

## FUND HOLDINGS - SWEDEN'S INSTITUTIONAL INVESTMENT INTO CHINESE BAD ACTORS

Source: FactSet

FINANCIAL INSTITUTION NAME → FUND TYPE ↓	Handelsbanken	Swedbank	SEB	Länsförsäkringar	Nordea	AMF
GLOBAL FUND	Handelsbanken Global Index Criteria	Swedbank Robur Globalfond	SEB Global Exposure Fund	Länsförsäkringar Global Index	Nordea Stratega 35	AMF Aktiefond Världen
EMERGING MARKETS	Handelsbanken Emerging Markets Index	Swedbank Robur Global Emerging Markets	SEB Emerging Markets Exposure Fund	Länsförsäkringar Tillväxtmarknad Index	Nordea Emerging Markets Enhanced Equity Fund	AMF Aktiefond Tillväxtmarknader
ASIA	Handelsbanken Asien Tema	Swedbank Robur Access Asien	SEB Asienfond ex Japan	Länsförsäkringar Asienfond	Nordea Kinafond	AMF Aktiefond Asien Stilla havet

KEY:	SANCTIONS LIST OVERVIEW:	SHORT NAME:
LIGHT GREEN: CLEAR	<b>Commerce Entity List:</b> A U.S. Department of Commerce list including foreign individuals, companies, and entities restricted from accessing U.S.-origin items due to involvement in activities contrary to national security or foreign policy interests.	Entity List
DARK ORANGE: HOLDS DIRECTLY SANCTIONED COMPANIES	<b>Uyghur Forced Labor Prevention Act (UFLPA) Entity List:</b> A U.S. Customs and Border Protection list identifying companies using forced labor from Xinjiang, triggering import bans under the UFLPA legislation.	UFLPA List
LIGHT ORANGE: HOLDS INDIRECTLY SANCTIONED COMPANIES	<b>DOD List of Chinese Military Companies Operating in the United States:</b> A U.S. Department of Defense list, also known as the 1260H list, referring to Section 1260H of the National Defense Authorization Act (NDAA), identifying entities associated with China's military-civil fusion strategy, often subjected to additional reporting and scrutiny requirements.	1260H List
	<b>Treasury OFAC SDN List:</b> A U.S. Department of the Treasury's list, compiled by the Office of Foreign Assets Control (OFAC), including individuals, entities, and vessels subject to sanctions due to their involvement in terrorism, narcotics trafficking, weapons proliferation, human rights abuses, or other activities threatening U.S. national security or foreign policy.	OFAC SDN List
	<b>Treasury OFAC Chinese Military-Industrial Complex Companies (CMIC) List:</b> A U.S. Treasury Department list targeting companies linked to China's military, requiring U.S. persons to divest from or avoid investments in these entities under E.O. 13959 and related amendments.	CMIC List

## FUND: Handelsbanken Global Index Criteria

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
360 Security Technology A	0.42427	Y	Entity List, 1260H List	
Cambricon Technologies A	4.02307	Y	Entity List	
Guangzhou Haige Communications Group A	1.59016	Y	Entity List	
Ninestar A	1.42175	Y	UFLPA List	
SenseTime Group B	0.02743	Y	CMIC List	
BGI Genomics A	1.07061	Y	1260H List	
Fiberhome Telecommunication Technologies	1.49548	Y	Entity List	
Chongqing Changan Automobile A	0.59038		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China South Industries Group Corporation (CSGC).
Kuang-Chi Technologies A	3.12205		Entity List	<a href="#">It is a subsidiary</a> of the sanctioned Kuang-Chi Group.
Shenzhen SED Industry A	0.76705		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Electronics Corporation (CEC).
China Overseas Land & Investment	2.77713		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China State Construction Group Co.
China COSCO Holdings	0.25680		OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
China National Nuclear Power A	0.74574		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China National Nuclear Corporation (CNNC)
China State Construction International Holdings	0.51557		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China State Construction Engineering Corporation.
Sinopharm Group	0.55927		Entity List	<a href="#">It is the parent company</a> of the sanctioned Sinopharm Equipment.
ZTE H	2.52279		Entity List, 1260H List, CMIC List	It is affiliated with the sanctioned ZTE Parsian, as both are <a href="#">owned by ZTE New Telecommunications Co.</a> (AKA Zhongxingxin). ZTE Parsian is found on the Entity List.  ZTE New Telecommunications Co. (AKA Zhongxingxin). is jointly controlled by the Chinese state-run enterprises <a href="#">CASC and CASIC, which appoint 5 of 9 directors</a> . Both CASC and CASIC are sanctioned - both are on the CMIC List, while CASIC is additionally on the 1260H List.
China Three Gorges A	2.47845		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China Three Gorges Group.
Empyrean Technology A	0.67670		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Electronics Corporation.
Inspur Electronic Information Industry	1.26902		Entity List, 1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned Inspur Group.
Poly Property Development H	0.15608		Entity List	<a href="#">It is a subsidiary</a> of the sanctioned China Poly Group.

