

# INVESTOR INFORMATION

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Sub-fund Formuepleje Penta KL

## Responsibility for Investor Information

As the Manager of Kapitalforeningen Formuepleje Penta, we hereby declare that, to the best of our knowledge, the details of this Investor Information are correct and contain all material information that section 62 of the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.), requires to be made available to the Fund's investors.

Investor Information as of December 20<sup>th</sup>, 2021

Formuepleje A/S

Søren Astrup  
Manager

Niels B. Thuesen  
Board member

## TABLE OF CONTENTS

Responsibility for Investor Information .....	1
<b>Introduction .....</b>	<b>4</b>
<b>Name and address of the Fund.....</b>	<b>4</b>
Registration numbers of the Fund.....	4
Formation.....	4
<b>Manager of the Fund.....</b>	<b>4</b>
<b>Conflicts of interest .....</b>	<b>5</b>
<b>Object.....</b>	<b>5</b>
<b>Investors .....</b>	<b>5</b>
<b>Articles of association and annual reports.....</b>	<b>6</b>
Financial calendar.....	6
Assets .....	6
Sub-funds .....	6
<b>Formuepleje Penta KL .....</b>	<b>7</b>
Investor profile/The typical investor in the Sub-fund .....	7
Investment policy, strategy and investment area .....	8
Securities Financing Transactions .....	8
Risk policy.....	9
Risk factors .....	9
The Sub-fund's risk framework .....	11
<b>Liquidity risk.....</b>	<b>14</b>
<b>Liquidity management.....</b>	<b>14</b>
<b>Valuation.....</b>	<b>15</b>
<b>Admission for trading on a regulated market.....</b>	<b>15</b>
<b>Unit certificates, subscription and redemption.....</b>	<b>15</b>
<b>Issue and redemption.....</b>	<b>16</b>
Price information .....	18
Units in circulation.....	18
Registration by name .....	18
Voting rights .....	18
Rights.....	18
Dissolution of the Sub-fund.....	18
Negotiability and transferability .....	18
<b>Regular information to investors.....</b>	<b>19</b>
Transfer .....	19
<b>Material agreements and costs.....</b>	<b>19</b>
<b>Total administrative expenses.....</b>	<b>23</b>
<b>Responsible investments.....</b>	<b>23</b>
<b>Associated individuals and companies .....</b>	<b>24</b>

<b>Complaints officer .....</b>	<b>25</b>
<b>Investor Information, annual report, etc. ....</b>	<b>25</b>
<b>Personal data .....</b>	<b>25</b>
<b>Special reservations .....</b>	<b>26</b>

## INTRODUCTION

This document, entitled Investor Information, has been prepared by Formuepleje A/S (Manager), which manages Kapitalforeningen Formuepleje Penta (The Fund), in compliance with section 62 of the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.). This Investor Information has been prepared in Danish and addresses Danish investors, including retail investors. It has been drawn up in compliance with Danish rules on capital associations and divisions authorised for marketing to retail investors as well as European Union legislation for alternative investment fund managers, etc.

The Investor Information is available on the Fund's website.

The Fund meets its general disclosure obligations towards investors by either sending the information to each individual investor, publishing it in the annual report or making the information available on the website.

## NAME AND ADDRESS OF THE FUND

Kapitalforeningen Formuepleje Penta  
c/o Formuepleje A/S  
Værkmestergade 25, 8  
DK-8000 Aarhus C, Denmark  
(hereinafter: the Fund)

Website: [www.formuepleje.dk](http://www.formuepleje.dk)

## Registration numbers of the Fund

Reg. no. with the Danish Financial Supervisory Authority: 24.024  
CVR no.: 35 40 14 07

## Formation

On March 20<sup>th</sup>, 2014, the Fund changed its name from Hedgeforeningen Formuepleje Penta to Kapitalforeningen Formuepleje Penta in connection with changing its legal status from that of a hedge fund to a capital association. Hedgeforeningen Formuepleje Penta was originally formed on 10 July 2013.

The Fund comprises the Sub-fund:

Formuepleje Penta KL  
SE number: 33 49 06 90  
ISIN code: DK0060498343  
FSA (FT) number: 24.024-1

(hereinafter: the Sub-fund)

## MANAGER OF THE FUND

The manager of the Fund is Formuepleje A/S, Værkmestergade 25, 8., DK-8000 Aarhus C, Denmark (hereinafter: the Manager).

The Manager is responsible for portfolio management and risk management in the Fund. In addition, the Manager is responsible for the administration of the Fund, including the Fund's legal and accounting services, investor requests, valuation and pricing, compliance, distribution of dividends, issue/redemption of units, etc., see Schedule 1 to the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.).

Subject to special terms set out in the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.), the Manager may delegate functions/assignments to third parties under the Manager's responsibility. The Manager's liability towards the Fund and its investors are not affected by the Manager's delegation of assignments to third parties.

The Manager has currently entered into agreements with third parties in the following areas:

- Marketing and agency for the sale of units

The manager has entered into an agreement with external financial companies regarding distribution of the Fund's shares for, inter alia, to increase accessibility for investors. The Fund does not pay separately for this. It is not considered that there are any conflicts of interest relating to such agreements. The Investor may, at any time, contact the Manager with a request for disclosure of the Manager's distribution partners.

The Manager has increased its capital base in order for it to be adequate to cover any risks of liability for damages in consequence of neglect of duty, see section 16(5) of the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.).

## CONFLICTS OF INTEREST

A manager of alternative investment funds must apply any reasonable organisational and administrative arrangements in the structuring of its business that are able to identify, prevent, manage and monitor conflicts of interest in order to prevent them from harming or adversely affecting the interests of the managed alternative investment funds or their investors.

There is a potential for conflicts of interest to arise between

- the Manager and the Fund/investors in the Fund,
- the Fund and the Manager's other clients,
- the Fund and the Manager's employees,
- the Fund and its investors,
- the Fund's investors.

The Manager has inter alia minimised the risk of conflicts of interest between the Fund and its clients by not receiving income from trading in securities, including brokerage, surcharges on the price of securities and/or exchange rates, settlement costs, etc.

The Manager exercises the greatest of care to avoid conflicts of interest and has inter alia established business processes and policies designed as far as possible to minimise, prevent as well as manage potential conflicts of interest. The Manager's interest policy can be found at [www.formuepleje.dk](http://www.formuepleje.dk).

## OBJECT

The object of the Fund is to generate a return for the Fund's investors by investing in liquid assets, including currency, or in financial instruments comprised by Schedule 5 to the Danish Financial Business Act, see section 3(1), no. 11, of the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.).

## INVESTORS

Investors in the Fund shall be any owner of one or more shares of the Fund's assets.

The legal consequences of investing in the Fund generally correspond to those of any other investment in securities. Upon registration of the unit certificates, the investor becomes the owner of the proportionate share of the Fund that the investment equals.

All investors in the Fund enjoy the same rights with respect to issues concerning all investors in the Fund.

The investors shall only be liable to the extent of their contributed capital and shall not otherwise be liable for the liabilities of the Fund.

All investors in the Fund will receive the same treatment with respect to issues concerning the Fund, and all investors in a Sub-fund will receive the same treatment with respect to issues concerning the Sub-fund. No investors have been granted any special rights that have not been disclosed in this document. The Manager exercises the greatest possible care in order to treat the investors of the Fund fair.

