

Statement on principal adverse impacts of investment decisions on sustainability factors

Nordea

30 June 2024

Financial market participant: Nordea Bank Abp (529900ODI3047E2LIV03)

Summary

Nordea Bank Abp (529900ODI3047E2LIV03) considers principal adverse impacts of investment decisions on sustainability factors for the discretionary portfolio management.¹ Nordea Bank Abp has delegated the investment management function for the discretionary portfolio management to Nordea Investment Management AB, collectively referred to as “we”, “us” or “our”. As such, the principal adverse impact of investment decisions made on behalf of these portfolios are also included in the consideration of principal adverse impact at the level of Nordea Investment Management AB. Discretionary portfolios managed internally by Nordea Bank Abp are excluded from this statement.

This statement on principal adverse impacts on sustainability factors covers the reference period from 1 January to 31 December 2023.

We consider principal adverse impact as part of our investment due diligence process and procedures. At entity level, we consider principal adverse impact by measuring and monitoring the aggregated negative impact of our investments on sustainability factors. We consider the mandatory principal adverse impact indicators and two voluntary indicators defined by the Sustainable Finance Disclosure Regulation (SFDR)², subject to data availability and quality. In the absence of mandatory data reporting requirements for investee companies, we are still facing challenges in identifying all principal adverse impacts of our investments.

¹ This statement applies as of 30 June 2024. It will be reviewed and updated at least annually. In case of any inconsistency between the translated versions of this summary and the English version, the English version will prevail.

² Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector.

This statement includes the reported principal adverse impact of our investments measured using these indicators. Comparability between the principal adverse impact of our investments and industry benchmarks is challenging due to the diversity of our portfolios (asset class, nature of the instruments, sectors we invest into etc.). Without comparative data from several previous reference periods, it remains difficult to estimate on which sustainability factors our investments have the most significant negative impact. However, given that climate change is a large threat to the global economy and implies specific risks to the companies and other entities we invest in, reducing the climate impact of our investments is a cornerstone of our ESG (environmental, social and governance) strategy alongside our other core areas of interest – biodiversity loss prevention / water preservation, human rights, and good corporate governance. This is reflected in the priorities set for our engagement activities and commitments. We assess climate change risks and the impact of the low-carbon transition on sectors and companies on an ongoing basis.

This statement also includes a description of actions taken, actions planned, and targets set to seek to reduce and mitigate the principal adverse impact of our investments.

Principal adverse impact assessment is further described in our active ownership, responsible investment and engagement policies and processes. Our active ownership efforts include engagement, proxy voting, attending annual general meetings and contributing to the development of industry ESG standards.

Description of the principal adverse impacts on sustainability factors

The mandatory indicators defined by the SFDR are set out in Table 1 below. For each of these indicators, we have included information to describe the actions that we have taken and actions that we plan to take/targets set to avoid or reduce the identified principal adverse impact.

We have included the reported principal adverse impact of our investments, measured using these indicators, for the reference period from 1 January to 31 December 2023.³

This information was initially reported on 30 June 2023, for the reference period from 1 January to 31 December 2022. We will continue to report this information on an annual basis, subject to data availability and quality.

³ The reported impact does not include impact of certain holdings for which data is not available and could not be obtained on a best effort basis or be estimated. The basis for our calculations of impact is the methodologies set out in the SFDR regulatory technical standards (Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 (the SFDR RTS)). The 2022 reported impact was calculated as the monthly average of impacts from 31 May 2022, but does not include data of January-May 2022 due to adjustments to methodology and data availability.

Table 1

Indicators applicable to investments in investee companies

Adverse sustainability indicator	Metric	Impact 2023 (year n)	Impact 2022 (year n-1) ⁴	Explanation	Actions taken, and actions planned and targets set for the next reference period	
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS						
Greenhouse gas emissions	1. GHG emissions	Scope 1 GHG emissions	952 557.27 tCO ₂ e	1 001 809.18 tCO ₂ e	GHG emissions are calculated as the Scope 1 ⁵ emissions in investee companies expressed in tons of carbon dioxide equivalent	<p>We are a signatory to the Net Zero Asset Managers Initiative and committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. We have an organisational-wide target to reduce the weighted average carbon intensity (WACI) of our investments; a set of portfolio-specific carbon footprint reduction targets, and a complementary target to ensure that individual companies are engaged to become 1.5°C aligned.</p> <p>We have set a 2025 target to ensure that 80% of our top 200 largest carbon footprint contributors are on a Paris-aligned trajectory or else subject to engagement to become aligned.</p> <p>Investment products that have been categorised as Article 8 or Article 9 under the SFDR may be subject to our Paris Aligned Fossil Fuel Policy which prohibits investments in fossil fuel companies that are not transitioning in line with the</p>
		Scope 2 GHG emissions	237 520.15 tCO ₂ e	243 427.49 tCO ₂ e	GHG emissions are calculated as the Scope 2 ⁶ emissions in investee companies expressed in tons of carbon dioxide equivalent	
		Scope 3 GHG emissions	7 271 120.06 tCO ₂ e	6 861 276.67 tCO ₂ e	GHG emissions are calculated as the Scope 3 ⁷ emissions in investee companies	

