Owner	Elisabeth Nicolaisen, CEO	Date of Approval	March 2025
Administrator	Head of Risk Management, HVRA	Policy Version	Version 1
Governing Body	Board of Directors	For external publication	Yes

Responsible Investment Policy

1. Objective

The objectives of the Responsible Investment Policy (the "**Policy**") are to establish and communicate the approach of Danske Invest Asset Management AS ("**DIAM**") to responsible investments while addressing the preferences of our investors.

The Responsible Investment Policy is a cornerstone of DIAM's ambitions to integrate sustainability into core businesses, and it supports our vision to be recognised as leading within the area of responsible investments. When investors entrust us with their assets and savings for investment, it is our duty to serve our investors' best interests by providing investment solutions that aim to deliver competitive and long-term performance. An integral part of this duty is investing responsibly and to manufacture funds that align with investor preferences. As a responsible investor, we are therefore mindful of not only how investment performance is affected by Sustainability Factors, but also the impact on society that our investments may cause.

The Policy is incorporated and elaborated upon in our Active Ownership Policy and Principal Adverse Impacts Statement as well as other published instructions and statements.

2. Definitions

The definitions for the terms used throughout this Policy are available in Appendix 1

3. Scope and target group

The Policy covers investment activities relating to funds managed by DIAM on behalf of investors. The Policy covers all asset classes that our funds are invested into. The Policy is equally relevant to the own capital of DIAM.

The Policy does not apply directly to discretionary mandates, investments in structured products, derivatives or funds managed by other management companies.

This Policy applies to investment management and delegates involved in the management of the funds.

4. DIAM's Approach to Responsible Investments

At DIAM, responsible investments play a key role when we invest our investors' assets. DIAM's approach to responsible investments is based on the principle of Double Materiality.

As a responsible management company, we are mindful of not only how Sustainability Factors impact investment performance (**Financial Materiality**) but also how our investments may have positive and/or negative impacts on society (**Environmental and Social Materiality**). We refer to this as "Double Materiality" considerations. We believe that attentiveness to these sustainability dimensions when investing is a cornerstone of our fiduciary duty to create value for investors *and* to create a responsible investment fund offering for our investors that supports the transition to a more sustainable society. Based on what is relevant for a specific asset class and investment strategy, these Double Materiality considerations can be addressed through **Inclusions, Exclusions** and **Active Ownership.**

We disclose our approach to responsible investments and report on our efforts to be transparent and support accountability for our investment processes and activities. As part of Danske Bank Group, we are included in Danske Bank's progress report through the initiatives Danske Bank have signed up for such as the UN-supported Principles for Responsible Investment (UN PRI).

The aim is to communicate such that our investors and stakeholders can find answers to any relevant questions on our investment processes and activities in a clear and accessible way. The information is published on our websites and, whenever relevant, disclosed and reported directly to investors and other stakeholders.

Where appropriate and allowed per applicable law, we as part of Danske Bank Group collaborate with peers, like-minded investors and other relevant parties, to reduce negative and maximise positive impact on Sustainability Factors. We also welcome an open dialogue with our stakeholders and value the opportunity to collaborate, where relevant. As part of Danske Bank Group, we participate in investor initiatives that aim to increase transparency and sustainability standards in companies and financial markets, such as the CDP International Sustainability Standards Board (ISSB) including the Sustainability Accounting Standards Board (SASB), the Institutional Investors Group on Climate Change (IIGC), the Paris Pledge for Action, the Net-Zero Asset Owner Alliance, the Net Zero Asset Managers Initiative, the Emerging Markets Investor Alliance (EMIA), and UN PRI[1].

Principle 1: We aim to protect the value of investments and generate attractive returns

As a part of our fiduciary duties to investors, we are committed to identify negative risk exposures with a financial impact on investments. This implies a duty to systematically identify Sustainability Factors that may pose a risk of causing material negative impact to the value of an investment (Sustainability Risk) and integrating considerations of such factors into our investment products.

For a Sustainability Factor to be considered financially material, it needs to have the potential to translate into investment performance and have a negative impact on either the revenue/expenses of the company, the value of its assets/liabilities or its cost of capital. By analysing Sustainability Factors in conjunction with other financial factors, it is possible to gain greater insights into the investments and thereby identify Sustainability Risks and investment opportunities.

[1] As further set-out in Appendix 1.

Financially material Sustainability Factors are unique to each investment and are determined by, for instance, business activities, industry categorisation and domicile.