Any issues concerning investments in the Fund are subject to Danish law and venue.

With respect to certificate-issuing Sub-funds, the legal act of perfection to be observed to ensure execution and recognition in Denmark is registration with VP Securities A/S.

## ARTICLES OF ASSOCIATION AND ANNUAL REPORTS

The Fund's financial year is the calendar year. For each financial year, the Board of Directors of the Fund shall prepare an annual report in accordance with the provisions of the legislation applying to Danish UCITS, consisting, as a minimum, of the management's review, statement by the management for the Fund and financial statements for each Sub-fund consisting of balance sheet, income statement and notes, including a presentation of the accounting policies.

The annual report is audited by at least one state-authorized public accountant elected by the general meeting.

The Fund shall prepare a semiannual report for each Sub-fund consisting of an income statement for the period 1 January to 30 June and a balance sheet as at 30 June.

The most recent audited annual report can be obtained from the Fund's website as well as from the Fund's Manager on request. In addition, annual reports will be sent directly to investors registered by name making a request to this effect. Annual reports are also published via Nasdaq Copenhagen A/S.

The Sub-fund's assets are subject to management and keeping of accounts, and an annual report is prepared for the Sub-fund.

### Financial calendar

Expected publication dates of the semiannual and annual report, as well as the date of the general meeting.

March 2022	Annual Report 2021
April 2022	Ordinary general meeting
August 2022	Semiannual report for H1 2022

The exact dates are set out in the financial calendar published via stock exchange announcement.

### Assets

As of June 30, 2021, the Fund's total assets amounted to: DKK 10.7 billion.

### Sub-funds

The Sub-funds of the Fund are separate entities in relation to liability. The Fund has only one Sub-fund, which is dealt with in the following section of the Investor Information.

### **Investor profile/The typical investor in the Sub-fund**

The Sub-fund addresses the investing public, although primarily financially strong investors with experience in and insight into securities trading, who can accept investments with a high risk index and who only invest on the basis of specific advice.

The Sub-fund is a complex financial product and investment in the Sub-fund is not appropriate or suitable for all investors. The Sub-fund is suitable for investors who either possess the requisite expertise prior to investment or have obtained specific advice based on their own situation.

Prior to investment, investors in the Sub-fund should seek advice on this, including to ascertain whether the investor is suitable and whether the investment is suitable for the investor. An investment in the Sub-fund should only make up a small element of a larger, well-diversified portfolio, and should have a minimum investment horizon of five years.

The risk in the Sub-fund is expected to differ from traditional investment in equities and bonds where the market risk dominates. The Sub-fund can consequently be used to obtain greater spreading of risk in a portfolio.

The Sub-fund is best suited for investment forms that do not entail disadvantages for mark to market taxation, see the section on tax and duty rules.

### ***Taxation of the Sub-fund***

The Fund's Sub-fund is cumulative and comprised by the section 3(1), no. 19, of the Danish Corporation Tax Act.

### ***Taxation of investors***

The following is a general description of the Danish tax rules that are expected to apply. Investors who are subject to special rules or use the unit certificates for business purposes are not comprised by the description. Further information on the tax rules may, to a limited extent, be obtained from the Manager. For more detailed and individual information, investors should consult their own advisors.

### ***Investors domiciled in Denmark***

When investing in the Sub-fund, taxation follows a mark to market principle. This means that an investor is taxed by the difference between the market value of the unit at the start of the income year and its market value at the end of the income year. If the units are acquired during the investor's income year, the difference taxed is that between the acquisition price and the closing value. If the unit is sold during the investor's income year, the difference taxed is that between the opening value and the sales price.

When investing for free funds, the gain is taxed as capital income while losses are deducted as capital income. For companies, both gains and losses are included in the corporate income subject to taxation.

Investment in the Sub-fund may take place under the Danish Business Tax Scheme. Gains and losses are included the company income.

When investing pension funds, the taxation follows the rules in the Danish Pension Yield Tax Act.

### ***Investors not domiciled in Denmark***

Investors who are not domiciled in Denmark are subject to taxation in accordance with the rules in the country in which they reside/are registered for taxation.



Such investors are not subject to taxation on gains or losses on the unit in Denmark. In addition, the investor is not subject to Danish dividend taxation, as the Sub-fund of the Fund is cumulative and does not distribute dividends.

## **Investment policy, strategy and investment area**

The fund invests based on a principle of absolute return targets. The fund has no benchmark.

The Sub-fund's investment policy and risk profile are set out in the articles of association of the Fund which are available on the Fund's website. Any amendments to the articles of association must be decided at the Fund's general meeting in accordance with the provisions of the articles of association to this effect.

Within the framework of the articles of association, the Manager may establish additional frameworks as set out in the present Investor Information.

The Sub-fund may use a fund of funds strategy.

The Sub-fund primary investments are in shares and bonds. The investments can both be directly in shares and bonds, but also indirect through units in UCITS, capital associations, AIF securities funds, other alternative investment funds and foreign (non-Danish) UCITS. The Sub-fund may also invest in other financial instruments that are settled directly (not on credit) and are admitted to trade on a regulated market (e.g. Exchange Traded Funds), investment companies and structured products covered by Appendix 5 of the Danish Financial Business Act.

The allocation takes place among asset classes on the basis of the theory of optimal portfolios. This means that the Sub-fund uses statistical and theoretical reasoning to put together a portfolio, aiming to optimise the relationship between expected return and risk. The optimised portfolio can then be leveraged or investment can be made in associations whose portfolios are leveraged, whereby the Sub-fund seeks to increase the expected return. The strategy is based on the return/risk profile being different to traditional association funds which invest in bonds and equities.

The Sub-fund may, as part of the investment strategy and in connection with managing the portfolio, make use of derivatives with a view to hedging, optimising the Sub-fund's return and risk profile, hedging currency risks or leveraging assets. The Sub-fund has the option of reusing pledged collateral or any other guarantee provided under the agreement that enables leverage. The Sub-fund may use derivatives admitted to trade on a regulated market, as well as instruments that are traded OTC. Up to 10% of the Sub-fund's assets may be placed in other securities.

The Sub-fund may deposit funds in a credit institution and carry out lending of securities.

## **Securities Financing Transactions**

The Sub-fund may enter into securities financing transactions and total return swaps as part of the general portfolio management. Securities financing transactions could be one of the following:

- Securities lending and deposits
- Repo transactions
- Buy- and sell-back
- Margin loans
- Total return swaps'

If the Sub-fund engages in other securities financing transactions, the Investor Information will be updated with the relevant and necessary information.

### ***Securities lending***

Currently, securities lending is used by the Sub-fund as a method of borrowing. There is no maximum limit on the proportion of assets that can be lent.

On behalf of the Sub-fund, the manager has entered into an agreement with Nordea Denmark, branch of Nordea Bank Abp, Finland (hereinafter referred to as 'Nordea Denmark') on lending securities.

Securities lending is used to increase the liquidity of the Sub-fund. This is achieved by the Sub-fund lending securities to Nordea Denmark, which in return provides cash as collateral. This corresponds, in practice, to taking out a cash loan.