⁴ Information on impact compared to previous year is initially reported on 30 June 2024, and continuously on an annual basis.

⁵ Scope 1 emissions are direct emissions generated from sources that are controlled by the investee company.

⁶ Scope 2 emissions are indirect emissions from purchased or acquired energy (including electricity, steam, heat and cooling) generated off-site and consumed by the investee company.

⁷ Scope 3 emissions are all indirect emissions that occur in the value chain of an investee company (including business travel, capital goods and processing of sold products).

					expressed in tons of carbon dioxide equivalent	climate objectives of the Paris Agreement, while still enabling investments in companies that are leading the transition out of fossil fuels, and for which we forecast sufficient reductions in Scope 1,2 and 3 PAI indicators over time.
		Total GHG emissions	8 461 587.64 tCO ₂ e ⁸	1 245 236.68 tCO ₂ e	The reported impact for total GHG emissions for 2023 includes the total Scope 1, 2 and 3 GHG emissions expressed in tons of carbon dioxide equivalent. The reported impact for total GHG emissions for 2022 includes the total Scope 1 and 2 GHG emissions expressed in tons of carbon dioxide equivalent, due to lack of data of Scope 3 emissions for reporting year 2022.	We consider GHG emissions using an internally developed monitoring system. Issuers identified as outliers on any of the GHG emission indicators or which exhibit high adverse impact across several indicators may be subject to further analysis and potential actions as further described below.
	2. Carbon footprint	Carbon footprint	310.78 tCO ₂ e/million EUR invested ⁹	46.56 tCO ₂ e/million EUR invested	Carbon footprint is calculated as the total GHG emissions expressed as a ratio for the value of all investments.	

⁸ Total Scope 1+2 GHG emissions: 1 190 077.418 tCO₂e.

⁹ Total Scope 1+2 GHG emissions: 43.72 tCO₂e/million EUR invested.

					<p>The reported impact for 2023 includes the total Scope 1, 2 and 3 GHG emissions.</p> <p>The reported impact for 2022 includes the total Scope 1 and 2 GHG emissions, due to lack of data of Scope 3 emissions for reporting year 2022.</p>
	3. GHG intensity of investee companies	GHG intensity of investee companies	765.55 tCO ₂ e/million EUR of owned revenue ¹⁰	111.73 tCO ₂ e/million EUR of owned revenue	<p>The reported impact for 2023 includes Scope 1, 2 and 3 emissions.</p> <p>The reported impact for 2022 includes Scope 1 and 2 emissions, due to lack of data of Scope 3 emissions for reporting year 2022.</p>

¹⁰ Total Scope 1+2 GHG emissions: 95.58 tCO₂e/million EUR of owned revenue.

	4. Exposure to companies active in the fossil fuel sector	Share of investments in companies active in the fossil fuel sector	4.14% investments in fossil fuels	3.45% investments in fossil fuels	Companies active in the fossil fuel sector means companies that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution including transportation, storage and trade of fossil fuels.	
	5. Share of non-renewable energy consumption and production	Share of non-renewable energy consumption and non-renewable energy production of investee companies from non-renewable energy sources compared to renewable energy sources, expressed as a percentage of total energy sources	63.86% non-renewable energy consumption 64.28% non-renewable energy production	61.35% non-renewable energy consumption 62.35% non-renewable energy production	Renewable energy sources means renewable non-fossil sources such as wind, solar and geothermal energy, tide, wave and other ocean energy, hydropower, biomass, landfill gas, sewage treatment plant gas, and biogas. Non-renewable energy sources means energy sources other than those referred to above. Energy consumption intensity means the ratio of	