Zhuzhou CRRC Times Electric	0.29510		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned CRRC Corporation.
Greentown China Holdings	1.53330		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned CCCG.
Hebei Sinopack Electronic Technology	0.84057		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned CETC.
Chongqing Taiji Industry Group	0.61978		Entity List, 1260H List, CMIC List	<a href="#">It is a sister company</a> of the sanctioned Sinopharm Equipment.

## FUND: Handelsbanken Emerging Markets Index

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
360 Security Technology A	0.031340	Y	Entity List, 1260H List	
BGI Genomics A	0.00445	Y	1260H List	
Iflytek A	0.004900	Y	Entity List	
Ninestar A	0.003410	Y	UFLPA List	
Zhejiang Dahua Technology A	1.36981	Y	Entity List, 1260H List	
China Overseas Land & Investment	1.736740		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China State Construction Group Co.
AVIC Industry Finance Holding	0.016150		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned AVIC.
Cgn Power Co.	0.958550		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China General Nuclear Power Corporation.
China Greatwall Technology Group A	0.745400		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Electronics Corporation (CEC).
China National Chemical Engineering A	0.052030		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China National Chemical Engineering Group Corporation (CNCEC)
China Yangtze Power A	0.874960		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China Three Gorges Group.
Greentown China	0.202980		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned CCCG.
Inspur Electronic Information Industry	0.615020		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned Inspur Group.
Kuang-Chi Technologies A	0.008810		Entity List	<a href="#">It is a subsidiary</a> to the sanctioned Kuang-Chi Group.
Shennan Circuits A	0.305850		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned AVIC.
Sinopharm Group	1.133200		Entity List	<a href="#">It is the parent company</a> of the sanctioned Sinopharm Equipment.
Tianma Microelectronics A	0.014330		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned AVIC.
Zhuzhou CSR Times Electric	0.673750		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned CRRC Corporation.
ZTE A	0.676990		Entity List, 1260H List, CMIC List	It is affiliated with the sanctioned ZTE Parsian, as both are <a href="#">owned by ZTE New Telecommunications Co.</a> (AKA Zhongxingxin). ZTE Parsian is found on the Entity List.
ZTE H	3.078560			ZTE New Telecommunications Co. (AKA Zhongxingxin). is jointly controlled by the Chinese state-run enterprises <a href="#">CASC and CASIC, which appoint 5 of 9 directors</a> . Both CASC and CASIC are sanctioned - both are on the CMIC List, while CASIC is additionally on the 1260H List.

### FUND: Handelsbanken Asien Tema

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
China Overseas Land & Investment	0.9128	N	1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China State Construction Group Co.

### FUND: Swedbank Robur Access Asien

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
Sinopharm Group	1.7382	N	Entity List	<a href="#">It is the parent company</a> of the sanctioned Sinopharm Equipment.
China Communication Services	1.137100	N	1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Telecom.
Cosco Shipping (CN) (COSCO SHIPPING Holdings)	1.677200	N	OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
CGN Power	3.582800	N	1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China General Nuclear Power Corporation.
China Yangtze Power Co	3.044200	N	1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China Three Gorges Group.

### FUND: SEB Global Exposure Fund

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
China Three Gorges Renewables Group Co Ltd 'A'	1.24454	N	1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China Three Gorges Group.
COSCO SHIPPING Holdings Co Ltd 'H'	1.133930	N	OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
Sinopharm Group Co Ltd 'H'	0.60405	N	Entity List	<a href="#">It is the parent company</a> of the sanctioned Sinopharm Equipment.

## FUND: SEB Emerging Markets Exposure Fund

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
Cambricon Technologies Corp	0.145500	Y	Entity List	
Ninestar Corp	0.104200	Y	UFLPA List	
Xinjiang Daqo New Energy Co	0.060800	Y	Entity list, UFLPA List	
Hygon Information Technology	0.218500	Y	Entity List	
China Overseas Land & Investment Ltd	0.194200		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China State Construction Group Co.
Zhuzhou Crrc Times Electric	0.096100		1260H List	<a href="#">It is a subsidiary of the sanctioned CRRC Corporation.</a>
Zte Corp	0.135900		Entity List, 1260H List, CMIC List	It is affiliated with the sanctioned ZTE Parsian, as both are <a href="#">owned by ZTE New Telecommunications Co.</a> (AKA Zhongxingxin). ZTE Parsian is found on the Entity List. ZTE New Telecommunications Co. (AKA Zhongxingxin). is jointly controlled by the Chinese state-run enterprises <a href="#">CASC and CASIC, which appoint 5 of 9 directors</a> . Both CASC and CASIC are sanctioned - both are on the CMIC List, while CASIC is additionally on the 1260H List.
China Greatwall Tech Group Co	0.119900		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Electronics Corporation (CEC).
China Three Gorges Renewables	0.139400		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China Three Gorges Group.
Cosco Shipping Holdings	0.302200		OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
Sinopharm Group Co	0.109500		Entity List	<a href="#">It is the parent company</a> of the sanctioned Sinopharm Equipment.
Ieit Systems (Inspur) Co Ltd	0.104900		Entity List, 1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned Inspur Group.
China Communications Service	0.068100		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Telecom.