Sustainability Risk exposures should be well managed and, as needed, lead to and/or influence a decision to either buy/increase weighting, hold/maintain weighting, decrease weighting, or sell/divest or to engage through our Active Ownership activities. The proper management of Sustainability Risks can be challenged by several factors, including lack of comprehensive and standardised data and the fact that Sustainability Risk factors often are complex, multidisciplinary and interlinked, which can make them difficult to assess in their entirety.

Appreciating that investments have different characteristics and are affected differently by Sustainability Factors, the investment teams tailor the analysis of Sustainability Factors to the specific investment strategy and asset class.

Further information on how the framework to identify, manage and control Sustainability Risks for our funds is outlined in the Risk Management Policy, published instructions and our Active Ownership Policy,

Roles and responsibilities:

- The Executive Management is ultimately responsible for ensuring that Sustainability Risks are incorporated into investment analysis and investment decision-making processes in accordance with said principle before delegating investment management.
- The Executive Management may delegate the implementation of this principle to employees who have the necessary knowledge, insight and experience to exercise the authorities received appropriately and in accordance with said principle.
- Risk Management are responsible for challenging the setup, governance and implementation and providing independent oversight.
- The Executive Management is responsible for ensuring that the operational framework adequately integrates Sustainability Risk at the investment manager.
- The Executive Management is responsible for developing relevant instructions, guidelines and processes.
- Risk Management is responsible for review and challenge of methodology used to identify Sustainability Risks.
- Compliance is responsible for challenging the setup, governance and implementation and providing independent oversight.

Principle 2: We aim to analyse and assess the impacts that investments may have on the environment and other societal dimensions

We aim to analyse and assess the negative impacts and positive contributions of our investments and to address these aspects in accordance with the preferences of our investors. As part of one of the largest financial institutions in the Nordic countries, the Danske Bank Group, we have the ability to be part of solutions to the challenges our planet and societies are facing, including through the investment opportunities we offer to our investors. Through the Danske Bank Group, we support the goals of achieving net zero by 2050 in line with ambitions of the Paris Agreement.

2.1. Principal Adverse Impacts

Negative impacts on Sustainability Factors from investments are referred to as "**Principal Adverse Impacts**". Such impacts can materialise through activities and practices that are harmful to society such as, but not limited to, activities with high carbon emissions, activities in the fossil fuel sector, substantial waste levels, lack of gender diversity, breaches of human rights and lack of company policies to avoid corruption and bribery. We prioritise the management of these impacts through the strategy commitments of the funds that we manufacture that are developed to align with the preferences of our investors and the overall responsible investment approach of Danske Invest.

Principal Adverse Impacts are to be identified through screening of Environmental and Social Materiality. The screening focuses on a core set of universal mandatory indicators that always lead to Principal Adverse Impacts and additional selected voluntary indicators (see current full list of the Principal Adverse Impact indicators that we consider in our Principal Adverse Impact Statement).

We work from the belief that by measuring and reporting the Principal Adverse Impacts of our funds, we are best positioned to monitor and steer the overall sustainability performance of our funds. The voluntary indicators are selected and kept updated on basis of considerations of relevance to our investment philosophy, exposures as well as data quality and coverage for the indicators.

The management and the prioritisation of Principal Adverse Impacts are defined by the investment strategy of our funds. Principal Adverse Impact considerations may lead to or influence decision-making to either buy/increase weighting, hold/maintain weighting, decrease weighting, or sell/divest. As a minimum standard, Principal Adverse Impacts are managed through **Exclusions**. This may be supplemented by other approaches such as **Active Ownership** and **Inclusion** that further address the impacts.

We report on Principal Adverse impacts that have been measured on an annual basis for all assets under management, including through Danske Bank Group consolidated reporting, and we also strive to report on Principal Adverse Impact on the majority of our funds.

Further information on how we identify, manage and control Principal Adverse Impacts are outlined in our Principal Adverse Impact Statement, the Exclusion Instruction, Inclusion Instruction and our Active Ownership Policy.

Positive Contribution

Positive contribution of investments can be identified through the screening of issuers/companies for activities with positive contribution to environmental or social objectives as well as investments with other positive attributes, including but not limited to, best-in-class operations, sound sustainability practices and sound environmental stewardship. The screening is based on criteria and thresholds set out in regulatory defined frameworks, such as the EU Taxonomy, market setting initiatives, proprietary models and methodologies , and other defined sustainability indicators.

Funds with positive contribution use **Inclusions** such as individual stock picking, tracking of climate indices or overall portfolio alignment.