					energy consumption per unit of activity, output or any other metric of the investee company to the total energy consumption of that investee company.
	6. Energy consumption intensity per high impact climate sector	Energy consumption in GWh per million EUR of revenue of investee companies, per high impact climate sector	<p>Sector A: 0.46 GWh/million EUR of revenue</p> <p>Sector B: 2.03 GWh/million EUR of revenue</p> <p>Sector C: 0.37 GWh/million EUR of revenue</p> <p>Sector D: 3.76 GWh/million EUR of revenue</p> <p>Sector E: 0.81 GWh/million EUR of revenue</p>	<p>Sector A: 0.50 GWh/million EUR of revenue</p> <p>Sector B: 1.91 GWh/million EUR of revenue</p> <p>Sector C: 0.44 GWh/million EUR of revenue</p> <p>Sector D: 3.24 GWh/million EUR of revenue</p> <p>Sector E: 0.86 GWh/million EUR of revenue</p>	<p>Impact is reported for the below high impact climate sectors.</p> <p>Sector A: Agriculture, forestry and fishing Sector B: Mining and quarrying Sector C: Manufacturing Sector D: Electricity gas steam and air conditioning supply Sector E: Water supply Sector F: sewerage waste management and remediation activities Sector G: Construction Sector H: Wholesale and retail trade repair of motor vehicles and motorcycles Sector I: Transportation and storage</p>

			<p>Sector F: 0.11 GWh/million EUR of revenue</p> <p>Sector G: 0.25 GWh/million EUR of revenue</p> <p>Sector H: 0.94 GWh/million EUR of revenue</p> <p>Sector L: 0.31 GWh/million EUR of revenue</p>	<p>Sector F: 0.13 GWh/million EUR of revenue</p> <p>Sector G: 0.47 GWh/million EUR of revenue</p> <p>Sector H: 1.20 GWh/million EUR of revenue</p> <p>Sector L: 0.37 GWh/million EUR of revenue</p>	<p>Sector L: Real estate activities</p> <p>GWh or gigawatt hours, is a unit of energy representing one billion (1 000 000 000) watt hours.</p>	
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Biodiversity	7. Activities negatively affecting biodiversity-sensitive areas	Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activities of those investee companies negatively affect those areas	1.12% with negative impact	1.12% with negative impact	Biodiversity-sensitive areas means Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas, as well as certain other protected areas.	<p>We are a member of the Finance for Biodiversity Pledge, a commitment of financial institutions to protect and restore biodiversity through finance activities and investments.</p> <p>We commit to take potential negative effects on biodiversity into consideration. Where possible, we engage with companies deemed to be outliers on biodiversity. We are involved in several initiatives to protect biodiversity. More information on these initiatives can be found in our Whitepaper on Biodiversity and Nature, available on our website.</p> <p>We consider the impact on biodiversity of our investment decisions using an internally developed monitoring system. Issuers identified as outliers on the biodiversity indicator or which exhibit high adverse impact across several indicators, may be subject to further analysis and potential actions, as further described below.</p>
Water	8. Emissions to water	Tonnes of emissions to water generated by investee companies per million EUR invested, expressed as a weighted average	0.05 tons/million EUR invested	0.56 tons/million EUR invested	Weighted average means a ratio of the weight of the investment in an investee company in relation to the enterprise value of the investee company.	<p>We consider emissions to water generated by investee companies using an internally developed monitoring system.</p> <p>Issuers identified as outliers on the emissions to water indicator or which exhibit high adverse impact across several indicators, may be subject to further analysis and potential actions, as further described below.</p>
Waste	9. Hazardous waste and radioactive waste ratio	Tonnes of hazardous waste and radioactive waste generated by investee companies per million EUR invested, expressed as a weighted average	59.29 tons/million EUR invested	1.05 tons/million EUR invested	Weighted average means a ratio of the weight of the investment in an investee company in relation to the enterprise	<p>We consider the hazardous waste and radioactive waste ratio generated by investee companies using an internally developed monitoring system.</p> <p>Issuers identified as outliers on the indicator or which exhibit high adverse impact across several indicators, may be</p>

					<p>value of the investee company.</p> <p>Due to improved coverage of issuers, and changes in the methodology of one of our data providers in relation to the classification of mining tailings and waste rock as hazardous, unless explicitly reported otherwise, a significant increase in the hazardous and radioactive waste indicator is observed.</p>	<p>subject to further analysis and potential actions, as further described below.</p>
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INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS

Social and employee matters	10. Violations of UN Global Compact principles and Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises	Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.80% involved in violations	0.78% involved in violations	Information on investee companies involved in violations of the UNGC principles or OECD Guidelines are based on our norms-based screening.	<p>We adhere to the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, and our aim is that the investee companies that we invest into comply with these norms.</p> <p>Our investments are subject to norm-based screening, which identifies investee companies that have been involved in violations of the UN Global Compact principles or OECD Guidelines for Multinational Enterprises.</p> <p>If a company is identified in this screening process, an internal assessment of the company is initiated and potential actions considered, as further described below.</p>
	11. Lack of processes and compliance mechanisms to monitor compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises	Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance/ complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises	0.20% without policies	0.14% without policies		<p>We adhere to the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, and our aim is that the investee companies that we invest into comply with these norms.</p> <p>To assess compliance with UN Global Compact principles and OECD Guidelines for Multinational Enterprises, we monitor the share of investments in investee companies without processes and compliance mechanisms. This is done for all managed assets on an ongoing basis using an internally developed monitoring system.</p> <p>Issuers identified as outliers on the indicator, or which exhibit high adverse impact across several indicators, may be subject to further analysis and potential actions, as further described below.</p>

	12. Unadjusted gender pay gap	Average unadjusted gender pay gap of investee companies	8.90% pay gap	9.54% pay gap	Unadjusted gender pay gap means the difference between average gross hourly earnings of male paid employees and of female paid employees as a percentage of average gross hourly earnings of male paid employees.	<p>We consider the average unadjusted gender pay gap of investee companies, subject to data quality and availability, using an internally developed monitoring system.</p> <p>Issuers identified as outliers on the indicator, or which exhibit high adverse impact across several indicators, may be subject to further analysis and potential actions, as further described below.</p>
	13. Board gender diversity	Average ratio of female to male board members in investee companies, expressed as a percentage of all board members	36% female directors/ total directors	35% female directors/ total directors		<p>We consider the average ratio of female to male board members, expressed as a percentage of all board members in investee companies, subject to data quality and availability, using an internally developed monitoring system.</p> <p>Issuers identified as outliers on the indicator, or which exhibit high adverse impact across several indicators, may be subject to further analysis and potential actions, as further described below.</p>

	14. Exposure to controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons)	Share of investments in investee companies involved in the manufacture or selling of controversial weapons	0% involvement	0% involvement		<p>Our Nordea-branded investment strategies do not invest in companies that are involved in the production or development of cluster munitions, anti-personnel mines, biological weapons, chemical weapons, weapons with non-detectable fragments, incendiary and blinding laser weapons or depleted uranium munitions. Our Nordea-branded investment strategies do not invest in companies that are verified to be involved in the production of nuclear weapons.</p> <p>Our holdings are screened on an ongoing basis for exposure to controversial weapons. If such a holding is detected, we conduct further analysis which is presented to the Responsible Investment Committee that decides how to proceed and any actions to take (e.g. engagement or exclusion).</p>
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Indicators applicable to investments in sovereigns and supnationals

Adverse sustainability indicator		Metric	Impact 2023 (year n)	Impact 2022 (year n-1)	Explanation	Actions taken, and actions planned and targets set for the next reference period
Environmental	15. GHG intensity	GHG intensity of investee countries	281.18 tCO2e/million EUR of owned GDP	285.40 tCO2e/million EUR of owned GDP	The GHG intensity of investee countries is expressed in tons of carbon dioxide equivalent.	We are a signatory to the Net Zero Asset Managers Initiative and committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. We have an organisational-wide target to reduce the weighted average carbon intensity (WACI) of our investments; a set of portfolio-specific carbon footprint reduction targets, and a complementary

					<p>target to ensure that individual companies are engaged to become 1.5°C aligned.</p> <p>We have set a 2025 target to ensure that 80% of our top 200 largest carbon footprint contributors are on a Paris-aligned trajectory or else subject to engagement to become aligned.</p> <p>Investment products that have been categorised as Article 8 or Article 9 under the SFDR may be subject to our Paris Aligned Fossil Fuel Policy. The Policy prohibits investments in fossil fuel companies that are not transitioning in line with the climate objectives of the Paris Agreement, while still enabling investments in companies that are leading the transition out of fossil fuels, and for who we forecast sufficient reductions in Scope 1,2 and 3 PAI indicators over time.</p> <p>We will work to enhance data coverage and calculation capabilities to enable monitoring of this indicator.</p>
Social	16. Investee countries subject to social violations	Number of investee countries subject to social violations (absolute number and relative number divided by all investee countries), as referred to in international treaties and conventions, United Nations principles and, where applicable, national law	<p>Absolute number: 2 investee countries subject to violations</p> <p>Relative number: 1.51% investee countries subject to violations</p>	<p>Absolute number: 2 investee countries subject to violations</p> <p>Relative number: 2.55% investee countries subject to violations</p>	<p>We adhere to investment restrictions applicable further to sanctions imposed by the EU, UN and US.</p> <p>Sovereign bonds are also assessed on their Human Rights performance using our proprietary methodology, which is based on the United Nations Universal Declaration of Human Rights and other recognised standards.</p> <p>We will work to continuously enhance data coverage and calculation capabilities to enable monitoring of this indicator.</p>

