



RI TRANSPARENCY REPORT

2019

Enter Fonder AB

About this report

The PRI Reporting Framework is a key step in the journey towards building a common language and industry standard for reporting responsible investment (RI) activities. This RI Transparency Report is one of the key outputs of this Framework. Its primary objective is to enable signatory transparency on RI activities and facilitate dialogue between investors and their clients, beneficiaries and other stakeholders. A copy of this report will be publicly disclosed for all reporting signatories on the [PRI website](#), ensuring accountability of the PRI Initiative and its signatories.

This report is an export of the individual Signatory organisation's response to the PRI during the reporting period specified above. It includes their responses to mandatory indicators, as well as responses to voluntary indicators the signatory has agreed to make public. The information is presented exactly as it was reported. Where an indicator offers a response option that is multiple-choice, all options that were available to the signatory to select are presented in this report. Presenting the information exactly as reported is a result of signatory feedback which suggested the PRI not summarise the information.

PRI disclaimer

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OO 01.1 Select the services and funds you offer

Select the services and funds you offer	% of asset under management (AUM) in ranges
Fund management	<input type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input checked="" type="radio"/> >50%
Fund of funds, manager of managers, sub-advised products	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Other	<input checked="" type="radio"/> 0% <input type="radio"/> <10% <input type="radio"/> 10-50% <input type="radio"/> >50%
Total 100%	

OO 02.1 Select the location of your organisation's headquarters.

Sweden

OO 02.2 Indicate the number of countries in which you have offices (including your headquarters).

- 1
 2-5
 6-10
 >10

OO 02.3 Indicate the approximate number of staff in your organisation in full-time equivalents (FTE).

12

OO 03.1 Indicate whether you have subsidiaries within your organisation that are also PRI signatories in their own right.

- Yes
 No

OO 04.1 Indicate the year end date for your reporting year.

31/12/2018

OO 04.2 Indicate your total AUM at the end of your reporting year.

Total AUM
 8,461,983,079 SEK
 942,188,063 USD

OO 04.4 Indicate the total assets at the end of your reporting year subject to an execution and/or advisory approach.

- Not applicable as we do not have any assets under execution and/or advisory approach

OO 05.1 Provide an approximate percentage breakdown of your AUM at the end of your reporting year using the following asset classes and investment strategies:

	Internally managed (%)	Externally managed (%)
Listed equity	57	0
Fixed income	43	0

Private equity	0	0
Property	0	0
Infrastructure	0	0
Commodities	0	0
Hedge funds	0	0
Fund of hedge funds	0	0
Forestry	0	0
Farmland	0	0
Inclusive finance	0	0
Cash	0	0
Money market instruments	0	0
Other (1), specify	0	0
Other (2), specify	0	0

OO 06	Mandatory	Descriptive	General
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OO 06.1	Select how you would like to disclose your asset class mix.
<input checked="" type="checkbox"/> as percentage breakdown <input type="checkbox"/> as broad ranges	

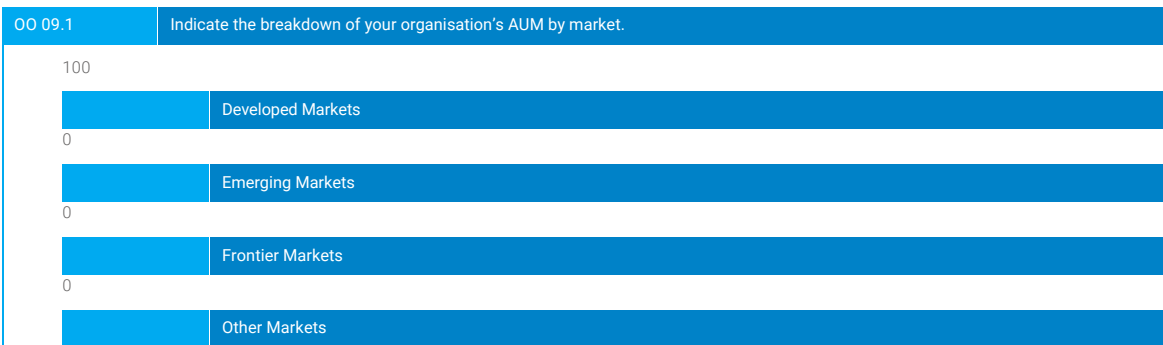
OO 06.3	Indicate whether your organisation has any off-balance sheet assets [Optional].
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

OO 06.5	Indicate whether your organisation uses fiduciary managers.
<input type="checkbox"/> Yes, we use a fiduciary manager and our response to OO 5.1 is reflective of their management of our assets. <input checked="" type="checkbox"/> No, we do not use fiduciary managers.	

OO 07	Mandatory to Report, Voluntary to Disclose	Gateway	General
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Private

OO 09	Mandatory	Peering	General
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OO 10	Mandatory	Gateway	General
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OO 10.1	Select the active ownership activities your organisation implemented in the reporting year.
Listed equity – engagement	
<input checked="" type="checkbox"/> We engage with companies on ESG factors via our staff, collaborations or service providers. <input type="checkbox"/> We do not engage directly and do not require external managers to engage with companies on ESG factors.	
Listed equity – voting	
<input checked="" type="checkbox"/> We cast our (proxy) votes directly or via dedicated voting providers <input type="checkbox"/> We do not cast our (proxy) votes directly and do not require external managers to vote on our behalf	
Fixed income Corporate (financial) – engagement	

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

Fixed income Corporate (non-financial) – engagement

- We engage with companies on ESG factors via our staff, collaborations or service providers.
- We do not engage directly and do not require external managers to engage with companies on ESG factors. Please explain why you do not.

OO 11 Mandatory Gateway General

OO 11.1 Select the internally managed asset classes in which you addressed ESG incorporation into your investment decisions and/or your active ownership practices (during the reporting year).

Listed equity

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

Fixed income - corporate (non-financial)

- We address ESG incorporation.
- We do not do ESG incorporation.

OO 12 Mandatory Gateway General

OO 12.1 Below are all applicable modules or sections you may report on. Those which are mandatory to report (asset classes representing 10% or more of your AUM) are already ticked and read-only. Those which are voluntary to report on can be opted into by ticking the box.

Core modules

- Organisational Overview
- Strategy and Governance

RI implementation directly or via service providers

Direct - Listed Equity incorporation

- Listed Equity incorporation

Direct - Listed Equity active ownership

- Engagements
- (Proxy) voting

Direct - Fixed Income

- Fixed income - Corporate (financial)
- Fixed income - Corporate (non-financial)

Closing module

- Closing module

OO LE 01 Mandatory Gateway General

OO LE 01.1 Provide a breakdown of your internally managed listed equities by passive, active - quantitative (quant), active - fundamental and active - other strategies.

