosophy and process.

#### EXAMPLE

"Five biggest contributors for 2022: 1. "XYZ company"; Type of business: "XYZ company" is the world's largest diversified natural resources company, with significant exposure to iron ore, oil and aluminium; Explanation : Benefited from continuous increase in commodity prices, in particular iron ore and crude oil; Outcome (contribution) : +X.X %; Lesson learnt : Limited supply (partly due to supply disruptions) and strong demand have helped keep commodity prices at a higher level for an extended period of time. This in turn has improved the performance of mining companies...".

*Provide the answer in the text box*

## 11. Control functions

Part of the award criterion 'fund quality' <16.5%>

Questions 11.3, 11.11, 11.15 and 11.17 are of particular importance and have weights in the range of 0.83% – 1.49% each, i.e., 3.32% – 5.96%. The other questions have equal weight and a total weight within the range of 10.54% – 13.18%, depending on the final weight given to questions 11.3, 11.11, 11.15 and 11.17.

This section covers the Fund Manager's control functions and organisation for managing financial and operational risks as well as its compliance and audit functions. FTN will evaluate the Fund Manager's ability to monitor and manage the risks within both the Fund and the management organisation, and to ensure compliance with the investment guidelines and other relevant provisions at all times during the term of the Fund Agreement. In this context,



quality is assessed in a comprehensive way and includes the following:

- The ability to attract and retain staff with relevant competence and experience
- Robust and secure systems and processes for compliance, monitoring, reporting and managing both financial and operational risks
- A good ability to manage the identified risks
- Information and communication technology (ICT) security procedures and processes, and a clear plan for meeting the requirements of the Regulation of the European Parliament on Digital Operational Resilience for the Financial Sector (DORA Regulation))
- An organisation with adequate staffing and a clear division of responsibilities and procedures to deal with ongoing as well as unforeseen events
- Procedures and processes that preserve the independence and authority of control functions within the organisation's second and third lines of defence, and
- Clear procedures and processes to identify and handle conflicts of interest

## Risk

11.1 Describe the methods and processes used to control the Fund's financial, operational and sustainability risks. This description should focus on how risk considerations are integrated in the management of the Fund, and how they are mitigated and reported. Describe the risk models and systems that contribute to the safety and effectiveness of risk management.

*Provide the answer in the text box*

11.2 Describe how the risk management function is organised based on the following:

- Structure and reporting lines based on the Fund Manager's overall organisation
- Number of full-time employees involved in the Fund's risk management with their respective tasks and responsibilities
- Expertise, experience and length of service of Key Employees.
- If any part of the Fund's risk control, risk management or risk reporting that is outsourced to a third party
- Division of responsibilities, both within the Fund Manager's organisation and, if applicable, between the Fund Manager and the Investment Manager

*Provide the answer in the text box*

11.3 How is the organisational independence of the risk-management function ensured?

*Provide the answer in the text box*

11.4 Describe the process for escalating risk issues.

- In which situations are risk issues escalated?
- Function or role of the final decision-maker to whom the risks are escalated, and what is the decision-making mandate (explain)?
- How are the decisions made in these situations documented?

*Provide the answer in the text box*

**11.5 What are the most important financial risk measures reported for the Fund?**

- How often are these reported?
- How are they reported and in what reporting channels (role, unit)?
- Why are these risk measures considered most important?

*Provide the answer in the text box*

**11.6 Describe the internal risk limits and investment guidelines applied to the Fund. Describe how compliance with them is ensured, when they were last amended, and why.**

*Provide the answer in the text box*

**11.7 Describe how the operational risk–management function is organised based on the following:**

- Structure and reporting lines based on the Fund Manager's overall organisation
- Number of full–time employees involved in the Fund's operational risk management with their respective tasks and responsibilities
- Expertise, experience, number and length of service of Key Employees.
- If any part of the Fund's operational risk control, risk management or risk reporting is outsourced to a third party?

*Provide the answer in the text box*

**11.8 Describe in detail your contingency and disaster plan, including:**

- Back-up solutions
- Critical systems
- How often the plans are tested
- Decision-making procedure

*Provide the answer in the text box*

**11.9 Describe systems and procedures for operational incident reporting**

*Provide the answer in the text box*

**Information and Communication Security (ICT)**

**11.10 Provide an overview of the Fund Manager's IT infrastructure including an outline of the system.**

*Provide the answer in the text box*

- 11.11** Has the Fund Manager conducted a GAP analysis to evaluate current resilience to cyber-attacks and other ICT-related risks in relation to the DORA Regulation? If so, which areas, if any, require further prioritisation and investments?