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Indicators applicable to investments in real estate assets

Adverse sustainability indicator		Metric	Impact 2023 (year n)	Impact 2022 (year n-1)	Explanation	Actions taken, and actions planned and targets set for the next reference period
Fossil fuels	17. Exposure to fossil fuels through real estate assets	Share of investments in real estate assets involved in the extraction, storage, transport or manufacture of fossil fuels	N/A	N/A	N/A	Not applicable given our investment universe.
Energy efficiency	18. Exposure to energy-inefficient real estate assets	Share of investments in energy-inefficient real estate assets	N/A	N/A	N/A	Not applicable given our investment universe.

Other indicators for principal adverse impacts on sustainability factors

In addition to the indicators set out above, we consider the two additional indicators included in the tables here below, subject to data availability and quality.

Table 2

Additional climate and other environment-related indicators

Adverse sustainability indicator	Metric	Impact 2023 (year n)	Impact 2022 (year n-1)	Explanation	Actions taken, and actions planned and targets set for the next reference period
Indicators applicable to investments in investee companies					
CLIMATE AND OTHER ENVIRONMENT-RELATED INDICATORS					

Water, waste and material emissions	8. Exposure to areas of high water stress	Share of investments in investee companies with sites located in areas of high water stress without a water management policy	0.14% exposure to areas of high water stress	0.97% exposure to areas of high water stress	Areas of high water stress means regions where the percentage of total water withdrawn is high (40-80 %) or extremely high (greater than 80 %) in the World Resources Institute's (WRI) Water Risk Atlas tool 'Aqueduct'.	We consider the exposure to areas of high water stress of investee companies by using an internally developed monitoring system. Issuers identified as outliers on the exposure to areas of high water stress indicator or which exhibit high adverse impact across several indicators, may be subject to further analysis and potential actions, as further described below.
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Table 3

Additional indicators for social and employee, respect for human rights, anti-corruption and anti-bribery matters

INDICATORS FOR SOCIAL AND EMPLOYEE, RESPECT FOR HUMAN RIGHTS, ANTI-CORRUPTION AND ANTI-BRIBERY MATTERS						
Adverse sustainability indicator	Metric	Impact 2023 (year n)	Impact 2022 (year n-1)	Explanation	Actions taken, and actions planned and targets set for the next reference period	
Indicators applicable to investments in investee companies						
Human Rights	14. Number of identified cases of severe human rights issues and incidents	Number of cases of severe human rights issues and incidents connected to investee companies on a weighted average basis	0.77% identified cases on a weighted average basis	2.57% identified cases on a weighted average basis	Weighted average means a ratio of the weight of the investment in an investee company in relation to the enterprise value of the	We adhere to the UN Global Compact principles and the OECD Guidelines for Multinational Enterprises, and our aim is that the investee companies that we invest into comply with these norms. Our investments are subject to norm-based screening, which identifies investee companies that have been involved in violations of the UN Global Compact

					investee company.	<p>principles or OECD Guidelines for Multinational Enterprises.</p> <p>If a company is identified in this screening process, an internal assessment of the company is initiated and potential actions considered, as further described below.</p>
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We consider these additional indicators, subject to data availability and quality, using an internally developed monitoring system. Issuers identified as outliers on any of the indicators or which exhibit high adverse impact across several indicators may be subject to further analysis and the process described below.

We do not use other indicators to identify and assess additional principal adverse impacts on a sustainability factor than the indicators set out above.

Description of policies to identify and prioritise principal adverse impacts on sustainability factors

The SFDR defines sustainability factors as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters. Principal adverse impact (PAI) is generally understood to mean the negative impact, caused by an investment decision or investment advice, on these factors. The SFDR includes a set of specific indicators that can be used to measure an issuer’s or investee company’s negative impact on sustainability factors, to enable identification of the principal adverse impact of investments by a financial market participant.