Strategies	Percentage of internally managed listed equities
Passive	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="checkbox"/> 0%
Active - quantitative (quant)	<input type="radio"/> >50% <input type="radio"/> 10-50% <input type="radio"/> <10% <input checked="" type="checkbox"/> 0%

Active - fundamental and active - other	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%
Total 100%	

OO FI 01	Mandatory	Gateway	General
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OO FI 01.1 Provide a breakdown of your internally managed fixed income securities by active and passive strategies

Type	Passive	Active - quantitative	Active - fundamental & others	Total internally managed fixed income security
Corporate (financial)	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	100%
Corporate (non-financial)	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%	<input type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input checked="" type="checkbox"/> 0%	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	100%

OO FI 03	Mandatory	Descriptive	General
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OO FI 03.2 Indicate the approximate (+/- 5%) breakdown of your corporate and securitised investments by investment grade or high-yield securities.

Type	Investment grade (+/- 5%)	High-yield (+/- 5%)	Total internally managed
Corporate (financial)	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	<input type="checkbox"/> >50% <input checked="" type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	100%
Corporate (non-financial)	<input checked="" type="checkbox"/> >50% <input type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	<input type="checkbox"/> >50% <input checked="" type="checkbox"/> 10-50% <input type="checkbox"/> <10% <input type="checkbox"/> 0%	100%

SG 01.1 Indicate if you have an investment policy that covers your responsible investment approach.

Yes

SG 01.2 Indicate the components/types and coverage of your policy.

Policy components/types	Coverage by AUM
<input checked="" type="checkbox"/> Policy setting out your overall approach <input type="checkbox"/> Formalised guidelines on environmental factors <input type="checkbox"/> Formalised guidelines on social factors <input type="checkbox"/> Formalised guidelines on corporate governance factors <input type="checkbox"/> Fiduciary (or equivalent) duties <input type="checkbox"/> Asset class-specific RI guidelines <input type="checkbox"/> Sector specific RI guidelines <input checked="" type="checkbox"/> Screening / exclusions policy <input checked="" type="checkbox"/> Engagement policy <input type="checkbox"/> (Proxy) voting policy <input type="checkbox"/> Other, specify (1) <input type="checkbox"/> Other, specify(2)	<input checked="" type="checkbox"/> Applicable policies cover all AUM <input type="checkbox"/> Applicable policies cover a majority of AUM <input type="checkbox"/> Applicable policies cover a minority of AUM

SG 01.3 Indicate if the investment policy covers any of the following

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments
- Your investment objectives that take ESG factors/real economy influence into account
- Time horizon of your investment
- Governance structure of organisational ESG responsibilities
- ESG incorporation approaches
- Active ownership approaches
- Reporting
- Climate change
- Understanding and incorporating client / beneficiary sustainability preferences
- Other RI considerations, specify (1)
- Other RI considerations, specify (2)

SG 01.4 Describe your organisation's investment principles and overall investment strategy, interpretation of fiduciary (or equivalent) duties, and how they consider ESG factors and real economy impact.

Enter Fonder is a fund management company that since 1999 has engaged in pure active management of equity and fixed income funds and mixed funds. This means that the funds invest on basis of Enter Fonder's own in-house analysis in order to enable clear positive outcomes in relation to the underlying index. The goal is to create best possible long term return taken into account risk factors. As a measure of the degree of active management, we provide "active share" numbers on a monthly basis since 2015 for the equity funds. Investment decisions are based on Enter Fonder's in-house, independent company research.

In Enter Fonder's efforts to generate returns for our clients, sustainability factors play an increasingly important role. We are convinced that companies that do not take social, ethical and environmental concerns in their business involves commercial and brand risks we as investors should be aware of. Since errors in the sustainability area is highly likely to result in increased cost for society they will also have impact on the companies' share price. Enter Fonder works in a structured way to integrate these aspects into our company research and stock valuation and further into the investment process.

SG 01.5 Provide a brief description of the key elements, any variations or exceptions to your investment policy that covers your responsible investment approach. [Optional]

To ensure that ESG issues have an impact on our investments we have worked out a model to fully integrate the screening results into our Investment Analysis and decision-making process. We continuously at least twice a year screen our equities and fixed income portfolios using Sustainalytic's screening.

In short, the portfolio companies are given a score in the areas Environment, Human Rights and Corporate Governance which adds up to a total ESG-score. The values of the ESG-scores are implemented numerically to Enter Fonders own in-house company research for equities and are thus integrated in our analysis.

In addition to our norm-based screening Enter Fonder do not invest in companies that own fossil assets for exploitation (coal, oil, gas) or in companies that produce pornography. We also refrain from investing in companies where more than 5% of sales come from alcohol, tobacco, weapons and games, and more than 5% originate from the distribution of pornographic material.

No

SG 01.6 CC Indicate the climate-related risks and opportunities that have been identified and factored into the investment strategies and products, within the organisation's investment time horizon.

In pursuit of the global sustainability goals, the management of carbon dioxide emissions will play a key role. The transition to a carbon dioxide-neutral society will result in risks for companies that are not well prepared for this development. These risks can be divided into operational risks and product risks. Enter Fonder uses an approach where each company's exposure to these risks is assessed in order to then be set in relation to their preparedness and

management of these risks. In addition to these risk factors, certain key parameters are also identified. These parameters include carbon intensity, risk of stranded assets and involvement in renewable solutions.

Enter Fonder will during 2019 start to quarterly publish a report, with an aggregated result for Enter Fund's holdings, which is compared with a benchmark index consisting of approximately 100 Swedish companies, all of which report enough data to be able to perform this type of analysis.

Since January 2017 we are publishing carbon footprint for our equity funds on our website.

We are also measuring the following datapoints for the companies we invest in for all our funds: water consumption, waste/pollution management and if the company has an existing climate policy.

SG 01.7 CC Indicate whether the organisation has assessed the likelihood and impact of these climate risks?

- Yes
- No

SG 01.9 CC Indicate whether the organisation publicly supports the TCFD?

- Yes
- No

Explain the rationale
 We do not yet publicly support the TCFD recommendations but we are considering to do so during 2019.

SG 01.10 CC Indicate whether there is an organisation-wide strategy in place to identify and manage material climate-related risks and opportunities.

- Yes
- No

Describe
 Yes, we will start reporting on climate-related risk and opportunities for all our funds in beginning of 2019.

SG 02 **Mandatory** **Core Assessed** **PRI 6**

SG 02.1 Indicate which of your investment policy documents (if any) are publicly available. Provide a URL and an attachment of the document.

- Policy setting out your overall approach

URL/Attachment
 URL
<http://www.enterfonder.se/en/invest/responsible-investment/>
 Attachment (will be made public)

- Screening / exclusions policy

URL/Attachment
 URL
<http://www.enterfonder.se/en/invest/responsible-investment/>
 Attachment (will be made public)

- Engagement policy

URL/Attachment
 URL
<http://www.enterfonder.se/en/invest/responsible-investment/>
 Attachment (will be made public)

- We do not publicly disclose our investment policy documents

SG 02.2 Indicate if any of your investment policy components are publicly available. Provide URL and an attachment of the document.