*Provide the answer in the text box*

- 11.12** How are the requirements of the DORA Regulation expected to affect the Fund Manager's, and if applicable the Investment Manager's, operations with respect to:
- Governance and risk management
  - Reporting of ICT incidents
  - ICT security testing
  - The ability of ICT providers to fulfil the requirements of the DORA Regulation

*Provide the answer in the text box*

- 11.13** Has the Fund Manager, and if applicable the Investment Manager, experienced any cyber-security incidents in the last three years? If

so, describe the incidents including actions taken, lessons learnt and, where applicable, compensation paid.

*Provide the answer in the text box*

### Compliance

- 11.14 Describe your organisation and internal process for monitoring and managing sanctions lists (EU and UN as specified in the mandatory requirements Annex 3). Describe the internal division of responsibilities in the area, which function is responsible for what?

*Provide the answer in the text box*

- 11.15 Describe the Fund Manager's compliance procedures in as much detail as possible, with respect to:
- 12. Pre- and post-trade compliance checks for the Fund
  - 13. Division of responsibilities
  - 14. System support
  - 15. Automated and manual processes

*Provide the answer in the text box*

**11.16** Which function does the chief compliance officer report to, and how often are compliance reports produced?

If the Fund Manager proceeds to the interview meeting, FTN may request a compliance report prior to the interview. Can this requirement be accommodated.

*Provide the answer in the text box*

**11.17** Describe the three most important compliance risks for the Fund and how they are managed.

*Provide the answer in the text box*

**11.18** Describe the Fund Manager's and, where applicable, the Investment Manager's whistleblowing policy or equivalent and systems and organisational arrangements. Have there been any reported cases, incidents or problems in the last three years?

*Provide the answer in the text box*

## Audit

- 11.19 Describe the ongoing work processes and reporting channels of the Fund Manager's internal audit function. How is the internal auditor appointed and by whom?

*Provide the answer in the text box*

- 11.20 Does the Fund Manager's external auditor or any other auditor provide any of the following reports?
- Report on the design and implementation of the Fund Manager's control system (e.g., ISAE 3402 or ISAE 3000 type 1)?
  - Report on the functionality and effectiveness of these control systems (e.g., ISAE 3402 or ISAE 3000 type 2)?

*Provide the answer in the text box*

## 12. Administration

Part of the award criterion 'fund quality' <3.0%>

All questions in the section have equal weight.

This section covers the administrative processes of the Fund Manager. FTN will evaluate the Fund Manager's ability to deliver a high-quality fund, with reliable valuation of assets and administrative processes compatible with the



Swedish Pension Agency's administrative requirements. (Annex B of the Fund Agreement, Fund Trading).

High quality in this context is defined as secure and robust processes with clear segregation of duties, and a correct and independently verified valuation of assets in the Fund, as well as a minimum risk for disruptions in the entire administrative workflow.

- 12.1 Describe how the Fund Manager's administrative operations are organised with details regarding responsibilities, deputies and back-up systems. Describe the most critical resources and the measures taken to minimise the operational risk that would arise if someone were unable to perform their duties.

*Provide the answer in the text box*

If possible, attach a business-support organisational chart as a PDF file labelled, e.g., as follows:

"NAME OF FUND MANAGER\_Chart Business Support.pdf".

- 12.2 Describe the entire process from order placement through the matching and confirmation of trades, preferably using a flowchart.

*Provide the answer in the text box*

If possible, attach a flowchart as a PDF file labelled, e.g., as follows:

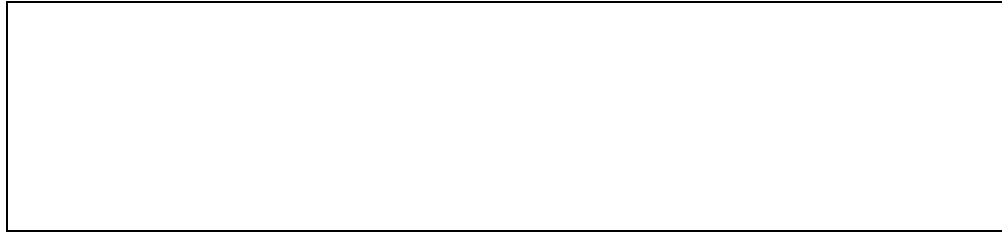
"NAME OF FUND MANAGER\_Flow\_Chart\_Transactions.pdf".

- 12.3 Describe the Fund Manager's work with the depositary appointed for the Fund. Please provide the following information about the depositary:
- The depositary's relationship with the Fund Manager (e.g., if the depositary is part of the same Group of Companies as the Fund Manager)
  - Date for the last change of depositary and the reason for the change
  - The reconciliation process between the Fund Manager's and the depositary's records of holdings and their valuation. Indicate the frequency of reconciliation and the tolerance levels applied for any differences
  - Any escalation procedures initiated by the depositary during the last three years, historically from 30 June 2023, or during the shorter period of the Fund's existence.