Responsible Investment Funds

DIAM manufactures funds with different levels of sustainability ambitions that enable the distribution of funds designed to cater for different levels of preferences of investors. Notwithstanding sustainability ambitions, all funds take due account of Sustainability Risk dimensions.

For **funds that promote environmental and/or social characteristics**, these characteristics and good governance practices are binding elements of the investment strategy and are managed in accordance with the frameworks defined through our Exclusion Instruction, Inclusion Instruction and Active Ownership Policy. Information about such funds is disclosed under Article 8 of the SFDR in accordance with the specific requirements herein. Funds promoting environmental and/or social characteristics have varying degrees of sustainability related ambitions.

For further information on how we incorporate considerations to adverse impacts and positive contribution in our individual funds, reference is made to the pre-contractual documentation and reporting.

Roles and responsibilities:

- The Executive Management is responsible for ensuring adherence to this principle but may delegate the implementation of this principle to employees who have the necessary knowledge, insight and experience to exercise the authorities received appropriately and in accordance with said principle.
- The Executive Management is responsible for developing sustainability-related value propositions.
- The Executive Management is responsible for developing the sustainability frameworks.
- The Executive Management is responsible for developing the reporting frameworks and ensuring that the required disclosures are in place.
- The Executive Management is responsible for decisions related to responsible investment related commitments.
- Product governance is managed in accordance with roles and responsibilities set out in through the New and Amended Product Approval (NAPA) process.

5. Reporting (not for publication)

DIAM Executive Management, DIAM Risk & Product Committee, DIAM BoD receive updates on the implementation of the Responsible Investment Policy annually from the Risk Management.

The Executive Management provide regular reporting to the Executive Management, DIAM BoD on the Responsible Investment Policy and the sustainability related commitments established for each Fund.

DIAM Risk Management report to DIAM Executive Management, DIAM Risk & Product Committee and DIAM BoD on the management of Sustainability Risks in DIAM and the funds. The report shall as minimum include an assessment of the overall view on DIAM's risk exposures stemming from DIAM's obligation to manage Funds Sustainability Risks and from DIAM's own investments, and the effectiveness of the risk management systems and framework for managing of those risks, to ensure that they remain adequate and effective. The assessment shall also include evaluation of DIAM's processes ensuring integration of the Sustainability Risks in the investment process, and adherence to the Responsible Investment Policy, funds prospectuses and legislation.

DIAM Risk Management provide regular reporting to the Executive Management and DIAM BoD on the level of Sustainability risk in all Funds and compliance with the Sustainability related investment restrictions established for each Fund.

6. Governance

Governance is key when it comes to ensuring an efficient execution of our Responsible Investment Policy. Our governance structure sets clear roles and responsibilities. We ensure sufficient competence is in place to manage the sustainability dimensions of our investments.

7. Escalation

Where a breach or potential breach of this Policy has been identified, an Employee must notify the owner of the Policy. Where the breach is also defined as an event, this must be registered and categorised immediately in ORIS according to the Non-Financial Risk Event Escalation Instruction.

The owner of the Policy must report to the Executive Management on significant breaches of the Policy in accordance with the Danske Bank Group Non-Financial Risk Event Escalation Instruction as adopted in Danske Invest Management.

8. Review

The Policy is managed by the Board of Directors. The Policy must be reviewed and approved annually as a minimum. It is the responsibility of The Executive Management to ensure that the Policy is updated and approved.

9. Change log

Date	Version number	Comments/changes
26 March 2025	Version 1.0	New Policy version based DIMA's policy

Appendix 1

The below definitions apply to the terms used throughout the Policy.