- Your organisation's definition of ESG and/or responsible investment and it's relation to investments

URL/Attachment
 URL
<http://www.enterfonder.se/en/invest/responsible-investment/>
 Attachment

- ESG incorporation approaches
- Active ownership approaches
- Reporting

URL/Attachment

- URL
<https://www.enterfonder.se/wp-content/uploads/%C3%85rsber%C3%A4ttelse-fonder-2018-190313-hemsidan.pdf>
- Attachment
- We do not publicly disclose any investment policy components

SG 03	Mandatory	Core Assessed	General
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SG 03.1 Indicate if your organisation has a policy on managing potential conflicts of interest in the investment process.

Yes

SG 03.2 Describe your policy on managing potential conflicts of interest in the investment process.

Enter Fonder AB's management continuously work on identifying, track and manage any conflicts of interest that may arise in the operations in accordance with internal rules. The company's CEO is responsible for implementing the internal rules and shall periodically review situations that possibly could constitute a conflict of interest and in the optimum way make sure that no unduly party is favoured. The company shall ensure that the unitholders of each fund is treated fairly. The company will not give priority to certain nobility unitholders interests in front of others. Enter Fonder continuously evaluate the choice of counterparties and monitor that the level of compensation is consistent with the service in return. This takes place twice a year and are reported to the board. In case of a substantial conflict of interest the board is to be informed. The issue of identification, monitoring and management of conflicts of interest is to be a standing item at the recurring compliance meetings where the CEO/The Company's Regulatory Compliance Function and the Risk Management Function together discuss the current issues relating to regulatory compliance.

No

SG 04	Voluntary	Descriptive	General
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Private

SG 05	Mandatory	Gateway/Core Assessed	General
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SG 05.1 Indicate if and how frequently your organisation sets and reviews objectives for its responsible investment activities.

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad-hoc basis
- It is not set/reviewed

SG 06	Voluntary	Descriptive	General
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Private

SG 07	Mandatory	Core Assessed	General
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SG 07.1 Indicate the internal and/or external roles used by your organisation, and indicate for each whether they have oversight and/or implementation responsibilities for responsible investment.

Roles

- Board members or trustees
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Internal Roles (triggers other options)

Select from the below internal roles

- Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Operating Officer (COO), Investment Committee
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Other Chief-level staff or head of department, specify
- Portfolio managers
 - Oversight/accountability for responsible investment
 - Implementation of responsible investment
 - No oversight/accountability or implementation responsibility for responsible investment
- Investment analysts
- Dedicated responsible investment staff
- Investor relations
- Other role, specify (1)

Other description (1)
Chief Sustainability Officer.
<input type="checkbox"/> Oversight/accountability for responsible investment <input checked="" type="checkbox"/> Implementation of responsible investment <input type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment
<input type="checkbox"/> Other role, specify (2)
<input checked="" type="checkbox"/> External managers or service providers
<input type="checkbox"/> Oversight/accountability for responsible investment <input type="checkbox"/> Implementation of responsible investment <input checked="" type="checkbox"/> No oversight/accountability or implementation responsibility for responsible investment

SG 07.2	For the roles for which you have RI oversight/accountability or implementation responsibilities, indicate how you execute these responsibilities.
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The Board is responsible for documentation, decision making and making sure that the internal rules are maintained.

CEO is responsible for making sure that the information from the service providers such as Sustainalytics are received and implemented to Enter Fonder and in turn provided to the portfolio managers. The CEO is also responsible for ensuring that SRI is integrated into the investment analysis.

CFO is responsible for managing the risk control and to ensure that the internal rules are maintained.

Portfolio managers and analysts within Enter Fonder are responsible for the contact with company management with the portfolio companies in Enters universe. Portfolio managers and analysts are also responsible for the actual integration of SRI into their investment analysis and decision making.

We have during the course of 2018/19 a an employee who part time manages the implementation and integration of SRI into investment processes.

SG 07.3	Indicate the number of dedicated responsible investment staff your organisation has.
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1

SG 07 CC	Voluntary	Descriptive	General
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SG 07.5 CC	Indicate the roles in the organisation that have oversight, accountability and/or management responsibilities for climate-related issues.
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Board members or trustees		
<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues		
Chief Executive Officer (CEO), Chief Investment Officer (CIO), Chief Risk Officer (CRO), Investment Committee		
<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues		
Portfolio managers		
<input checked="" type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input type="checkbox"/> No responsibility for climate-related issues		
External managers or service providers		
<input type="checkbox"/> Oversight/accountability for climate-related issues <input type="checkbox"/> Assessment and management of climate-related issues <input checked="" type="checkbox"/> No responsibility for climate-related issues		
Other role, specify (1)		
<table border="1"> <thead> <tr> <th style="background-color: #808080; color: white;">Other description (1)</th> </tr> </thead> <tbody> <tr> <td>Other role, specify (1)</td> </tr> </tbody> </table>	Other description (1)	Other role, specify (1)
Other description (1)		
Other role, specify (1)		

SG 07.6 CC	For board level roles for which have climate-related issues oversight/accountability or implementation responsibilities, indicate how these responsibilities are executed.
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The Board is responsible for documentation, decision making and making sure that the internal rules are maintained.

CEO is responsible for safe-guarding that companies involved in specific climate related operations are excluded from investments.

CFO is responsible for managing the risk control and to ensure that the internal rules are maintained.

Portfolio managers and analysts within Enter Fonder are responsible for the contact with company management with the portfolio companies in Enters universe.

SG 07.7 CC	For the management-level roles that assess and manage climate-related issues, provide further information on the structure and process involved.
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CEO is responsible for updating list of companies that are not approved for investments. CEO distributes on ongoing basis this list of companies among the fund managers.

SG 08	Voluntary	Additional Assessed	General
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Private

SG 09	Mandatory	Core Assessed	PRI 4,5
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SG 09.1 Select the collaborative organisation and/or initiatives of which your organisation is a member or in which it participated during the reporting year, and the role you played.

Principles for Responsible Investment

	Your organisation's role in the initiative during the reporting period (see definitions)
Basic	

- Asian Corporate Governance Association
- Australian Council of Superannuation Investors
- AFIC – La Commission ESG
- BVCA – Responsible Investment Advisory Board
- CDP Climate Change
- CDP Forests
- CDP Water
- CFA Institute Centre for Financial Market Integrity
- Code for Responsible Investment in SA (CRISA)
- Code for Responsible Finance in the 21st Century
- Council of Institutional Investors (CII)
- Eumedion
- Extractive Industries Transparency Initiative (EITI)
- ESG Research Australia
- Invest Europe Responsible Investment Roundtable
- Global Investors Governance Network (GIGN)
- Global Impact Investing Network (GIIN)
- Global Real Estate Sustainability Benchmark (GRESB)
- Green Bond Principles
- Institutional Investors Group on Climate Change (IIGCC)
- Interfaith Center on Corporate Responsibility (ICCR)
- International Corporate Governance Network (ICGN)
- Investor Group on Climate Change, Australia/New Zealand (IGCC)
- International Integrated Reporting Council (IIRC)
- Investor Network on Climate Risk (INCR)/CERES
- Local Authority Pension Fund Forum
- Principles for Sustainable Insurance
- Regional or National Social Investment Forums (e.g. UKSIF, Eurosif, ASRIA, RIAA), specify
- Responsible Finance Principles in Inclusive Finance
- Shareholder Association for Research and Education (Share)
- United Nations Environmental Program Finance Initiative (UNEP FI)
- United Nations Global Compact
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify
- Other collaborative organisation/initiative, specify

SG 10	Mandatory	Core Assessed	PRI 4
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SG 10.1 Indicate if your organisation promotes responsible investment, independently of collaborative initiatives.