*Provide the answer in the text box*

- 12.4 Describe in detail the process for determining the daily NAV, including a description of how underlying securities are valued. Also describe the Fund Manager's process for third-party valuations.
- Which price sources are used and are they external or internal?
  - Are there alternative sources of asset prices if the primary price source becomes unavailable?
  - How are stale prices detected and managed?
  - Are reasonableness checks carried out before the NAV is set, and is there a formal approval process before the NAV is assessed?
  - Describe how corporate actions are taken into account in the NAV calculation
  - Describe how trades are included in the NAV calculation (e.g., are unconfirmed trades included in the calculation or only confirmed trades).

*Provide the answer in the text box*



## 13. Fees

Award criterion 'cost effectiveness' <25.0%>

Question 13.2, the price criterion, is of particular importance and has a weight of 20.0%. The remaining 5.0% is divided equally between the other questions in the chapter.

This section asks questions about the Fund's fee and cost structure. This information will form the basis for assessing the cost-effectiveness of the Fund. It is a mandatory requirement to answer question 13.1 and 13.2.

The Fund Manager must explain the management fee and the model used to collect the management fee, as well as the administrative and operational costs of the Fund as defined in the PRIIPs Regulation. FTN analyses what is included in administrative and operational costs, how often they are renegotiated and whether any compensation is paid to Related Parties.

A high-quality fund has a fee model that is transparent and appropriate to the investment policy and volume of capital invested. The Fund Manager focuses on the costs of the Fund and regularly evaluates and renegotiates the costs in order to offer pension savers the lowest possible cost.

- 13.1 The tender shall state the so-called Procured price (see price appendix – Appendix A to the Fund Agreement). The Procured price refers to the price for the fund and the relevant unit class expressed as a percentage of AuM that the Fund Manager offers in this procurement, which will be included in the Fund Agreement and thus applied in the premium pension fund platform.

The Procured price shall be based on the management fee, as well as the administrative and operational costs of the Fund in the relevant share class. The Management Costs shall include management fees and other administrative and operational costs (please note that in this procurement no performance fee may be included).

Please note that the Procured price may never be exceeded during the Contract Period. If the administration and operational costs of the Fund increase, the Fund Manager must reduce the management fee as a consequence.

The Procured price may be lower than the Fund's regular Management Costs (fees and costs charged in the rest of the market, i.e. regular Management Costs). In such a case, the difference between the regular Management Costs and the Procured Price (the price reduction) shall be paid to the Swedish Pensions Agency by the Fund Manager on a quarterly basis in accordance with the terms of the Fund Agreement (Annex A).

Provide your offered Procured price by providing the information requested in the attached Excel file "Additional Information", Annex 4, under the tab "Question 13-1". If the Management Costs are the same regardless of the amount invested (AuM), it is sufficient to answer one row. However, in the case of a model where the Management Costs vary with the amount invested, the first step down in price should be at SEK 2000 million. A maximum of five intervals may be entered.

Please complete all yellow shaded cells.

Interval	Range of AuM in SEK		Offered Procured price (Bp)	Of which management fee (Bp)	Of which administrative and operational costs (Bp)
	Minimum amount in interval (SEK)	Highest amount in interval (SEK)			
1	0	2 000 000 000	-		
2	2 000 000 001		-		
3	2 000 000 001		-		
4	2 000 000 001		-		
5	2 000 000 001	999 999 999 999	-		

Copy the completed information from the Excel file into the box, paste as picture.

13.2 In the table below, indicate the offered Procured price in the procurement in accordance with your answer to question 13.1, for the different indicated sizes of the amount invested (AuM) by the Swedish Pensions Agency. The offered price should be broken down into annual management fees and administrative and operational costs.

The information should be entered in the attached Excel file "Supplementary information", Annex 4, under the tab "Question 13-2", and copied into the box below.

The information will be evaluated and scored as set out in section 6.13 of the Procurement Guidelines.

*Please complete all yellow shaded cells.*

Investment amount (million SEK)	Weight	Offered Procured price (annual management cost) (Bp)	Of which annual management fee (Bp)	Of which annual administration and operating costs (Bp)
2 000	40%	-		
2 500	20%	-		
3 000	20%	-		
4 000	10%	-		
5 000	10%	-		
Anbud	100%	0		

*Copy the completed information from the Excel file into the box, paste as picture.*

13.3 What is included in the costs defined as administrative and operational costs under the PRIIPs Regulation? Describe which costs are fixed and which costs are variable (varies according to the AuM in the Fund)

*Provide the answer in the text box*

- 13.4 Indicate which of the costs (if any) included in the administrative or operational costs are paid to a Related Party.

*Provide the answer in the text box*

- 13.5 How often are the terms of the Fund's other administrative and operational costs renegotiated?

*Provide the answer in the text box*