We have implemented certain safeguards to ensure that our investments meet minimum ESG standards. When applicable, our ESG safeguards include application of exclusion lists and norm-based screening. By applying general screening criteria pre-investment, we aim to limit investing into companies with negative impact on sustainability factors. Additionally, to identify, manage and mitigate principal adverse impact where relevant, we integrate PAI considerations in our investment decision-making process. Identification of high negative impact on environmental and social factors results in further analysis and may be a driver for active ownership activities, including voting and engagement, as a mean to mitigate that impact. High negative impact on sustainability factors may ultimately lead to divestment.

We consider PAI on entity level by measuring and monitoring the aggregated negative impact on sustainability factors of our investments.¹¹

Monitoring of PAI is subject to data availability and quality.

¹¹ It should be noted that the level of principal adverse impact consideration may differ depending on the financial product’s strategy. We report on the principal adverse impact of all of our financial products, subject to data availability and quality.

Selection of indicators

Our Responsible Investment Policy describes the framework governing our approach to responsible investments and ESG/sustainability. Our ESG strategy identifies four core areas of interest:

- Climate
- Human rights
- Good corporate governance
- Biodiversity/water

These four core areas of interest have been identified as such due to the severe long-term consequences that adverse impact may have on these matters. We have developed certain ESG positions around these four core areas to describe the requirements that we have on investee companies in relation hereto. The PAI indicators that we consider are aligned with our ESG positions and are subject to data quality and availability. Our ESG positions are further described in our Responsible Investment Policy.

Considering principal adverse impact of investment decisions, i.e. the environmental and social impact of our activities, and sustainability risk, i.e. material negative impact of ESG issues on the value of investments, captures the full scope of the double materiality concept. Information on how we integrate sustainability risk in the investment decision-making process is available [here](#).

Identification and assessment of PAI

Principal adverse impact assessment is integrated in our active ownership and engagement policies and processes, and can be summarised as set out below.

As a starting point, we apply norm-based screening filters to identify companies that are allegedly involved in breaches of international law and norms on environmental protection, human rights, labour standards and anti-corruption. These filters identify impact relating to some of the PAI indicators. To identify impact of our investment decisions across all the mandatory and the additional PAI indicators that we have chosen to consider, we have developed a proprietary PAI monitoring system (PAI engine).

The PAI engine is based on data acquired from third-party providers and investee companies. By ranking the performance of companies across each indicator, we aim to identify each company's negative impact on climate and social issues as defined by the PAI metrics, both intrinsically and compared to its peers. We measure the overall exposure on entity level as well as the impact on product level, subject to data availability.

Companies identified by the PAI engine as outliers on specific indicators or that exhibit high adverse impact across several indicators, are analysed further by our Responsible Investment team and a recommendation for action is made to our Responsible Investment Committee (RIC). RIC is presented with an update on the identified company on a quarterly basis and may, based on this, decide on the appropriate action to be taken in each case.¹²

The range of possible actions consists of the following:

No action: The PAI indicator level of the investee company is deemed acceptable or judged not to reflect the actual ongoing performance of the company, and no further action is deemed necessary. The investee company will continue to be assessed on an ongoing basis.

Engagement: Companies that have been flagged as having a high adverse impact on one or across several PAI indicators may be identified as candidate for an engagement case. Engagement may also be initiated due to other reasons such as the issuer's overall PAI performance, material exposure to one of our four core areas of interest (listed above), identification in norms-based screening, or low data coverage for the investee company compared to benchmark. Reasons for, and scope of, engagement activities is further described below. The Responsible Investment team engages with the investee company and tracks performance after the engagement, based on relevant engagement key performance indicators. Our engagement with investee companies is further described in the "Engagement policies" section below.

Exclusion: The investee company is deemed not eligible for investments across our portfolios, and is added to our exclusion list. Addition to the exclusion list may be due to the identification of high negative adverse impact on sustainability factors in the PAI engine as described above. It may also be due to the investee company's sector being deemed incompatible with our ESG strategy. Exclusion is generally considered as the option of last resort as we believe that engagement is more efficient to positively influence the issuer to move in the right direction. Our exclusion list is available [here](#).

In deciding the appropriate action, the RIC considers, among other things, the severity and scope of individual adverse impacts, and the probability of occurrence and severity of adverse impacts, including their potentially irremediable characteristics. For further information, please refer to our [Responsible Investment Annual Report](#) and our [Responsible Investments Policy](#).