Yes

SG 10.2 Indicate the actions your organisation has taken to promote responsible investment independently of collaborative initiatives. Provide a description of your role in contributing to the objectives of the selected action and the typical frequency of your participation/contribution.

Provided or supported education or training programmes (this includes peer to peer RI support) Your education or training may be for clients, investment managers, actuaries, broker/dealers, investment consultants, legal advisers etc.)

	Description
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Workshops for our staff with invited RI Officers of investment universe companies. We also engage in The Swedish Investment Fund Association and their Sustainability Working Group.

Frequency of contribution

- Quarterly or more frequently
- Biannually
- Annually
- Less frequently than annually
- Ad hoc
- Other

- Provided financial support for academic or industry research on responsible investment
- Provided input and/or collaborated with academia on RI related work
- Encouraged better transparency and disclosure of responsible investment practices across the investment industry
- Spoke publicly at events and conferences to promote responsible investment
- Wrote and published in-house research papers on responsible investment
- Encouraged the adoption of the PRI
- Responded to RI related consultations by non-governmental organisations (OECD, FSB etc.)
- Wrote and published articles on responsible investment in the media
- A member of PRI advisory committees/ working groups, specify
- On the Board of, or officially advising, other RI organisations (e.g. local SIFs)
- Other, specify

No

SG 11	Voluntary	Additional Assessed	PRI 4,5,6
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Private

SG 12	Mandatory	Core Assessed	PRI 4
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SG 12.1 Indicate whether your organisation uses investment consultants.

- Yes, we use investment consultants
- No, we do not use investment consultants.

SG 13	Mandatory	Descriptive	PRI 1
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SG 13.1 Indicate whether the organisation undertakes scenario analysis and/or modelling and provide a description of the scenario analysis (by asset class, sector, strategic asset allocation, etc.).

- Yes, to assess future ESG factors
- Yes, to assess future climate-related risks and opportunities
- No, not to assess future ESG/climate-related issues

SG 14	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1
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SG 14.1 Some investment risks and opportunities arise as a result of long term trends. Indicate which of the following are considered.

- Changing demographics
- Climate change
- Resource scarcity
- Technological developments
- Other, specify(1)

other description (1)

We exclude investments in companies that own fossil assets for exploitation.

- Other, specify(2)
- None of the above

SG 14 CC	Voluntary		General
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SG 14.8 CC Indicate whether climate-related risks are integrated into overall risk management and explain the risks management processes for identifying, assessing, and managing climate-related risks.

- Process for climate-related risks is integrated into overall risk management
- Process for climate-related risks is not integrated into our overall risk management

Please describe

We work to prevent Climate change by not investing in companies that own fossil assets for exploitation. We also measure the carbon footprint in our portfolios.

SG 14.9 CC	Indicate whether the organisation undertakes active ownership activities to encourage TCFD adoption.
<input type="radio"/> Yes <input checked="" type="radio"/> No, we do not engage	

SG 15	Mandatory to Report, Voluntary to Disclose	Descriptive	PRI 1
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SG 15.1	Indicate if your organisation allocates assets to, or manages, funds based on specific environmental and social themed areas.
<input type="radio"/> Yes <input checked="" type="radio"/> No	

SG 18	Voluntary	Descriptive	General
Private			

SG 19	Mandatory	Core Assessed	PRI 2, 6
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SG 19.1	Indicate whether your organisation typically discloses asset class specific information proactively. Select the frequency of the disclosure to clients/beneficiaries and the public, and provide a URL to the public information.
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Listed equity - Incorporation

Do you disclose?

- We do not proactively disclose it to the public and/or clients/beneficiaries
- We disclose to clients/beneficiaries only.
- We disclose it publicly

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL

- Broad approach to ESG incorporation
- Detailed explanation of ESG incorporation strategy used

Annually

<https://www.enterfonder.se/wp-content/uploads/%C3%85rsber%C3%A4ttelse-fonder-2018-190313-hemsidan.pdf>
https://www.enterfonder.se/wp-content/uploads/Merged_Public_Transparency_Report_Enter-Fonder-AB-2018-1.pdf

Listed equity - Engagement

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL

Disclosure to public and URL	
<input checked="" type="checkbox"/> Details on the overall engagement strategy <input type="checkbox"/> Details on the selection of engagement cases and definition of objectives of the selections, priorities and specific goals <input checked="" type="checkbox"/> Number of engagements undertaken <input checked="" type="checkbox"/> Breakdown of engagements by type/topic <input type="checkbox"/> Breakdown of engagements by region <input checked="" type="checkbox"/> An assessment of the current status of the progress achieved and outcomes against defined objectives <input checked="" type="checkbox"/> Examples of engagement cases <input type="checkbox"/> Details on eventual escalation strategy taken after the initial dialogue has been unsuccessful (i.e. filing resolutions, issuing a statement, voting against management, divestment etc.) <input type="checkbox"/> Details on whether the provided information has been externally assured <input checked="" type="checkbox"/> Outcomes that have been achieved from the engagement <input type="checkbox"/> Other information	
Annually	
https://www.enterfonder.se/wp-content/uploads/%C3%85rsber%C3%A4ttelse-fonder-2018-190313-hemsidan.pdf https://www.enterfonder.se/wp-content/uploads/Merged_Public_Transparency_Report_Enter-Fonder-AB_2018-1.pdf	

Listed equity – (Proxy) Voting

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

Fixed income

Do you disclose?

