

Swedbank Pension Fund K3 (Growth Strategy)

November 30, 2009

Investment Principles

Swedbank Pension Fund K3 (Growth Strategy) is a contractual investment Fund founded for providing mandatory funded pension. The objective of the Fund's investment activity is to achieve as long-term and stable growth of the capital gain as possible. The Fund's assets shall be invested in bonds, shares, money market instruments and other assets of either Estonian or foreign origin. The Fund's assets may be invested in shares or in the investment funds dealing with investments in shares to the extent of 50% of the market value of the Fund's assets.

General information

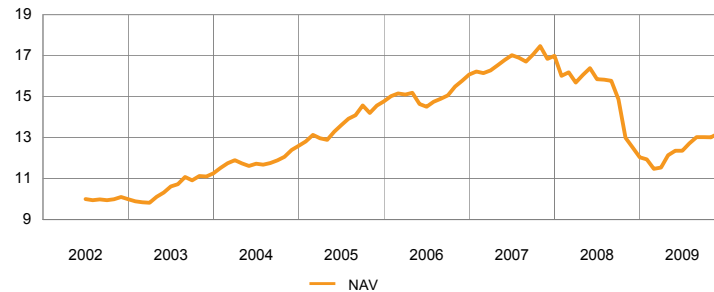
Fund Management Company	Swedbank Investeerimisfondid AS
Fund Manager	Jelena Fedotova
Inception	2002
Contact	Swedbank offices and tel. 6 310 310 www.swedbank.ee/funds

Net Asset Value (NAV)	13.19 EEK
Net Assets	4 853 867 417 EEK
Management Fee per annum	1.59%
Subscription Fee	1.5%
Redemption Fee	1.0%
Benchmark	EPI50

Statistics (computed over 3 years)

Standard Deviation	11.4%
--------------------	-------

Fund performance



	YTD	1 month	3 months	1 year	3 years	5 years	Inception
Performance	9.5%	1.3%	1.3%	5.3%	-16.4%	6.4%	31.9%
Annualized				5.3%	-5.8%	1.2%	3.8%

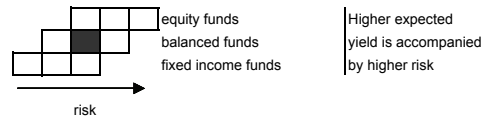
	2003	2004	2005	2006	2007	2008	2009
Performance	12.7%	11.9%	17.2%	8.9%	5.7%	-29.1%	

Manager Commentary

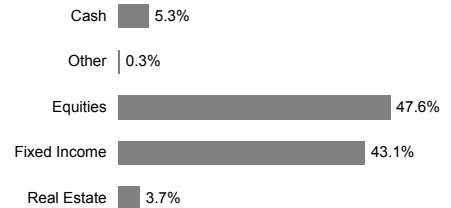
With the exception of Japan, all equity markets where the fund invests in were up over November. Gains were led by Latin America (up almost 7% in EUR terms), USA and Russia (both up over 4% in EUR terms). In the fixed income markets euro government bond yields drifted slightly lower, but there was a big dispersion across individual countries – Greece spreads widened strongly, while spreads for most other euro countries were little changed. Investment grade bond yields continued tightening. The selling of Swedbank Private Debt Fund on November 30 boosted the fund's performance by 0,6%. At the end of November markets were temporarily shaken by the credit problems in Dubai. The pension fund does not hold any assets in the Middle-East region and was thus not directly affected by the woes.

In November we maintained the equity weighting close to legally allowed limits. We keep overweighting more cyclical regions, like bigger emerging markets and Europe while underweighting the US and Japan. In the latter we slightly increased our positions after the Japanese Central Bank provided markets another liquidity injection and verbally intervened to depreciate the currency. The biggest changes in the portfolio were related to currency exposure and fixed income markets. At the beginning of the month we significantly increased our positions in EEK investment grade and Estonian government or quasi sovereign related instruments. In the anticipation of euro entry we see that the Estonia related risk levels have further room to compress. We are considering to express that view also indirectly by increasing our exposure in Swedish equity market, which in the past has among other factors also been influenced by the risk perception in the Baltic Countries.

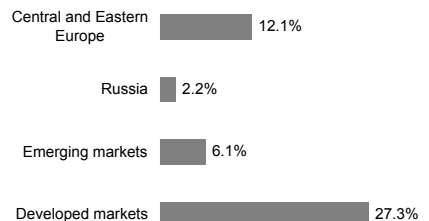
Risk level



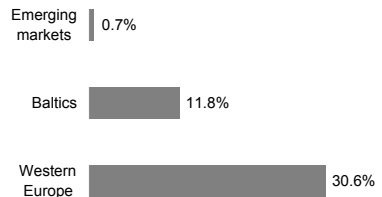
Portfolio by instruments



Equity portfolio by regions



Fixed Income portfolio by regions



Largest investments

Stocks	Weight
SSGA USA Index Equity Fund	7.0%
SSGA Europe Index Equity Fund	6.5%
SSGA Tracks Pan Euro	4.5%
Luxor Eastern Europe Index Fund	2.9%
Aviva CEE Equity Fund	2.7%
Bonds	Weight
SSGA Euro Corp. Bond Index Fund	3.1%
Italy 5% 08.01.2039	2.5%
PIMCO Dist Sen Credit Opp Fund	2.0%
Italy 3.75% 15.12.2013	1.9%
France 4.25% 25.04.2019	1.8%

The value of the Fund's unit can either grow or decrease in time. The current return of the Fund shall not guarantee the same return in the future. Funds investing in foreign markets are vulnerable to monetary movements, which may lead to a growth or decrease of the net asset value of the Fund's unit. Pension Funds are founded on the basis of Funded Pensions Act. The following payment which conditionally consists of two parts - tax (4% portion of the social tax) and contribution (2% contribution of the state funded pension, withheld by the employer on the employee's gross wages) - shall be transferred to the mandatory funded pension account for a person who has joined the funded pension system.