Our active ownership efforts also include proxy voting, attending annual general meetings, contributing to the development of industry ESG standards and the filing of shareholder resolutions. We vote in as many annual general meetings as practically possible, and prioritise votes related to the four core areas of interest defined in our ESG strategy (listed above) and further described in the "Engagement policies" section below.

¹² Descriptions of actions taken under our active ownership and engagement policies and processes are referring to actions taken on behalf of the funds managed by Nordea Investment Funds S.A. and Nordea Funds Ltd. Depending on specific client requests, such actions may also be taken on behalf of clients to whom Nordea Investment Management AB provide portfolio management services, subject to the individually negotiated agreements.

Details of our voting activities via the fund companies can be accessed via our [voting portal](#).

Margin of error with our methodologies

The methodology to identify PAI is always subject to data availability and quality. We are reliant on the quality of data received from investee companies and third-party data providers. To the extent possible, data reported by investee companies is prioritised. This is done in order to minimise the reliance on third-party estimations, contributing to improving the overall quality of the data we use as input in our investment and active ownership processes.

Where reported data is not available or of adequate quality, we use proxy data provided by third-party data providers.

A limitation in terms of data availability is that we may not be able to gather the same level of information about the impact of indirect investments, such as fund-of-fund investments and certain derivatives. The impact reported above does not include impact of certain holdings for which data is not available and could not be obtained on a best effort basis or estimated. We continuously strive to improve data coverage.

Governance in relation to policies

Nordea Investment Management AB's Senior Executive Management has overall responsibility to define the approach to ESG/sustainability. The daily responsibility to implement our Responsible Investment Policy and our active ownership and engagement framework, lies with Nordea Investment Management AB's Responsible Investment team.

Nordea Investment Management AB's responsible investment, active ownership and engagement framework is updated at least on an annual basis.

Information on our engagement policies is set out [nordea.com](https://www.nordea.com).

Data sources

Our PAI engine applies a range of data, including values, scores and weights sourced from investee companies and several third-party data providers. For a given indicator, multiple data sources may be used. For each indicator data source, third-party data providers are selected based on data quality assessments. The indicator importance is prioritised according to parameters reviewed and maintained by ESG analysts in Nordea Investment Management AB's Responsible Investment team. These parameters take into account various aspects that may impact the performance of the engine, including data quality, data freshness and history, data coverage, aspects of the methodology of the data providers, the materiality of the indicator's subject matter, and divergence of indicator values.

We apply various measures to control the data quality, both third-party and internal. The external data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

More information about the external data sources used is available upon request.

Engagement policies

As described above, we undertake a range of engagement activities with investee companies and issuers. The purpose is to influence and encourage improved ESG practices, enhance sustainable long-term financial performance and to seek to mitigate adverse impact on sustainability factors.

Nordea Investment Management AB has adopted an engagement policy under the Shareholder Rights Directive II¹³. The purpose of the engagement policy is to describe how we ensure effective and sustainable shareholder engagement and protect shareholder's rights.

Nordea Investment Management's Engagement Policy outlines the general principles for how shareholder engagement is integrated in investment strategies and sets out the different engagement activities that is carried out on behalf of clients where relevant. The Engagement Policy elaborates on general principles that Nordea Investment Management has established for positively influencing investee companies, including improve their corporate governance practices as well as ensuring a more long-term approach. It should however be noted that the application of Nordea Investment Management's Engagement Policy is subject to the individual agreements and negotiated investment guidelines between Nordea Investment Management and its clients. The Engagement Policy is governed by Nordea Investment Management AB and approved by its board, further to recommendation by the Corporate Governance Committee. The Engagement Policy is reviewed on an annual basis and was approved in its current form in 2024.

The scope of our engagement activities include three main categories: thematic, norms and investment-led. These engagement types may overlap and be applied to a company simultaneously.

Thematic engagements may be undertaken either by us alone or in collaboration with other asset managers and asset owners. Collaborative engagements can take place within the framework of industry initiatives such as Climate Action 100+, Nature Action 100, International Sustainability Standards Board (ISSB), The United Nations Principles for Responsible Investment (PRI), CDP or Investor Alliance for Human Rights, or through ad hoc initiatives. We will in some cases initiate and lead such ad hoc investor alliances. Our thematic engagements will typically concern issues under one of the core areas of interest identified in our ESG strategy, as described above.