- We do not disclose to either clients/beneficiaries or the public.
- We disclose to clients/beneficiaries only.
- We disclose to the public

The information disclosed to clients/beneficiaries is the same

- Yes
- No

Disclosure to public and URL	
<input type="radio"/> Broad approach to RI incorporation <input checked="" type="radio"/> Detailed explanation of RI incorporation strategy used	
Annually	
https://www.enterfonder.se/wp-content/uploads/Merged_Public_Transparency_Report_Enter-Fonder-AB_2018-1.pdf https://www.enterfonder.se/wp-content/uploads/%C3%85rsber%C3%A4ttelse-fonder-2018-190313-hemsidan.pdf	

LEI 01	Mandatory	Gateway	PRI 1		
LEI 01.1	Indicate (1) which ESG incorporation strategy and/or combination of strategies you apply to your actively managed listed equities and (2) the breakdown of your actively managed listed equities by strategy or combination of strategies (+/- 5%)				
<input type="checkbox"/> Screening alone (i.e. not combined with any other strategies) <input type="checkbox"/> Thematic alone (i.e. not combined with any other strategies) <input type="checkbox"/> Integration alone (i.e. not combined with any other strategies) <input checked="" type="checkbox"/> Screening and integration strategies					
<table border="1"> <tr> <td>Percentage of active listed equity to which the strategy is applied</td> <td>100%</td> </tr> </table>				Percentage of active listed equity to which the strategy is applied	100%
Percentage of active listed equity to which the strategy is applied	100%				
<input type="checkbox"/> Thematic and integration strategies <input type="checkbox"/> Screening and thematic strategies <input type="checkbox"/> All three strategies combined <input type="checkbox"/> We do not apply incorporation strategies					
LEI 02	Voluntary	Additional Assessed	PRI 1		
Private					
LEI 03	Voluntary	Additional Assessed	PRI 1		
Private					
LEI 04	Mandatory	Descriptive	PRI 1		
LEI 04.1	Indicate and describe the type of screening you apply to your internally managed active listed equities.				
<input checked="" type="checkbox"/> Negative/exclusionary screening					
<input checked="" type="checkbox"/> Product <input checked="" type="checkbox"/> Activity <input checked="" type="checkbox"/> Sector <input type="checkbox"/> Country/geographic region <input type="checkbox"/> Environmental and social practices and performance <input type="checkbox"/> Corporate governance					
<table border="1"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td>Enter Funds do not invest in companies that own fossil assets for exploitation (coal, oil, gas) or in companies that produce pornography. We also refrain from investing in companies where more than 5% of sales come from alcohol, tobacco, weapons and games, and more than 5% derive from the distribution of pornographic material.</td> </tr> </tbody> </table>				Description	Enter Funds do not invest in companies that own fossil assets for exploitation (coal, oil, gas) or in companies that produce pornography. We also refrain from investing in companies where more than 5% of sales come from alcohol, tobacco, weapons and games, and more than 5% derive from the distribution of pornographic material.
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<input type="checkbox"/> Positive/best-in-class screening					
<input checked="" type="checkbox"/> Norms-based screening					
<input checked="" type="checkbox"/> UN Global Compact Principles <input type="checkbox"/> The UN Guiding Principles on Business and Human Rights <input type="checkbox"/> International Labour Organization Conventions <input type="checkbox"/> United Nations Convention Against Corruption <input checked="" type="checkbox"/> OECD Guidelines for Multinational Enterprises <input type="checkbox"/> Other, specify					
<table border="1"> <thead> <tr> <th>Description</th> </tr> </thead> <tbody> <tr> <td>The norm-based screening is provided through Sustainalytics. The screening contains environmental, social and corporate governance rating for each security. Each rating consists of multiple factors. All securities are screened biannually.</td> </tr> </tbody> </table>				Description	The norm-based screening is provided through Sustainalytics. The screening contains environmental, social and corporate governance rating for each security. Each rating consists of multiple factors. All securities are screened biannually.
Description					
The norm-based screening is provided through Sustainalytics. The screening contains environmental, social and corporate governance rating for each security. Each rating consists of multiple factors. All securities are screened biannually.					
LEI 04.2	Describe how you notify clients and/or beneficiaries when changes are made to your screening criteria.				
<p>The screening is made on all our current holdings at the time the screening is made. We also add companies we have not invested in yet. The screening is made on environmental, social and corporate governance issues.</p> <p>Information on changes is made on our webpage as well as by direct information to all clients involved .</p>					
LEI 05	Mandatory	Core Assessed	PRI 1		
LEI 05.1	Indicate which processes your organisation uses to ensure screening is based on robust analysis.				
<input checked="" type="checkbox"/> Comprehensive ESG research is undertaken or sourced to determine companies' activities and products. <input type="checkbox"/> Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies <input type="checkbox"/> External research and data used to identify companies to be excluded/included is subject to internal audit by ESG/RI staff, the internal audit function or similar <input checked="" type="checkbox"/> Third-party ESG ratings are updated regularly to ensure that portfolio holdings comply with fund policies. <input type="checkbox"/> Trading platforms blocking / restricting flagged securities on the black list <input type="checkbox"/> A committee or body with representatives independent of the individuals who conduct company research reviews some or all screening decisions					

- A periodic review of the quality of the research undertaken or provided is carried out
- Review and evaluation of external research providers
- Other, specify
- None of the above

LEI 05.2 Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your ESG screening strategy.

- <10%
- 10-50%
- 51-90%
- >90%

LEI 05.3 Indicate how frequently third party ESG ratings are updated for screening purposes.

- Quarterly or more frequently
- Bi-annually
- Annually
- Less frequently than annually

LEI 06	Voluntary	Additional Assessed	PRI 1
Private			

LEI 08	Mandatory	Core Assessed	PRI 1
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LEI 08.1 Indicate the ESG factors you systematically research as part of your investment analysis and the proportion of actively managed listed equity portfolios that is impacted by this analysis.

ESG issues	Proportion impacted by analysis										
Environmental	<table border="1"> <tr> <td></td> <td>Environmental</td> </tr> <tr> <td><input type="radio"/> <10%</td> <td></td> </tr> <tr> <td><input type="radio"/> 10-50%</td> <td></td> </tr> <tr> <td><input type="radio"/> 51-90%</td> <td></td> </tr> <tr> <td><input checked="" type="radio"/> >90%</td> <td></td> </tr> </table>		Environmental	<input type="radio"/> <10%		<input type="radio"/> 10-50%		<input type="radio"/> 51-90%		<input checked="" type="radio"/> >90%	
	Environmental										
<input type="radio"/> <10%											
<input type="radio"/> 10-50%											
<input type="radio"/> 51-90%											
<input checked="" type="radio"/> >90%											
Social	<table border="1"> <tr> <td></td> <td>Social</td> </tr> <tr> <td><input type="radio"/> <10%</td> <td></td> </tr> <tr> <td><input type="radio"/> 10-50%</td> <td></td> </tr> <tr> <td><input type="radio"/> 51-90%</td> <td></td> </tr> <tr> <td><input checked="" type="radio"/> >90%</td> <td></td> </tr> </table>		Social	<input type="radio"/> <10%		<input type="radio"/> 10-50%		<input type="radio"/> 51-90%		<input checked="" type="radio"/> >90%	
	Social										
<input type="radio"/> <10%											
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<input type="radio"/> 51-90%											
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Corporate Governance	<table border="1"> <tr> <td></td> <td>Corporate Governance</td> </tr> <tr> <td><input type="radio"/> <10%</td> <td></td> </tr> <tr> <td><input type="radio"/> 10-50%</td> <td></td> </tr> <tr> <td><input type="radio"/> 51-90%</td> <td></td> </tr> <tr> <td><input checked="" type="radio"/> >90%</td> <td></td> </tr> </table>		Corporate Governance	<input type="radio"/> <10%		<input type="radio"/> 10-50%		<input type="radio"/> 51-90%		<input checked="" type="radio"/> >90%	
	Corporate Governance										
<input type="radio"/> <10%											
<input type="radio"/> 10-50%											
<input type="radio"/> 51-90%											
<input checked="" type="radio"/> >90%											

LEI 09	Mandatory	Core Assessed	PRI 1
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LEI 09.1 Indicate which processes your organisation uses to ensure ESG integration is based on a robust analysis.