Securities lending may be discontinued at short notice, after which loans and collateral are stated at market value.

Securities lending will not take place within time periods where the companies pay out dividends.

The time period defined as five days prior to and five days after the dividend date.

### ***Risk of securities lending***

Securities lending entails a counterparty risk, though this is significantly reduced through the terms of the lending agreement, including the requirement for collateral.

If the counterparty defaults on the agreement or is unable to return the lent securities, there is a risk that the value of the collateral will be less than the value of the lent securities, which can negatively impact performance.

This risk is very low, as the collateral consists of cash.

### **Risk policy**

The Sub-fund's risk policy in generating long-term capital growth outperforming the market return via portfolio investment, mainly in bonds and equities, is to ensure the best possible risks management. Factors such as asset composition, gearing and general market fluctuations will affect the risk in the Sub-fund.

The risk of losses in the Sub-fund can be expected to be below the historically registered level for equities.

Investment in the Sub-fund implies a risk of losses, as well as the chance for gains. The investor must be aware that an investment in the Sub-fund is in no way to be considered on a par with a deposit in a bank or the similar. There are several risk factors that may affect the price development for the Sub-fund.

Investment in the Sub-fund should only take place after prior specific advice, including information on the risks associated with the investment.

The Sub-fund's risk profile is sought maintained by investment in a portfolio of securities so as to comply with the risk framework set out in the articles of association and this Investor Information. The Manager monitors the exploitation of this framework continuously.

The Sub-fund's placement on a risk scale from 1-7 appears in the Key Investor information document, which can be found on [www.formuepleje.dk](http://www.formuepleje.dk)

The risk factors involved in investment are described in the section below.

### **Risk factors**

The following is an outline of a number of characteristics and risk factors entailed by investment in the comprised financial instruments and possessed by the applied investment techniques. These characteristics and risk factors can affect the price development to a varying degree and thus also the risk of losses. The stated risk factors are not considered an exhaustive list of potential risks.

#### Gearing risk

The Sub-fund may leverage the balance sheet using derivative financial instruments (derivatives) or by taking out loans multiple times larger than the Sub-fund's assets or by investing in funds whose portfolio

are leveraged. There may consequently be a risk that the Sub-fund goes bankrupt and that the investor thus loses his entire investment in the Sub-fund.

#### Investment advisor risk

The investment strategy is based on an active investment philosophy using historical model calculations. There is no guarantee that these calculations or the assessments will result in a positive return in the future.

#### Risk related to financing situation

Any changes to the Sub-fund's conditions for obtaining finance may result in rising financing costs or restriction of financing, which means that certain profitable investments may be avoided to the detriment of the return development in the Sub-fund.

#### Conversion risk

As the Sub-fund may invest in convertible mortgage bonds, there may be a risk that the redemptions become larger than expected, which may result in losses for the Sub-fund.

#### Risk related to changes in convexity, volatility and interest-rate curve

Convexity, higher volatility in the market and changes to the interest-rate curve profile may adversely affect the price of the mortgage credit bonds in which the Sub-fund has invested. If the developments deviate from the expectations, the Sub-fund may suffer a loss.

#### Risk related to yield spread

The Sub-fund may make investments with an attempt to exploit the development in the yield spread between two interest rates (e.g. the yield on mortgage-credit bonds and swaps). If the yield spread develops counter to expectations, this will entail a risk of losses.

#### Market risk

The Sub-fund engages in investments on the global securities markets. A higher volatility in the market may adversely affect the prices of the securities in which the Sub-fund has invested. If the developments deviate from the expectations, the Sub-fund may suffer a loss.

#### Stock market risk

Price movements in the stock markets can sometimes fluctuate dramatically, and stock prices may fall a lot and quickly. Stock markets may be exposed to unique political or regulatory conditions that may affect the value of the Sub-fund's investments. Moreover, market, sectoral, national, regional or general economic conditions could affect the value of the Sub-fund's investment, both positively and negatively.

#### Interest rate risk and bond market risk

A sub-fund that invests in bond markets will be exposed to the risk of fluctuating interest rates. Interest rates are affected by both national and international macroeconomic factors, such as state of the market, fiscal and monetary policy and inflation expectations. When the interest rate level rises, the price of bonds falls, so the value of a sub-fund's investments decreases. Interest rate risk can be described by the term duration which, amongst other things, is an expression of the price risk on the bonds that the sub-fund invests in. The lower the duration, the more stable the bond prices are if interest rates change.

#### Event risk

In exceptional situations, such as the global credit crisis in autumn 1998, terrorist attacks in the US in September 2001 and the financial crisis of 2008–2009, as well as disease outbreaks, such as SARS in 2003 and COVID-19 in 2019–2020, financial markets are gripped by collective panic when investor risk aversion increases dramatically. In these situations, the market's normal price development pattern is often superseded by a market regime with significant price increases on liquid government bonds from countries with high credit ratings and massive price declines and sharp rising price variation on riskier

asset classes, including credit bonds issued by companies with high credit risk and government bonds issued or guaranteed by states with high credit risk. In these situations, the prices of the riskier bond issues tend to co-exist with conflicting, less risky government bonds.

#### Liquidity risk

Under normal circumstances, the market for many securities in different asset classes is regarded as liquid. Any changes in the market may result in a greater difference in rates between buying and selling rates and/or reduced liquidity of the Sub-fund's investments.

#### Liquidity risk on bonds

In some situations, it may be difficult to sell bonds at their real value. The reason for this may be that there is no interest in the bonds in the given situation. This lack of interest is typically due to there being relatively few bonds which are rarely traded or due to extreme market situations where many investors want to sell the same type of bond at the same time. This may be either directly on the market or through a fund that acts in the market on behalf of investors. In these situations, the difference between buying and selling prices will be great. The liquidity risk is most pronounced on the sale of bonds. It expresses that you can only sell the bonds at much lower prices than what the bonds are actually worth, estimated based on what you can sell smaller items of the bonds for. In extreme situations, where many investors choose to dispose of their shares at the same time, the liquidity risk may lead to some sub-funds sometimes being required to suspend the option of redeeming shares until the market situation allows it.

#### Counterparty risk

The Sub-fund may, among others, invest in other investment associations, capital associations, alternative investment funds, investment companies, structured products and other collective investment schemes, where there may be counterparty risk. Correspondingly, there is a counterparty risk associated with securities lending and deposits with the custodian, as well as when taking out financing. The Sub-fund may also use derivative financial instruments, which may give rise to a counterparty risk during the life of the instrument.

The counterparty risk is attempted limited by collateral or by engaging with one or several large, robust banks as counterparties. Generally speaking, accepted counterparties must be so-called Investment Grade companies. The accepted counterparties must be licensed to conduct financial business, considered to have a high creditworthiness and sufficient credit rating.

### **The Sub-fund's risk framework**

Within the framework of the investment and risk policies set out in the articles of association the board of directors of the Manager defines a risk framework for the Sub-fund to be met when investing the individual Sub-fund's assets.

Any non-compliance with the risk framework for the individual Sub-fund must be terminated immediately. The Manager must announce any non-compliance no later than eight business days after it was established. The announcement may be made on the Fund's website or via stock exchange announcement.