### FUND: SEB Asienfond ex Japan

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
Poly Property Services Co. Ltd.	0.19679	N	Entity List	<a href="#">It is a subsidiary</a> of the sanctioned China Poly Group.

### FUND: Länsförsäkringar Tillväxtmarknad Index

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
360 Security Technology Inc	0.15073	Y	Entity List, 1260H List	
Cambricon Technologies Corp Ltd	0.39994	Y	Entity List	
Guangzhou Haige Communications Group Inc	0.04333	Y	Entity List	
Iflytek Co Ltd	0.19128	Y	Entity List	
Ninestar Corp	0.05881	Y	UFLPA List	
Zhejiang Dahua Technology Co Ltd	0.08236	Y	Entity List, 1260H List	
Crrc Corp Ltd Ord A	0.27533		1260H List	
Crrc Corp Ltd Ord H	0.50292	Y		
Hygon Information Technology Ord A	0.46732	Y	Entity List	
Beijing Tiantan Biological Pr Ord A	0.06188		Entity List	<a href="#">It is a sister company</a> to the sanctioned Sinopharm Equipment.
CGN Power CO H	0.63504		1260H List, CMIC List	
CGN Power Co Ltd	0.08777			<a href="#">It is a subsidiary</a> of the sanctioned China General Nuclear Power Corporation.
China Cssc Holdings Ltd Ord A	0.22522		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China State Shipbuilding Corporation (CSSC).
China Greatwall Technology Group Co Ltd	0.07775		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Electronics Corporation (CEC).
China National Nuclear Power Co Ltd	0.27896		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China National Nuclear Corporation (CNNC).

China National Software & Service Co Ltd	0.06804		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Electronics Corporation (CEC).
China Overseas Land & Investment Ltd	1.14817		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China State Construction Group Co.
China State Construction Intl Hldgs Ord	0.5573		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China State Construction Engineering Corporation.
China Three Gorges Renewables Group Co Ltd	0.18478		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China Three Gorges Group.
China Yangtze Power Co Ltd	1.00006		1260H List	<a href="#">It is a subsidiary</a> of the sanctioned China Three Gorges Group.
Cnooc Energy Technology Ord A	0.04105		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned CNOOC.
Cosco Holdings Ord H (Cosco Shipping Hldgs Co Ltd Ord H)	0.82463		OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
Cosco Shipping Hldgs Co Ltd Ord A	0.27725		OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
Cosco Shipping Energy Transpo Ord H	0.2388		OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
Cosco Shipping (China Ship) Ord A	0.06588		OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
Chongqing Changan Automobile Co Ltd	0.17754		1260H List, CMIC List	<a href="#">It is a subsidiary</a> to the sanctioned China South Industries Group Corporation (CSGC).
Empyrean Technology Co Ltd Ord A	0.08179		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned China Electronics Corporation.
Inspur Electronic Information Industry Co Ltd	0.13649		Entity List, 1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned Inspur Group.
Jiangsu Zhongtian Technology Co Ltd	0.07235		Entity List	<a href="#">It is the parent company</a> of the sanctioned Zhongtian Technology Submarine Cable Co.
Orient Overseas Intl.	0.33462		OFAC SDN List	As a <a href="#">subsidiary of COSCO Shipping Co.</a> , it is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co.
Shennan Circuits Co Ltd	0.10077		1260H List, CMIC List	<a href="#">It is a subsidiary</a> of the sanctioned AVIC.
Sinopharm Group Co Ltd	0.63654		Entity List	<a href="#">It is the parent company</a> of the sanctioned Sinopharm Equipment.
Zhuzhou CRRC Times Electric Co Ltd Ord A	0.0594		1260H List	<a href="#">It is a subsidiary of the sanctioned CRRC Corporation.</a>



Zhuzhou Crrc Times Electric Ord H	0.35195		1260H List	
ZTE Corp A	0.25727		Entity List, 1260H List, CMIC List	It is affiliated with the sanctioned ZTE Parsian, as both are <a href="#">owned by ZTE New Telecommunications Co.</a> (AKA Zhongxingxin). ZTE Parsian is found on the Entity List.
ZTE Corp H	0.52185			ZTE New Telecommunications Co. (AKA Zhongxingxin). is jointly controlled by the Chinese state-run enterprises <a href="#">CASC and CASIC, which appoint 5 of 9 directors</a> . Both CASC and CASIC are sanctioned - both are on the CMIC List, while CASIC is additionally on the 1260H List.

### FUND: Nordea Emerging Markets Enhanced Equity Fund

COMPANY NAME	MARKET VALUE (USD, Million)	DIRECTLY SANCTIONED?	SANCTIONS LIST	RELATIONSHIP WITH SANCTIONED ENTITY
COSCO SHIPPING Holdings	1.83460	N	OFAC SDN List	It is affiliated with the sanctioned COSCO Shipping Tanker (Dalian) Seaman and Ship Management Co., as both are in the <a href="#">COSCO Shipping</a> Group.
Zhuzhou CRRC Times Electric	0.71543	N	1260H List	<a href="#">It is a subsidiary</a> of the sanctioned CRRC Corporation.