- Comprehensive ESG research is undertaken or sourced to determine companies' activities and products
- Companies are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Third-party ESG ratings are updated regularly.
- A periodic review of the internal research is carried out
- Structured, regular ESG specific meetings between responsible investment staff and the fund manager or within the investments team
- ESG risk profile of a portfolio against benchmark
- Analysis of the impact of ESG factors on investment risk and return performance
- Other, specify
- None of the above

LEI 09.2 Indicate the proportion of your actively managed listed equity portfolio that is subject to comprehensive ESG research as part your integration strategy.

- <10%
- 10-50%

- 51-90%
- >90%

LEI 09.3 Indicate how frequently third party ESG ratings that inform your ESG integration strategy are updated.

- Quarterly or more frequently
- Bi-Annually
- Annually
- Less frequently than annually

LEI 09.5 Describe how ESG information is held and used by your portfolio managers.

- ESG information is held within centralised databases or tools and it is accessible by all relevant staff
- ESG information or analysis is a standard section or aspect of all company research notes or industry/sector analysis generated by investment staff
- Systematic records are kept that capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

LEI 10	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 1
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Private

LEI 12	Voluntary	Descriptive	PRI 1
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Private

LEI 13	Voluntary	Descriptive	PRI 1
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Private

LEA 01	Mandatory	Core Assessed	PRI 2										
LEA 01.1	Indicate whether your organisation has an active ownership policy.												
<input checked="" type="checkbox"/> Yes													
LEA 01.2	Attach or provide a URL to your active ownership policy.												
<input type="checkbox"/> Attachment provided: <input checked="" type="checkbox"/> URL provided: https://www.enterfonder.se/en/invest/responsible-investment/													
LEA 01.3	Indicate what your active engagement policy covers:												
<table border="1"> <tr> <td colspan="2">General approach to active ownership</td> </tr> <tr> <td colspan="2"> <input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Alignment with national stewardship code requirements <input type="checkbox"/> Assets/funds covered by active ownership policy <input type="checkbox"/> Expectations and objectives <input checked="" type="checkbox"/> Engagement approach </td> </tr> <tr> <td colspan="2">Engagement</td> </tr> <tr> <td colspan="2"> <input checked="" type="checkbox"/> ESG issues <input type="checkbox"/> Prioritisation of engagement <input type="checkbox"/> Method of engagement <input checked="" type="checkbox"/> Transparency of engagement activities <input type="checkbox"/> Due diligence and monitoring process <input type="checkbox"/> Insider information <input type="checkbox"/> Escalation strategies <input type="checkbox"/> Service Provider specific criteria <input type="checkbox"/> Other specify; </td> </tr> <tr> <td colspan="2"> <input type="checkbox"/> (Proxy) voting approach <input type="checkbox"/> Other <input type="checkbox"/> None of the above </td> </tr> </table>				General approach to active ownership		<input type="checkbox"/> Conflicts of interest <input type="checkbox"/> Alignment with national stewardship code requirements <input type="checkbox"/> Assets/funds covered by active ownership policy <input type="checkbox"/> Expectations and objectives <input checked="" type="checkbox"/> Engagement approach		Engagement		<input checked="" type="checkbox"/> ESG issues <input type="checkbox"/> Prioritisation of engagement <input type="checkbox"/> Method of engagement <input checked="" type="checkbox"/> Transparency of engagement activities <input type="checkbox"/> Due diligence and monitoring process <input type="checkbox"/> Insider information <input type="checkbox"/> Escalation strategies <input type="checkbox"/> Service Provider specific criteria <input type="checkbox"/> Other specify;		<input type="checkbox"/> (Proxy) voting approach <input type="checkbox"/> Other <input type="checkbox"/> None of the above	
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<input type="checkbox"/> (Proxy) voting approach <input type="checkbox"/> Other <input type="checkbox"/> None of the above													
<input type="checkbox"/> No													
LEA 01.4	Do you outsource any of your active ownership activities to service providers?												
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No													

LEA 02	Mandatory	Core Assessed	PRI 1,2,3								
LEA 02.1	Indicate the method of engagement, giving reasons for the interaction.										
<table border="1"> <thead> <tr> <th>Type of engagement</th> <th>Reason for interaction</th> </tr> </thead> <tbody> <tr> <td>Individual / Internal staff engagements</td> <td> <input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff </td> </tr> <tr> <td>Collaborative engagements</td> <td> <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via collaborative engagements </td> </tr> <tr> <td>Service provider engagements</td> <td> <input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers </td> </tr> </tbody> </table>				Type of engagement	Reason for interaction	Individual / Internal staff engagements	<input checked="" type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input checked="" type="checkbox"/> To encourage improved/increased ESG disclosure <input checked="" type="checkbox"/> To gain an understanding of ESG strategy and/or management <input type="checkbox"/> We do not engage via internal staff	Collaborative engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via collaborative engagements	Service provider engagements	<input type="checkbox"/> To influence corporate practice (or identify the need to influence) on ESG issues <input type="checkbox"/> To encourage improved/increased ESG disclosure <input type="checkbox"/> To gain an understanding of ESG strategy and/or management <input checked="" type="checkbox"/> We do not engage via service providers
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LEA 03	Mandatory	Core Assessed	PRI 2
LEA 03.1	Indicate whether your organisation has a formal process for identifying and prioritising engagements.		
<input type="checkbox"/> Yes			

✓ No

LEA 04	Mandatory	Core Assessed	PRI 2
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LEA 04.1 Indicate whether you define specific objectives for your organisation's engagement activities.

Individual / Internal engagements	<input type="radio"/> All engagement activities <input type="radio"/> Majority of engagement activities <input type="radio"/> Minority of engagement activities <input checked="" type="radio"/> We do not define specific objectives for engagement activities carried out by internal staff.
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LEA 05	Mandatory	Core Assessed	PRI 2
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LEA 05.1 Indicate if you monitor and/or review engagement outcomes.

Individual / Internal engagements	<input type="radio"/> Yes, in all cases <input checked="" type="radio"/> Yes, in majority of cases <input type="radio"/> Yes, in a minority of cases <input type="radio"/> We do not monitor, or review engagement outcomes carried out by our internal staff.
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LEA 05.2 Indicate if you do any of the following to monitor and review the progress of engagement activities.