The board of directors of the Manager may change the risk framework. No later than eight business days after making a decision to change the risk framework of the Fund or a Sub-fund, the Manager shall inform the investors registered by name about the changes and make an announcement of the changes. The changes may not be effected until the investors in the Sub-fund have been able to redeem their units.

With a view to maintaining the Sub-fund's risk profile, the board of directors of the Manager has established the following risk frameworks for the Sub-fund.

The Fund uses look through as far as exposure to asset classes is concerned.

## Risk framework

	Timing of investments		Absolute
	Lower	Upper	Upper
<b>Investment area (Geographical)</b>			
No restrictions			
<b>Investment area (Instruments)</b>			
<i>Equities</i>			
Largest single stock in the equities portfolio.	0%	10%	
Total stock exceeding 5% of the equities portfolio.	0%	40%	
Net equity exposure <sup>1</sup> as a percentage of assets.	0%	130%	
<i>Bonds</i>			
Length of time in the bond portfolio.	-1	6	
Individual issuer of mortgage credit, etc., as a percentage of the bond portfolio	0%	80%	
Exposure against Swedish mortgage credit bonds may not exceed 180% at the time of investing. Hereof maximum 10% of the assets may be an open position, the rest of the exposure must be financed in SEK or hedged in DKK or EUR.	0%	180%	
Other bonds as a percentage of assets.	0%	10%	
<i>Derivatives</i>			
Hedging of exchange rate risks	0%	100%	
<i>Alpha</i>			
Exposure as a percentage of assets.	0%	13%	14.95%
<i>Other securities</i>			
Other securities as a percentage of assets.	0%	10%	
<b>General restrictions</b>			
Gross exposure as a percentage of assets.	0%	1450%	
Long positions as a percentage of assets <sup>2</sup> .	0%	500%	
Loans as a percentage of assets <sup>3</sup> .	0%	500%	

Loans in currencies other than DKK and EUR should be matched by assets, but a net exposure of maximum 10 % of the sub-funds' assets, in other currencies can be allowed.	0%	10%	
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<sup>1</sup> The calculation hereof observes the principles of Chapter 3 of the Danish "Derivatbekendtgørelse (BEK nr. 762 17/06/2014)" (Executive Order on Danish UCITS' Use of Derivative Financial Instruments) on portfolio level.

<sup>2,3</sup> Regarding to the potential use of repo transactions double exposure are allowed without it is considered as an exceeding of the determined limit. This presupposes that the underlying active to the lapsed repo is identical with the underlying active for the continuing repo, plus that the value date for expiration of the old repo and the beginning of the new repo must be the same.

The above frameworks are described in more detail below.

## ***Investment area***

There are no geographical restrictions regarding where the Sub-fund may make investments.

### Equities

- A maximum of 10% of the Sub-fund's equity positions may be invested in a single net equity position at the time of investment,
- The sum total of net equity positions that each individually exceeds 5% of the total equity exposure may not exceed 40% of the Sub-fund's total equity portfolio at the time of investing,
- The sum total of combined net equity positions at the time of investing may not exceed the value of the Sub-fund's assets.

### Bonds

- The Sub-fund's option-adjusted duration (interest rate risk) at the time of investing must be in the range of -1 to 6,
- A maximum of 80% of the Sub-fund's bond portfolio may be invested in bonds issued by an individual mortgage institution or issuer of covered bonds (SDO),
- A maximum of 10% of the Sub-fund's assets at the time of investing may be invested in bonds that are not Danish or Swedish mortgage credit bonds or bonds guaranteed or issued by the Danish or Swedish government.
- The Sub-fund's exposure against Swedish mortgage credit bonds may not exceed 180% at the time of investing. Hereof maximum 10% of the assets may be an open position, the rest of the exposure must be financed in SEK or hedged in DKK or EUR.

### Derivatives (derivative financial instruments)

- The Sub-fund may choose to fully or partially hedge exchange rate risks for all investments. Derivatives and financial instruments of all types used for hedging and optimisation hereof are included in the calculation of the framework.

### Alpha

- A maximum of 13% of the Sub-fund's equity may be invested in the Alpha strategy at the time of investment. Furthermore, any such investment may never exceed 14.95% of the Sub-fund's assets.

### Other securities

- A maximum of 10% of the Sub-fund's assets at the time of investing may be invested in securities that are not subject to the above rules.

### General restrictions

- The Sub-fund's gross exposure may not exceed 1,500% of the Sub-fund's total assets, and 1,450% at the time of investing,

- The total of all long positions may not exceed 500% of the Sub-fund's assets with the addition of costs payable,
- The sum total of loans must not exceed 500% of the Sub-fund's assets,
- Loans in currencies other than DKK and EUR should be matched by assets, but a net exposure of maximum 10 % of the sub-funds' assets, in other currencies can be allowed.

### **Return and loss risk index**

The Sub-fund's risk profile measured on risk of loss can be compared to a non-g geared index (the loss risk index).

The loss risk index reflects the Sub-fund's risk of loss measured over 12-24 months. The Sub-fund's risk measured on standard deviation can in some periods differ from the loss risk index.

The Sub-fund's loss risk index is:

100% NDUEACWF            MSCI World All Countries NR

The Sub-fund's and loss risk index's return for the past five years is shown in the table below:

	2016	2017	2018	2019	2020
Sub-fund return (%)	21.58 %	15.22 %	-2.00 %	33.70 %	3.08 %
Loss risk index return (%)	10.69 %	9.04 %	-4.63 %	29.10 %	6.24 %

Source: Bloomberg and Formuepleje A/S

The return of the Sub-fund is calculated after deduction of administration, trade etc. costs. Please note that past performance cannot be used as a guarantee for the future return of the Sub-fund.

### **Further details**

Further details about the quantitative limits mentioned in the section on the Sub-fund and about the methods applied by the Manager to ensure compliance with these limits may be obtained by contacting the Manager. In addition, the investor can obtain information about the most recent developments in the most important risks and returns for the categories of the individual instruments in the Sub-fund.

## **LIQUIDITY RISK**

The Manager routinely evaluates, based on a self-developed liquidity model, whether the overall composition of the portfolio has the desired liquidity. This is particularly relevant in the event that the portfolio has to be reduced quickly or 100 % realised.

## **LIQUIDITY MANAGEMENT**

Liquidity shall be taken to mean the ability of an asset to be converted to cash with a limited price discount compared to the recognition of the asset in the Sub-fund's net asset value. More specifically, an asset's liquidity is a function of how fast and cost-effectively it can be converted to cash under different market conditions.

The purpose of a risk management framework for liquidity is dual:

1. Monitoring the Sub-fund's liquidity to ensure that the liquidity level reflects the investment and liquidity profile. The liquidity level also reflects the underlying obligation and the expected disposals under normal and extraordinary circumstances.

2. Enabling, on behalf of the investors, the realisation of the liquidity premiums that are part of the added value in a Sub-fund without risk to the Fund's overall liquidity.

The Fund's Sub-fund are subject to appropriate monitoring with a view to ensuring a sufficient liquidity level to be able to counter outflows under normal circumstances.

#### Illiquid assets subject to special measures

At the latest update of this Investor Information, no assets were subject to special measures, cf. section 64 (1) of the Danish "lov om forvaltning af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.)