Active Ownership	The use of rights and position of ownership to influence the activities or behaviour of investee companies based on financial and/or impact materiality considerations. Active ownership is exercised by taking an active interest as an investor in the investee companies' circumstances, development, and management, and by adopting a long-term focus in the company in line with the Shareholder Rights Directive II.
Do No Significant Harm	A principle ensuring that neither environmental nor social objectives are significantly harmed when investing sustainably as measured against indicators on principal adverse impacts, minimum social and environmental safeguards and/or screening criteria defined by regulations.
Double Materiality	The determination of whether a sustainability factor is of relevance when investing from either the perspective of Financial Materiality and/or Environmental and Social Materiality.
Environmental and Social materiality	The inside-out impacts that an issuer's/company's economic and financial activities may have on sustainability factors
ESG	Environmental, social and/or governance.
Exclusions	The exclusion of certain sectors, companies/issuers, and activities from investments on the basis of defined criteria and thresholds or identified controversies, adverse sustainability impacts or failure to meet minimum sustainability safeguards.
Financial Materiality	The outside-in impacts that sustainability factors may have on a company's/issuer's economic and financial activities throughout their entire value chain (both upstream and downstream), affecting the value (returns) of such activities.
Inclusion	The active inclusion of a company/issuer in investments on basis of sustainability-related considerations.
Principal Adverse Impacts	A principal adverse impact is any impact of investment decisions or advice that results in a negative effect on sustainability factors, such as environmental, social and employee concerns, respect for human rights, anti-corruption, and anti-bribery matters.
Principal Adverse Impacts Statement	The Statement on Principal Adverse Impacts of Investment Decisions on Sustainability Factors of DIAM.
SFDR	Regulation (EU) 2019/2088 of the European Parliament and of the Council on Sustainability-Related Disclosures in the Financial Services Sector as supplemented by underlying delegated acts.
Sustainability Factors	Environmental, social and employee-related matters, respect for human rights, anti-corruption, and anti-bribery matters.
Sustainable Investment	An investment in an economic activity that contributes to an environmental objective, as measured, for example, by key resource efficiency indicators on the use of energy, renewable energy, raw materials, water and land, on the

	production of waste, and greenhouse gas emissions, or on its impact on biodiversity and the circular economy. Or an investment in an economic activity that contributes to a social objective, in particular an investment that contributes to tackling inequality or that fosters social cohesion, social integration and labour relations. Or an investment in human capital or economically or socially disadvantaged communities, provided that such investments do not significantly harm any of those objectives and that the investee companies follow good governance practices, in particular with respect to sound management structures, employee relations, remuneration of staff and tax compliance.
Sustainability Risks	An environmental, social or governance event or condition that, if it occurs, could cause an actual or a potential material negative impact on the value of the investment[2]

[2] Sustainability factors that impose a risk to Danske Invest Asset Management are not covered by the term "sustainability risk" in this policy, but instead managed and defined in the Danske Invest Asset Management Risk Management Policy.

Appendix 2

A non-exhaustive list of the applicable sectoral regulations and external standards that have been taken into account by the Responsible Investment Policy is available below:

- Sectoral Regulations and Directives as implemented in local laws;
  - Commission Delegated Regulation (EU) 2015/35 of 10 October 2014 supplementing Directive 2009/138/EC of the European Parliament and of the Council on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II)
  - Directive 2009/65/EC of the European Parliament and of the Council of 13 July 2009 on the coordination of laws, regulations and administrative provisions relating to undertakings for collective investment in transferable securities (UCITS)
  - Directive 2011/61/EU of the European Parliament and of the Council of 8 June 2011 on Alternative Investment Fund Managers and amending Directives 2003/41/EC and 2009/65/EC and Regulations (EC) No 1060/2009 and (EU) No 1095/2010 (AIFMD)
  - Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on markets in financial instruments and amending Directive 2002/92/EC and Directive 2011/61/EU (MiFID II)
  - Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 regarding the encouragement of long-term shareholder engagement (Shareholders Rights Directive II)
  - Regulation (EU) 2019/2088 of the European Parliament and Council on sustainability-related disclosures in the financial services sector (SFDR) and underlying delegated acts

- External Standards and Commitments
  - UN Sustainable Development Goals (SDGs)
  - UN Global Compact
  - UN Guiding Principles on Business and Human Rights
  - UN Principles for Responsible Investment
  - OECD Guidelines for Multinational Enterprises
  - G20/OECD Principles of Corporate Governance
  - Sustainability Accounting Standards Board (SASB)
  - Net Zero Asset Managers Initiative
  - Net-Zero Asset Owners Alliance
  - ISSB
  - CDP (formerly Carbon Disclosure Project)
  - Paris Pledge for Action
  - Climate Action 100+
  - The Partnership for Biodiversity Accounting Financials (PBAF)
  - The Partnership for Carbon Accounting Financials (PCAF)
  - Science Based Targets Initiative
  - Nature Action 100
  - Finance for Biodiversity Pledge

- The Danske Bank Group position statements[3]
    - Danske Bank Position Statement Agriculture
    - Danske Bank Position Statement Climate Change
    - Danske Bank Position Statement Fossil Fuels
    - Danske Bank Position Statement Mining and Metals
    - Danske Bank Position Statement Arms and Defence
    - Danske Bank Position Statement Forestry
    - Danske Bank Position Statement Human Rights

[3] See Danske Bank Group Sustainable Finance Policy & Position Statements: https://danskebank.com/sustainability