Individual / Internal staff engagements	<input type="checkbox"/> Define timelines/milestones for your objectives <input type="checkbox"/> Track and/or monitor progress against defined objectives and/or KPIs <input checked="" type="checkbox"/> Track and/or monitor the progress of action taken when original objectives are not met <input checked="" type="checkbox"/> Revisit and, if necessary, revise objectives on continuous basis <input type="checkbox"/> Other; specify
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LEA 06	Mandatory	Additional Assessed	PRI 2,4
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LEA 06.1 Indicate whether your organisation has an escalation strategy when engagements are unsuccessful.

- Yes
- No

LEA 07	Voluntary	Additional Assessed	PRI 1,2
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LEA 07.1 Indicate whether insights gained from your organisation's engagements are shared with investment decision-makers.

Type of engagement	Insights shared
Individual / Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 07.2 Indicate the practices used to ensure information and insights collected through engagements are shared with investment decision-makers.

- Involving investment decision-makers when developing engagement programme
- Holding investment team meetings and/or presentations
- Using IT platforms/systems that enable data sharing
- Internal process that requires portfolio managers to re-balance holdings based on interaction and outcome levels
- Other; specify
- None

LEA 07.3 Indicate whether insights gained from your organisation's engagements are shared with your clients/beneficiaries.

Type of engagement	Insights shared
Individual/Internal staff engagements	<input checked="" type="radio"/> Yes, systematically <input type="radio"/> Yes, occasionally <input type="radio"/> No

LEA 08	Mandatory	Gateway	PRI 2
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LEA 08.1 Indicate if you track the number of your engagement activities.

Type of engagement	Tracking engagements

Individual / Internal staff engagements	<input checked="" type="checkbox"/> Yes, we track the number of our engagements in full <input type="checkbox"/> Yes, we partially track the number of our engagements <input type="checkbox"/> We do not track
------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

LEA 09	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
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Private

LEA 10	Voluntary	Additional Assessed	PRI 2
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LEA 10.1	Indicate which of the following your engagement involved.
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- Letters and emails to companies
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Meetings and/or calls with board/senior management
- Meetings and/or calls with the CSR, IR or other management
 - In a minority of cases
 - In a majority of cases
 - In all cases
- Visits to operations
- Visits to the supplier(s) from the 'company's supply chain
- Participation in roadshows
- Other

LEA 11	Voluntary	Descriptive	PRI 2
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Private

LEA 12	Mandatory	Descriptive	PRI 2
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LEA 12.1	Indicate how you typically make your (proxy) voting decisions.
----------	----------------------------------------------------------------

	Approach
<input checked="" type="checkbox"/> We use our own research or voting team and make voting decisions without the use of service providers.	
	Based on
<input checked="" type="checkbox"/> our own voting policy <input type="checkbox"/> our clients' requests or policies <input type="checkbox"/> other, explain	
<input type="checkbox"/> We hire service provider(s) who make voting recommendations and/or provide research that we use to guide our voting decisions.	
<input type="checkbox"/> We hire service provider(s) who make voting decisions on our behalf, except for some pre-defined scenarios where we review and make voting decisions.	
<input type="checkbox"/> We hire service provider(s) who make voting decisions on our behalf.	

LEA 14	Voluntary	Additional Assessed	PRI 2
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Private

LEA 15	Mandatory	Descriptive	PRI 2
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LEA 15.1	Indicate the proportion of votes where you or the service providers acting on your behalf have raised concerns with companies ahead of voting.
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- 100%
- 99-75%
- 74-50%
- 49-25%
- 24-1%
- Neither we nor our service provider(s) raise concerns with companies ahead of voting

LEA 16	Mandatory	Core Assessed	PRI 2
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LEA 16.1	Indicate the proportion of votes participated in within the reporting year in which, you and/or the service provider(s) acting on your behalf, have communicated to companies the rationale for abstaining or voting against management recommendations.
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- 100%
- 99-75%

- 74-50%
- 49-25%
- 24-1%
- We do not communicate the rationale to companies
- Not applicable because we and/or our service providers do not abstain or vote against management recommendations

LEA 17	Mandatory	Core Assessed	PRI 2
LEA 17.1	For listed equities where you and/or your service provider have the mandate to issue (proxy) voting instructions, indicate the percentage of votes cast during the reporting year.		
<input type="radio"/> We do track or collect this information <input checked="" type="checkbox"/> We do not track or collect this information			
LEA 18	Voluntary	Additional Assessed	PRI 2
Private			
LEA 19	Mandatory	Core Assessed	PRI 2
LEA 19.1	Indicate whether your organisation has a formal escalation strategy following unsuccessful voting.		
<input type="radio"/> Yes <input checked="" type="checkbox"/> No			
LEA 20	Voluntary	Descriptive	PRI 2
Private			

FI 01.1 Indicate (1) Which ESG incorporation strategy and/or combination of strategies you apply to your actively managed fixed income investments; and (2) The proportion (+/- 5%) of your total actively managed fixed income investments each strategy applies to.

Corporate (financial)	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	100
	All three strategies combined	0
	No incorporation strategies applied	0
Corporate (non-financial)	Screening alone	0
	Thematic alone	0
	Integration alone	0
	Screening + integration strategies	0
	Thematic + integration strategies	0
	Screening + thematic strategies	100
	All three strategies combined	0
	No incorporation strategies applied	0

FI 01.2 Describe your reasons for choosing a particular ESG incorporation strategy and how combinations of strategies are used.

To ensure that ESG issues have an impact on our investments we have worked out a model to fully integrate the screening results into our Investment Analysis and decision-making process. Through Sustainalytics we screen all our equities and fixed income twice a year. In short, the portfolio companies are given a score in the areas Environment, Human Rights and Corporate Governance which adds up to a total ESG-score. The values of the ESG-scores are implemented numerically to Enter Fonders own in-house company research for equities and are thus integrated in our analysis. Technically, since fixed income holdings are not analyzed in the same way as equities, the result cannot be integrated into our in-house company research, but our fixed income fund manager is obliged to consider the screening results and work under the same ESG policy as our equity fund managers.

In addition to our norm-based screening Enter Fonder do not invest in companies that own fossil assets for exploitation (coal, oil, gas) or in companies that produce pornography. We also refrain from investing in companies where more than 5% of sales come from alcohol, tobacco, weapons and games, and more than 5% originate from the distribution of pornographic material.

Private

FI 03.1 Indicate how you ensure that your ESG research process is robust:

- Comprehensive ESG research is undertaken internally to determine companies' activities; and products and/or services
- Issuers are given the opportunity by you or your research provider to review ESG research on them and correct inaccuracies
- Issuer information and/or ESG ratings are updated regularly to ensure ESG research is accurate
- Internal audits and regular reviews of ESG research are undertaken in a systematic way.
- A materiality/sustainability framework is created and regularly updated that includes all the key ESG risks and opportunities for each sector/country.

- Other, specify
- None of the above

FI 03.2 Describe how your ESG information or analysis is shared among your investment team.