Norms and incident engagements may be triggered by observed norms breaches through the norms-based screening process, or by high negative impact on one or more PAI indicators listed in Tables 1, 2 and/or 3 above.

¹³ Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC as regards the encouragement of long-term shareholder engagement (Shareholder Rights Directive II).

Investment-led engagements may be initiated and executed at the individual investment strategy level. Portfolio managers and the Responsible Investment team may engage proactively with companies when material ESG risks that may not be adequately managed are observed or when opportunities are not deemed to be fully capitalised on. Engagement may also be undertaken to advance certain themes related to the UN Sustainable Development Goals, e.g. human rights and climate change.

We will monitor and review the principal adverse impact of our holdings, as described above, on a yearly basis and adapt targets and measures to mitigate impact as required.

Our voting and engagement activities aim to mitigate principal adverse impact over time. Investee companies identified as a candidate for an engagement case may during the engagement be asked to identify actions taken to reduce emissions or to make certain commitments to measure and report emissions. To ensure that the company is responsive and makes progress, the Responsible Investment team continues to engage with the investee company and tracks performance after the engagement, based on relevant engagement KPIs. If the investee company does not meet the set KPIs in the relevant timeframe, the case may be escalated and additional actions taken. As a last resort, we may consider to divest.

For more information, please refer to the [Engagement Policy](#) and [SRD II Disclosure Report](#) of Nordea Investment Management AB.

Our Responsible Investment Policy and active ownership framework sets out additional detail of our engagement with investee companies.

References to international standards

Our ambition is that the companies that we invest in comply with the international conventions and norms that we adhere to. These include, but are not limited to those listed below with the respective PAI indicator(s) used to measure adherence to the respective standards:

- UN Global Compact
 - PAI 1.10.1 UNGC breaches
- OECD Guidelines for Multinational Enterprises
 - PAI 1.10.1 UNGC breaches
 - PAI 1.11.1 UNGC policy
- UN Guiding Principles on Business and Human Rights
 - PAI 1.10.1 UNGC breaches
 - PAI 1.11.1 UNGC policy
- Universal Declaration of Human Rights
 - PAI 1.10.1 UNGC breaches

- Children's Rights and Business Principles
 - PAI 1.10.1 UNGC breaches
- ILO conventions on labour standards
 - PAI 1.10.1 UNGC breaches
- Rio Declaration on Environment and Development
 - PAI 1.10.1 UNGC breaches
- UN Convention on Corruption
 - PAI 1.10.1 UNGC breaches
- Convention on Cluster Munitions
 - PAI 1.14.1 Controversial weapons

We have dedicated resources within the Responsible Investment team and systems to enable measurement of the adherence to these international conventions and norms. To the extent possible, data reported by companies, regulatory authorities and/or non-governmental organisations are prioritised over data from data providers' estimation models. For some indicators where availability of data is poor, we use proxy data provided by third-party data providers to enable assessment.

External data providers and other data sources are assessed on an ongoing basis for data quality, coverage and other attributes.

Paris Agreement

As a signatory to Net Zero Asset Managers Initiative we are committed to supporting the goal of net zero greenhouse gas emissions by 2050 or sooner, in line with global efforts to limit warming to 1.5°C. Our short-and mid-term targets work towards this overall ambition, through complementary top-down and bottom-up approaches: from an organisational-wide target to reduce the weighted average carbon intensity (WACI) of investments; a set of portfolio-specific carbon footprint reduction targets, and a complementary target to ensure individual companies are engaged to become 1.5°C aligned. We have specifically set a 2025 target to ensure that 80% of our top 200 largest carbon footprint contributors are on a Paris-aligned trajectory, or else subject to engagement to become aligned.

To assess the alignment profile of companies, we have developed an in-house alignment assessment tool which complements PAI indicators by evaluating a set of forward looking alignment criteria as defined by the [PAI Net Zero Investment Framework](#). Key data sources include Transition Pathway Initiative, CA100+, Science-Based Targets Initiative and CDP.

In addition, our investment products categorised as Article 8 or Article 9 under the SFDR may be subject to our Fossil Fuel Policy which prohibits investments in fossil fuel companies that are not transitioning in line with the climate objectives of the Paris Agreement, while still enabling investments in companies that are leading the transition out of fossil fuels, and hence for which we forecast sufficient reductions in Scope 1,2 and 3 PAI indicators over time. Please refer to the [Fossil Fuel Policy](#) for more information.

Historical comparison

A historical comparison of the period reported on with the previous reported period is included above.