## VALUATION

The value of the Fund's wealth (assets and liabilities) is determined (recognised and measured) by the Manager pursuant to Part 6 of the Danish "lov om forvaltning af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.),, as well as the Order on registration in the Danish FSA register of valuation experts and Commission Delegated Regulation (EU) No 231/2013.

The net asset value in a Sub-fund is calculated by dividing the value of the assets at the time of statement by the number of units subscribed for in the Sub-fund.

The net asset value of the units of a unit class is calculated by dividing such portion of the assets of the Sub-fund made up at the time of calculation as corresponds to the portion of the joint portfolio generating return to the unit class, adjusted for any class-specific assets and costs incurred by the unit class, by the number of units subscribed for in the unit class.

Where the board of directors has resolved to issue units without dividend entitlement (ex coupon), see the articles of association, the issue price and the price on redemption, if any, of such units will be calculated on the basis of the net asset value less the value of the calculated and audited dividends for the preceding financial year.

The Manager of the Fund informs investors of the assessment and calculation of net asset value by making this information available on the Fund's website.

## ADMISSION FOR TRADING ON A REGULATED MARKET

The Sub-fund Formuepleje Penta KL is listed at Nasdaq Copenhagen A/S.

## UNIT CERTIFICATES, SUBSCRIPTION AND REDEMPTION

### ***Unit certificates***

The Sub-fund issues certificates. The unit certificates are registered with VP Securities A/S in denominations of DKK 100 and multiples thereof.

### ***ISIN code***

The Sub-fund is registered in VP Securities A/S with the following ISIN codes

Sub-fund Formuepleje Penta KL: DK0060498964

### ***Paying agent***

Formuepleje A/S  
Værkmestergade 25, 8.  
DK-8000 Aarhus C, Denmark



Tel.: +45 8746 4900

Fax: +45 8746 4901

Orders may also be placed through all other banks and securities companies.

Danske Bank A/S (hereinafter: Danske Bank) is the certificate-issuing agent. The unit certificates are held in custody accounts with Danish banks at no charge. However, portfolio changes in the VP account are subject to ordinary VP fees.

## ISSUE AND REDEMPTION

Issue and redemption prices are calculated at net asset value at the time of issue or redemption respectively, according to the same principles used in the annual report, see section 4 of the Executive Order on Calculation of Issue and Redemption Prices for Subscription and Redemption of Units in Danish UCITS, etc.

To calculate the issue price, the value of assets at the time of issue is divided by the nominal value of units subscribed for, with the addition of an amount towards the covering of the expenses associated with buying financial instruments and any necessary expenses incidental to issuing.

To calculate the redemption price, the value of assets at the time of redemption is divided by the nominal value of units subscribed for, with the deduction of an amount towards the covering of the expenses associated with selling financial instruments and any necessary expenses incidental to redemption.

The issuing and redemption price are fixed by application of the dual-pricing method, see the principles to this effect in the Executive Order on Calculation of Issue and Redemption Prices for Subscription and Redemption of Units in Danish UCITS, etc.

### ***Tap issue***

Subscription in the Sub-fund is made in accordance with the provisions of the articles of association without a fixed upper amount limit. Subject to the Manager's decision, the Sub-fund is open for new issues on every banking day. Settlement is affected two banking days after subscription by registration of the certificates in the investor's account with VP Securities A/S. The issue price is calculated every day. The Manager may perform tap issues of the Fund's units on an ongoing basis.

Tap issues can be suspended at the discretion of the Manager if it is assessed, for instance, that there is significant doubt about the value of the Sub-fund's assets at the time of issue. Any suspension and resumption of issues after suspension will be published by announcement via Nasdaq Copenhagen A/S and on the Fund's website.

For large issues in excess of DKK 10 million, the Fund's board of directors may allow issues by non-cash contribution of securities.

### ***Maximum issue costs***

The following maximum expenses in per cent of the net asset value are included in the issue cost:

Brokerage and other costs of purchasing securities, etc.:	0.55%
Marketing, etc.:	0.00%
Subscription, sales and guarantee commission, etc.:	0.00%
Total:	0.55%

The stated maximum issue costs may be exceeded in periods of unusual market conditions and fee changes which result in an increase in other market-related costs of purchasing and selling the Sub-fund's instruments. In the event that such a situation arises, the Fund will inform about specific issue costs via Nasdaq Copenhagen A/S and on the Fund's website during this time, and it will also be announced when the stated maximum issue premium applies again.

The costs for the Fund will be lower than the rates stated above in case of large issues. For large issues, the Fund thus reserves the right to reduce the issue premium for the Fund in specific instances. However, the issue premium cannot be lower than the costs of purchasing securities, etc., unless the issue takes place in connection with non-cash contribution of securities in the Sub-fund.

### ***Delivery of purchased units***

Units purchased in tap issues are customarily settled concurrent with the registration of the units with VP Securities A/S on the investor's account.

### ***Redemption***

At the request of an investor, the Fund shall redeem the investor's share of the Sub-fund's assets.

Redemption shall be affected in accordance with the articles of association, and the Manager has decided that the Sub-fund is open for redemption on a daily basis without notice. Settlement is affected two banking days after redemption.

In connection with redemption, an amount shall be deducted towards covering the expenses associated with the sale of the redemption amount that the Sub-fund's assets and liabilities reflect, including financial instruments and any loans as well as any necessary expenses incidental to the redemption.

For redemptions of DKK 10 million or above, the Manager may, at the request of investors, undertake redemptions by withdrawal in kind of securities. In the case of withdrawal in kind, the redemption deduction may deviate from the maximum redemption costs stated in the Investor Information, as there would not be any costs in connection with selling securities in the market in connection with the redemption.

### ***Maximum redemption costs:***

The following maximum expenses in per cent of the net asset value are included in the redemption deduction:

Brokerage and other costs of purchasing securities, etc.:	0.55%
Marketing, etc.:	0.00%
Subscription, sales and guarantee commission, etc.:	0.00%
Total	0.55%

The stated maximum redemption cost is typically expected to be lower. The redemption costs are made available daily on the Fund's website.

Redemption may be suspended at the discretion of the Manager if it is assessed, for instance, that the Fund cannot determine the net asset value due to market conditions, or if, to ensure equal treatment of investors, the Fund does not determine the redemption price until the Fund has realised the assets required for redemption of the units. Any suspension and resumption of redemption after suspension will be published via Nasdaq Copenhagen A/S and on the Fund's website.

The stated maximum redemption costs may be exceeded in periods of unusual market conditions and fee increases, etc. which result in an increase in other market-related costs of purchasing and selling the Sub-fund's instruments. In the event that such a situation arises, the Fund will publish the specific redemption costs via Nasdaq Copenhagen A/S and inform about them on the Fund's website during this time, and it will also be announced via Nasdaq Copenhagen A/S and on the Fund's website when the stated maximum redemption deduction applies again.

The Fund's units are offered as a tap issue through Danske Bank as the certificate-issuing agent for VP Securities A/S. Subscription orders may also be placed through other banks and by application to Formuepleje A/S (Manager).

In special cases, the Fund may demand that the redemption price be determined after the Fund has realised the assets required for accommodating the redemption.