- ESG information is held within a centralised database and is accessible to all investment staff
- ESG information is displayed on front office research platforms
- ESG information is a standard item on all individual issuer summaries, research notes, 'tear sheets', or similar documents
- Investment staff are required to discuss ESG information on issuers as a standard item during investment committee meetings
- Records capture how ESG information and research was incorporated into investment decisions
- Other, specify
- None of the above

FI 04 **Mandatory** Gateway **PRI 1**

FI 04.1 Indicate the type of screening you conduct.

	Corporate (financial)	Corporate (non-financial)
Negative/exclusionary screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Positive/best-in-class screening	<input type="checkbox"/>	<input type="checkbox"/>
Norms-based screening	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

FI 04.2 Describe your approach to screening for internally managed active fixed income

Enter Fonder is provided with ESG screening information from Sustainalytics. The screening consists of three numeric ratings - corporate, social and environmental - from which each security receives a prime threshold. Depending on the securities industry the ratings are weighted differently. Each of the ratings consists of multiple different factors.

FI 05 Voluntary Additional Assessed **PRI 1**

Private

FI 06 **Mandatory** Core Assessed **PRI 1**

FI 06.1 Indicate which systems your organisation has to ensure that fund screening criteria are not breached in fixed income investments.

Type of screening	Checks
Negative/exclusionary screening?	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Analysis is performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above
Norms-based screening	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Analysis is performed to ensure that issuers meet screening criteria <input checked="" type="checkbox"/> We ensure that data used for the screening criteria is updated at least once a year. <input type="checkbox"/> Automated IT systems prevent our portfolio managers from investing in excluded issuers or bonds that do not meet screening criteria <input checked="" type="checkbox"/> Audits of fund holdings are undertaken yearly by internal audit or compliance functions <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above

FI 07 **Mandatory to Report, Voluntary to Disclose** Descriptive **PRI 1**

Private

FI 08 **Mandatory** Core Assessed **PRI 1**

FI 08.1 Indicate whether you encourage transparency and disclosure relating to the issuance of themed bonds as per the Green Bonds Principles, Social Bond Principles, or Sustainability Bond Guidelines..

- We require that themed bond proceeds are only allocated to environmentally or socially beneficial projects
- We require the issuer (or 3rd party assurer) to demonstrate a process which determines the eligibility of projects to which themed bond proceeds are allocated
- We require issuers to demonstrate a systematic and transparent process of disbursing themed bond proceeds to eligible projects until all funds are allocated
- We require issuers to report at least once per year on the projects to which proceeds have been allocated including a description of those projects
- Other, specify
- None of the above

FI 08.2	Describe the actions you take when issuers do not disburse bond proceeds as described in the offering documents.		
	If an issuer would not meet the green bond criterias we would then reconsider our investment in such a bond. It has not so far occurred.		
FI 09	Mandatory	Additional Assessed	PRI 1
FI 09.1	Indicate how you assess the environmental or social impact of your thematic investments.		
	<input type="checkbox"/> We require issuers to report at least once per year on specific environmental or social impacts resulting from our themed investments <input type="checkbox"/> We ensure independent audits are conducted on the environmental or social impact of our investments <input type="checkbox"/> We have a proprietary system to measure environmental and social impact <input type="checkbox"/> We measure the impact of our themed bond investments on specific ESG factors such as carbon emissions or human rights <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above		
FI 14	Mandatory to Report, Voluntary to Disclose	Core Assessed	PRI 2
	Private		
FI 15	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
	Private		
FI 16	Mandatory to Report, Voluntary to Disclose	Additional Assessed	PRI 1,2
	Private		
FI 17	Mandatory to Report, Voluntary to Disclose	Additional Assessed	General
	Private		
FI 18	Voluntary	Descriptive	PRI 1,2
	Private		

CM1 01	Mandatory	Additional Assessed	General		
CM1 01.1	Indicate whether the reported information you have provided for your PRI Transparency Report this year has undergone:				
<input type="checkbox"/> Third party assurance over selected responses from this year's PRI Transparency Report <input type="checkbox"/> Third party assurance over data points from other sources that have subsequently been used in your PRI responses this year <input type="checkbox"/> Third party assurance or audit of the correct implementation of RI processes (that have been reported to the PRI this year) <input type="checkbox"/> Internal audit of the correct implementation of RI processes and/or accuracy of RI data (that have been reported to the PRI this year) <input checked="" type="checkbox"/> Internal verification of responses before submission to the PRI (e.g. by the CEO or the board) <ul style="list-style-type: none"> <input checked="" type="checkbox"/> Whole PRI Transparency Report has been internally verified <input type="checkbox"/> Selected data has been internally verified <input type="checkbox"/> Other, specify <input type="checkbox"/> None of the above					
CM1 02	Mandatory	Descriptive	General		
CM1 02.1	We undertook third party assurance on last year's PRI Transparency Report				
<input type="radio"/> Whole PRI Transparency Report was assured last year <input type="radio"/> Selected data was assured in last year's PRI Transparency Report <input checked="" type="radio"/> We did not assure last year's PRI Transparency report <input type="radio"/> None of the above, we were in our preparation year and did not report last year.					
CM1 03	Mandatory	Descriptive	General		
CM1 03.1	We undertake confidence building measures that are unspecific to the data contained in our PRI Transparency Report:				
<input type="checkbox"/> We adhere to an RI certification or labelling scheme <input type="checkbox"/> We carry out independent/third party assurance over a whole public report (such as a sustainability report) extracts of which are included in this year's PRI Transparency Report <input type="checkbox"/> ESG audit of holdings <input type="checkbox"/> Other, specify <input checked="" type="checkbox"/> None of the above					
CM1 04	Mandatory	Descriptive	General		
CM1 04.1	Do you plan to conduct third party assurance of this year's PRI Transparency report?				
<input type="radio"/> Whole PRI Transparency Report will be assured <input type="radio"/> Selected data will be assured <input checked="" type="radio"/> We do not plan to assure this year's PRI Transparency report					
CM1 07	Mandatory	Descriptive	General		
CM1 07.1	Indicate who has reviewed/verified internally the whole - or selected data of the - PRI Transparency Report . and if this applies to selected data please specify what data was reviewed				
<input checked="" type="checkbox"/> CEO or other Chief-Level staff <table border="1" style="margin-left: 20px;"> <tr> <td>Sign-off or review of responses</td> </tr> <tr> <td> <input type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses </td> </tr> </table> <input type="checkbox"/> The Board <input type="checkbox"/> Investment Committee <input type="checkbox"/> Compliance Function <input type="checkbox"/> RI/ESG Team <input type="checkbox"/> Investment Teams <input type="checkbox"/> Legal Department <input type="checkbox"/> Other (specify)				Sign-off or review of responses	<input type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses
Sign-off or review of responses					
<input type="checkbox"/> Sign-off <input checked="" type="checkbox"/> Review of responses					