No investors are obliged to have their units redeemed in full or in part.

## **Price information**

Net asset value, issue and redemption prices for units in the Sub-fund are calculated on every banking day.

Assets and liabilities are measured at fair value. The fair value is stated on the basis of the established market value on an approved market. If the asset or liability is not traded on an approved market, a price is obtained from a third party, or the price is calculated in accordance with an approved model. The net asset value in the Sub-fund is calculated by dividing the value of the assets at the time of statement by the number of units subscribed for in the Sub-fund.

The Fund announces the net asset value daily. The net asset value and the issue and redemption price are announced via Nasdaq Copenhagen A/S, first before the market opening at 9.45 a.m. and then between 12 noon and 1 p.m. and between 3.30 p.m. and 4.30 p.m. In addition, any significant changes to the values must be announced separately. The information is also published on the Fund's website.

## **Units in circulation**

The Fund will publish the number of unit certificates for the Sub-fund in circulation on a daily basis and before the market opening at 9.45 a.m.

## **Registration by name**

The units shall be registered in the name of the holder and registered in the Fund's register of investors which is kept by the Manager. The registration by name is made by the bank in which the units are held in custody.

## **Voting rights**

Each investor has one vote for each DKK 100 unit. Voting rights may be exercised provided that the unit is registered by name in the Fund's register of investors one week prior to the general meeting.

## **Rights**

No units carry any special rights.

## **Dissolution of the Sub-fund**

The board of directors of the Fund may make a recommendation at a general meeting for the investors to dissolve the Sub-fund. Among the reasons for such a recommendation could be an insufficient capital base or obsolete investment areas in the Sub-fund, if applicable.

The adoption of any resolutions to dissolve, merge or split the Sub-fund requires that at least two thirds of the votes cast and of the part of the Sub-fund's assets represented at the general meeting vote in favour of the resolution.

## **Negotiability and transferability**

The units are freely transferable and negotiable. No units carry any special rights.

## ***Right of redemption***

Subject to the terms following from the Fund's articles of association and as described above in this document, the investor may also make a request for the full or partial redemption of its units in Sub-funds of the Fund.

## REGULAR INFORMATION TO INVESTORS

Pursuant to section 62, no. 25 of the Danish Alternative Investment Fund Act, the Manager shall describe how and when the information comprised by sections 64 and 65 in the Act are published.

The Manager publishes the following information regularly on the Fund's website:

Daily:

- Net asset value as well as issue and redemption prices.

Annually:

- Annual report.
- Semiannual report

Regularly when publishing the Investor Information (and where applicable):

- The department applies a fund-of-funds strategy. At the latest update of this Investor Information, the underlying funds were registered in Denmark and Luxembourg.
- The manager uses a combination of standard purchasing systems and proprietary risk management systems to manage the risks in the Department.
- Certificates as a percentage of the assets of the Sub-Fund, which, due to their illiquid nature, are subject to special measures (see the section on Illiquid assets subject to special measures).
- All new schemes for managing the Fund's liquidity (see the Liquidity Risk and Liquidity Management sections in this Investor Information).
- Any change in the maximum leverage level that the Manager may use on behalf of the Fund, and any right to reuse pledged collateral or any other guarantee provided under the agreement that allows the leverage. The maximum leverage level is shown in the section on Risk limits. In addition, the Investor Information will contain information on whether there is a right to reuse provided collateral etc.

In addition, the following information is provided (where applicable):

- Changes/exceeding of risk frameworks (by stock exchange announcements, such as publication on the website)
- The Sub-fund's current risk profile (appears at all times in the Factsheet for the Sub-fund, which is published on the website, [www.formuepleje.dk](http://www.formuepleje.dk))
- The total amount of gearing in the Sub-fund. Information on this can be found in the Factsheet for the Sub-fund on the website.

The Investor Information is updated regularly, and the latest document can be found on the website, [www.formuepleje.dk](http://www.formuepleje.dk).

### Transfer

The Fund only has one Sub-fund, and it is consequently not possible for investors to move from one Sub-fund to another in the Fund.

## MATERIAL AGREEMENTS AND COSTS

### *Management agreement*

The Fund has entered into a management agreement with Formuepleje A/S. The Manager is approved by the Danish Financial Supervisory Authority as Manager of alternative investment funds (FAIF) (FSA no. 17.104).

The Manager also maintains the Fund's register of investors in which the registration by name of the Fund's units is made.

The Sub-fund in the Fund pays a fixed fee of 0.22% of the assets as remuneration for the Manager's services. The remuneration is calculated and invoiced monthly in arrears at the above-mentioned rate. The

fee is calculated on the basis of the fund's end-of-month assets, calculated at the official closing rate on the third-to-last trading day of each month. The fee is settled on the second-to-last trading day of each month.

Either party may terminate the management agreement subject to six month's notice, or shorter notice if agreed by the parties.

The Manager has drawn up a policy for conflicts of interest to meet the potential conflicts of interest that may arise in connection with the delegation. The policy of conflicts of interest in force from time to time is available on the Fund's website.

The Fund's additional costs, including among other: costs related to the board of directors, accountants, the Danish Financial Security Authority and other public authorities, stock market, holding of the general meeting, register of shareholders, market making, VP Securities A/S, fees to the custodian due to depositary services etc. and usually bank services, are all hold be the Fund itself.

## ***Custodian***

The assets of the Fund must be kept separate from the Manager and held by a custodian meeting the pertinent conditions set out in the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.).

Under an agreement with Danske Bank and in accordance with the Danish "lov om forvaltere af alternative investeringsfonde m.v." (Act on Alternative Investment Fund Managers, etc.), the Fund has appointed the bank as custodian for the Fund. The custodian function at Danske Bank is functionally and organisationally separated from the bank's other customer-oriented activities.

With the agreement, the custodian assumes responsibility for holding and monitoring the Fund's financial assets, monitoring investment and gearing limits, including checking the Fund's cash flows and ensuring that they are booked correctly in the Fund's accounts, for instance in connection with investors' issues and redemptions in the Fund.

In addition, the custodian shall ensure

- that the sale, issue, repurchase, redemption and annulment of units in the Fund are affected in accordance with the legislation and the Fund's articles of association
- that the net asset value calculation and the associated procedures are affected in accordance with applicable law and the Fund's articles of association
- that the consideration in relation to transactions entered into by the Fund is made to the Fund within customary time-limits
- that the income of the Fund is applied in accordance with applicable law and the Fund's articles of association.

The custodian is liable towards the Fund or its investors for any loss of financial instruments held in custody that is caused by the custodian or any third party to whom this assignment has been delegated; see below for further details. However, the custodian shall not be liable for the loss of instruments if it can be substantiated that the loss is due to an external event that the custodian could not reasonably have been expected to control and whose consequences would have been unavoidable also if the custodian had taken all reasonable measures.

Furthermore, the custodian is liable for any other loss in consequence of the custodian's negligent or wilful neglect of its obligations, see above.

Subject to the pertinent conditions in the Danish lov om forvaltere af alternative investeringsfonde m.v. (Act on Alternative Investment Fund Managers, etc.), the custodian may delegate the holding of the Fund's financial instruments which are held in a custody account (securities) to a third party (sub-custodian). As a predominant general rule, the custodian's liability towards the Fund and the Fund's investors is not affected by any delegation. In special instances, the custodian may, by agreement with the applicable third party and the Fund, take measures aimed at transferring the liability from the custodian to the applicable third party. No measures have been taken to transfer the custodian's liability to such sub-custodians.

As remuneration for the services handled by the custodian the Fund pays a basic fee of 27.000 DKK per sub-fund per year. For foreign securities, a country-dependent deposit fee of between 0.0075% and 0.33% p.a. of the market value of the Fund's foreign securities. The deposit agreement can be terminated by the Association and Danske Bank with 6 months' notice.

### **Accountants**

The Fund's auditors perform the regular external task of auditing for the Fund and, on an ad hoc basis, may be given other duties relating to accounting, tax and non-auditing services. Furthermore, based on the information underlying the work done, the auditors shall submit conclusions and information about the Fund and audit the Fund's annual report.

### **Investment advisory services**

The Fund has entered into an investment advisory agreement with the Manager. The Manager comes under the supervision of the Danish FSA, FSA no. 17.104.

The agreement implies inter alia that the Manager prepares macroeconomic analyses and investment proposals for use as input in working out and carrying out the investment strategy. Advice is given in accordance with applicable regulations, the articles of association of the Sub-fund, as well as other of the Manager's guidelines, including risk frameworks (as included in the present Investor Information).

As remuneration for the advisory service, a fixed fee of 2.03% of the Sub-fund's assets plus a performance fee of 10% of the Sub-fund's return above High Water Mark is paid. The performance fee and the fixed fee is settled monthly.

The fee for the fixed remuneration is calculated and invoiced monthly in arrears at the above-mentioned rate. The fee is calculated on the basis of the fund's end-of-month assets, calculated at the official closing rate on the third-to-last trading day of each month. The fee is settled on the second-to-last trading day of each month.

The performance fee is 10% of the fund's return above the most recent High Water Mark. The fee is calculated on the basis of the fund's net asset value, calculated at the official closing rate on the third-to-last trading day of the month. The fee is settled on the second-to-last trading day of each month.

The calculation of the performance-based fee is based on the following formulae:

$AAH_{total} = AAH_t \times \text{number of circulating shares (ultimo)}$

$AAH_t = \text{Max} [0, (NAV(AFC)_t - HWM_{t-1}) \times 10 \%$

$HWM_t = \text{Max} [NAV_t, HWM_{t-1}]$ ,

whereas  $NAV_0 = HWM_0$

$HWM_0 = \text{HMW on the first subscription date}$

$AAH_{Total} = \text{Total performance-based fee in month } t$ ,

$AAH_t = \text{Performance-based fee per share in month } t$ ,

$HWM_t = \text{High Water Mark month } t$ ,

$NAV(AFC)_t = \text{Net Asset Value month } t$ , defined as net asset value per share month  $t$  after fixed costs, but before settlement of any performance-based fee.

$NAV_t = \text{Net Asset Value month } t$ , defined as net asset value per share month  $t$  after fixed costs and after settlement of any performance-based fee.

High Water Mark is not adjusted as a result of issues and redemptions but must be adjusted if the denomination of the certificates changes.

Before a performance-based fee is triggered, the net asset value must be higher than the most recently determined High Water Mark. Performance-based fees are only paid when the net asset value is higher than the last time a performance-based fee was paid. This means that previous negative results are not reset. It also means that a performance-based fee cannot be paid more than once for the same return.

Performance-based fees are calculated from return on investment after fixed fees, but before performance-based fees. This, together with the High Water Mark, is considered to be in the interest of investors, as this ensures that the interests of the manager and investor are aligned, and, in particular, that the manager has an interest in protecting assets from price drops. At the same time, the fund's risk limit ensures that the manager cannot influence the performance-based fee through increased risk-taking beyond this.

The calculation methods and principles here fore is described in more detail in the management agreement and the accompanying appendixes, between the Fund and the Administrator.

High Water Mark of the Sub-fund Formuepleje Penta KL can be found on the Funds website.

The following is an example illustrating the general principles for calculating performance-based fees:

t=0 at the start time

t=1 at the end time

t=-1 at the time before t=0

It is assumed that:

Circulating quantity = 40,000,000

NAV0 = HWM0 = 250

NAV(AFC)0 = 250

An investment creates a return of 5% during the period.

NAV(AFC)1 = 262.5

This follows from  $AAH1 = \text{Max} [0, (\text{NAV}(\text{AFC})1 - \text{HWM}0) \times 10 \%$ , that

$AAH1 = 1.25$

$AAH \text{ total} = 50,000,000$

$NAV1 = 261.25$

$HWM1 = \text{Max} [NAV1, HWM0]$ ,

It follows that  $HWM1 = 261.25$ .

If deemed in the interest of the Fund, the Fund may terminate the agreement effective immediately. If the termination is not caused by material breach of this agreement, then after termination of the agreement, the Manager will be entitled to receive the performance fee in the current month and for six months thereafter.

The investment advisor also assists in connection with securities trading and provision of loans for the Fund's Sub-fund. Trading in bonds is usually settled at net prices and the Manager must concurrently ensure that the Fund's trading costs (brokerage, price spreads, etc.) are maintained within the rates stated under issue and redemption costs.

### ***Marketing of the Fund***

The Fund and Manager have entered into a collaboration agreement on marketing of the Fund. Under the agreement, the Manager undertakes to distribute the Fund's Sub-fund and ensure that the Manager's employees have completed training and obtained the necessary certifications to entitle them to perform this activity in a qualified manner.

There is no separate fee for marketing or distribution of the Fund. The relevant agreement is governed by the advisory agreement with the Manager.

### **Market maker**

The Fund has entered into an agreement with Danske Bank for the latter to quote prices for the units in the Divisions, for instance in the Nasdaq Copenhagen A/S trading systems, on every trading day apart from in exceptional situations. The purpose is to promote liquidity through trading in the units. Market-making must include purchase and sale prices and be based on current issue and redemption prices. Danske Bank is remunerated for the services on a quarterly basis for the sub-fund's trading activity. The market maker agreement can be terminated by either party with 1 month's notice.

## **TOTAL ADMINISTRATIVE EXPENSES**

The performance fee may not exceed 17% of the Sub-funds' highest asset value in the financial year.

The total cost of administrative expenses can be found in the Fund's annual rapport.

### Annual Percentage Rate (APR)

The annual percentage rate (APR) includes administrative expenses, transaction costs for operating activities and the investor's transaction costs in the form of maximum issue premiums and redemption deductions. The amount is calculated under the assumption that the investment is held for seven years.

The latest calculated APR for the Sub-fund can be found in the Fund's annual rapport.

### Fees to the Danish Financial Authority and the Board of Directors

The overall fee to the Danish Financial Authority is paid once a year and is determined by the Danish Financial Authority by the end of the calendar year,

The overall fee to the Fund's Board of Directors is approved on the Fund's general meeting.

The fees to the Danish Financial Authority and the Board of Directors can be found in the Fund's annual rapport.

## **RESPONSIBLE INVESTMENTS**

Formuepleje wants to achieve a long-term, attractive return for all funds. This presupposes focused risk management, which also includes assessment of environmental, social and governance-related (ESG) conditions. In its work with ESG, Formuepleje focuses on i.a. environmental and climate impact, labour rights, human rights and anti-corruption. Guidelines for this work are set out in the Responsible Investment Policy, which covers all ESG areas, including environment and climate change, labour rights and employee conditions, respect for human rights, anti-corruption and bribery. As a rule, Formuepleje addresses all areas in accordance with the same principles. Generally, Formuepleje wants to raise ESG standards in the markets where investments are made, as this has a number of social benefits in the form of i.a. higher growth and a more sustainable development.

Formuepleje wants to influence the companies, who they invest in. Exercising active ownership is a natural part of active asset management, since it allows both influencing and reducing specific investment risks and makes it possible to make an impact on the invested companies in a direction, which promote a sustainable development. Enforcement of the Policy for active ownership is also an obligation as a responsible investor.

The Policy for responsible investment and Policy for active ownership can be found on the fund's website, [www.formuepleje.dk](http://www.formuepleje.dk).

The basis for Formuepleje's responsible investment policy is the UN PRI ("United Nations Principles for Responsible Investment"), which is a set of principles for responsible investment. UN PRI is a global



initiative to promote responsible investment and was established by some of the world's largest investors in co-operation with the UN. Formuepleje has endorsed these principles and conducts an annual reporting and assessment process under the guidelines of the PRI. Part of this report is published on the PRI website.

Formuepleje works on the basis of a number of principles in relation to responsible investment which, among other things, mean that ESG analyses are included in all investment processes, and that Formuepleje refrains from investing in companies whose risk of violation of international principles of corporate social responsibility is unacceptable.

Formuepleje has entered into consulting agreements with external investment advisors for all equity funds. All portfolio managers (internal and external) must be able to demonstrate their approach to ESG risks. This method must be well-described, consistent, and adapted to the specific market conditions. The approach of Formuepleje's ESG Committee is evaluated on an ongoing basis, at least once a year. External investment advisers have all signed the UN PRI or meet similar requirements, and they all involve ESG factors in their investment process. For example, this may happen by a worse ESG score or uncertainty about the ESG score detracting from the valuation of companies. Work on responsible investment is also an integral part of the ongoing evaluation of the advisors, and at least annually separate ESG meetings are held with investment advisors, where the ESG work is the main point on the agenda.

Formuepleje will not publish an external exclusion list, but can continually opt out of companies which supposedly violate international principles of social responsibility such as the UN Global Compact, UN Guiding Principles and the OECD Guidelines for Multinational Enterprises. Formuepleje cooperates with an external service provider from which reports on companies suspected of serious violations of international norms and conventions are regularly received. As a rule, the recommendations are followed, but all inputs are evaluated, and Formuepleje's investment committee makes the final decision on the possible exclusion of a company. Companies in the portfolios have already been through the relevant portfolio manager's own due diligence process, so it is rare that Formuepleje ends up excluding a company from the portfolios.

In collaboration with an external actor, Formuepleje works actively to influence companies which are suspected of violating international norms. Formuepleje receives regular reports on developments in individual cases, and on whether there is still a prospect of a solution being reached. This is included as an important input in the evaluation of whether it is possible to continue investing in these companies. As a rule, Formuepleje considers supporting companies which are moving in the right direction in terms of ESG matters more effective than divestment.

Formuepleje does not expect the consideration of ESG risks in the investment process to reduce returns for the funds. Investing in companies that understand and manage ESG-related risks – including respecting international principles for corporate social responsibility – results in healthier long-term returns and higher risk-adjusted returns.

The fund is classified as a financial product according to article 6 in the ESG Disclosure regulation. The investments, that are the basis for this financial product, do not account for the EU criteria for environmentally sustainable economic activities.

## ASSOCIATED INDIVIDUALS AND COMPANIES

### ***Board of Directors of the Fund***

Managing Director, cand.silv., E\*MBA, HD(F)  
Carsten With Thygesen (chairman)

Professor, PhD, Institute of Law, cand.merc.(jur.)  
Hanne Søndergaard Birkmose

Attorney-at-Law, Partner, DLA Piper Denmark Advokatpartnerselskab, cand.jur.  
Michael Vinther

Director, cand.oecon  
Lars Sylvest

### ***Manager of the Fund***

Formuepleje A/S  
Management, Søren Astrup, Henrik Franck and Henry Høeg  
Værkmestergade 25, 8.  
DK-8000 Aarhus C, Denmark  
CVR no. 18 05 97 38

### ***The Fund's Investment Advisor***

Formuepleje A/S  
Management, Søren Astrup, Henrik Franck and Henry Høeg  
Værkmestergade 25, 8.  
DK-8000 Aarhus C, Denmark  
CVR no. 18 05 97 38

### ***The Fund's auditors***

Ernst & Young P/S, Godkendt Revisionspartnerskab  
By Thomas Hjortkjær Petersen og Klaus Skovsen  
Dirch Passers Allé 36  
DK-2000 Frederiksberg  
CVR no. 30 70 02 28

### ***The Fund's Custodian***

Danske Bank A/S  
Holmens Kanal 2-12  
DK-1092 Copenhagen K, Denmark  
CVR no. 61 12 62 28

## **COMPLAINTS OFFICER**

In accordance with the Danish Financial Business Act, investors in the Fund may file a complaint with the Fund's complaints officer with the Fund's Manager. Complaints guidelines are available on the website <https://www.formuepleje.dk/om-os/klagevejledning/> and can also be obtained by contacting the Manager.

## **INVESTOR INFORMATION, ANNUAL REPORT, ETC.**

Key Investor Information, Investor Information and annual reports are published on the Fund's website.

## **PERSONAL DATA**

You can read more about how we process personal data in the Privacy policy which is available on [www.formuepleje.dk](http://www.formuepleje.dk). If you have any questions regarding the use of personal data, you are very welcome to contact the Fund's Manager.

You can contact Legal & Compliance on [legal@formuepleje.dk](mailto:legal@formuepleje.dk).

## SPECIAL RESERVATIONS

This Investor Information, which has been prepared in Danish, addresses Danish investors and has been drawn up in accordance with Danish rules and legislation.

This Investor Information is approved by Finansinspektionen in Sweden for the purpose of selling and marketing units to retail customers in Sweden. The Investor Information is not approved by or registered with other foreign authorities with a view to sale and marketing of units to retail clients outside Denmark.

The shares cannot be supplied or traded in USA and Canada and this Investor Information cannot be handed over to investors domiciled in these countries.

Information contained in this Investor Information does not constitute advice concerning investments or any other issues and does not constitute an offer or solicitation of an offer to buy or sell. Investors are encouraged to obtain individual advice on their own investment situation and related issues.

The details of this Investor Information do not constitute an offer or a solicitation of an offer in any jurisdiction where such offer or solicitation of an offer is not allowed or to individuals to whom such offer or such solicitation of an offer is not allowed.

Any information contained in the present Investor Information, including in relation to investment strategy and risk profile, is subject to change as resolved by the Manager within the framework of legislation and the articles of association.

This version of Investor Information supersedes any and all previous versions of Investor Information in relation to the matters herein addressed. The wordings of any and all previous versions therefore cease to be valid as of the date of publication of this Investor Information.

